

## Safeguarding Policy V2.2

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Version Control			
Version Number	Reviewer Name	Comments	Date
2.1	Katie Edmead	Update of <i>Keeping Children Safe in Education</i> reference to reflect the release of 2024 guidance.	06/09/2024
2.1	Katie Edmead	Addition of 'exploitation' as a form of abuse. Referenced throughout the policy and definition added to the appendix.	06/09/2024
2.1	Katie Edmead	Section added to address online safety and safeguarding.	11/09/2024
2.1	Katie Edmead	Amendment to the expectation of learners informing us of absences, and the DSL's process of managing concerns when a concern is raised about learner absence.	11/09/2024
2.1	Katie Edmead	Amendment to the process of contacting absent 16–18-year-old learners and clarification on contacting employers outside of regular working time.	11/09/2024
2.1	Katie Edmead	Additional information on safeguarding training provided to staff.	11/09/2024
2.1	Katie Edmead	Artificial Intelligence (AI) policy added to Supporting Documents and Policies section.	11/09/2024
2.1	Katie Edmead	Addition of Peer-on-Peer Abuse definition to Appendix A.	11/09/2024
2.2	Norah Smith	Added Barbara Veeramallay-Permaul as Designated Safeguarding Lead, removed Katie Edmead as DSL. Updated Safeguarding telephone number.	06/03/2025

### Introduction and Purpose

Safeguarding is everyone's responsibility within Primary Goal and is of paramount importance. Primary Goal will take every reasonable step possible to safeguard and promote the welfare of all learners and staff. This policy sets out the responsibilities of all those working within Primary Goal to protect children, young people and vulnerable adults from abuse, harm, exploitation or neglect. As such, this policy sets out the commitment Primary Goal makes to ensuring our safeguarding policies and procedures are compliant with current legislation and guidance, are robust, and are fit for purpose.

This policy is to be read, understood and adhered to at all times by all those working with, or on behalf, of Primary Goal. This includes all employees, Board members, volunteers, agency or associate staff, employers and learners.

## Statutory Framework

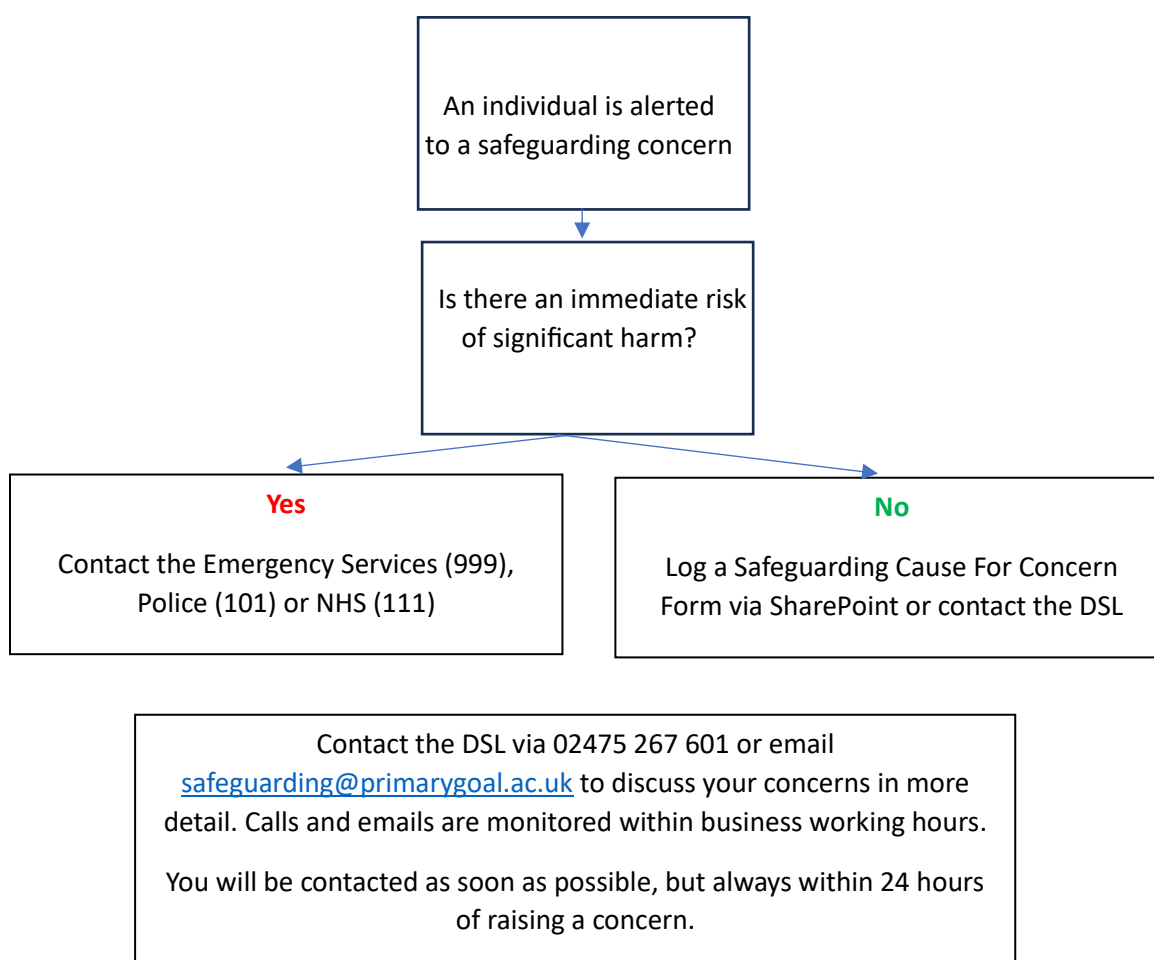
This policy has been written in accordance with the following guidance documents and legislation:

- Keeping Children Safe in Education 2024 (Part 1), Department for Education
- Working Together to Safeguard Children 2023, Department for Education
- The Children Act 1989 and 2004
- The Education Act 2002
- The Care Act 2014
- The Equality Act 2010

Should any new legislation be introduced, or changes are made to the existing legislation, this policy will be reviewed and updated accordingly.

## Procedures

The following procedure should be followed in all cases of an actual or potential safeguarding concern occurring:



In all cases, a Safeguarding Cause for Concern Form should be completed to record details of the safeguarding concern. As much information as possible should be documented to ensure that appropriate action may be taken. In situations where the safeguarding concerns is of an urgent nature, the Safeguarding Cause for Concern Form should be filled out once appropriate action has been taken to ensure the safety of those involved (i.e. the emergency services have been contacted).

Reports must be made to the Designated Safeguarding Lead as soon as possible and within **24 hours** of the concern occurring. Reports are reviewed as soon as possible, but always within 1 working day by **Barbara Veeramallay-Permaul (Chief Operating Officer / Designated Safeguarding Lead)**, or another appropriate Senior Manager in the DSL's absence.

If an individual would like to discuss a potential or actual safeguarding concern in more detail, they can do so via the following channels:

- Contact **Barbara Veeramallay-Permaul (Chief Operating Officer/Designated Safeguarding Lead)** via **02475 267 601**
- If the DSL is unavailable, contact your line manager
- Email [safeguarding@primarygoal.ac.uk](mailto:safeguarding@primarygoal.ac.uk)
- Call **02475 267 601**

Staff should not attempt to investigate safeguarding concerns themselves. All concerns should be reported to the Designated Safeguarding Lead to conduct any such investigations.

### Safeguarding Learners

The safeguarding and welfare of learners is of paramount importance within Primary Goal. Safeguarding and Prevent information and procedures form part of the onboarding process for learners, including providing information on how to report safeguarding concerns. All learners are provided with a Learner Handbook at the start of their programme which also provides relevant information on safeguarding.

Safeguarding and Prevent topics are embedded within the curriculum throughout a learner's programme. This is done in a variety of ways which include, but are not limited to live training sessions, email and Teams communications, and conversations with their Coaches/Trainers in coaching sessions and progress reviews. The Delivery Team are responsible for the delivery of awareness coaching/training in the workplace to apprentices to ensure they have a full understanding of keeping themselves safe from harm. Coaches and Trainers also provide awareness to learners on national and local risks that they may be exposed to.

The Delivery team is also responsible for educating apprentices in understanding how they might be drawn into radicalisation. It is the Delivery Team's responsibility to identify changes in behaviour or vulnerabilities of the learners that could be indicator of abuse, and to report their concerns to the Designated Safeguarding Lead. Learners requiring additional learning support (ALS) are also monitored more regularly as it is recognised that they may present more vulnerabilities to radicalisation.

Learners and staff have access to the 'Community Support Index' which provides signposting information to national charities, agencies and organisations to support with a variety of safeguarding concerns. The Delivery Team will draw attention to the Community Support Index to further support learner safeguarding.

### **Online Safety**

As a digital and IT apprenticeship provider with an understanding of the risks posed in the online space, our commitment to safeguarding extends into the digital realm. We understand that although safeguarding policies and processes should be applied regardless of whether concerns are present online or offline, there may be additional factors in considering and responding to online concerns. Primary Goal aims to ensure both learner and staff safety online through effective education and training.

Primary Goal staff should ensure that apprentices are aware of online safety practices and report any concerns about digital safety to the Designated Safeguarding Lead as per reporting procedures. In turn, apprentices are expected to use digital resources responsibly and report any issues or concerns to a member of Primary Goal staff.

Online and digital safeguarding forms party of the mandatory training completed by all Primary Goal staff upon commencement of employment and is updated annually as a minimum. Staff should seek to regularly upskill themselves on advancements in digital technologies and their associated risks in order to inform and support learners.

Additionally, all Primary Goal owned devices utilised by staff are monitored by Senso.cloud which offers IT monitoring and management software for the purposes of safeguarding. The system will monitor the keystrokes of users to support in identifying vulnerable or at-risk and users who may pose a risk to others, as well as any inappropriate or harmful behaviour. This spans across all Primary Goal and non-Primary Goal systems accessed via Primary Goal devices, including but not limited to emails, Teams messages, internet searches and personal notes. The DSL is notified of urgent violations that have been detected by the system allowing for the review and appropriate action to be taken if a risk is identified.

### **Missing Learners**

Primary Goal is aware that unexplained, unusual or lengthy absences from the workplace, teaching sessions or pre-arranged meetings need investigating as they could be an indication of a safeguarding or welfare issue. Learners should inform their Coach or another appropriate member of Primary Goal staff if they will be absent from their apprenticeship for any reason for a period of 2 calendar weeks or more. Employers are required to notify Primary Goal of any unexplained learner absence from work, and that Coaches and Trainers follow up missed sessions with the learner and employer.

If a member of staff has concerns about a learner's absence, this should be reported to the Designated Safeguarding Lead or another appropriate member of the Senior Leadership Team using the usual reporting procedure so that they can attempt contact with the learner. If contact is made, the Designated Safeguarding Lead or appropriate member of the Senior Leadership Team will work with the learner, and employer if needed, to provide support, signpost, or make an external referral where necessary.

In the event that a learner cannot be contacted by a member of staff at Primary Goal, the employer will be contacted to provide an update on their attendance and also attempt to contact the learner if necessary. In the event that the

learner cannot be contacted by their employer or Primary Goal, their next of kin will be contacted to check on their welfare. Should these attempts also be unsuccessful, the emergency services will be contacted.

### **16–18-Year-Old Learners**

Fortnightly reports are produced by the Head of Learning, Quality and Performance relating to the attendance and engagement of those learners aged between 16 and 18 years old. Staff are expected to contact learners within this age group more frequently as it is recognised that they may present more vulnerabilities. For absences relating to learners aged between 16 and 18 years old, all reports must be made to the Designated Safeguarding Lead within 24 hours of the missed session should contact not be made. Following this, the Designated Safeguarding Lead, or another member of the Senior Leadership Team, will attempt to contact the learner's employer and next of kin to determine the learner's safety and assist in contacting the learner. For those learners working within educational establishments or other such employers that do not operate throughout the calendar year, contact with the employer will still be attempted in cases of unexplained absence.

Should the learner still be uncontactable and contact to the employer and/or next of kin has been unsuccessful during this time period, an internal risk assessment will be undertaken within a maximum of 72 hours. Should it be deemed necessary, a report will then be made to the emergency services.

### **Reporting and Record Keeping**

All safeguarding concerns should be documented via the Safeguarding Cause for Concern Form which can be found on SharePoint and is accessible by all staff. For safeguarding concerns raised by those without access to Primary Goal's internal SharePoint system (i.e. by a learner via telephone), the Designated Safeguarding Lead, or another member of staff, will complete the Safeguarding Cause for Concern form.

Written accounts of safeguarding concerns shall be factual, non-speculative and include direct quotes where possible to ensure accuracy.

A confidential record will be kept of all cases referred to the Designated Safeguarding Lead, which will only be shared with those with safeguarding responsibilities within the organisation, or with external agencies where referral is necessary. All information will be shared on a 'need to know' basis in line with data protection and confidentiality laws.

Written records will be kept securely for a period of six years via a restricted site on Primary Goal's internal SharePoint system.

Safeguarding reports are created as part of the Board Report by the Designated Safeguarding Lead to be shared with the Senior Leadership Team and Board of Governors. This report is provided to help identify any trends in safeguarding issues and assess the impact of our provision. Confidentiality is maintained throughout reporting and details of concerns are only shared on a 'need to know' basis.

### **Recruitment and Training**

Primary Goal encourages job applicants with a criminal record to disclose this information as soon as possible in the recruitment process so that the Company can establish the relevance of the conviction compared to the role. Primary

Goal will not discriminate against job applicants on the grounds of previous criminal convictions that have no relevant bearing on the post being applied for. Upon an offer of employment being made to a candidate in possession of a criminal conviction which does not affect the post they have applied for, or any other area of the business, a risk assessment will be completed by the HR Manager and the CEO to demonstrate that all risks have been considered and mitigated.

All employees of Primary Goal are required to have an Enhanced DBS certificate. Certificates will be updated at least once every 3 years. Should there be a delay in staff members receiving a DBS certificate before their start date of employment, a risk assessment will be completed by the employee's line manager, HR Manager and CEO to detail any risk mitigation that will take place whilst the employee awaits certification.

Upon commencement of employment, all staff are required to undertake safeguarding training via the Education and Training Foundation (ETF) to demonstrate understanding and competency within safeguarding practices and procedures. Staff are required to update their safeguarding training on an annual basis. The Designated Safeguarding Lead is required to be trained to a Level 4 standard.

All staff are required to undertake Prevent training through the Home Office website upon commencement of employment, which is updated at least annually.

Quarterly drop-in safeguarding sessions are arranged for staff to attend for topical and current safeguarding updates, training and sharing of best practice. Additional ad-hoc training will also be provided to staff based on business need, identified risks or updated legislation.

Primary Goal offers Mental Health First Aid training to those staff with an interest in supporting mental health across the organisation. Once trained, these staff are available for learners and staff as an additional signposting resource to support with mental health and wellbeing discussions. Should any staff trained as Mental Health First Aiders have concerns about the safety or welfare of an individual they are engaging with, the safeguarding concern reporting procedure will be followed.

A record of all staff, associate, Board member and volunteer safeguarding training and DBS expiry dates are recorded on the Single Central Record (SCR) which is kept up to date by the HR Manager. Certificates for all trainings can be found in staff members' Professional Development folders.

### **Staff Concerns**

Employees understand that they should not allow feelings of loyalty towards colleagues interfere with their judgement when there are concerns about a colleague's behaviour or conduct in relation to safeguarding. If staff have concerns about the behaviour of a member of staff, they should:

- Refer to the Company's Whistleblowing policy for guidance regarding improper conduct or unethical behaviour.
- Report concerns to the Designated Safeguarding Lead.

In line with Primary Goal's Performance Management procedures, concerns will be investigated, and appropriate action taken during the course of any investigation. Where appropriate and necessary, the Designated Safeguarding Lead will involve external agencies such as the relevant Local Authority Designated Officer (LADO), Local Adults Safeguarding Boards or Social Services.

## Supporting Policies and Documents

This policy should be read alongside the following Primary Goal documents:

- Prevent Policy
- Safer Recruitment and Selection Policy
- Equality, Diversity and Inclusion Policy
- IT Policy
- Artificial Intelligence (AI) Policy
- Whistleblowing Policy
- Complaints Policy
- Employee Handbook

## Review

Primary Goal will continue to review the contents of this policy on an ongoing basis and will review annually as a minimum.

## Appendix A – Glossary

Terminology	Information
<b>Abuse</b>	A violation of an individual's human and civil rights by another person or persons. It may be a single act or repeated acts, an act of neglect or failure to act, or multiple acts.
<b>Adverse Childhood Experiences (ACEs)</b>	Traumatic events that occur during childhood that can have a significant impact on a person's physical, emotional, and mental health.
<b>Breast Ironing</b>	Breast ironing (also called breast flattening) is when young girls' breasts are damaged over time to flatten them and delay their development. Signs of this could include pain when lifting arms, or unusual behaviour after time away from education.
<b>Bullying</b>	Behaviours that aim to physically or emotionally hurt victims that usually happen over a prolonged period of time. This can occur online (Cyberbullying) as well as offline.
<b>Child-on-Child/Peer-on-Peer Abuse</b>	Applies to both children and adults and is defined as abuse inflicted by peers. Examples could include bullying, harassment, intimidation, racism. Can occur both online and offline.
<b>Coercive Control</b>	An act or a pattern of acts of assault, threats, humiliation and intimidation or other abuse that is used to harm, punish, or frighten a person. This controlling behaviour is designed to make a person dependent by isolating them from support, exploiting them, depriving them of independence and regulating their everyday behaviour.
<b>County Lines</b>	Where illegal drugs are transported from one area to another, often across police and local authority boundaries (although not exclusively), usually by children or vulnerable people who are coerced into it by gangs.

<b>Cuckooing</b>	When criminals take over the homes of vulnerable people and use them as a base to deal drugs or commit other crimes in the area. Victims of 'cuckooing' can include older people, those suffering from mental or physical health problems, sex workers, single parents and those living in poverty. Signs of this type of abuse could be frequent or unfamiliar visitors (normally at unsociable hours), new or regularly changing residents at an address.
<b>Discriminatory Abuse</b>	Abuse relating to the unequal treatment of an individual based on age, disability, gender and gender reassignment, marriage and civil partnership, pregnancy and maternity, race, religion and belief, sex or sexual orientation. This could encompass any type of abuse.
<b>Domestic Violence/Abuse</b>	Any incident or pattern of incidents of controlling, coercive or threatening behaviour, violence, or abuse between those aged 16 or over who are or have been intimate partners or family members regardless of gender or sexuality. This could encompass any type of abuse.
<b>Exploitation</b>	A form of abuse referring to the deliberate manipulation or abuse of power one individual exerts over another in order to control, usually for a form of gain.
<b>Extremism</b>	Extremism is the promotion or advancement of an ideology based on violence, hatred or intolerance, that aims to (1) negate or destroy the fundamental rights and freedoms of others; or (2) undermine, overturn or replace the UK's system of liberal parliamentary democracy and democratic rights; or (3) intentionally create a permissive environment for others to achieve the results in (1) or (2).
<b>Female Genital Mutilation (FGM)</b>	Procedures that involve partial or total removal of the external female genitalia, or other injury to the female genital organs for non-medical reasons. Signs of this type of abuse could be pain when standing or sitting, being out of the country for extended periods of time with evasive reasoning (particularly around school holidays), spending longer than usual in the toilet, a change in behaviour after a period of absence.
<b>Financial or Material Abuse</b>	A type of abuse which includes having money or other property stolen, being defrauded, being put under pressure in relation to money or other property and having money or other property misused.
<b>Forced Marriage</b>	A marriage in which one or both parties are married without their consent or against their will, or a marriage where one or both partners lack the consent to marry.
<b>Gaslighting</b>	A type of emotional abuse that causes a victim to question their own feelings, instinct, or sanity.
<b>Grooming</b>	When someone builds a relationship, trust and emotional connection with a person so they can manipulate, exploit and abuse them.
<b>Hate Crime</b>	Defined as any incident that is perceived by the victim, or any other person, to be racist, homophobic, transphobic or due to a person's religion, belief, gender identity or disability.
<b>Honour-Based Abuse/Violence</b>	A crime or incident committed to protect or defend the 'honour' of a family or community. A collection of practices used predominantly to control the behaviour of women and girls within families or other social groups in order to protect supposed cultural and religious beliefs, values and social norms in the name of 'honour'.



<b>Mate Crime</b>	A form of crime in which a perpetrator befriends a vulnerable person with the intention of then exploiting the person financially, physically, or sexually.
<b>Mental Health</b>	Mental health includes our emotional, psychological, and social well-being. It affects how we think, feel, and act. It also helps determine how we handle stress. Signs of poor mental health could be repeated or prolonged absences from work/education, appearing withdrawn, seeming disengaged with topics and activities that used to engage.
<b>Modern Slavery</b>	Examples of modern slavery could include human trafficking, forced labour, domestic servitude, sexual exploitation such as prostitution or pornography, debt bondage (being forced to work to pay off unrealistic debts).
<b>Neglect/Acts of Omission</b>	Defined as the persistent failure to meet a person's basic physical, emotional and/or psychological needs, likely to result in the serious impairment of health or development. Examples could include failure to provide access to shelter, clothing, heating, personal or medical care, ignoring or isolating a person, not taking account of individuals' cultural, religious, ethnic, educational, social and recreational needs.
<b>Organisational or Institutional Abuse</b>	The mistreatment of people, typically in their workplace, brought about by poor or inadequate care or support, or systematic poor practice that affects the whole care setting. This type of abuse can also occur in settings designed to provide care such as hospitals, care homes, schools, and nurseries.
<b>Peer-on-Peer Abuse</b>	A term used to describe children abusing other children, which could include, but is not limited to, physical and sexual abuse, sexual harassment and violence, emotional harm, on- and offline bullying and teenage relationship abuse.
<b>Physical Abuse</b>	Any type of abuse that inflicts physical harm. This could include assault, rough handling, scalding/burning, physical punishments, unlawful use of restraints, making someone purposely uncomfortable (i.e., forcing them to endure cold temperatures), involuntary isolation or confinement, misuse of medication, force-feeding or withholding food.
<b>Psychological or Emotional Abuse</b>	Any type of abuse that involves emotional mistreatment. Examples could include enforced isolation, removing means of communication, preventing someone from meeting their needs, preventing the expression of choice or opinion, threats of harm, cyber bullying.
<b>Radicalisation</b>	The process whereby a person or a group adopts radical views that are opposed to their current social, political and/or religious situations. The person or group goes on to support terrorism and extremist ideologies that are associated with terrorist groups.
<b>Revenge Porn</b>	The sharing of private, sexual materials, either photos or videos, of another person, without their consent and with the purpose of causing embarrassment or distress.
<b>Self-Harm</b>	When somebody intentionally damages or injures their body. It is a way of expressing emotions. Signs of self-harm could be unusual or unexplained injuries, alcohol or drug misuse.
<b>Self-Neglect</b>	Acts of neglect inflicted by an individual onto themselves. Examples could include not seeking medical support when needed, neglecting personal hygiene and health.

<b>Sexual Abuse</b>	Defined as sexual behaviour(s) or sexual act(s) forced upon a person without their consent. Examples could include rape, sexual assault, inappropriate touch, non-consensual masturbation, non-consensual penetration or attempted penetration, sexual photography or being forced to look at sexually explicit images, indecent exposure.
<b>Terrorism</b>	The use or threat of action, both in and outside of the UK, designed to influence any international government organisation or to intimidate the public. It must also be for the purpose of advancing a political, religious, racial, or ideological cause. Planning, assisting and even collecting information on how to commit terrorist acts are all crimes under British terrorism legislation.
<b>Upskirting</b>	Upskirting refers to the act of taking a photograph (also known as a “creepshot”) under a person’s clothing without their permission with intention of obtaining sexual gratification, or to cause humiliation, distress or alarm.
<b>Voyeurism</b>	The practice of gaining sexual pleasure from watching others when they are naked or engaged in sexual activity, either with or without consent, or using a device to film or view sexual content without the victim's consent.

## Appendix B – Community Support Index

[Community Support Index.xlsx](#)