



**Policy Name: Safeguarding Policy and Procedure  
Version: 1**

## To be read alongside Prevent action plan

### Policy Context

Intequal work with Apprentices on a remote basis and therefore will have reduced direct contact with young people. We do, however, recognise our responsibility in appropriately supporting young adults and that they may make disclosures that could affect the safety of others.

### Aims of this Policy

- To outline Intequal's commitment to ensuring the safety of Apprentices engaged on our direct delivery learning programmes.
- To provide a learning environment in which Apprentices feel safe, secure, valued and respected, feel confident and know how to approach Intequal if they are in difficulties.
- To raise the awareness of all the Intequal delivery team of the need to safeguard Apprentices and of their responsibilities in identifying and reporting possible cases of concern.
- To acknowledge the need for effective and appropriate communication between all members of staff in relation to safeguarding.
- To develop a structured procedure within Intequal that will be followed by all members of the team in cases of concern.
- To implement Prevent through training of staff and monitoring of activity via weekly calls and progress review activity.
- To develop effective working relationships with all other agencies, involved in the safeguarding of Apprentices.
- To ensure that all adults within our team who have access to Apprentices have been checked for their suitability.

## **Intequal Safeguarding Management**

- Intequal have a member of staff who acts as the Safeguarding Lead.
- Intequal's Director with responsibility for Pastoral and Safeguarding is Rod Harris.
- All members of the Intequal direct delivery team will receive Safeguarding and Prevent training in order to develop their understanding of the signs and indicators of abuse, neglect and/or radicalisation every year.
- Intequal will provide a Safeguarding Team to whom Apprentice pastoral concerns will be passed for investigation and resolution.
- All members of the Intequal direct delivery team know how to respond to an Apprentice who discloses abuse or neglect, and the procedure to be followed in appropriately sharing a concern or disclosure of possible abuse or neglect.
- Apprentices are made aware of Intequal responsibilities regarding safeguarding procedures through being made aware of the Safeguarding Policy at their programme induction and within their handbook.
- Intequal's selection and recruitment policy includes all checks on staff suitability including DBS checks as recommended and in accordance with current legislation and good practice.

## **Responsibilities**

Intequal understand our responsibility to safeguard our Apprentices requires that we all appropriately share any concerns.

We have a Nominated Safeguarding Lead who is responsible for:

- Referring an Apprentice where there are concerns about welfare, possible abuse or neglect to the Apprentice's local Children Social Care. A phone call will be made and then a written referral (if required) will be emailed as soon as possible by the close of the day.
- Ensuring that detailed and accurate written records of concerns.
- Ensuring that all such records are kept confidentially and securely and are separate from other records, with a front sheet listing dates and brief entry to provide a chronology.
- Ensuring that an indication of further record-keeping is marked.
- Acting as a focal point for our team's concerns and liaising with other agencies and professionals.
- Ensuring that all the Intequal team are aware of our safeguarding policy and procedures and know how to recognise and refer any concerns.
- Keeping themselves up to date with knowledge to enable them to fulfil their role, including attending relevant training, at least every two years.

## **Procedures around an Apprentice making a disclosure**

Issues of safeguarding may relate but are not limited to the below:

- Neglect
- Physical abuse
- Sexual abuse
- Emotional abuse
- Radicalisation

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Where an Apprentice makes a disclosure the Intequal team member should:

- At the first appropriate moment explain that you cannot keep information confidential.
- Listen - avoid asking leading questions.
- Encourage the Apprentice to talk to the Safeguarding team.
- At the first possible moment write up the details as accurately as possible making sure you write down what was said and not make judgments about what was said. A factual account of the conversation should be written.
- If you are at all concerned whether an Apprentice has made a disclosure or you think they may have started to make a disclosure, but you were interrupted, discuss details with the Safeguarding team.
- The Safeguarding team should fully document the disclosure before making a referral to the appropriate Children's Social Care, first by phone and followed up with a written referral if requested.
- The Intequal Team should only be given access to confidential information on a 'need to know' basis and at the discretion of the Safeguarding Lead.

Intequal can be contacted for all Safeguarding queries by emailing [safeguarding@intequal.co.uk](mailto:safeguarding@intequal.co.uk).

## Disclosures

When an Apprentice tells you about a situation that falls under safeguarding;

### DO

- Revisit your initial discussions with the Apprentice to ensure they understand your “duty of care” and can therefore make an informed choice as to what they share with you.
- Whilst following lone working protocols, ensure they are somewhere comfortable and that your conversation can not be overheard.
- Take them seriously and explain that you understand they are telling **you** for a reason.
- Acknowledge they have been brave to tell you and that you will support them throughout the escalation process.
- Take your time, this could be the first time that they have built up the courage to discuss with anyone.
- Reassure them that what has happened is not their fault.
- Reassure them that if abuse has occurred it is in general not unusual and has happened to lots of children and young people.
- Be honest about your position. Explain you will have to tell and why.
- Write up the details as soon as possible and include a factual account.
- Speak to the Safeguarding team as soon as possible.

### DON'T

- Make promises you cannot keep.
- Try and shield them from the process.
- Lead or ‘interrogate’ them with lots of questions.
- Cast doubt on what they tell you. It has taken a great deal of courage for them to tell.
- Say anything, which may make them feel responsible for the abuse (e.g. “Why haven’t you told anyone before?”)
- Communicate your own feelings of anger.
- Panic. When confronted with the reality of abuse or any other safeguarding situation there is often a feeling of needing to ‘act immediately’. Action taken too hastily can be counter-productive.
- Put any timescales on escalations.
- Feel that you are not supporting them by passing the situation ownership to the Safeguarding team, Intequal understand the importance of supporting them through this very challenging time.
- Ring or contact the parents.

## Confidentiality

We recognise that all matters relating to child protection and safeguarding are confidential.

The Safeguarding team will disclose personal information about an Apprentice to other members of staff on a need to know basis only. All of the Intequal Team, however, **must** be aware that they have a professional responsibility to share information with other agencies in order to safeguard children and vulnerable adults.

All the Intequal team must be aware that they cannot promise an apprentice to keep secrets which might compromise their safety or well-being or that of another.

We will always undertake to share our intention to refer to social services with their parents /carers unless to do so could put them at greater risk of harm or impede a criminal investigation. If in doubt, we will consult with social services on this point.

## Supporting the Intequal Team

We recognise that our team members working and becoming involved with apprentices who have suffered harm, or appears to be likely to suffer harm may find the situation stressful and upsetting.

We will support them by providing an opportunity to talk through their anxieties with the Safeguarding team and to seek further support.

We understand that staff should have access to advice on the boundaries of appropriate behaviour. The document “Guidance on Safe Working Practices for the Protection of Children and Staff in Education Settings” provides advice on this and the circumstances, which should be avoided in order to limit complaints against staff of abuse of trust, and/or allegations of physical or sexual abuse.

## Implementation

- All Apprentices will be advised of the policy on induction.
- Partner organisations will be notified of the policy through dialogue and our website.
- All of our team will be notified of the policy when they begin employment.

## Special Category Data

It is important employers and apprentices alike are aware of and understand this special category of personal information. It replaces, and is very similar to, the “sensitive personal data” category contained in the old Data Protection Act. It is personal data that is more sensitive than other types, and so require additional protection and safeguards. It is defined in Article 9 of the General Data Protection Act (GDPR) as:

“personal data revealing a person’s racial or ethnic origin, political opinions, religious or philosophical beliefs, trade-union membership, and the processing of genetic data, biometric data for the purpose of uniquely identifying a person, or data concerning health or sex life and sexual orientation”.

## How special category data should be handled?

Processing of such special category data is prohibited under the GDPR unless one of the listed exemptions applies.

- The individual has given an explicit consent to the process of those personal data for one or more specified purposes; OR
- Processing is carried out in the course of its legitimate activities with appropriate safeguards.

**Rod Harris** takes overall responsibility for the policy and its implementation, for liaison with stakeholders and appropriate outside agencies. The Safeguarding team will ensure the daily management of this policy and that all staff are adequately trained and supported.

As a matter of course, all stakeholders are reminded of this policy on an annual basis following review.