

Organisation Positioning Statement

We believe that it is **always** unacceptable for anyone to experience abuse of any kind and recognise it is our responsibility to safeguard the welfare and wellbeing of all learners or associates. This organisation is committed to safeguarding and promoting the welfare of individuals and groups and expects all employees, our representatives and our learners to share this commitment.

We recognise that:

- The welfare of the learner is paramount
- All learners, irrespective of, but not limited to; their age, disability, race, religion or belief, sex, sexual orientation, gender reassignment, marriage or civil partnership, pregnancy and maternity have the right to equal protection from all types of harm or abuse
- Working in partnership with learners and with other agencies is essential in promoting a safe learning environment

The purpose of the policy is to:

- Provide protection for the learners
- Provide employees, and those representing our organisation, with guidance on procedures they should adopt in the event that they suspect a learner or associate may be experiencing, or be at risk of, harm

The policy applies to all employees and anyone working on behalf of this organisation.

We will seek to safeguard all learners by:

- Valuing them, listening to them, and respecting them
- Adopting safeguarding guidelines through procedures and a code of conduct for employees and representatives
- Recruiting employees safely
- Sharing information about concerns with agencies who need it, and involving learners and their parents/carers appropriately

We are also committed to reviewing our policy and practice at least annually.

Policy Statement

Our provision complies with The Children Act 2004, and subsequent Amendments. The term 'child' means anyone under the age of 18 and the term 'vulnerable adult' means a person who may be in need of community care services by reason of mental or other disability, age or illness; or who is or may be unable to take care of him/herself, or unable to protect him/herself against harm or exploitation. This may be a temporary or permanent state.

Our organisation realises that a number of situations may render a person 'vulnerable' such as; victims of domestic violence, young people living away from home or in temporary accommodation, migrants, living in a drug-misusing family, living in areas of high crime, those likely to face racism and the elderly or young people who themselves may have caring issues.

We fully recognise the contribution we must make to effectively safeguard children, young adults and vulnerable persons. We recognise that all employees and our representatives have a full and active part to play in protecting them from harm.

We believe that our workplace and our learners' workplaces should provide a caring, positive, safe and stimulating environment which promotes the social, physical and moral development of the individual, enabling them to have optimum life chances.

All complaints, allegations or suspicions will be taken seriously, are recorded and action taken accordingly, and where appropriate signposting given to external specialist organisations.

The definition of vulnerable adults, as above, includes (but is not exclusive to) individuals with any of the following conditions:

- Learning difficulties
- Physical impairments
- Sensory impairments
- Mental health needs
- Age related frailty
- Dementia
- Brain trauma
- Drug or alcohol problems

It is important that people are protected from all forms of abuse or potential harm. Abuse may be, but not limited to:

- Sexual (inappropriate behaviour or relationship)
- Physical and emotional abuse or neglect
- Female Genital Mutilation
- Exploitation (eg financial, sexual, forced marriage, forced labour through modern slavery and/or human trafficking)
- Grooming (eg for a sexual, criminal or radicalisation intent)
- Domestic violence
- Bullying, including cyber bullying
- Victimisation
- Self-harm
- Criminalisation
- Unsafe or potentially unsafe environment or activities
- Unsuitable housing/homelessness/immigration issues

With the increasing threats to individuals, the UK and other countries through radicalisation, hate crime and or extremist activities, safeguarding now extends itself to include awareness that children, young people and adults are at risk of being coerced.

This organisation wants to promote and continue to facilitate the exchange of opinion and ideas and enable debate as well as learning. We have no wish to limit or otherwise interfere with the free flow of ideas, but recognise the importance of balance and the need to preserve national security whilst protecting civil liberties and rights. Although it is vital that we must protect academic freedom, it is a long-established principle that we have a duty of care to our learners.

To support the government's *Prevent* Strategy, we will do our best to respond to these issues and signpost potential concerns accordingly. It is important to stress that the Channel Programme referral process is not about criminalising a learner but rather about intervening before a learner may commit an act which does criminalise them.

Possible indicators or signs of radicalisation may include:

- The individual's views become increasingly extreme regarding another section of society or government policy
- They are observed downloading, viewing or sharing extremist propaganda from the web
- They become withdrawn and focused on one ideology
- The individual becomes increasingly intolerant of more moderate views
- The individual may change their appearance, their health may suffer (including mental health) and they may become isolated from family, friends, peers or social groups
- The individual expresses a desire/intent to take part in or support extremist activity

The aims of this policy are to:

- Support the individual's development in ways that will foster security, confidence and independence
- Raise the awareness of employees, representatives, learners and our business partners of the need to safeguard children, young people and vulnerable adults and of their responsibilities in identifying and reporting possible cases of abuse, bullying or harassment, of any nature, and in identifying those that may be in need
- Source and provide the most appropriate information, advice and guidance on a wide range of welfare topics or issues to help employees, learners and employers
- Provide a systematic means of monitoring those known or thought to be at risk of harm
- Emphasise the need for good levels of communication between all employees, our representatives, our learners and their employers
- Support the structured procedure that must be followed by all employees and our representatives in cases of suspected abuse, neglect, bullying or harassment to any child or vulnerable person

- Develop and promote effective working relationships with other agencies, particularly Care or Adult Services (Social Care/Services), Safeguarding Boards, the Police and where applicable consultation with external *Prevent* Channel Coordinators
- Ensure that all adults in our employment who have access to children and vulnerable persons have been checked, training and continually monitored to meet current safeguarding legislation with regard to their suitability

We will continually observe the requirements of the Modern Slavery Act 2015.

Scope

Welfare and Safeguarding applies to all employees and our representatives based in the UK and covered by UK laws and legislation.

Safe Recruitment and Selection

- We will ensure safeguarding considerations are incorporated into every stage of the recruitment process
- Our commitment to safeguarding is published at advertisement and application levels
- Applicant identities are checked at interview
- All job offers are subject to appropriate references being supplied
- Individual's criminal convictions are checked on appointment, as appropriate to the job role, via Enhanced DBS Disclosure and used in the interim with additional supervision and monitoring in place. Confirmation of DBS check confirmed soon after appointment

Induction and Training

This organisation will ensure that:

- All new employees develop their understanding of the signs and indicators of abuse, neglect, bullying and/or harassment within the twelve week induction period via appropriate certificated training in safeguarding
- All '**Designated Persons**' for Safeguarding will receive ongoing internal training
- All employees will have access to training resources and ongoing legislative updates
- All employees in contact with children and potentially vulnerable persons receive refresher training at least every three years and/or following the introduction of new procedures and or legislation
- All employees know how to respond to an individual that discloses welfare issues, abuse, neglect, radicalisation, bullying and/or harassment

Responsibilities

Managers and other appointed employees, of each unit, have Designated Person for Safeguarding accountability regarding:

- Adhering to the processes with regard to referring or monitoring an issue if there are concerns about possible abuse or an individual or vulnerable group are in need of our intervention
- Ensuring employees are fully aware of and adhere to policy, procedures and escalation processes
- Ensuring Designated Person contact lists are up to date and readily available
- Providing support and expertise in monitoring issues to an appropriate conclusion
- Safe keeping of written and electronic records of all welfare and safeguarding concerns about an individual/group, even if there is no need to make an immediate referral
- Signposting to specialist or protection agencies, as appropriate
- Notifying the Single Point of Contact Designated Person for any *Prevent* concerns
- Notifying the appropriate agency if employees or learners are aware of a potential risk or raise a concern about activities within the environments which we or they work in. For issues that may require external intervention or investigation; such as legal tribunals, Ofsted, CQC, or funding body, the Designated Person for Safeguarding or their nominated deputy, consults with an appropriate senior manager before a decision is made to refer a complaint or allegation, having gathered and examined all relevant testimony and information
- Ensuring that all such records are kept confidential and only shared with relevant agency or individual.
- Statistical analysis at national level facilitates the sharing of best practice and continual improvement

Employees are responsible for:

- Raising awareness of the need to safeguard children and vulnerable persons and of their responsibilities in identifying, managing and reporting possible cases of abuse, bullying or harassment, of any nature, and of identifying those that may be at risk of exploitation
- Sourcing, providing and signposting the learner to the most appropriate information, advice and guidance on a wide range of welfare topics or issues, consulting with their Designated Person for Safeguarding for advice if unsure of how to address an issue
- Adhering to the processes with regard to referring or monitoring an individual if there are concerns about possible abuse or an individual in need
- Recording all actual or potential cases of welfare or safeguarding issues, either witnessed or raised and reporting them immediately to their Designated Person for Safeguarding

Single Point of Contact (SPoC) Designated Person for *Prevent* concerns

- The role of the SPoC is to consult with the external *Prevent* Coordinator, local to the region, and would follow the government's Channel Process regarding intervention, if necessary

Providing Support

The organisation recognises that an individual who is abused or witnesses domestic violence/abuse may find it difficult to develop and maintain a sense of self-worth, that in these circumstances they may feel helpless and humiliated and they may feel self-blame.

We accept that research shows that the behaviour of an individual in these circumstances may range from that which is perceived to be normal to aggressive or withdrawn.

It is therefore important that employees record precisely what has been alleged, using the words of the complainant. Records should use accurate quotation. It should also, if felt appropriate, include factual observations about the observable physical and emotional state of the individual sharing their concerns. This information should be recorded and stored securely, in line with confidentiality policy and should be accessible only to those who need to access it as part of further investigation and action taken to resolve a complaint or allegation.

We can provide a comprehensive list of external agencies and protection services who are in a position to provide expertise on a variety of safeguarding and welfare issues.

Confidentiality

The organisation recognises that all matters relating to welfare and safeguarding issues are highly confidential. We will only disclose any information internally or to an external organisation on a 'need to know' basis only.

All records and referral letters will be electronic, and kept on a secure server by the Designated Person for Safeguarding. There must not be any record printed or stored on a hard drive or memory stick.

All communication (verbal or written) must be classified as Confidential and Data Protection (DPA or GDPR) laws apply.

Supporting Employees

We recognise that employees who have become involved with a child or vulnerable person who has suffered harm, or appears to be likely to suffer harm, may find the situation stressful and upsetting.

Our organisation will support such employees by providing an opportunity to talk through their anxieties with their line manager, Designated Person or their HR consultant.

Allegations Against Employees

The Company's HR Disciplinary and Grievance procedures for managing allegations against employees shall be adhered to.

Prevention

We recognise that we play a significant part in the prevention of harm to children and individuals by providing them with good lines of communication with trusted adults and an ethos of protection.

All staff must comply fully with our company policies on Equality, Diversity & Inclusion, Social Media, Code of Conduct, IT Security and Information Assurance and all those stated on the last page of this policy.

Our organisation will therefore:

- Establish and maintain an ethos where individuals feel secure and are encouraged to talk and are always listened to
- Ensure that all individuals know there is an adult whom they can approach if they are worried or in difficulty
- Include in the induction procedures information which equips individuals with the skills they need to stay safe from harm and to know to whom they should turn for help
- Educate individuals about the risk of the internet and social networking providing easy access and communication of inflammatory material, sophisticated propaganda, along with the potential for cyber bullying and grooming
- Prohibit the use or sharing of illegal materials (online or hardcopy) and/or the endorsement of extremist speakers. Such behaviour will be seen as a disciplinary and possibly criminal offence

Code of Conduct

Our organisation recognises that their employees are in a position of trust and as such have strict ethics on conduct based on the protection of themselves and their learners. Therefore,

- Individual employees must not socialise with learners regardless of age. It is, though, considered that organised and sanctioned social events (such as works function, award ceremonies, sanctioned group sports event etc) are accepted upon management authorisation
- Whilst a learner is on programme, personal or intimate relations must not occur between trainer/learner, regardless of age
- We fully support freedom of speech. However, promoting prejudiced, extremist or criminal views will not be tolerated
- Employees must adhere to our Social Media policy, and in addition to this policy, either during or out of working hours, trainers must not initiate, follow, or approve to be a 'friend' of individual learners whilst on programme, on any social/community networking, chat, blog sites. *An exception is where use of authorised employer electronic forums warrant and promote communication*
- Cyber bullying includes any form of electronic communication (text, online or emails etc) which can be construed as inappropriate and any breach will be taken seriously and may lead to disciplinary action
- Employees must disclose any gifts of any value

- Trainers should not get emotionally or personally involved in a learner's issue but keep relationship at a professional level at all times, keeping a record of any issue verbatim
- Physical intervention should only be applied if there is a risk to an employee, the learner or other people
- Employees must adhere to Health and Safety policy at all times, including the non-transportation of learners in company/employee cars without the permission of management, unless in an emergency to prevent a welfare or safeguarding issue occurring
- All business activities and/or learner visits must be conducted on business premises and in no circumstances should employees, learners and business partners conduct business activities in private residences. The only exception to this is where Health and Social Care learners are required to be assessed in a customer's home and in this instance each visit must be carried out in line with Health and Safety policies and the qualification's standard practices
- Learners are responsible for the safe keeping and taking of prescribed medication, however, whilst under our supervision in a residential setting, we, along with their trainer, have a duty of care to ensure an appropriate risk assessment is in place. Employees, who have been made aware of a potential condition affecting a learner, and with the required consent and training, may administer treatment only in an emergency
- Employees must also adhere to other policies aspects relating to Code of Conduct, HR, IT Security and Data Protection policies

Learner Health & Safety at Work

Our Health & Safety Policy Statement and procedures reflect the consideration we give to the protection of individuals within the working environment.

Monitoring & Review

The management team will be responsible for the monitoring and periodic review of the Welfare and Safeguarding Policy, Procedures and related policies and procedures and records to ensure the requirements of company and current legislation are being met.

Procedural References

Employees should read this policy in conjunction with its associated policies and procedures.

Legal References and Compliance

- Equality Act 2010
- Children Act 2004 and subsequent Amendments
- Every Child Matters: Change for Children, 2004
- Working Together to Safeguard Children 2006
- The Safeguarding Vulnerable Groups Act 2006 and Amendments
- Safeguarding Board Act (Northern Ireland) 2011
- Safeguarding Children Board (Northern Ireland)
- Protecting Vulnerable Groups Scheme (Scotland)
- Safeguarding Children Board (Scotland)
- Safeguarding Children Board (LSCB) (England and Wales)
- All Wales Child Protection Procedures 2008 (Wales)
- Social Services and Well-being (Wales) Act 2014

- Modern Slavery Act 2015
- In Safe Hands – The Role of Care and Social Services Inspectorate (Wales)
- *Prevent* Strategy

The Volkswagen Group UK Apprenticeship Programme also has a 24hr Safeguarding number should any learner require immediate assistance.

Volkswagen Group UK Apprenticeship Programme Designated Person (DP)



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24hr Safeguarding number - 07860 259 868