



# Safeguarding Policy

Reviewed annually

Last updated Feb 2022. Review date: Feb 2023

## 1) Our commitment

WMC Training is committed to safeguarding all young people and vulnerable adults who take part in training facilitated within our training centres or externally by our Tutors. We believe everyone at WMC Training has a duty of care to safeguard and promote welfare, and to enhance awareness of the broader welfare spectrum, specifically the issues facing young people in society. All young people and vulnerable adults have a right to protection from abuse regardless of their age, race, religion, ability, gender, language, or sexual identity. All reasonable steps will be taken to ensure our commitment to safeguarding is met and all suspicions and allegations of abuse will be taken seriously and responded to quickly and appropriately.

## 2) Objectives

The aim of the policy is to ensure you are aware of and understand your responsibilities, that of others, signs there might be a safeguarding concern, along with the reporting procedures for all safeguarding issues.

## 3) Scope

This policy covers safeguarding of Children and Adults at Risk, both our learners, learners during EPA, learners, and those persons in settings in where we practise which fall into the category of child or adult at risk. It is inclusive of specific highlighted safeguarding agenda areas – as defined by law, and in the wider context all our students and learners. This policy also aligns our compliance with the Government Prevent strategy.

## 4) Introduction

- WMC Training is fully aware of Data protection and will strive to ensure that all personal information and identities are kept confidential except where disclosures are made; this is explained within this policy. WMC Training's safeguarding children and young people policy runs within the guidance of -
- Keeping Children Safe in Education 2020
- The Children Act 2004 (with consideration for legislative changes)
- Safer Working Practice for Adults who Work with Children and Young People 2015
- Safeguarding Children and Safer Recruitment in Education 2010
- Working Together to Safeguard Children 2018
- Information Sharing Guidance for Practitioners 2015



- WMC Training's E-safety Policy
- Counter Terrorism and Security Act 2015

## Changes and Updates:

The Safeguarding Policy will be reviewed and updated annually, in February, by the Senior Management Team. Any amendments made in the yearly review or outside of it will be detailed below:

<b>Date</b>	<b>Amendments</b>	<b>By Who</b>
06.04.2021	Update on definitions and indicators of abuse, addition of peer-on-peer abuse, amendments to how to inform LADO and where.	Lyndsey Herdman
18.08.2021	Amendments made to safeguarding and prevent officers	Emma Grimshaw
07.02.2022	Amendments to DSL lead and officers. Peer on Peer abuse	Sarah Fulford



## 5) Key Contacts

**Lead Designated Officer** – Sarah Fulford

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Mobile: 07535980254

**Additional Designated Officers include:**

Emma Grimshaw

[Emma.grimshaw@wmctraining.co.uk](mailto:Emma.grimshaw@wmctraining.co.uk)

**Prevent Officer:**

Maria Ahmed

[maria.ahmed@wmctraining.co.uk](mailto:maria.ahmed@wmctraining.co.uk)

## Definitions

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

Safeguarding is the protection of children and adults at risk from abuse and neglect, promoting health and development, ensuring safety and care, and ensuring optimum life chances. The Safeguarding Agenda includes a wide range of potential risks:

- Abuse (physical, emotional, financial, institutional, sexual, and organisational)
- Self-neglect
- Discrimination
- Child sexual exploitation
- Bullying AND cyberbullying
- Domestic abuse
- Substance misuse
- Fabricated and induced illness
- Faith abuse
- Forced marriage
- Gang and youth violence



- Private fostering
- Female genital mutilation (FGM)
- Gender based violence
  
- Radicalisation and extremism
- Sexting
- Teenage relationship abuse
- Trafficking and modern slavery
- Breast ironing
- mental health concerns
- Children missing from Education

### **Definitions and Indicators of Abuse:**

Abuse is a violation of an individual's human or civil rights by another person and may consist of a single act or multiple acts. As well as physical and psychological abuse, acts of neglect or an omission to act may amount to abuse. Abuse may also occur when a child or vulnerable adult is persuaded to enter a financial or sexual transaction to which he or she has not consented or cannot consent.

**Physical abuse** – causes harm to a person. It may involve hitting, shaking, throwing, poisoning, burning, scalding, drowning, or suffocating. It may be done deliberately or recklessly or be a deliberate failure to prevent injury.

**Neglect** – is the persistent or severe failure to meet a physical and/or psychological need.

**Sexual abuse** – involves a child, young or vulnerable person being forced or coerced into participating in or watching sexual activity. It is not necessary for the child to be aware that the activity is sexual, and the consent of the child is irrelevant.

**Emotional abuse** – occurs where there is persistent emotional ill treatment or rejection. It causes severe and adverse effects on the child, young or vulnerable person's behaviour and emotional development, resulting in low self-worth.

**Financial abuse** – may include being overcharged for services, being tricked into receiving goods or services that they do not want or need, inappropriate use, exploitation, or misappropriation or property and/or utilities, theft, deception, fraud or exploitation or pressure in connection with wills.

**Institutional abuse** - Service users required to fit in excessively to the routine of the service, more than one individual is being neglected, everyone is treated in the same way, other forms of an abuse on an institutional scale.

**Peer on peer abuse** -Peer-on-peer abuse is any form of physical, sexual, emotional, and financial abuse, and coercive control exercised between children, and within children's relationships (both intimate and non-intimate), friendships, and wider peer associations. Peer-on-peer abuse can take various forms, including (but not limited to): serious bullying (including cyberbullying), relationship abuse, domestic violence and abuse, child sexual exploitation, youth and serious youth violence, harmful sexual behaviour and/or prejudice-based violence including, but not limited to, gender-based violence. Online peer-on-peer abuse is any form of peer-on-peer abuse with a digital element, for example, sexting, online abuse, coercion and exploitation, peer-on-peer grooming, threatening language delivered via online means, the distribution of sexualised content, and harassment.

Alongside the Safeguarding Agenda above this could be due to, and not limited to any of the following:

- Living in sheltered housing
- Receiving any form of health care
- Receiving a welfare service to support their need to live independently
- Receiving a service due to their age or disability
- Living in residential accommodation such as a care home
- Receiving domiciliary care in their own home
- Expectant or nursing mother living in residential care
- Person under supervision of probation service

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

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

### **Peer on peer abuse**

This form of abuse occurs when there is any kind of physical, sexual, emotional, or financial abuse or coercive control exercised between children both on and offline. It is important that staff can challenge inappropriate behaviours between children/young people. Downplaying certain behaviours, for example dismissing sexual harassment as “just banter”, “just having a laugh”, “part of growing up” or “boys being boys”; or not recognising that emotional bullying can sometimes be more damaging than physical harm and should be taken equally seriously, can lead to a culture of unacceptable behaviours, an unsafe environment for children and in worst case scenarios a culture that normalises abuse leading to children/young people accepting it as normal and not coming forward to report it. Stopping harm and ensuring immediate safety is the priority.

### **Sexual Exploitation and Grooming**

Grooming is when someone builds an emotional connection with a child to gain their trust for the purpose of sexual abuse or exploitation. Children and young people can be groomed online or in the



real world, by a stranger or by someone they know – for example, a family member, friend or professional. Groomers may be male or female. They could be any age.

Child sex exploitation (CSE) is a type of sexual abuse in which children are sexually exploited for money, power or status. Children or young people may be tricked into believing they're in a loving, consensual relationship. They may be also groomed online. Some children and young people are trafficked into or within the UK for the purpose of sexual exploitation. Sexual exploitation can also happen to young people in gangs.

### **Mate Crime**

Mate crime happens when people with learning difficulties are befriended by someone who uses the relationship to exploit or abuse them. For more information – [www.safernet.org.uk](http://www.safernet.org.uk)

### **Gangs**

Being in a gang can make a person feel part of something or that they belong but being part of a gang like this can be dangerous. Sometimes a person can be forced to commit a crime or do things that are unsafe. If a gang carries knives or other weapons, they might get them out to show off or intimidate people. This can be very scary for other people, especially if they think the gang will use them.

### **What is County Lines?**

There is currently no legal definition, but County Lines is basically a form of exploitation, including child exploitation. County Line gangs use children and other vulnerable people to move drugs and money to and across areas using traditional gang culture as well as targeted and specific grooming of individuals including children. Once caught up in county lines, both adults and children are at risk of extreme physical and/or sexual violence, gang recriminations and trafficking. Families and individuals including children are being taken advantage of due to their naivety, inexperience, and desire to belong or earn money and can easily be groomed into selling and transporting drugs. How are children being exploited? Criminals are deliberately targeting vulnerable children. Gangs groom children into trafficking their drugs for them with promises of money, phones, friendship and belonging. In reality, children are then controlled using threats, violence and sexual abuse. The effects of this are that they live in fear and continue being exploited as they feel that they have no way to leave and live a different life – so they must keep doing what the gang wants. They, themselves are then considered criminals, when in fact they have been groomed and exploited to carry out such criminal behaviour when they do not have the age or understanding that they have been exploited.

### **Domestic Violence Abuse**

Domestic violence and abuse is any incident, or pattern of incidents, of controlling, coercive or threatening behaviour, and violence or abuse between those aged 16 years or over who are or have been intimate partners or family members regardless of gender or sexuality. this can encompass, but is not limited to, the following types of abuse: psychological, physical, sexual, financial and or emotional.

## Identifying cases of Female Genital Mutilation (FGM) and Forced Marriage

There are many different types of abuse but there are some that staff may be less aware of. Female Genital Mutilation (FGM) and Forced Marriage fall into this category. Any indications that children or adults at risk may be subject to FGM or Forced Marriage, or that this may have already taken place, will be dealt with under the procedures outlined in this policy. In support of this provision, WMC Training will do everything that it can to ensure that:

- The DSLs are aware of the issues surrounding FGM, Forced Marriage and current legislation.
- Advice and signposts are available for accessing additional support, e.g. the NSPCC's helpline, ChildLine services, Forced Marriage Unit
- Awareness raising about FGM, and Forced Marriage is incorporated in WMC Training's safeguarding training

Where there are concerns about FGM or Forced Marriage, a referral must be made as a matter of urgency. It is also extremely important that if a child or adult at risk has disclosed that they are at risk of FGM or Forced Marriage, the case is referred to Social Care, even if it is against that person's wishes.

WMC Training staff must NOT consult or discuss these concerns with the child or vulnerable adult's parents or family, or others within the community, if there is an imminent risk, e.g. the child or adult at risk being taken out of the country, police must be informed (999) and the safety of the child or adult at risk must be the prime consideration whilst awaiting the police response. It was made a legal requirement in October 2015 to report known cases to FGM in under 18's.

## 6) Our responsibility

We all have a responsibility to ensure that children, young people and adults at risk are protected from harm, informed about potential risks to their welfare, and understand how to seek help. We ensure all concerns are dealt with timely and appropriately. We also have a responsibility to minimise the risk of allegations.

All staff are expected to comply with any DBS check request and to have a good understanding of what constitutes a safeguarding or welfare concern and how to provide support, guidance in such instances and the channels for escalating a concern. We assist all staff in this, on-going training and awareness, as well as continuous information, advice and guidance and therefore safeguarding and prevent training is a mandatory requirement for all WMC Training staff.

The responsibilities of particular individuals are detailed below:

- **Our Directors** - to ensure we have effective policies.
- **Our SMT**- to ensure policies are implemented and followed, and sufficient time and resources are allocated to employees to carry out their responsibilities.
- **Designated Safeguarding Lead** – to maintain links with Local Safeguarding Children's Boards and Prevent Coordinators, inform and advise all parties on legislation changes and current safeguarding themes, plan and implement training for all employees including CPD, quality



assurance and standardisation for the designed safeguarding officer team. Carry out investigations where appropriate into welfare concerns reported and liaise with external bodies such as safeguarding boards where appropriate. Support and coordinate escalation

- process. Overall management of safeguarding issues and report any issues that arise to the SMT. Review procedures and policies on a timely basis. Maintain own CPD to ensure their role can be fulfilled competently.
- **Designated Safeguarding Officer** – to deal with employee concerns over learner’s welfare, signpost and offer guidance. Carry out investigations where appropriate into welfare concerns reported and liaise with external bodies such as safeguarding board where appropriate.
- Maintain own CPD to ensure their role can be fulfilled competently and seek guidance where appropriate.
- **Prevent Officer** – to maintain links with local Prevent Officers and deliver training and support to the team on the Prevent agenda and local issues. To work with the Designated Safeguarding Lead to recognise and act on any concerns of radicalisation and extremism that are identified by colleagues and to ensure information is readily available and accessible to staff, employers and apprentices.
- **Tutors**- to check safety and welfare with all learners at each visit/communication, ensuring learners complete all safety related learning activities within their programme. You must be aware of indicators and that there may be a safeguarding issue, and if required to follow the flow charts as outlined in the policy. To provide support and referral to external agencies if urgent action is required and if comfortable to do so, and then inform safeguarding team of their actions. To carry out training as directed by the SMT in a timely manner.
- **Administration**- You must be mindful of indicators that there may be a safeguarding issue should you encounter a learner or potential learner – and follow the flow charts and procedure outlined in this policy.

## 7) Safe Recruitment

WMC Training carries out a safe recruitment process and ensures that all appropriate checks are carried out on new staff that will work or meet children and adults at risk in line with the Disclosure and Barring Service requirements. See safe recruitment policy for more information.

### 8 A. Disclosure and Barring Service Checks

The Disclosure and Barring Service (DBS) is an executive agency of the Home Office and its primary purpose is to help employers make safer recruitment decisions and appointments. By conducting checks and providing details of criminal records and other relevant information, DBS helps to identify applicants who may be unsuitable for certain work and positions, especially those involving contact with children (those less than 18 years old) or adults at risk.

Depending on the type and regularity of contact with children or adults at risk involved in a particular role, employers are entitled to make appropriate types of enquiry about the applicant’s criminal record and seek a disclosure through a DBS check. Lifetime can undertake five types of criminal records checks depending on the role applied for:





### **A1. Standard DBS check**

This will be for positions that are included in the Rehabilitation of Offenders Act (ROA) 1974 (Exceptions) Order 1975. This type of check contains details of individual's convictions, cautions, reprimands or warnings recorded on police central records and includes both 'spent' and 'unspent' convictions that will be shown on a criminal records check.

### **A2. Enhanced DBS check**

This will be for positions included in both the ROA 1974 Exceptions Order and in the Police Act 1997 regulations. This type of check contains the same details as the standard check plus any information held locally by police forces that it is reasonably considered to be relevant to the post applied for.

### **A3. Enhanced DBS & barred list check (child)**

An enhanced check with information from the DBS's children's barred list is only available for those individuals engaged in regulated activity with children and a small number of posts as listed in the Police Act 1997 regulations.

### **A4. Enhanced DBS & barred list check (adult)**

An enhanced check with information from the DBS's adults barred list is only available for those individuals engaged in regulated activity with adults and a small number of posts as listed in the Police Act 1997 regulations.

### **A5. Enhanced DBS & barred list check (child and adult)**

An enhanced check with information from the DBS's children and adults barred list is only available for those individuals engaged in regulated activity with both vulnerable groups including children and a small number of posts as listed in the Police Act regulations

All WMC Training staff hold DBS checks and WMC Training choose the correct DBS check based on staff job roles.

## **B. Confidentiality**

Information provided in a DBS disclosure report must be kept confidential and only on a need-to-know basis.

We recognise that job applicants and our employees need to feel confident that information about their convictions will not be disclosed to colleagues unless there is a specific reason for doing so. Those involved in recruitment decisions should ensure that when appointing an individual with a



conviction, they are advised as to whom within WMC Training knows of their conviction and the reasons why the information has been disclosed.

### **C. Failure to Disclose Information Relevant to the Type of DBS Check Appropriate to Your Role**

Having a criminal record does not necessarily preclude an individual from working at WMC Training. The decision as to whether a person with a criminal record should be appointed, or an offer of employment withdrawn, or employment terminated will be taken only after careful and thorough consideration of the outcome of any DBS check as well as job and offence related factors.

Nonetheless we request all employees to tell us about any information relevant to the type of DBS check appropriate for their role. This could mean, for example, that if your role requires satisfactory Enhanced DBS and barring check, you need to tell us about any convictions, cautions or reprimands or being barred from working with children as soon as any of these have been issued. Failure to disclose information relevant to the type of DBS check appropriate to your role would be seen by WMC Training as a breach of trust and confidence. Such acts are considered as gross misconduct and you would be invited to a disciplinary hearing with a potential outcome of instant dismissal.

## **9) Reporting a Concern - see Process Charts (Appendix B) For reporting detailed report of raising safeguarding concern see (Appendix C)**

**a) If a learner raises a concern/allegation with you:** If the learner has a concern over their own personal welfare and wellbeing, you are to listen to and record all information given, making no judgement or assumptions. Take any actions required to secure the immediate safety of the child or adult at risk if deemed appropriate, this may involve staying with them until a responsible adult can be located. This will be recorded for WMC Training reference on a safeguarding form but only shared if learner agrees and raised with the manager if learner agrees.

If the learner gives consent you must report the issue to a designated officer. If you feel the learner's safety and wellbeing are at risk and they do not give consent for the matter to be escalated, you should escalate only when you believe the matter would deteriorate if additional support was not sourced.

You should always consider the wishes of the individual, even those aged under 18. Guidance should be sourced with a safeguarding officer if you are unsure. The designated officer will then decide the appropriate course of action, and if a referral outside the organisation is appropriate. (Appendix B1)

**b) If Tutor/Manager/Administrator has a concern:** This might be through observation, alleged by others or discussion. To follow procedure set out as point (a). (Appendix B1)

**c) If a learner/ parent has a concern/ allegation about a member of WMC Training staff:** All learners are to be informed that if they have a concern over their own personal welfare and wellbeing that they do not feel comfortable talking to their tutor about, they are to contact WMC Training's Designated Officer. Contact details for the designated person are available in this policy, student and employer handbooks, our website and e-portfolio system. The Designated Officer is to record on a safeguarding form. Follow procedure set out in (Appendix B2)



**d) If a parent contacts you to report a concern about their child. Ensure you listen and record the details as per a learner reporting a concern to you. Ensure you have contact details for the parent.** You must report the issue to the designated officer recording on a safeguarding form. The designated officer will then decide the appropriate course of action, and if a referral outside the organisation is appropriate, liaise with the parent as appropriate. Be mindful of confidentiality as all learners aged 16 and above and of employed status are deemed to be adults, and therefore no

information should be passed to parents or carers without prior consent to do so from the learner. Follow procedure set out in (Appendix B2)

**e) If you observe a safeguarding issue taking place within the working practices of an employer's setting** - example would be a practitioner hitting a child or observing inappropriate restraint techniques. Take action to stop the activity immediately, and inform the individual of your concerns, ask them to remove themselves from the area and advise them you will inform their senior manager. Take any actions to secure the safety of the child or adult at risk, this may involve staying with them until a responsible adult can be located. Inform your designated safeguarding officer record on safeguarding form. Be mindful of differences between poor practice and a safeguarding issue and apply your action appropriately. (Appendix B3)

**f) If a learner reports unsafe practices or safeguarding issues to you within their working environment** - Advise the learner to follow in house reporting or whistle blowing procedures. You may support the learner in speaking to the appropriate senior team members. Report the incident to your designated safeguarding officer and report on a safeguarding form the DSL will offer additional guidance and signposting for the learner and will monitor. (Appendix B3)

It is important you do not pass any information to other parties or try to investigate the concern yourself. All concerns should be reported to [Lyndsey.herdman@wmctraining.co.uk](mailto:Lyndsey.herdman@wmctraining.co.uk) in the first instance.

- If you require an immediate response call your designated safeguarding officer immediately, it is noted that the designated officer may not be available out of normal working hours, so in circumstances where the individual is in immediate danger report the incident to the police on 999.
- The designated officer will endeavour to make initial contact with regards to the concerns within 48 hours.
- The designated officer will assess if the individual is at risk of significant harm and decide upon the next course of action, this can range from offering signposting to support agencies to referral to the police and local safeguarding authorities. This may also involve passing information to the DBS.

### **Important Information**

**If you feel the safeguarding concern you have reported is not being dealt with effectively by the safeguarding team, please refer to the Designated safeguarding Lead or follow the whistleblowing policy.**

**If you disagree with the outcome of a safeguarding referral outcome, please refer to the Safeguarding lead for guidance or you may also follow the local safeguarding board escalation procedure – found on their local authority website.**

## **10) Training and Educating Employees**

Each member of the safeguarding team holds a formal L3 safeguarding qualification, and undertake regular CPD events and standardisation meetings in order to keep updated with legislation and refresh their knowledge.

All employees undertake a Safeguarding Induction and/or completion of a L2 online course specifically for Safeguarding Young Vulnerable People. The training received is continually reviewed to ensure most appropriate and up to date training is given. Aligning with the mandatory duty surrounding the Governments Counter Terrorism and Security Act 2015 all staff undertake Prevent training aligning with their role within WMC Training.

Key safeguarding concepts are communicated with the team periodically as legalisation changes.

Monthly focus topics are distributed monthly to raise awareness and promote discussion in all areas under the wider safeguarding agenda including areas such as radicalisation, mental health issues, positive relationships, and staying safe on the internet, which will educate employees alongside giving greater knowledge to be passed onto learners.

Safeguarding is referenced in Team meeting bi-monthly and any concerns discussed weekly in management meetings.

Additional training programmes to support are available to all staff and will be part of staff CPD cycles.

Key Individuals involved in both learner recruitment and staff recruitment will complete safe recruitment training in the near future.

## **11) Keeping Yourself Safe**

To maintain yours and the learner's safety you must always ensure your Outlook calendar is up to date, can be accessed by the office and your manager, has the learner's name, the employers name, the address, and postcode of your location and a contact number for the employer.

The following are strictly prohibited:

- Befriending learners on personal social media sites
- Distributing personal telephone numbers



- Visit learners at home or transporting learners to and from locations (this includes travelling in a car with a learner driving)
- Do not use sarcasm, insults or belittling comments towards learners
- Personal relationships with learners

It also important to be mindful of the following when conducting yourself:

- Locations of one-to-one meetings with colleagues. These should take place at a neutral location
- Where possible always ensure you have a mobile phone with you or nearby so you can easily access it and get help
- You will naturally build a rapport with learners through the apprenticeship contact, and the learners may see you as a confidante and support but be sure to maintain professional boundaries whenever carrying out work.
- Be respectful of all young and vulnerable people, and appreciate you are in a position of trust. We are to listen to concerns and support.
- Uphold confidentiality within certain remits when required by the situation but be careful not to promise to keep secrets or ask others to do so.
- Avoid spending time alone with learners in a closed environment. If this is unavoidable for example during a formal assessment/ examination, ensure a member of the site staff is aware where you are and monitors this.
- Be careful when giving learner advice – as this is based on your opinion, focus support on information (facts) and guidance (signposting).
- Be mindful of any learners you acquire that by default creates a conflict of interest i.e., a partner or friend becomes a learner. Discuss appropriateness/ alternative assessor arrangements with your line manager.
- If a learner offers you gifts of any sort because of the support through their programme, please refer to your line manager for guidance.
- If at any point you feel unsafe in a learner's company inform the site manager, your line manager, the designated safeguarding officer and leave the premises.
  
- If at any point you feel you are in danger and need immediate help, please dial 999 to access the police. If you are unable to do this due to the situation you are in but still able to make a call please call the office and ask for EDNA, (Emergency Developing Need Assistance) they will immediately call 999 on your behalf and give them your location.

## **12) Keeping Learners Safe**

All learners are subject to an induction when they enter a workplace. This covers all aspects of Health and Safety and ensures that all learners are aware of who in the company to liaise with,



regarding Safeguarding concerns. This will be repeated with any new employer engagement and/or where a learner(s) may have moved.

The induction paperwork also summarises WMC Training's commitment to Safeguarding, Prevent and Health and Safety, a guide to all possible Safeguarding concerns and who at WMC Training can be contacted for advice and support, as well as contact details for Head Office.

When an employer invites WMC Training into a company to deliver training, consideration is given to any person receiving training who is under 18 years of age. As an employee they will already have received a company induction. However in fulfilling its Duty of Care, WMC Training will ensure that the Safeguarding part of our own induction is completed with the employer.

Learners are issued with a Student handbook detailing both internal and external support services. This contains contact details for police, WMC Training head office, safeguarding team and other external bodies. It also provides details of our student counselling service which are also provided on our website.

Monthly topics in relation to equality and diversity, safeguarding and prevent are discussed during each apprenticeship visit, guided by our internal procedures and timelines and followed up by crib sheets for topic information. Learning surrounding these activities is discussed and documented at each visit, along with pastoral checks within the review documentation.

### **13) Leadership and Management**

The dedicated safeguarding lead and all Senior Management team meet quarterly providing a greater focus on safeguarding and safety of learners.

Safeguarding is discussed in weekly huddles and supervisions.

The effectiveness of all welfare support and educational material is analysed periodically by learner voice.

All staff are also subject to Quality Assurance checks carried out by the Safeguarding Lead.

### **14) Associated Policies**

- Equality and Diversity Policy
- Grievance Policy
- E-safety policy
- Mental Health Policy
- Prevent Policy

**[View table](#)**

**Appendix A**



## **Statement on the secure storage, handling, use, retention and disposal of disclosures and disclosure information**

### **General Principles**

As an organisation using the Disclosure and Barring Service (DBS) to help assess the suitability of applicants for positions of trust, WMC Training complies fully with the DBS Code of Practice regarding the correct handling, use, storage, retention and disposal of disclosures and disclosure information. It also complies fully with its obligations under the Data Protection Act and other relevant legislation pertaining with the safe handling, use, storage, retention and disposal of DBS disclosure

### **Handling**

In accordance with section 124 of the Police Act 1997, disclosure information is only passed to those who are authorised to receive it in the course of their duties. The SMT will be responsible for maintaining a record of all those to whom disclosures or disclosure information has been revealed. It is recognised that it is a criminal offence to pass this information to anyone who is not entitled to receive it.

### **Usage**

Disclosure information is only used for the specific purpose for which it was requested and for which the applicant's full consent has been given.

### **Retention**

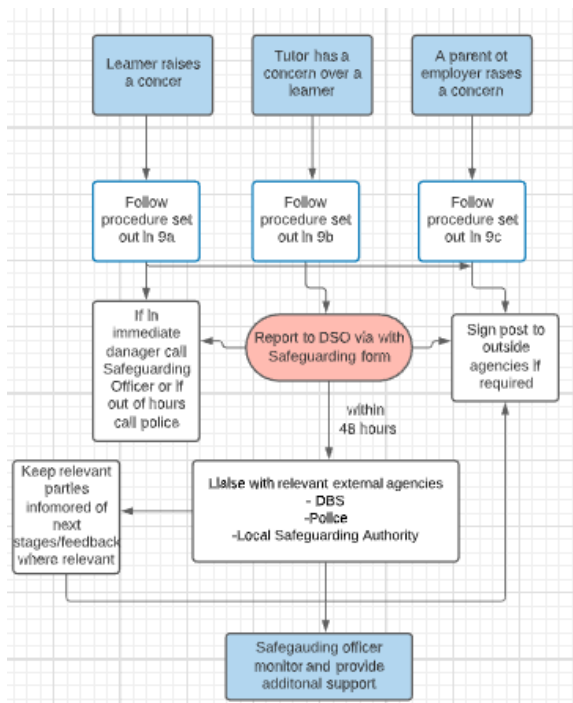
Once a recruitment (or other relevant) decision has been made, WMC Training does not keep disclosure information for any longer than is necessary. This is generally for a period of up to six months, to allow for the consideration and resolution of any disputes or complaints.

### **Disposal**

Once the retention period has elapsed, WMC Training will ensure that any disclosure information is immediately destroyed by secure means, i.e. by shredding or confidential waste disposal.

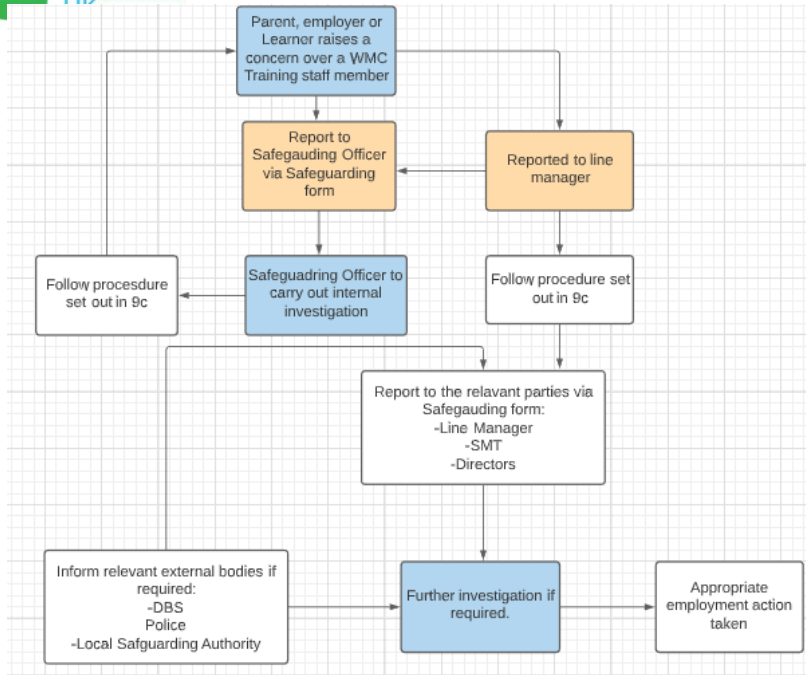
## Appendix B Flow charts for reporting incidents

### 1) Learner Process



### 2) Allegations against staff

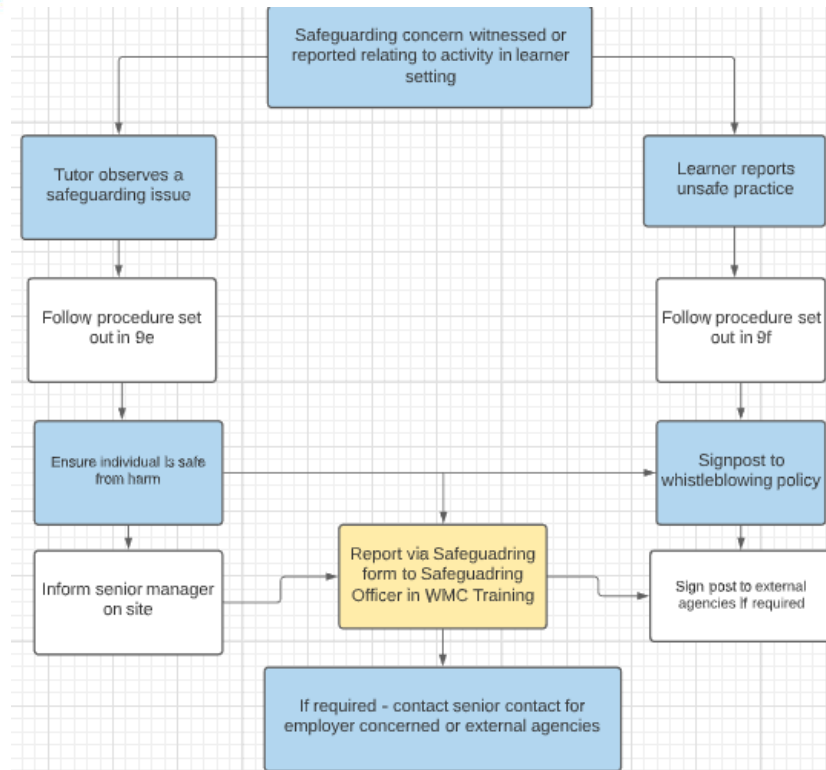




**External bodies also include:**

**the local authority designated officer (LADO) of the Employer, staff members home address, and head office, Ofsted, Police, Local Safeguarding Authority, ESFA and any sub-contracting organisation.**

**3) Safeguarding concern witnessed or reported relating to activity in learner setting**



## Appendix C

### Detailed Procedure for dealing with Safeguarding Concerns

#### 1. Recognition

Signs of abuse can be difficult to spot, as can a learner trying to find the right language to tell you about a concern. If you have any concerns over the welfare of the learner from what you have seen, heard, discussed with the learner or you have noticed changes in their behaviour which cause you safeguarding concerns, you must report it to the designated person. You do not personally have to believe the concerns in order to raise them, any concerns raised should be taken seriously.

#### 2. Response

No report or concerns about possible abuse should be ignored. Your main role here is to listen and record with no judgements or leading questions; use open

question to gather factual details – when did it take place, who said what, what happened. You must stay calm and not let the learner know if you feel panicked or shocked. Do not make any promises about what will happen next, but only that you will pass it onto the designated person within WMC Training, and that we will do everything we can to help. It is good practice to show support and reassurance but be mindful to maintain a situation where you do not put yourself at risk..

#### 3. Record

Ensure you record notes of the incident or disclosure as close to the time as possible. The notes should be dated and signed where possible. The notes should detail what you saw/heard or what was discussed with an individual, the names of those involved and the time, location, and what action you took. Use the WMC Training Safeguarding Incident Form.

#### **4. Report**

Report the concerns to the designated person, ensuring you have recorded all details as above. This communication can via email, or phone call and followed up by emailing the Safeguarding Incident Form. All communication and documents will remain confidential between the designated person, designated Lead and individual that has reported it however the SMT and director will be made aware of an ongoing safeguarding issue and this will be flagged for reporting but no details will be discussed.

#### **5. Referral**

The designated person will then take the decision of what course of action should be taken. Only the designated person should be taking the decision to make referrals outside of the organisation.

