



## Safeguarding Policy

- To be read alongside the following policies:

- **Peer on Peer Abuse Policy**
- **FGM Policy**
- **Behaviour Policy**
- **Prevent Policy**

Learners are made aware of the policy through induction, are given a company handbook with the DSO details, all email signatures have details of the safeguarding contact, safeguarding is discussed in scheduled learner meetings, it is covered within the monthly learner newsletter, there is a specific section of the company website [www.metagedu.io](http://www.metagedu.io) dedicated to safeguarding and this policy is displayed on the website.

Safeguarding training is given to all staff annually, safeguarding is discussed in 121 sessions, staff attend safeguarding specific standardisation, a copy of the policy is on the HR portal where staff sign to confirm they have read and understand the policy.

### **1. POLICY STATEMENT**

MetaGedu Apprenticeships LTD (“the Company”) is committed to adopting the highest standards and taking all reasonable steps in relation to the safety and welfare of children, young people, and adults in respect of its learning services. We will meet our social and moral responsibilities to protect such individuals fully in accordance with the law and where appropriate, with the support of relevant external agencies.

All children, young people, and adults, without exception, have the right to protection from abuse regardless of age, disability, gender reassignment, marriage and civil partnership, pregnancy and maternity, race, religion and belief, gender, sexual orientation or socio-economic background.

We aim to create a positive learning and working environment where every individual can be true to themselves and is able to learn and work without fear of harm.

We will ensure that our employee/freelancers are carefully selected, trained, supervised, and have an appropriate enhanced DBS check in place where required. We will ensure that all employee/freelancers adopt and abide by the Company’s Safeguarding Code of Conduct, are proactive and respond to any allegations appropriately in accordance with the reporting procedure detailed in this policy.



Where learners and clients go out into the workplace, a Workplace Suitability Risk Assessment will be carried out before commencement of the work placement and this will determine if an enhanced DBS check is required for any employee/freelancers in the workplace, as detailed in line with MetaGedu Apprenticeships LTD requirements.

## **2. SCOPE AND PURPOSE**

This policy applies to:

- employee/freelancers (individuals who work –or have applied to work for the company either on a permanent, temporary, contractual, or voluntary basis)
- employers (organisations that work in partnership with MetaGedu Apprenticeships LTD to provide apprenticeships or work placements to learners or clients)
- suppliers (external partners who are in receipt of and/or providing MetaGedu Apprenticeships LTD services on our behalf)
- MetaGedu Apprenticeships LTD clients and customers/learners

The words ‘employee/freelancers’ is used in this policy to denote all those above.

The purpose of this policy is to set out MetaGedu Apprenticeships LTD approach to safeguarding children, young people and adults and detail the procedure and processes to be followed when dealing with child protection and safeguarding issues so that all employee/freelancers can play their respective parts in ensuring learner, client, and staff safety.

It sets out how we will promote the need for vigilance with regard to learner, client and employee/freelancer safety; how we will ensure the correct implementation of current and anticipated safeguarding legislation and guidance and how we will keep up to date with developments and best practice in safeguarding principles and procedures.

Although it is impossible to ensure that no child, young person, or adult will come to harm, the implementation of this policy is aimed at facilitating the management of the risk associated with the protection of individuals.

## **3. GENERAL PRINCIPLES**

The Company’s Safeguarding Policy and associated policies are based on the following principles:

- The welfare of children, young people and vulnerable adults is the primary concern.
- All children, young people and vulnerable adults have the right to protection from abuse.



- It is the responsibility of experts to determine whether or not abuse has taken place, but it is everyone's responsibility to report any concerns using the appropriate procedures outlined in this policy;
- All incidents of suspicious practice and allegations must be taken seriously and responded to swiftly and appropriately.
- Confidentiality must be upheld in line with the Data Protection Act 1998 and the Human Rights Act 1998.

## **4. DEFINITION OF TERMS AND TYPES OF ABUSE**

### **4.1 Child**

A child is defined as someone who has not reached 16 years of age.

### **4.2 Young Person**

A young person is defined as someone who has not yet reached 18 years of age

### **4.3 Vulnerable Adult**

Following the Protection of Freedoms Act 2012 the definition of regulated activity relating to adults no longer labels adults as 'vulnerable'. Instead, the definition identifies the activities which, if any adult requires them, lead to that adult being considered vulnerable at that particular time.

This means that the focus is on the activities required by the adult and not on the setting in which the activity is received; or the personal characteristics or circumstances of the adult receiving the activities or the frequency in which they receive the service.

An adult is defined as vulnerable when they are in receipt of a 'regulated activity' in relation to vulnerable adults. Regulated activity is therefore defined by the following 6 broad categories:

- (i) Providing health care
- (ii) Providing personal care
- (iii) Providing social work
- (iv) Assistance with cash, bills and/or shopping
- (v) Assistance in the conduct of a person's own affairs
- (vi) Providing transportation of individuals where that transport is provided because of age, health, or disability

For more information, please see the Safeguarding Vulnerable Groups Act 2006, as amended by the Protection of Freedoms Act 2012.

### **4.4 Discriminatory Abuse**

Discriminatory abuse includes psychological abuse, harassment and discrimination which is motivated by a person's age, gender, disability, sexual



orientation, race, cultural background, or religion. Discrimination may be a motivating factor in other forms of abuse such as domestic violence or hate crime.

Where the abuse or neglect is motivated by age, gender, sexual orientation, immigration status, racial, religion or disability; or occurs in a domestic violence situation; or perceived as a Hate Crime: the abuse will be considered to be aggravated by these factors.

Discriminatory abuse can be in the form of personal or institutional discrimination. Personal discrimination is the prejudice of the individual, whereas Institutional discrimination is where systems and structures directly discriminate against potential or actual users of a service.

Signs and symptoms of Discriminatory Abuse can include:

- fearfulness expressed in the eyes, person avoids looking at the potential abuser, flinching on approach
- emotional withdrawal
- sleep disturbance
- low self-esteem
- unexplained fear or defensiveness
- isolation / shunning by others
- threats or intimidation, bullying or shouting
- unexplained attacks on property or possessions
- continual favouritism to other people in preference to the individual
- internalising the discrimination to the extent that they express similar discriminatory views about others

**Other types of Abuse which could be considered Discriminatory:**

- **Hate Crimes:** any incident which constitutes a criminal offence which is perceived by the victim or any other person as being motivated by prejudice and hate.
- **Ageism:** discrimination based on age, especially against the elderly.
- **Gender Discrimination:** is a belief that one sex is superior to the other and that the superior sex has endowments, rights, prerogatives and status greater than those of the inferior sex.
- **Homophobia:** discrimination against (fear or dislike of) homosexual people and homosexuality
- **Transgender Discrimination:** discrimination against people who are transgender
- **Religious Intolerance:** is either intolerance motivated by one's own religious beliefs or intolerance against another's religious beliefs or practices.



- **Racism:** the belief that all members of each race possess characteristics or abilities specific to that race, especially to distinguish it as inferior or superior to another race or races.
- **Disablism:** discriminatory, oppressive, or abusive behaviour arising from the belief that disabled people are inferior to others.

#### 4.5 Physical Abuse

Physical Abuse is the physical mistreatment of one person by another which may or may not result in physical injury. Physical abuse includes assault, hitting, slapping, scratching, pushing, kicking, pinching, burning, force-feeding, misuse of medication or the withholding of medication or treatment, unwarranted or inappropriate restraint, forced isolation or inappropriate sanctions, unwarranted or unauthorised deprivation of liberty, false imprisonment or abduction, rough handling causing injury, or any injury not fully explained by the history given.

##### **Signs and symptoms of Physical Abuse can include:**

- unexplained bruises or welts on body, including face, lips, mouth, body, arms, back, buttocks, thighs
- bruises in various stages of healing, clusters forming regular patterns, reflecting the shape of an article or finger marks
- unexplained burns, especially on soles, palms and back, immersion burns, rope burns, electric appliance, or carpet burns
- unexplained fractures to any part of the body, especially if in various stages of healing, multiple or spinal injuries
- unexplained lacerations or abrasions to the mouth, lips, gums, eyes, external genitalia
- Recoiling from physical contact or flinching
- malnutrition – rapid or continuous weight loss, insufficient supply of food on premises, dehydration, complaints of hunger
- lack of personal care, inadequate or inappropriate clothing, inadequate heating
- untreated medical problems
- unmanaged urinary / faecal incontinence
- signs of medication misuse such as drowsiness
- Use of furniture and other equipment to restrict movement.

##### **Other types of Abuse which could be considered Physical:**

- **Domestic Violence:** 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



- **Forced Marriage** is a marriage conducted without the valid consent of one or both parties where duress is a factor. Forced Marriage is a violation of internationally recognised human rights and contrary to the Matrimonial Causes Act 1973
- **'Honour' Based Violence** is an incident or crime carried out to protect or defend the honour or 'izzat' of the family or community. This type of violence can be distinguished from other forms of violence as it is often committed with some degree and / or collusion from the family and / or community. Honour based violence includes acts of harassment, assault, imprisonment, unexplained death (suicide), forced pregnancy / abortion and in some cases murder. The family may perceive that the person has acted inappropriately and dishonoured the family and community. Consequently, the violence carried out is to punish them for this. For more information about honour-based violence visit Karma Nirvana's website [www.karmanirvana.org.uk](http://www.karmanirvana.org.uk)
- **Environmental Abuse:** includes depriving someone of their liberty, sustained restrictions on a person's freedom of movement because of the physical environment the person is in, culture of the environment or institution.

#### 4.6 Sexual Abuse

Sexual abuse is the involvement of individuals in sexual activities to which they have not had the freedom and capacity to give their informed consent to, before and during the act, and/or may not fully comprehend. These acts include rape and attempted rape, sexual assault by penetration, sexual assault, female genital mutilation, abuser touching the victim's body for their own gratification, indecent exposure, non-contact abuse (pornography), sexual harassment, causing or inciting a person to engage in sexual activity without their consent.

**Signs and symptoms of sexual abuse can include:**

- full or partial disclosure or hints of sexual abuse
- signs of depression, stress
- recoiling from physical contact
- unusual difficulty in walking and sitting
- sexually transmitted disease, urinary tract / vaginal infections
- love bites, bruises or finger marks on thighs or arms
- significant change in sexual behaviour, language or outlook
- fear of males or females
- pregnancy in a person who is not able to consent

**Other types of Abuse which could be considered Sexual:**

- **Female Genital Mutilation:** (FGM) is a collective term for procedures which include the removal of part or all the external female genitalia for cultural or other non-therapeutic reasons.



- **Sexual Exploitation:** Sexual exploitation of vulnerable adults involves exploitative situations, contexts, and relationships where the vulnerable person receives 'something' (e.g., food, accommodation, drugs, alcohol, SIM cards and mobile phones, cigarettes, affection, gifts, money) or perceived friendship/ boyfriend as a result of them performing, and/or others performing on them, sexual activities.

#### 4.7 Psychological / Emotional Abuse

Psychological or emotional abuse is action or neglect by a person which impairs the psychological wellbeing of another person. This results from being repeatedly made to feel unhappy anxious afraid humiliated or devalued by the actions or inactions and/or attitudes of others and includes emotional abuse, threats of harm or abandonment, deprivation of contact, blaming, controlling, intimidation, coercion, harassment, verbal abuse, isolation or withdrawal from services or supportive networks.

#### Signs and symptoms of Psychological/Emotional abuse can include:

- fearfulness expressed in the eyes, avoids looking at the caregiver, flinching on approach
- ambivalence to carer
- emotional withdrawal
- sleep disturbance
- low self-esteem
- unexplained fear or defensiveness
- threats or intimidation, bullying or shouting
- significant pressure on a person to commit criminal acts<sup>8</sup>
- threat to abandon person or put them "away"
- promises which are not kept
- few visitors, phone calls or outings
- locking the person in at home, or in a car
- significant community pressure for example anti-social behaviour

#### Other types of Abuse which could be considered Psychological:

- **Anti-Social Behaviour:** acting in a manner that caused or was likely to cause harassment alarm or distress to one or more persons not of the same household as the defendant.
- **Discriminatory Abuse:** as described above
- **Cyber Abuse:** the use of technology and social networking sites to threaten, bully, harass, groom for exploitation, stalk, pose risks to personal safety and wellbeing or discriminate against an adult at risk. This could be using a PC, Laptop, tablet, mobile phone, gaming console or Television with internet access. Threats can come through content, contact, and conduct. This includes text messages, phone calls, pictures, video clips, emails, chat room





messages, instant messaging, and websites. Signs and symptoms can include spending long periods of time online, secrecy about a mobile phone and/or computer, withdrawal from social contact, depression, mood swings, unexplained gifts, sleep disturbance and self-harming. For more information see <http://www.digitalstalking.com/>

#### **4.8 Financial or Material Abuse**

Financial abuse is the misappropriation of an individual's funds, benefits, savings, assets etc. or any other action that is against the person's best financial interests. This includes theft, fraud, exploitation, pressure in connection with wills, property or inheritance or financial transactions, denying access to money, or the misuse or misappropriation of property, possessions, or benefits.

#### **Signs and symptoms of Financial/Material Abuse can include:**

- unusual or inappropriate bank activity
- a Power of Attorney obtained when a person is unable to comprehend
- recent change of deeds or title of house
- person lacks belongings or services which they can clearly afford
- recent acquaintances expressing sudden or disproportionate affection for a person with money or property
- carer asks only financial questions of the worker, does not ask questions about care
- withholding money
- person managing financial affairs is evasive or uncooperative

#### **4.9 Neglect and Acts of Omission**

Neglect is the deliberate withholding OR unintentional failure to provide appropriate and adequate care and support. Section 44 Mental Capacity Act 2005 states "Anyone who has a duty of care to a person who lacks capacity is guilty of an offence if they deliberately or recklessly ill-treat that person or if they wilfully neglect that person."

It does not matter whether the behaviour was likely to cause, or caused, harm or danger to the victim's health. Wilful neglect usually means that a person has deliberately failed to carry out an act they knew they had a duty to do.

#### **Signs and Symptoms of Neglect and Acts of Omission can include:**

- physical condition of the person is poor
- unexplained or untreated deterioration in health and wellbeing, including not seeking appropriate medical attention
- inadequate heating or lighting
- poor personal hygiene
- malnutrition – loss of weight





- dehydration
- demanding food or drink
- pressure sores
- inconsistent or reluctant contact with health or social agencies
- lack of social support and/or refusal to arrange access to callers / visitors
- inappropriate, old or shabby clothing, or being kept in night clothes during the day
- sensory deprivation, not allowed to have hearing aid, glasses or other aids to daily living
- accumulation of medication, or prescriptions not being collected from pharmacy
- increased number of incidents or accidents e.g., falls or physical altercations with others, which appear to have resulted from a lack of supervision both inside and outside of the home environment.

## 5. PROCEDURE

The Company believes that for Safeguarding to impact on all aspects of the operational life of our employee/freelancers it must become the informed responsibility of all.

All employee/freelancers have a responsibility and duty of care to actively make the learning environment safe and secure for all and take appropriate action where necessary to achieve this effectively.

To ensure appropriate action is taken in such circumstances the Company has adopted and utilised the principles of the **5 R's Model** that should be implemented and followed across all operational activities. Further information on this model can be found below.

Recognition  Response  Reporting  Recording  Referral

### 5.1 Recognition

Recognition involves the ability to recognise behaviour that may indicate abuse as this is of fundamental importance. Whether the abuse may occur on Company premises, in the home or in any other setting in which the learner or client may find themselves, all those playing a role in meeting the learners' or clients' needs should be aware and informed so that possible abuse can be recognised, investigated, and acted on seamlessly and effectively.

Signs and indicators of abuse in young people and/or vulnerable adults may include direct disclosure. This isn't always easy to recognise as such, as it may be that the learner or client is struggling to find the words, is using language the abuser uses for actions and body parts, or the disclosure is wrapped in analogy or euphemism which is difficult to identify. A learner or client may choose anyone in the organisation to disclose to (including tutors, assessors, advisors etc.), or indeed any of these may be



the ones to spot concerning signs or behaviour in the learner or client. Therefore, all employee/freelancers that come into contact with learners and clients are trained in how to recognise and respond to this situation, and how to report a concern.

Recognising signs and indicators of abuse is also difficult, as any signs could have another explanation. It is vital that all employee/freelancers complete their Safeguarding eLearning, can spot signs, are not encouraged to overreact and assume abuse is occurring and know when to pass on concerns to the appropriate person.

## **5.2 Response**

Appropriate response is vital. No report about possible abuse or neglect should ever be ignored.

Your role in the moment when you respond is to ascertain what you are dealing with and to listen. The learner or client may be very scared and emotional in telling you this information, so you must stay calm, use effective empathic listening skills, and not let them know if you are feeling panicked, shocked, or outraged at what you are hearing, as this may shut them down. You need to ask open questions (not leading or suggestive ones) and gather just enough information to know that it is a disclosure of abuse that needs to be passed on, and how immediate the danger or harm is to the individual.

Do not lead or probe with questions – ask only completely open questions. Demonstrate interest and concern, and take it seriously, even if you are finding it difficult to believe because it is so shocking, or perhaps it is an allegation being made against someone known to you. Finally reassure that they have done the right thing by telling you, as you will do what you can to help.

Reassure the learner or client that they have done the right thing in reporting their concerns and that you will do everything you possibly can to help. Do not make unrealistic promises by agreeing to 'keep it quiet' but ensure that they are aware of who you must tell and what might happen next, and that this is for their safety. If you are unclear on what the next steps will be inform the learner or client that you will speak to the appropriate Equality & Safeguarding representative to discuss next steps and advise the learner or client on the outcome of these discussions and next steps.

It is not your role to investigate the situation; you just need to be clear that it will be treated in confidence but recorded and passed on to the appropriate people/person by emailing [safeguarding@metagedu.io](mailto:safeguarding@metagedu.io)

## **5.3 Recording**

As the first point of contact you must ensure that Part 1 of the Safeguarding Protection Form is completed accurately. This section of the form must be completed by the individual that has taken the testimony and been approached by the learner or client.



Whilst completing Part 1 of the form you may seek advice from your Safeguarding representative; Local Safeguarding Board; Children's Services, Adult Services, Local Police Station. Safeguarding matters must be dealt with as a priority and seeking advice from either your local E&S representative or an appropriate body must be sought without delay.

You should record precisely what has been alleged, using key phrases and words the individual used. You are not expected to remember every detail of the conversation, and therefore it is not recommended that notes or any other recording is made during the conversation, but immediately afterwards.

You should also record your observations of the individual, as well as your interpretation of the facts if you clearly identify when you are doing so.

On completion of Part 1 of the Safeguarding Protection Report Form, the following activity should take place:

On completion of Part 1, contact should be made with the Safeguarding lead – Gary Callaghan.

**Please ensure prior to emailing the Safeguarding Protection Form or making contact with an Advisor, all sections and information is completed accurately, failure to do so could result in unnecessary delays and increased risk of harm to the client or learner.**

#### **5.4 Reporting**

On completion of Part 1 of the Safeguarding Protection Report Form, the following activity should take place:

The Safeguarding lead will refer the issue to the relevant safeguarding coordinator or in the event of the concern being with a levy paying employer/employee the safeguarding lead will assume responsibility for dealing with the concern.

The Safeguarding lead will develop effective links with relevant external agencies, including local authority and multi-agency hubs, and co-operate as required with their enquiries regarding safeguarding and prevent matters including attendance at strategy meetings and initial case conferences.

Please ensure prior to emailing the Safeguarding Protection Form or making contact with an Advisor, all sections and information is completed accurately, failure to do so could result in unnecessary delays and increased risk of harm to the client or learner.

**If the matter involves an allegation against an employee/freelancer this should be brought to the immediate attention of the Head of Apprenticeships.**



### **5.5 Learner and Client Referrals**

As detailed on the Safeguarding Protection Form, formal learner and client referrals must only be made by the Senior Safeguarding Lead.

Details of any such referrals must be included on the Safeguarding Protection Form, this is to prevent numerous referrals being made for the same incident; it also allows consistency in the process and means that the Safeguarding lead can build relationships with their local referral agencies and safeguarding boards.

### **5.6 Employee/freelancer Referrals**

Where it is identified that an employee/freelancer poses a risk, has abused their position of trust or caused some form of harm to a child, young person or vulnerable adult whether through an act or omission, the Company is legally required to make an appropriate referral to the DBS

Employee/freelancer DBS referrals must only be made by the Head of Operations following consultation with the Head of Apprenticeships. Prior to a formal referral, advice and clarification must be sought from the Safeguarding Board to assess whether the situation requires such a referral and once referred it will be their decision whether or not to take any further action.

### **5.7 Safeguarding Protection Form**

The Safeguarding Protection Form can be requested from the Head of Operations.

Employee/freelancers must ensure that they familiarise themselves with the content of both the content of this policy and the Safeguarding Code of Conduct prior to completing a Safeguarding Protection Form.

Employee/freelancers should also inform their learners, clients, parents, employers, and suppliers of these policies, procedures, responsibilities and associated documentation.

## **6. STORAGE OF DOCUMENTATION**

All safeguarding documentation including, Safeguarding Protection Forms; supporting emails; referral information and statements must be sent electronically as soon as reasonably practicable in line with the guidance in this policy for secure storage, monitoring and logging.

Where documentation is required to be temporarily held locally all documents must be stored in a locked cabinet and accessible only to Safeguarding Lead. Once documentation has been forwarded centrally and receipt of the documentation has been confirmed all local records must be destroyed securely.



## **7. IT USAGE**

Staff are only permitted to use company equipment. All equipment is fitted with a tracker system which records websites visited and RAG rates them to highlight anything of concern. Screen shots are also recorded every 30 seconds to monitor usage. SMT have access to view the recordings and can classify websites as 'safe' or not.

Learners are only permitted to use company IT equipment for assessments/exams. The equipment is set up and software installed, the assessment/exam is invigilated so learners only access the required material.

## **8. SUPPORT**

The Company is committed to providing timely and effective support to all learners, clients and employee/freelancers to achieve and maintain a safe and secure environment for all.

## **9. DISCLOSURE BARRING SERVICE**

All staff are subject to an enhanced DBS check where relevant for the role, or a criminal record check from a foreign country if an applicant has lived abroad for a significant period of time. In line with recently updated guidance, a successful applicant for a post will have their social media history searched prior to confirming their appointment.

Checks are renewed every 2 years.

Document Control				
Version	Date Reviewed	Next Review	Reviewed by	Role
7	23/06/22	January 2023	Alan Wilson	Head of Apprenticeships
Signature				