
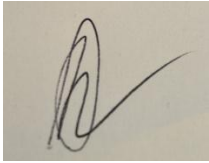




Safeguarding Policy

Monitoring and Version Control

Author	Ashleigh Gorton
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Signatories	Ashleigh Gorton  Andrew Smithson 

Safeguarding Policy Statement

The primary objective of this policy is to establish our approach to safeguarding vulnerable adults and young people from abuse, criminal activities, exploitation, or being lured into extremist activities. This objective also embodies:

- Protecting apprentices from abuse and maltreatment.
- Preventing harm to the apprentice's health or development.
- Taking action to enable all children and young people to have the best outcomes with us.

This policy is applicable to all areas of our operations and is binding on *all personnel*, including permanent and temporary employees, external associates and apprentices. The policy encompasses both preventive measures in place and guidelines for responding to concerns, allegations, or suspicions of abuse.

We will develop the policy as and when; this will be done by working with the relevant authorities to ensure the policy is up-to-date and factors in any new risks.

As per Section 175 of the Education Act (2002), we are mandated to establish and implement measures aimed at safeguarding and promoting the welfare of young people, and vulnerable adults who may be at risk of harm or abuse.

In addition, we are obligated to comply with the Prevent Duty (See Prevent Policy). This policy provides a framework for these measures and should be reviewed in conjunction with other relevant policies and procedures we have, including web links and appendices, such as our Safeguarding procedures that align with the Local Authority Safeguarding Procedures. This policy takes into account various publications, as well as recent and applicable guidance and legislation in this domain.

- The Children Act 1989 (as amended) - to assist the Local Authority Social Services Department acting on behalf of children in need
- The Children and Social Work Act 2017 – Safeguarding of Children (Chapter 2)
- The Safeguarding Vulnerable Groups Act 2006
- Working Together to Safeguard Children 2023 - safeguard and promote the welfare of children
- Keeping Children Safe in Education 2024 - Safeguarding is Everybody's Responsibility
- Education and Training (Welfare of Children) Act 2021
- Human Rights Act 1998
- The Equality Act 2010 / Public Sector Equality Duty (PSED)

Designated Safeguard Lead

Name: Andrew Smithson

Position: Business Development Manager

Phone: 03301 338 666 (Office)

Email:

- Safeguarding@themarketingtrainer.co.uk
- Andy@themarketingtrainer.co.uk
- (Deputy) mitch@themarketingtrainer.co.uk

- (Deputy) ash@themarketingtrainer.co.uk

Our Safeguarding Objectives

- To protect apprentices with Care and Support needs from harm and reduce the risk of abuse or neglect.
- To intervene whenever possible to prevent abuse or neglect.
- To safeguard apprentices by empowering them to make choices and maintain control over their lives.
- To provide accessible information and support to help individuals recognise different forms of abuse, stay safe and healthy, and report concerns regarding their own or another apprentice's safety and well-being.
- To ensure that our apprentices and staff are aware of and understand the referral process.
- Ensure that recruitment methods and processes are robust and contribute towards safe recruitment.
- Ensure that information relating to safeguarding concerns is shared appropriately with relevant agencies, in accordance with legal and regulatory requirements.
- To promote the mental health and wellbeing of apprentices by providing access to mental health support services, signposting external resources, and embedding mental health awareness into staff and apprentice training.

Our Safeguarding Commitment

We aim to keep apprentices safe and will always adhere to the following:

- Listen, respect and value all.
- Always having a DSL (Designated Safeguarding Lead).
- Having a code of conduct for both staff and apprentices (listed in this policy).
- Ensuring *all* staff understand this policy and procedures.
- Guaranteeing that effective whistleblowing procedures, as listed in our Whistleblowing Policy.
- Ensuring that inductions are completed by all apprentices and employers.
- Confirming staff are recruited safely and all relevant checks are made (e.g. DBS, reference checks, application forms, etc).
- Making sure all staff complete an online safeguarding course when starting within the organisation (within 5 working days).
- Ensuring all data is stored and recorded securely and safely within GDPR guidelines.
- Making sure all staff and apprentices have access to updates around safeguarding.
- Implementing and developing an e-safety policy and any related procedures.
- Ensuring procedures are used to manage any allegations against employers or staff.
- Implementing an anti-bullying environment and making sure the policy is robust to deal with any bullying.
- Providing training, support, supervision and quality assurance for all staff through effective management.
- Check Health and Safety measures in accordance with the law (and Health and Safety policy) to ensure a safe physical environment for all apprentices and staff.
- Sharing our safeguarding procedures and information with authorised parties who need to know. Including agencies involved with apprentices and any parents or carers appropriately.

- Ensuring regular reviews of the policy, procedures and recording forms take place in order to maintain a robust policy.
- Consult staff and key stakeholders when making improvements to the policy to ensure the safeguarding processes are not hindered in terms of their effectiveness to make referrals or raise concerns.

Promoting the Safeguarding Policy

We recognise there are various channels that they can utilise to communicate and give regular updates around the Safeguarding policy. We are committed to creating a safeguarding culture where apprentices feel safe, listened to, and confident that their concerns will be taken seriously. Safeguarding is embedded into every aspect of our operations, from regular check-ins with apprentices to encourage open dialogue about safeguarding.

- Available on our website under 'policies', for any stakeholder to access at any time.
- Raise awareness of the signs of safeguarding issues, who the DSL and deputies are, and their contact details, and how to refer.
- Safeguarding Policy in the apprentice handbook, this will include all the details as above.
- Safeguarding awareness training in apprentice induction.
- Safeguarding scenarios in progress reviews with apprentice and line manager.
- Safeguarding training for all staff, as a minimum annual, this will be group training with the DSL.
- Monthly Safeguarding newsletter to apprentices and apprentices with updates.
- MyTMT will have the contact numbers of the DSL and any other relevant authority under the general resources section.
- Safeguarding learning material to be given to employers.
- Welfare curriculum embedded into any standard delivered.
- We engage apprentices in regular discussions about safeguarding through surveys, feedback sessions, and progress reviews

Associated Policies and Procedures

We have policies and procedures in place, many of which are relevant to implementing the Safeguarding and Prevent Policy. This includes the following:

- Equality and Diversity Policy
- Data Protection Policy (GDPR)
- Health and Safety Policy
- Anti-Bullying and Harassment Policy
- Whistleblowing Policy
- Prevent Policy
- E-Safety Policy
- Communications Policy

Definitions

Safeguarding: This is the process of protecting vulnerable people, children or young people from crime, abuse or terrorism related activity.

Radicalisation: This is the process in which an individual comes to support any terrorist acts or extremist ideologies associated with terrorism. A vulnerable apprentice may be more likely to being drawn toward this.

A Child/vulnerable young person – in accordance with The Education Act 2011, and therefore in accordance with the law, is “anyone who has not yet reached their 18th birthday....” we regard any young person below the age of 18 as a child/vulnerable young adult.

Vulnerable adults are individuals who may be susceptible to abuse, harm, or exploitation due to mental health issues, physical health conditions, or personal circumstances.

Harm refers to the mistreatment or negative impact on an individual's health and development, which could include witnessing the mistreatment of others. Development encompasses physical, intellectual, emotional, social, or behavioural growth. Health includes both physical and mental well-being. Ill-treatment involves non-physical forms of abuse, including sexual abuse.

Abuse and neglect are forms of maltreatment that involve inflicting harm or failing to prevent harm to a child or vulnerable young adult. These individuals may experience abuse in a family, institutional, or community setting, either by someone known to them or, less commonly, a stranger. The perpetrator of abuse or neglect may be an adult, child, or multiple individuals.

- Physical;
- Emotional;
- Neglect;
- Sexual abuse.

Role of the Designated Safeguarding Lead

All staff are required to work in partnership to ensure the protection of young people involved in our training, support services and recruitment.

The DSL (Designated Safeguarding Lead) has overall responsibility for Safeguarding and Prevent and includes the following roles:

The DSL is responsible for making referrals to external safeguarding authorities (e.g., Local Authority Designated Officer, Social Services, or Police) when a concern reaches the threshold for external intervention. The DSL will assess all reported concerns and, where necessary, contact relevant agencies within 24 hours

- The DSL will be required to complete compulsory DSL training every two years.
- Communicating and reporting the policy to all associated, including staff, contractors and associates. The DSL will provide advice, information and training on the protection of young people and vulnerable adults.
- Being the main contact within the business for the protection of young people and vulnerable adults.

- Responsible for managing the Safeguarding and Prevent Action plan.
- Keeping up to date with the latest knowledge on Prevent and Safeguarding issues.
- Ensuring that any policy and reporting procedures are monitored. They must also be reviewed in accordance with any changes in legislation.
- Maintaining any confidential records and actions taken of any reported cases.

Expectations

All Staff

We recognise that safeguarding is a duty of all staff members, regardless of their position in the company, we operate a culture of “it can happen”. Safeguarding training will be mandatory for all staff, this will include completion of the relevant safeguarding modules, such as from the ‘Education and Training Foundation’. We understand that any staff member could be able to identify an apprentice who could have safeguarding issues, and therefore will ensure all training for all staff covers the following:

- Staff will know where to go for advice in relation to safeguarding or child/vulnerable adult protection issues or when they are uncertain about whether to refer to a concern about an apprentice.
- Staff know our procedure for referrals on vulnerable adult protection issues.
- Staff understand that they have the right to contact the appropriate agencies, such as the LADO, or the CSCP (Coventry Safeguarding Children Partnership) or MASH (Multi Agency Safeguarding Hub) if they feel that concerns are not being passed on appropriately by designated staff.
- Staff know of the requirement to keep detailed, accurate, secure written records of any referrals or concerns.
- Staff will recognise and respond to safeguarding and welfare concerns.
- Staff understand their responsibilities in being alert to the signs of abuse.
- Staff know how to respond to a student who discloses abuse or is at risk of self-harm.
- Staff know of appropriate approaches to confidentiality and disclosure of information.
- Staff fully understand our guidance on relationships with students.

Safer Recruitment

Measures are in place which address the following (DBS checks, staff recruitment, Staff training and development, off the job training, online reviews, guidance and support for apprentices). Safeguarding questions are also asked during interviews to assess any knowledge on safeguarding.

DBS Checks

Human Resource policies that implement safer recruitment:

- The commencement of employment is dependent on the completion, verification, and submission of all required documentation to the Senior Management Team
- Supervision must be arranged and maintained until the DBS check is finalised. We will conduct a DBS risk assessment whilst we wait for finalised DBS checks.
- Prior to the start of employment, the submission of DBS applications, along with supporting documents, to HR is mandatory.

- In case the DBS check reveals any disclosures, a risk assessment must also be carried out.

Staff Recruitment

Safeguarding measures around this are:

- Application forms must be completed (including relevant questions) when applying for a role.
- A CV is required, but an application must also be fully completed.
- Verification of identity.
- Examination of the barred list.
- Comprehensive background check using an enhanced DBS certificate.
- Verification for prohibition from teaching.
- Verification of professional qualifications.
- Verification of the right to work in the UK.
- At least 2 work references, preferably the last 2 employers which will be followed up.
- Social media background vet.

Off-the-job Training

Safeguarding and Prevent policies will be promoted throughout completion of the apprenticeship. It will include the following:

- During an apprentice induction, apprentices will receive an introduction to Safeguarding and learn how to report any concerns they may have. In addition, there will be a diverse range of curriculum topics offered, including e-learning modules covering areas that promote the wellbeing of apprentices.

Staff Training and Development

New staff who start with us will undergo an induction which will cover safeguarding and Prevent training, which will be conducted by the DSL. This will include:

- An introductory training session which has specific training on the Prevent Duty Policy and Safeguarding Policy.
- Staff roles and responsibilities and how to report and identify Prevent Duty and safeguarding issues.
- How to follow the referral process, as stated in the Appendix 1.

All staff, including board members will partake in ongoing training at an appropriate level. Individuals will complete regular refresher training at least annually. Regular updates will be a standard part of team meetings, board meetings, senior management meetings and one to ones between managers and delivery staff. Any new information from agencies, or the relevant safeguarding partners will be used to update the Safeguarding Policy and any safeguarding training resources.

IT Monitoring

Any IT equipment provided to apprentices and staff will be subject to monitoring its use. Filters will be applied to restrict the access to any harmful context that includes being drawn into extremist behaviour, for more info see the extract of the IT Policy listed in this policy.

Any use deemed inappropriate will be reported to the DSL and appropriate action will be taken.

Apprentices Reporting a Safeguarding Concern

We encourage apprentices to be vigilant and have a proactive approach to the safety and welfare of themselves, their peers and others on site.

This Includes:

- Reporting any safeguarding concerns to a member of staff or directly to a DSL with whom they feel comfortable discussing these concerns.
- Abiding by our Apprentice Code of Conduct which is designed to safeguard all those on our sites or using our facilities, including the IT network.
- Behaving in a way that does not compromise them or lead to allegations of a criminal or safeguarding nature.

Safeguarding Concerns that an apprentice may have regarding themselves or another apprentice:

- Bullying
- Abuse – Domestic/Physical/Sexual/Psychological/Financial/Neglect
- Discrimination
- Radicalisation - Holding an extreme/radical view/ideology
- Sexual Harassment
- Youth produced sexual material
- Homelessness
- Forced marriage
- Child sexual exploitation
- Missing from home
- Trafficking
- Knife crime
- Domestic violence
- FMG

It is important for all apprentices to understand that they have the right to be protected and should speak up if they feel at risk while at work. No concern should be considered too trivial, and it is better to speak out than suffer in silence.

If an apprentice suspects a safeguarding issue, they should first report it to their coach or senior manager. Alternatively, they can contact the Designated Safeguarding Lead or Deputies.

We work closely with employers to ensure that workplace environments are safe for apprentices. Employers receive safeguarding training upon induction and guidance throughout various touchpoints during the apprenticeship on recognising and reporting concerns.

Referral Process

Staff making referral concerns about an apprentice's behaviour but *with no disclosure* about any abuse.

The signs of abuse might not always be obvious, and an apprentice might not tell anyone what is happening to them. Staff should therefore question behaviour if something seems unusual and try to speak to the apprentice, alone, if appropriate, to ask how they are doing.

Indicators of Safeguarding Issues

- Absence - Missing work or not turning up for their training session or coaching session
- Changes in appearance
- Changes in behaviour and character - becoming quiet or loud, aggressive or withdrawn
- Changes in emotional health - crying, anxiety or low mood
- Excessive alcohol consumption
- Physical injuries - for example, cuts or bruises
- Talk of poor living conditions
- Self-harm
- Use of drugs
- Withdrawing from certain activities - reluctance to go online, sudden changes in use of technology.
- Suddenly having expensive clothes or phones

The nature and severity of concerns regarding an apprentice's wellbeing can vary, as well as the duration and how they were identified. If any staff members have concerns about an apprentice's welfare, they should seek guidance from the DSL, if they need to. The DSL will then identify which of the following the concern is and will also record:

- Urgent: contact at risk victim immediately, review information and escalate as required
- Medium: reach out to victim within 24 hours, discuss concerns and draw up plan of review
- Low: follow up questions with victim within 24 hours, continue to monitor the situation

When a safeguarding concern is raised by an apprentice, staff must:

1. Listen to the apprentice, take their concern seriously, and reassure them.
2. Avoid promising confidentiality but explain that the information will be shared with the DSL to protect them.
3. Record the details of the concern and immediately report it to the DSL.
4. Ensure the apprentice knows they can follow up or ask questions after the report is made.

If further investigation is deemed necessary, the DSL may organise a meeting with relevant parties, such as the apprentice, their parents and trainers/coaches.

We recognise that safeguarding incidents are not over once the referral has been made and that apprentices will need support during the process and after. Following the investigation, the DSL will act as a point of contact for the apprentice, whether it is pastoral support, or arranging external support or guidance, the DSL will look to facilitate this.

The most important consideration is whether sharing information is likely to support the safeguarding and protection of an individual.

Necessary and proportionate

Not sharing more data than is necessary to be of use is a key element of the GDPR and Data Protection Act 2018, there should be a consideration of the impact of disclosing information on the information subject and any third parties. Information must be proportionate to the need and level of risk.

Relevant

Only information that is relevant to the purposes should be shared with those who need it. This allows others to do their job effectively and make informed decisions.

Adequate

Information should be adequate for its purpose. Information should be of the right quality to ensure that it can be understood and relied upon.

Accurate

Information should be accurate and up to date and should clearly distinguish between fact and opinion. If the information is historical then this should be explained.

Timely

Information should be shared in a timely fashion to reduce the risk of missed opportunities to offer support and protection to an apprentice. Timeliness is key in emergency situations, and it may not be appropriate to seek consent for information sharing if it could cause delays and therefore place an apprentice at increased risk of harm. Staff should ensure that sufficient information is shared, as well as consider the

urgency with which to share it.

- “Urgent concerns should be reported to the DSL *immediately*—either in person or by phone. Written documentation should follow within the same working day.”
- “All safeguarding concerns, regardless of urgency, should be referred to the DSL within 24 hours of discovery.”

Secure

Information should be shared in an appropriate, secure way. This will be done via our platform. Staff must always follow the Data Protection policy on security for handling personal information.

Record

Information sharing decisions must be recorded, whether the decision is taken to share. If the decision is to share, reasons should be cited including what information has been shared and with whom, in line with our procedures.

If the decision is not to share, it is good practice to record the reasons for this decision and discuss them with the requester. The information should not be kept any longer than is necessary. In some rare circumstances, this may be indefinitely, but if this is the case, there should be a review process scheduled at regular intervals to ensure data is not retained where it is unnecessary to do so.

We also recognise sharing is also essential for the identification of patterns of behaviour when a vulnerable individual is at risk of going missing or has gone missing when multiple individuals appear associated to the same context or locations of risk, or in relation to young adults in the secure estate where there may be multiple local authorities involved in an individual’s care.

Follow-up and Support

Once a referral has been made, the DSL will:

1. Ensure the apprentice receives ongoing support, either internally or through external agencies (e.g., counselling, mental health services).
2. Maintain contact with the apprentice to monitor their wellbeing throughout the investigation process.
3. Hold review meetings to reassess the apprentice’s situation and ensure that they continue to feel safe. If the incident is closed, the DSL will document and archive the incident.
4. Provide regular updates to relevant parties, including parents/guardians where appropriate.

Confidentiality Statement

The safety and well-being of the apprentice is of utmost importance. As part of their daily responsibilities, staff may have access to confidential information regarding apprentices. Under certain circumstances, staff may be given highly sensitive or private information. However, staff must never use confidential or personal information about an apprentice or their family to benefit themselves or others. This information must never be used to intimidate, humiliate, or embarrass an apprentice.

While respecting confidentiality, information will always be shared with safeguarding authorities where it is in the apprentice's best interests. We will never withhold information where failure to disclose could place the apprentice at further risk of harm

Annual Review of the Policy

Our Board of Directors are responsible for implementing and monitoring the Safeguarding Policy. The number of safeguarding cases will be reviewed on a regular basis. The Marketing Trainer will liaise with any relevant governing bodies, employers and apprentices to ensure the Safeguarding Policy is robust and competent. The policy will be reviewed on an annual basis to ensure that all updates to legislation are reflected and best practice is adapted.

We adhere to the following process:

Review policies, and implement any changes to minimise the threat of new risks, or on the advice of Safeguarding Agencies. This will be on an annual basis at a minimum unless needed to change immediately.

Reports from monitoring and review activities regarding safeguarding will be reviewed by SMT and presented monthly. An annual report will also be compiled for stakeholders to see the impact of the policy.

This policy will be reviewed annually by SMT within four weeks of a review of any serious safeguarding incident which highlights any weaknesses in the policy.

This policy and the associated guidance and procedures document is to be made available to all staff and apprentices in various formats appropriate to The Marketing Trainer audiences, e.g. in Apprentice Handbooks, on website etc.

Possible Actions:

- Training could be required for all staff members to combat a new risk.
- Policies are updated/new policies created.

Senior Management Team Meetings

As part of all SMT meetings, safeguarding will always be a point on the agenda to discuss any concerns. Any immediate concerns will be dealt with initially without requiring an SMT meeting to take place.

Safeguarding Contacts

The DSL will maintain regular communication with external agencies, including Local Safeguarding Boards, social services, and the police. We will ensure that safeguarding concerns are escalated swiftly to external bodies when necessary, and we will participate in multi-agency safeguarding meetings when required

Advice for Young People by Young People

www.coap.org.uk (coping with drug or alcohol or other difficult situations at home or with a parent)

Alternative to Samaritans (for Young People) Get Connected is a confidential 24 hour free telephone helpline that might be a suitable alternative to the Samaritans –

www.getconnected.org.uk or 0808 808 4994

Bullying (including Cyber) Workplace

http://www.supportline.org.uk/problems/bullying_at_work.php

Cyberbullying <http://www.nhs.uk/Livewell/Bullying/Pages/Cyberbullying.aspx> or

<http://www.saferinternet.org.uk/about/helpline>

Child Sex Exploitation:

<http://www.nspcc.org.uk/preventing-abuse/child-abuse-and-neglect/childsexualexploitation/what-is-child-sexual-exploitation/> or

<http://www.stopitnow.org.uk/> or 0808 1000 900

Domestic Violence For women: <http://www.nationaldomesticviolencehelpline.org.uk/> or 0808 2000 247

Domestic Violence For men: http://www.mensadviceline.org.uk/mens_advice.php.html or 0808 801 0327

Drug or Alcohol Abuse Drugs - <http://www.talktofrank.com/> or call: 0300 123 6600 text: 82111

Alcohol - <https://www.drinkaware.co.uk/understand-your-drinking/is-your-drinking-a-problem/alcohol-support-services> or call: 0300 123 1110

Both - <http://www.addaction.org.uk/>

Eating Disorders B-Eat - <https://www.b-eat.co.uk/support-services/helpline> or Adults 0345 634 1414 email help@beat.co.uk.

Under 25's 0345 634 7650 email fyp@b-eat.co.uk
<http://www.eatingdisorderssupport.co.uk/help/links-resources>

E-Safety - <http://www.saferinternet.org.uk/about/helpline> or 0844 381 4772

Extremism, Radicalisation and Terrorism

<https://www.gov.uk/government/publications/protectingchildren-from-radicalisation-theprevent-duty> or 020 7340 7264 email: counter.extremism@education.gsi.gov.uk

Faith Abuse <http://www.equalityadvisoryservice.com/app/home> or 0808 800 0082

FGM <http://www.nhs.uk/NHSEngland/AboutNHSservices/sexual-healthservices/Pages/fgmresources.aspx> or 0800 028 3550

Forced Marriage Karma Nirvana Victim Support 0800 5999 247

<https://www.gov.uk/guidance/forcedmarriage> Forced Marriage Unit email fmu@fco.gov.uk or 020 7008 015; Outreach email fmuoutreach@fco.gov.uk ; Facebook: Forced Marriage page; Twitter: @FMUnit

Gangs and Youth Violence For concerned adults - <http://www.nspcc.org.uk/preventing-abuse/keeping-childrensafe/stayingsafe-away-from-home/gangs-young-people/> or 0808 800 5000

For young people - <http://www.childline.org.uk/Pages/Home.aspx> or 0800 1111

Gender Based Violence Solace Advice Hub email advice@solacewomensaid.org.uk or 0808 802 5565 Women and Girls Network Advice Hub email advice@wgn.org.uk or 0808 801 0660

24 Hour Domestic Violence Helpline 0808 2000 247

Living with a Family Member's Addiction to Alcohol or Drugs

<http://www.nhs.uk/Livewell/drugs/Pages/caring-for-a-drug-user.aspx> or 0300 123 6600
<http://www.adfam.org.uk> Long Term Absence <http://fitforwork.org/employee/> or 0800 032 6235

Mental Health Problems http://www.nhs.uk/conditions/stress-anxiety-depression/pages/mentalhealth_helplines.aspx

Self-Harm or Suicidal Thoughts Suicide

<http://www.nhs.uk/conditions/Suicide/Pages/Introduction.aspx> Self-Harm
<http://www.nhs.uk/conditions/Self-injury/Pages/Introduction.aspx> Sexting
<http://www.nspcc.org.uk/preventing-abuse/keeping-children-safe/sexting/> or call: 0808 800 5000 (18 and over) 0800 1111 (under 18)

Teenage Pregnancy <http://www.nhs.uk/conditions/pregnancy-and-baby/pages/teenagerpregnant.aspx> or 0300 123 2930

Trafficking, Exploitation and Modern Slavery <http://www.salvationarmy.org.uk/human-trafficking> or 0300 303 8151

Safeguarding Referral Process Flowchart - Appendix 1

