

EDUCATION FOR INDUSTRY AWARDS

Safeguarding Policy

Version 1.0



Safeguarding Policy

Purpose

Education for Industry Awards (EFIA) has a formal and ethical duty to protect young people and vulnerable adults. The nature of the services we provide means that staff may spend time in educational institutions and settings.

This policy provides clarification of our safeguarding approach and expectations.

Scope

This policy applies to all those employed, contracted or otherwise engaged and acting as representatives of EFIA.

Objectives

The objectives of the policy are to:

- Provide a definition of safeguarding and clarifying what constitutes a safeguarding event.
- Outline the context for any potential safeguarding action likely to take place.
- Detail the principles of the safeguarding approach.
- Clarify main mechanisms through which the policy will be enacted.
- Specify roles, responsibilities and expectations of behaviour.
- Describe how the policy will be communicated to staff and stakeholders.
- Set commitments for monitoring the operation of the policy and review terms.

Definitions

Government guidance defines safeguarding as: protecting children from maltreatment, preventing impairment of children's health or development, ensuring that children are growing up in circumstances consistent with the provision of safe and effective care, taking action to enable all children to have the best outcomes. While formal duties for discharging these responsibilities in full will typically lie with other parties, we extend the sense of this definition for the purposes of this policy to include all assessment candidates, who may also be vulnerable adults.

Safeguarding concern. Where an inappropriate behaviour is reported or a disclosure made, which prompts staff to reasonably question whether there is an underlying safeguarding issue, they are said to have formed a safeguarding concern.

Safeguarding issue. An incident or event representative of maltreatment, harm or the interruption of development of an individual in line with official guidance and in keeping with duly qualified professional assessment. These may be one of the following:

- crime
- mental health
- drug use
- gangs and youth violence
- unsafe activities and environments
- domestic violence
- bullying, including cyberbullying
- exploitation e.g. financial, sexual, forced marriage
- sexual abuse or inappropriate relationships
- private fostering
- radicalisation or extremism
- grooming behaviour
- self-harm
- fabricated or induced illness
- female genital mutilation
- neglect
- faith abuse
- unsuitable housing/homelessness
- gender-based violence/violence against women and girls
- physical or emotional abuse
- sexting
- trafficking



Context

EFIA is an end-point assessment (EPA) organisation, which comes into contact with young people and adults who may be vulnerable. We are committed to contributing to the protection of these individuals in any way we can and expect high standards in the conduct of our representatives.

Many staff and contractors will come into contact with learners and assessment candidates for short periods of time, largely in formal settings, and often with others present. Another way we are likely to communicate with candidates is through formal, written instructional and support materials. Within this context, there are three primary ways in which a safeguarding concern or issue may arise:

- A safeguarding concern may be raised in relation to the behaviour of EFIA representatives. These are addressed through our procedures where an incident is reported.
- A safeguarding concern may be disclosed to EFIA representatives, which will have to be sensitively treated and responsibly communicated to the relevant institutional actors, agencies or authorities, for resolution.
- We must be aware of opportunities to highlight safeguarding in the content of our written instructional and support materials, proactively identifying meaningful opportunities to raise awareness.

Principles

The following principles underpin the approach of this policy and related procedures and should guide action in the event of ambiguity:

- **Prevention.** All reasonable steps to prevent the occurrence of a safeguarding issue will be taken through a combination of robust checking procedures, awareness raising and training.
- **Clear and robust reporting and investigative procedures.** The clarity and confidence with which individuals within the scope of this policy are able to handle, report, investigate and communicate safeguarding concerns is essential.
- **Monitoring.** To ensure an effective and robust approach, emphasis should be placed on the way safeguarding concerns are recorded and monitored. These processes are outlined in detail.

Prevention

All reasonable steps will be taken to reduce the risk of harm to young people and vulnerable adults. The mechanisms by which this will be achieved are as follows:

- **Recruitment procedures.** In taking on staff or contractors, mandatory checks will be made in terms of their employment history, references and qualifications, identity, Disclosure and Barring Service (DBS) and through mandatory training at induction.
- **Probation periods, performance monitoring and appraisals.** For directly employed staff formal monitoring over their probation period and thereafter through performance monitoring and appraisal will provide opportunities to raise awareness and concerns where applicable.
- **Awareness raising.** All opportunities will be considered to raise awareness of the Safeguarding Policy and best practice. This may be at routine meetings, as a focus for training and development days, proactively flagging examples of best practice, or through any other means.
- **Training.** All staff will be required to have basic safeguarding training on appointment and will receive refreshers at three year intervals thereafter. Designated Safeguarding Officers will receive enhanced training enabling them to fulfil their responsibilities and work with relevant stakeholders and agencies. They will receive refresher training at two year intervals.

Reporting and Investigative Procedures

The following procedures should be followed in referring a safeguarding concern, depending on the circumstances. They describe separate processes for:



- Reporting your own safeguarding concern or issue.
- Receiving information, which raises a safeguarding concern.
- Substantiating and acting on a reported safeguarding concern.

Reporting Your Own Safeguarding Concern or Issue

Where a member of staff has formed a concern, the following procedure must be followed:

1. **Discuss the concern.** Raising concerns with the Designated Safeguarding Officer is advised as a first step. Discussing the concern is seen as an important aid to determining whether or not it is a safeguarding concern, which will require it to be reported.
2. **Report the safeguarding concern.** If after this discussion you still have concerns or consider that the individual in question has experienced a safeguarding issue, you must report this directly to a Designated Safeguarding Officer. This must be done as soon as possible and by the end of the working day. Every effort must be made to report your concern directly to the Designated Safeguarding Officer, in person or by phone, not relying solely on email in case they are not being monitored. **Annex A** contains a template which details information required in reporting your concern.
3. **Confidentiality and sharing of information.** Where you receive sensitive information about a young person or vulnerable adult you have a duty to take particular care with this information, and you should disclose it only to those whom it is strictly necessary, e.g. the Designated Safeguarding Officer. The more sensitive the information is, the greater the need to ensure that only those professionals who have to be are informed.

Receiving Information, Which Raises a Safeguarding Concern

Where a candidate, or another young person or vulnerable adult talks to you about any issue you feel may be a safeguarding concern, you must follow this procedure.

1. **Take the complaint seriously.** A reported incident cannot be dismissed without having undergone a process of informed evaluation. It must be the assumption of the individual receiving the disclosure that it is being put forward in good faith.
2. **Listen.** It is important that you listen to the disclosure or allegation in line with the following guidelines:
 - **Do not judge their representation.** It is important to listen without judgement. You are not investigating, only receiving information.
 - **Communication to their preferences.** You should always communicate in a way that is appropriate to their age, understanding and preference. This is especially important for disabled people and for individuals whose preferred language is not English.
 - **Do not ask leading questions.** These can jeopardise any future investigation in the event the concern is substantiated. Keep questions to a minimum – just enough to understand the specifics of what is being alleged.
 - **Do not investigate any allegation.** This is in case the allegation leads to a criminal investigation; you must not do anything that may jeopardise a police investigation.
3. **Inform.** Inform the student that you will be reporting the allegation and make sure you have their name and other details as specified in **Annex A**.
4. **Confidentiality.** It is important that you reassure the student, but you do not promise confidentiality. Explain the Safeguarding Policy and that if you believe the candidate or



individual is at risk of significant harm, you will have to report this in order for them to receive help from the appropriate source.

5. **Note what has been discussed.** Record full information about the candidate or individual as soon as possible after the first point of contact, including:
 - Name(s)
 - Address(es) and telephone number – in order to ensure we have current details
 - Gender
 - Date of birth
 - Confirm name(s) of person(s) with parental responsibility if the student is under 18 years old.
6. **Report your concerns.** Any concern, suspicion, allegation or incident that represents a safeguarding concern must be reported to the Designated Safeguarding Officer as soon as possible and, in any event, before the end of the working day. This should be done in person or by telephone and email should not be relied on as the primary method of communication. The Dedicated Safeguarding Officer will also need a copy of your report.

Substantiating and Acting on a Reported Safeguarding Concern

The procedures for dealing with allegations or safeguarding concerns must be applied with common sense and judgement, mindful of the context of the concern. Cases may not meet the criteria for a safeguarding issue or may do so without warranting onward referral to stakeholders or external agencies. In these cases, local arrangements should be followed to resolve the case quickly. In rare cases, allegations will be so serious that they require immediate intervention from children's services or the police.

Any action will require a measured response and be based on an appropriate process of substantiated fact. In this respect, it is the responsibility of the Designated Safeguarding Officer to determine the substantiation process for all received safeguarding concerns. This process will begin with the reporting of the safeguarding concern and conform to the following procedure:

1. **Receive the report.** This may come in a number of forms, for example an informal conversation, receipt of an email or similar. The first step in the process is to check the documentation is in order and, if no written report has yet been received, to prompt the individual who has escalated the concern to complete the required form. In a minority of cases, the Designated Safeguarding Officer will have to complete this to the best of their ability instead. This step is important because any investigation, whether led internally or by external agencies, may come to rely on this information.
2. **Assess immediate risks.** This step in the procedure is to triage incidents to determine whether they are of a severity or otherwise of a nature where immediate action is necessary. It is expected that the vast majority of incidents will not require immediate action of this type. Some circumstances, however, may require removing or seeking to prevent an individual from coming to harm. Depending on the circumstances, the Designated Safeguarding Officer will need to make an immediate judgement based on the severity and credibility of the reported safeguarding concern; either seeking a direct intervention in the case of it relating to an employed member of staff, or an immediate referral to the relevant agency or stakeholder without the usual process of substantiation or referral.
3. **Substantiation.** Many reported safeguarding concerns will be just that – concerns. To ensure that they are progressed in an orderly, responsible and balanced fashion, the Designated Safeguarding Officer must first determine the process by which they will set about substantiating the concern. This may involve talking further with the individual who reported the

concerns, with others who may be able to comment on the concern or, in some cases, with the candidate or individual subject to the concern. Consulting in confidence with other duly trained officials for complex cases is also an appropriate and permitted response. All steps taken must ensure they are handled sensitively, taking care to minimise or eliminate the disclosure of personal information, clarifying early and often that they are acting on a reported and unsubstantiated concern only. All steps taken and findings should be recorded.

4. **Determine referral or escalation.** Once the facts of the case are better understood, appropriate action should be taken, always considering the best needs of the individual or individuals whose safety or welfare are the cause for the concern. In some cases, it may be appropriate to consult other suitably qualified individuals. The Designated Safeguarding Officer will determine the next action which may be either: a) to refer the concern once it has been substantiated or b) to conduct an internal investigation in the event that the reported concern relates to a member of staff or contractor.
 - Where the safeguarding concern is best pursued by another institution, for example the centre at which assessments are taking place and to which the candidate belongs, the referral will be made by the Designated Safeguarding Officer. They will also make the determination in terms of the extent of information shared in relation to the concern raised and the documented processes of substantiation. The referral will be considered complete only when they have received confirmation of receipt. Only in the most severe circumstances, e.g. where it is determined to be required for an individual's urgent protection, required by law, or there is no other feasible route, would it be expected that the referral take place directly to the relevant statutory agency.
 - Where the safeguarding concern relates to a member of staff or contractor an internal investigation will be launched.

5. **Record of conclusion.** A written account of the original report, findings from the substantiation process and any onward actions taken should be generated and filed with the single central register. In the case of the safeguarding concern relating to the conduct of a member of staff, it should be clarified whether the allegation was upheld or not and the following definitions should be used in relation to the allegation in the final conclusion:
 - **Substantiated:** there is sufficient evidence to prove the allegation.
 - **Unsubstantiated:** there is insufficient evidence to either prove or disprove the allegation. The term, therefore, does not imply guilt or innocence.
 - **False:** there is sufficient evidence to disprove the allegation.
 - **Malicious:** there is sufficient evidence to disprove the allegation and that there has been a deliberate act to deceive.

Communication, Monitoring and Review Procedures

Single central record. A single central record will be kept and securely maintained by the Designated Safeguarding Officer. All received safeguarding concerns and records of conclusion will be filed here for the purposes of review and audit.

Communication and training. Managers in Education for Industry Awards will be responsible for ensuring that staff have access to relevant training on safeguarding, enabling them to identify and confidently enact the procedures in this policy in relation to safeguarding concerns. Managers will also find opportunities to proactively raise awareness of the Safeguarding Policy and best practice, including at induction and periodically thereafter.



Policy and practice review. The policy and associated organisational processes and practice will be reviewed annually. A report to the board of governors is required, which details all incidents and their resolution for the purposes of internal review.

Roles and Responsibilities

The following sections outline key roles and responsibilities in this policy.

Role	Responsibility
Governing body	<ul style="list-style-type: none"> To ratify and review this policy annually. To appoint a safeguarding lead governor, who will be duly trained to oversee the policy and its implementation.
Designated Safeguarding Officer	<ul style="list-style-type: none"> To be the focal point for reported safeguarding concerns or issues. To support staff to understand this policy and in clarifying any aspect of it. To take forward their role as specified in this policy.
Managers	<ul style="list-style-type: none"> To apply the relevant recruitment and procedures to all members of appointed staff. To make safeguarding training available to staff. To identify and take opportunities to raise awareness of the safeguarding policies and best practice.
All staff	<ul style="list-style-type: none"> To read and understand this policy in full – proactively clarifying any element that is not understood. To follow the relevant aspect of the policy with confidence, demonstrating the behaviours specified.



Annex A: Safeguarding Concern Report Form

Please report your concerns directly and send the completed form to the **Designated Safeguarding Lead** at policy@efiawards.co.uk before the end of the working day.

Please complete clearly and factually.

1	Name of staff member reporting			
	Position			
2	Name of candidate who is of concern			
	Training Provider / Assessment series		DOB	
3	Is this concern arising from (indicate as appropriate)			
	Observation by yourself			
	Disclosure by the student of concern			
	Disclosure by somebody else			
4	Does the concern involve a member of EFIA staff? If yes, please give their name and role.			
5	Date & time of observation or disclosure:			
	Factual details of observation or disclosure (expand document as required)			
	 <i>NB: Please use the 'Body Map' over the page to record the location of any injuries</i>			
6	Any action already taken by you/others (expand document as required)			
	Date/Time reported to Safeguarding Officer:			
	Signature			

Good Practice Checklist

- Make sure the subject is safe.
- Never promise complete confidentiality. Be clear that you have a duty to report anything that you consider is evidence that someone is at risk, whether that be a student, a member of their family, or another person.
- In the case of a disclosure, reassure the subject that they will be taken seriously.
- Record the facts of the observation/disclosure and clearly mark any statements of opinion.
- Do not make judgements, you only need to report.
- In case of injury, seek medical treatment if it is required urgently, but be conscious of not disturbing or destroying potential evidence.
- If a crime has been committed, check whether the police have been contacted.
- Do not discuss your report with anyone, particularly any alleged perpetrator.
- Report to a Designated Safeguarding Officer, directly, not by email, by the end of the working day.

Body Map - Front and Back Views

