



Safeguarding Policies and Procedures (Updated 31st Aug 2021)

Purpose and Background of Policy

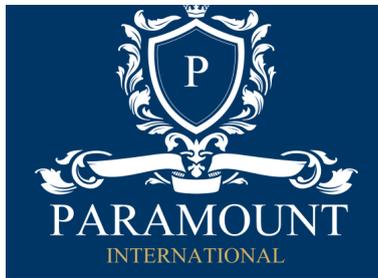
This Policy and associated procedures have been developed in response to the Government Legislation and Guidance in respect of safeguarding children/young people and vulnerable adults:

- The Education Act 2002 (Section 175) which requires Training Providers and Colleges to make arrangements to ensure that their functions are carried out with a view to safeguarding and promoting the welfare of children attending programmes. In addition, we must have regard to any guidance issued by the Secretary of State in considering what arrangements we need to make for that purpose of the section.
- The Children Act 1989 defines a child as any person under the age of 18 years. This includes all 14–16 year old school children attending college as a supplement to their Key Stage 4 curriculum.
- The Children Act 2004 Section 11 places duties on a range of organisations and individuals to ensure their functions, and any services that they contract to others, are discharged with regard to the need to safeguard and promote the welfare of children.
- Working Together to Safeguard Children – A guide to inter-agency working to safeguard and promote the welfare of children (2013) sets out statutory guidance and covers the legislative requirements and expectations on individual services to safeguard and promote the welfare of children including private organisations like Paramount International (Working Together 2013 Chapter 2, 37 – Voluntary and private sectors).
- DfES/NIACE publication “Safer Practice, Safer Learning” (2007). The guidance applies to all education providers of post-16 learning and skills. Education providers of post- 16 learning and skills (referred to in this guidance as ‘provision’ or ‘providers’) have responsibilities to ensure the safety of children, young people and those adults deemed ‘vulnerable’.
- Crown Prosecution Service (CPS): Violent extremism

Policy Statement

Adults and children/young people have the right to access education, training and support free from fear of harm and protected from mistreatment and abuse.

Adults and children/young people should be able to access learning and support with as much independence as is appropriate and within their capabilities and to make choices, even if those choices involve a degree of risk. Where any potential risk is identified, a risk assessment will be completed.



Paramount International recognises that all members of staff and learners have a role to play in safeguarding the welfare of children/young people and vulnerable adults and preventing their abuse.

All complaints, allegations or suspicions will be taken seriously and where action is necessary, this will be undertaken with due regard to Paramount International Safeguarding Procedures.

The procedures contained in this document provide guidance to managers and staff on the implementation of the policy.

Equal Opportunities Statement

The policy will be implemented in accordance with Paramount Internationals commitment to valuing Diversity and Equality. However, where there are concerns about a child or vulnerable adult's welfare this will take priority.

Location and Access to the Policy and Procedures

The policy will be displayed on site notice boards

Person(s) with Responsibility for the Policy and Procedures

Designated Safeguarding Officer

Deputy Designated Safeguarding Officer

Policy to be reviewed

Annually, next full review August 2022

Approved by

Paramount International Audit Committee.

Linked Policies:

Health and Safety Policy Equality
and Diversity Policy E-Safety
Policy

Anti-Bullying Policy

Complaints Policy

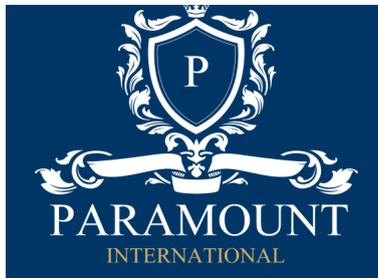
Whistle-Blowing Policy

Disciplinary Policy Lone

Working Policy

Disclosure for Vetting & Barring (Disclosure and Barring Service Referral Guide;

<http://www.homeoffice.gov.uk/publications/agencies-public-bodies/dbs/dbs-referrals-guidance/dbs-referral-faq?view=Binary>



DEFINITIONS

Children / Young People

The Children Act 1989 and 2004 defines a 'child' as a person under the age of 18.

Vulnerable Adults

The Safeguarding Vulnerable Groups Act 2006 defines a 'vulnerable adult' as a Person aged 18 and over, and who is or may be in need of community care services by reason of mental or other disability, age or illness; and who is or may be unable to take care of him or herself, or unable to protect him or herself against significant harm or exploitation' (Department of Health, 2000).

In general terms an adult is classed as vulnerable when they are receiving one of the following services:

- ☐ social care service;
- ☐ health care;
- ☐ Living in sheltered accommodation;
- ☐ Detained in custody or under a probation order;
- ☐ Requiring assistance in the conduct of his/her affairs;
- ☐ Receiving a service or participating in an activity targeted at older people;
- ☐ People with disabilities or with physical or mental health conditions.

Vulnerable adults may include those people who:

- Suffer from mental illness, including dementia
- Have a physical or sensory disability
- Have a learning disability
- Have an acquired brain injury
- Suffer from a severe, incapacitating physical illness
- Are elderly and very frail

Vulnerability may be a permanent or temporary state.

Definitions of Child Abuse*

Child abuse is any form of maltreatment of a child (or young person under 18). This may be abuse or neglect by inflicting harm or by failing to act to prevent harm. This includes abuse by an adult or adults or another child or children.



Significant Harm

Where the child is suffering or likely to suffer significant harm. The term derives from the Children's Act and introduces the concept as the threshold that justifies compulsory intervention by the appropriate authorities in family life in the best interest of children.

- **Neglect** – the persistent failure to meet a child's basic physical and/or psychological needs, likely to result in the serious impairment of the child's health or development. Neglect may occur during pregnancy as a result of maternal substance misuse.

Once a child is born neglect may include failing to:

- provide adequate food, clothing and shelter (including exclusion from home or abandonment).
- protect a child from physical or emotional harm or danger.
- ensure adequate supervision (including the use of inadequate caregivers).
- ensure access to appropriate medical care or treatment.

- **Physical abuse** – a form of abuse, which may involve hitting, shaking, throwing, poisoning, burning or scalding, drowning, suffocating or otherwise causing physical harm to a child. Physical harm may also be caused when a parent or carer fabricates the symptoms of, or deliberately induces illness in a child.

- **Sexual abuse** – involves forcing or enticing a child or young person to take part in sexual activities, not necessarily involving a high level of violence, whether or not the child is aware of what is happening.

These activities may involve:

- physical contact including assault by penetration (rape or oral sex).
- non-penetrative acts such touching, kissing etc outside of clothing.
- involving children in looking at, or in the production of sexual images.
- Making children behave in sexually inappropriate ways or grooming a child for abuse (including via the internet).

It is important to note sexual abuse is not solely perpetrated by adult males. Women can commit acts of sexual abuse, as can other children/young people.

- **Emotional abuse** – The persistent emotional maltreatment of a child such as to cause severe or persistent adverse effects on the child's emotional development.

This includes a wide range of direct and indirect actions such as:

conveying to a child they are worthless or unloved, unvalued or valued only in so far as they meet the needs of another person.



- not giving the child opportunities to express their views, silencing them or making fun of what they say and/or do.
- expectations of the child which are age or developmentally inappropriate, over protection or preventing participation or opportunity to socially interact.
- seeing or hearing mistreatment of others i.e. witnessing domestic violence.
- bullying including cyber bullying, exploitation or corruption of a child.

It is important to note that some level of emotional abuse is involved in all types of maltreatment, although it may occur alone.

(*Refer to Working Together 2013 for definitions in full)

Definition of Abuse

The definition of abuse is “a violation of a person’s human or civil rights by any other person or persons”. Department of Health, “No Secrets”, 2000

Categories and possible Signs of Abuse

- **Physical Abuse:** this is usually the use of force to cause pain and injury such as hitting, pinching, pushing shaking, pulling hair, misuse of medication or restraint. Signs this may be happening include the person having burns, unexplained bruising, scratches or accidents occurring that cannot be explained.
- **Psychological or Emotional Abuse:** such as threats of harm or abandonment, humiliation, bullying, blaming or controlling behaviour, intimidation and coercion, or showing lack of respect or dignity.
- **Financial or Material Abuse:** this is when a vulnerable adult is exploited for financial gain. It includes theft, fraud, exploitation, misuse or misappropriation of property, possessions and/or finances, putting pressure on person to include them in their will or on how they spend their benefits.
- Signs of this could be valuables going missing in the home or there may be a change in financial circumstances that cannot be explained.
- **Neglect and Acts of Omission:** this is when a vulnerable adult does not have their basic needs met and/or does not get the help they need to be able to meet their needs. Such as medical or physical needs, food, drink, and warmth.
- Signs might include deteriorating health, appearance or mood. It also includes ignoring indicators of abuse and withholding information in relation to allegations or suspicion of abuse.



- **Discriminatory Abuse:** this includes a person being treated unfairly, harassed, ridiculed or targeted because of their race, religion, sexuality, gender, age or impairment such as their mental or physical health.
- **Sexual Abuse:** includes rape or any other sexual act, which the vulnerable adult has not consented, or could not consent, or was pressurised into. Signs can include changes in behaviour including highly sexualised behaviour/language or physical discomfort.
- **Institutional Abuse:** is when organisations such as residential, nursing or care homes, hospitals, day centres or sheltered or housing schemes are run in a way where people are abused, harmed or mistreated.

Examples of signs given are not exhaustive and the presence of one or more indicators is not proof that abuse is actually taking place.

NB Also need to be aware that learners/participants may be victims or perpetrators of domestic violence.

Abuse if vulnerable adults and children through Radicalisation & Violent extremism

Paramount International is also concerned with the abuse of vulnerable adults and children through Radicalisation & Violent extremism. The organisation is vigilant to concern about the presence of radicalisation and/or extremism within any setting or the failure of the organisation to address such issues appropriately

Violent Extremism is defined by the Crown Prosecution Service (CPS) as: "The demonstration of unacceptable behaviour by using any means or medium to express views, which: Encourage, justify or glorify terrorist violence in furtherance of particular beliefs; Seek to provoke others to terrorist acts; Encourage other serious criminal activity or seek to provoke others to serious criminal acts; Foster hatred which might lead to inter-community violence in the UK."

In order to ensure staff are appropriately aware of such incidences and are able to report them appropriately, further guidance is available in the Preventing Radicalisation and Extremism Safeguarding Policy

IMPLEMENTATION OF POLICY AND PROCEDURES

Introduction

The following procedures provide guidance to managers and staff on the implementation of the policy.



It is important that children/young people and vulnerable adults are protected from abuse and that all complaints, allegations and suspicions are taken seriously and dealt following procedures in place.

Generally, the more dependent a person is on the help of others for general day to day living, the more vulnerable the person is likely to be. This is especially so where there is also a degree of mental incapacity or mental disorder that affects the person's ability to make informed decisions and exercise choices.

Partnerships and External Structures

Vulnerable adults

A multi-disciplinary approach to assessing the level of an adult's vulnerability is advisable. The lead agency in the protection of vulnerable adults is Adult Social Care Services.

Paramount Internationals Designated Safeguarding Officer will seek advice and refer to Adult Social Care Services as necessary.

S/he will also liaise with local Adult Social Care Services to:

- ensure that Paramount International is aware of local interagency protocols and practice and that these are incorporated into procedures.
- identify local guidance on training for staff who work with vulnerable adults and to gain access to local authority training that may be available.

Children/Young People

The lead agency in the protection of children/young people is Children's Social Care. Paramount Internationals Designated Safeguarding Officer will seek advice and refer to Children's Social Care as necessary in line with Paramount Internationals duty and legal obligation to safeguard children from harm.

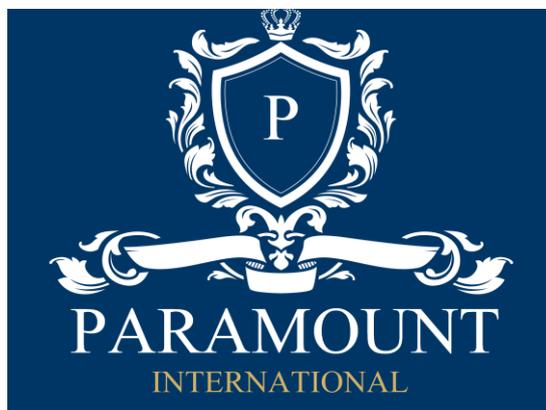
Confidentiality

The purpose of safeguarding procedures is to protect children/young people and vulnerable adults but also, as far as is possible to secure the individual's autonomy.

The issue of confidentiality in the context of child protection and safeguarding vulnerable adults is complex. How a member of staff handles the situation if a learner/customer does not initially want to be identified as being in need of protection is crucial in making them feel safe to disclose their identity.

Vulnerable adults (learner/customer)

Careful considered professional judgement will often need to be made as to a person's capacity to make informed decisions for her/himself, and the extent to which she/he is able to protect her/himself.



When the 'concerns' relate in particular to adult 'service users' it is good practice to gain the consent of a person with the cognitive ability or mental capacity to give informed consent, who may be at risk of abuse, before making a referral to on their behalf.

For customers/learners who are able to make choices and decisions, information must not be passed on to external authorities unless the customer/learner agrees or unless Paramount International's Designated Safeguarding Officer is satisfied that there is a serious risk of harm to self, other customers/learners or the public at large.

However, in many adult protection situations the person's consent cannot be gained or is superseded by other concerns, for example, the level of risk to the individual is very high (life or limb) or other vulnerable adults or children may be at risk.

Where an adult lacks the capacity to make informed decisions for her/himself or to safeguard him or herself, other people will need to make those decisions. In these circumstances, if it is felt to be appropriate the Paramount International's Designated Safeguarding Officer will make a referral to Adult Social Care Services.

If a customer/learner does not wish to be named and staff are in any doubt about how to proceed, advice can be sought from the local Adult Social Care Services' Safeguarding Officer or Duty Social Worker. This should preferably be done via Paramount International's Designated Safeguarding Officer. If s/he is unavailable, however, contact should be made via one of the other Safeguarding Champions listed in **Appendix 1**. In any event, the Paramount International Designated Safeguarding Officer must always be informed if contact has been made with the local Adult Social Care Services with regard to a safeguarding vulnerable adult report/issue.

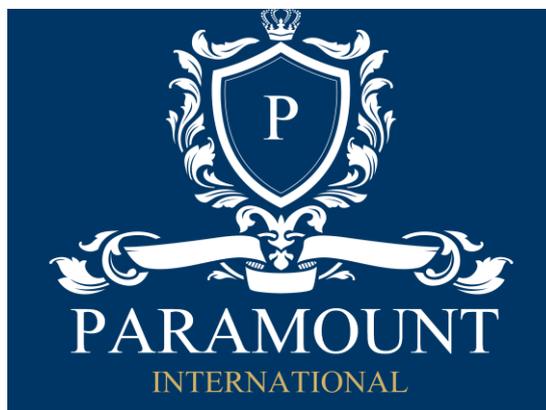
Children/Young People (Learners)

In respect of children/young people there are several things to consider including the possible risk posed to other children or young people and Paramount International has a legal responsibility to notify Children's Social Care where a child/young person (learner) or other children/young people are or may be at risk of harm.

If a young person does not wish to be named and staff are in any doubt about how to proceed, advice must be sought from the local Children's Social Care Services, Duty Social Worker. This should preferably be done via the Designated Safeguarding Officer or Deputy Manager.

Staff responsible for safeguarding of Children/Young People and Vulnerable Adults

Members of staff with responsibility for issues relating to the safeguarding of children/young people and vulnerable adults in Paramount International are referred to in this document as "Safeguarding Champions" or "Designated Safeguarding Officer or Deputy Manager". A list of names, titles and contact details for these Officers, other relevant members of staff and other relevant agencies is attached at **Appendix 1**.



RESPONSIBILITY FOR THE IMPLEMENTATION OF THE POLICY

We believe that it is everyone's responsibility to remain vigilant and to ensure that children and vulnerable adults are provided with a safe and secure environment.

Staff dealing with children and vulnerable adults will be trained in how to recognise and respond to a situation where abuse is reported and how to report this or any concerns. They should try to consider and act on 5 R's:

- Recognition;
- Response;
- Reporting;
- Recording;
- Referral.

Recognition - signs and indicators of abuse may just cause concern, but it could be a direct disclosure from someone. A direct disclosure may be made to anyone within the organisation who is trusted by the individual.

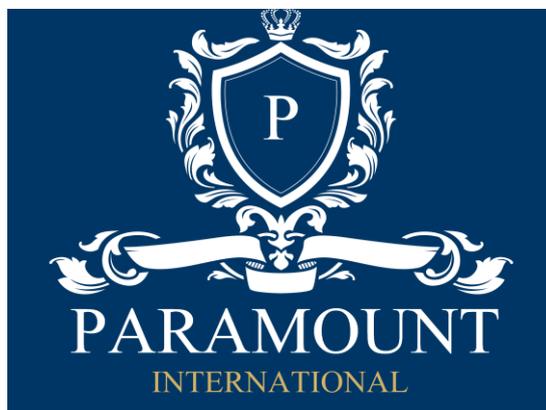
Response – Appropriate response is vital. No report should ever be ignored. At this point the response is just to listen, stay calm, and not show shock or outrage at what is being disclosed. You may need to ask some questions, but these should never lead or probe, just gather enough information to ascertain if there is immediate danger or harm. Do not make any promises as to what will happen and be clear that everything will be treated in confidence but must be passed on to the appropriate DP.

Reporting – Immediately report your concerns or information to the DP. Once the report has been made, the responsibility will lie with the DP. You are within your rights to check that appropriate action has been taken, but confidentiality may mean that the DP may not be able to share this information with you. If for any reason you feel that the matter has not been taken forward, you can make a referral directly to the Independent Safeguarding Authority.

Recording – You should record precisely what has been alleged, using the key words and phrases used by the individual. You can also record your own observations of the individual, as well as your interpretation of the facts. This record should be passed on in person to the DP, who will store it securely, where it is only accessible to those staff with safeguarding responsibilities.

Referral - The DP should gather enough information to make a referral, if appropriate by talking to the appropriate people outside the organisation.

Whistle blowing - People are encouraged to speak up about any concerns they may have. They will be protected by the Company's whistle blowing policy, provided that it is made in good faith.



Dealing with disclosure of abuse – Learner (child/young person) & Learner or Customer (Vulnerable Adult)

- Assess whether anyone is at immediate risk.

Take any reasonable steps **within your role** to protect any person from immediate harm, for example:

- Call an ambulance or a GP if someone needs medical attention
- Call the emergency services/Police if a crime is taking place.

- Promises of confidentiality should not be given as the matter may develop in such a way that these cannot be honoured.

- Inform the **learner/customer** that **there is** a legal duty to inform an authorised agency. The arrangements for this should be discussed with the learner/customer.

- The person to whom an allegation or concern is reported **must not question the learner/customer or investigate the matter further**; they must:
 - Treat the matter seriously
 - Keep an open mind and avoid asking leading questions (use phrases such as tell me, explain to me, describe to me)

Make a written record of the information as soon as possible using the Safeguarding Alert Form (**Appendix 2**) where possible in the learner's/customer's own words, which should include:

- the name of the complainant and, where different, the name of the learner/customer who has allegedly been abused
- The date of birth of the learner/customer who has allegedly been abused
- When and where the alleged incident/s took place, including dates and times if given
- who was present
- The account of what is alleged to have happened
- a description of any injuries observed
- Your name, signature and date



Where appropriate give the person contact details so that they can report any further issues or ask any questions that may arise.

Abuse Suspected but not disclosed by Learner/Customer

Where abuse is suspected but not disclosed by a learner/customer, the member of staff with the concern should discuss their concerns with the Designated Safeguarding Officer or Safeguarding Champion (**Appendix 1**).

The Safeguarding Alert form should be completed and sent to the Designated Safeguarding Officer or Champion who, if they consider that the information given indicates that the risk to the learner/customer is very high (life or limb) or that the learner/customer or others may be at risk of significant harm s/he will alert the local Adult Social Care and/or Children's Social Care Services.

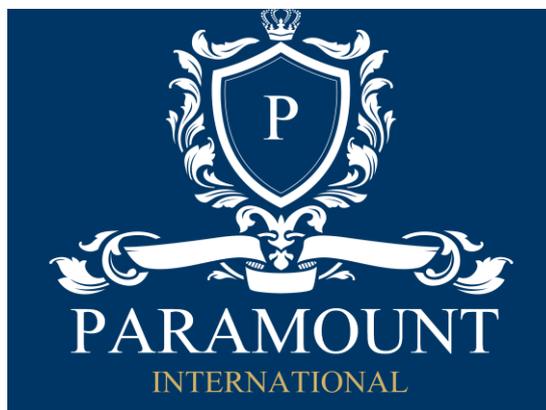
The Safeguarding Alert Form (**Appendix 2**) for recording information is available within this Policy and Procedure.

Reporting/Referral Procedure

The names and contact details of members of staff (Designated Safeguarding Officer and Champions) who have responsibility for issues relating to safeguarding children and vulnerable adults are included in (**Appendix 1**) If you have received an allegation of abuse or need further advice or guidance about an issue related to safeguarding children/young people or vulnerable adults, you should:

- Contact the Designated Safeguarding Officer or Champion in your area immediately to report that an allegation has been made.
- The Safeguarding Champion in your Region will contact the Paramount International Ltd Designated Safeguarding Officer as soon as possible but in any event, within two hours.
- If the Safeguarding Champion in your Region is unavailable, you should report directly to the Paramount International Designated Safeguarding Officer.
- If neither the Safeguarding Champion in your Region or the Paramount International Ltd Designated Safeguarding Officer are available, contact the Director further guidance.

If none of the above named Managers can be contacted within two hours of the initial concern arising, the member of staff making the report should contact the local Children's or Adult Social Care Services' Duty Social Worker or Safeguarding Officer to discuss the concern and/or report the allegation. A written record of the date and time of the referral

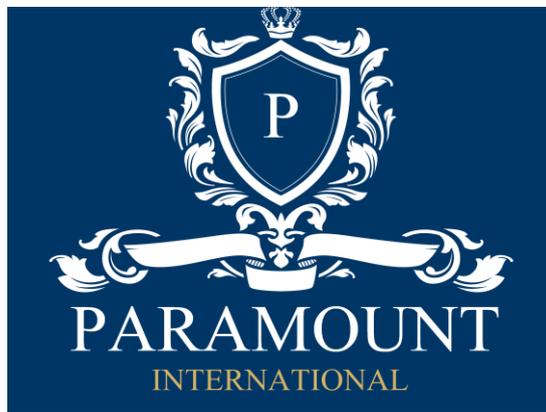


and named contact (on the Safeguarding Alert Form) must be kept. They must notify the Paramount International Ltd Designated Safeguarding Officer as soon as possible about the action taken and provide the written record within the Safeguarding Alert Form.

Action to be taken by Paramount Internationals Designated Safeguarding Officer

- Before taking action, the Designated Safeguarding Officer must be in receipt of all required information. If it is considered appropriate to do so, Paramount Internationals Safeguarding Officer will report the matter to the local Children's or Adult Social Care Services' Duty Social Worker or Safeguarding Officer as appropriate.
- A written record of the date and time of the report (on the Paramount International Safeguarding Alert Form) shall be made and the report must include the name and position of the person to whom the matter is reported. A telephone report must be confirmed in writing to the local Children's or Adult Social Care Services within 24 hours. The confirmation may be handwritten, posted or faxed but, in any event, a copy of the document must be kept on the learner/customer's file. If the referral contains information about a staff member or other service user, the referral and any related information is stored separately and confidentially with reference to it on the learner/customer's file.
- Paramount Internationals Designated Safeguarding Officer should discuss with the local Children's or Adult Social Care Services what action will be taken (where appropriate) to inform the parents/guardian/carer of the learner/customer and a note of that conversation should be made, together with confirmation of any steps agreed with the local Children's/Adult Social Care Services to safeguard the learner/customer and/or other learners/customers in the interim or with regard to retaining control until the appropriate person arrives. **At no point should Paramount International staff undertake any investigatory interviews.**
- The Designated Safeguarding Officer must notify Paramount Internationals Director as soon as practicable and in any event within 24 hours of the initial concern arising.
- A brief written summary of the allegation together with the action taken will be made to the Chief Executive within five working days and a final report submitted to confirm that the matter has been concluded.
- Written Records - The Paramount International Designated Safeguarding Officer shall retain a copy of:
 - The report to local Children's/Adult Social Care Services
 - Any notes, memoranda or correspondence dealing with the matter
 - Any other relevant material

Copies of reports, notes etc should be kept securely locked at all times.



Allegations about a Member of Staff

Introduction

In order to safeguard children/vulnerable adults, all staff appointments are made subject to:

- Satisfactory references
- Enhanced Disclosure and Barring Service (DBS) checks (previously Enhanced CRB checks)

Until these references and reports have been received new staff will not be appointed or allowed to work with children/young people or vulnerable adults.

Recognising and responding to an allegation

The following procedures must be applied where allegations relating to a member of staff are received.

There are a number of sources from which a complaint or an allegation might arise, including from:

- A child/young person or an adult
- A parent/guardian/carer
- A member of the public
- A disciplinary investigation

The person to whom an allegation or concern is reported **must not question the child/vulnerable adult or investigate the matter further.**

They must deal with the matter as they would if a learner/customer had disclosed abuse including following the same Reporting Procedure via the Designated Safeguarding Champion in your region **(Appendix 1)**

Once a report in respect of allegations or suspicion of abuse by a member of staff has been received from a Safeguarding Champion, Paramount International's Designated Safeguarding Officer will contact HR and the Director

If the Safeguarding Champion, Paramount International's Designated Safeguarding Officer, or Director is not available (as per reporting/referral procedures) contact the Head of Service HR for further guidance.



- Obtain written details of the allegation, signed and dated by the person receiving the allegation
- Record any other information in relation to time, dates and location of incident(s) and names of any potential witnesses
- Record discussions about the child/vulnerable adult and/or member of staff, any decisions made, and the reasons for those decisions
- Countersign and date the written record
- Report allegation to Paramount International Ltd's Designated Safeguarding Officer.

Action by Paramount Internationals Designated Safeguarding Officer

Once the report has been received Paramount Internationals Designated Safeguarding Officer must report to the Local Authority Designated Officer (LADO) in respect of a child or Adult Social Care Services (Safeguarding) in respect of a vulnerable adult within 1 working day if the allegation suggests a person who works with children/vulnerable adults has:

- Behaved in a way that has harmed a child/vulnerable adult, or may have harmed a child/vulnerable adult
- Possibly committed a criminal offence against or involving a child/vulnerable adult
- Behaved towards a child/children, vulnerable adult/adults in a way that indicates s/he is unsuitable to work with children/vulnerable adults in connection with his/her employment or voluntary activity

Paramount Internationals Designated Safeguarding Officer will also contact the Director and HR to agree how to inform the member of staff against whom the allegation has been made and to agree appropriate action pending any investigation initiated by the LADO/Adult Social Care Services.

If a concern or an allegation requiring immediate attention is received outside normal office hours the relevant member of staff must consult immediately with the Children's/Adult Social Care Services emergency duty team/ or local Police.

If the allegation/concerns are in respect of a child/young person the LADO must be informed the next working day. If the report made out of hours is not made by Paramount Internationals Designated Safeguarding Officer the relevant member of staff should ensure Paramount Internationals Designated Safeguarding Officer and Director are informed as soon as possible.



Malicious Allegations

Where it is subsequently found that an allegation was made with malice aforethought, the Director and Head of Service – HR will determine what if any action can/is to be taken dependent on status of person who made the allegation.

Proportionate responses to perpetrators of false or unsubstantiated allegations:

- Despite the distress caused, children/young people/vulnerable adults who make false allegations may still be entitled to continue to receive full access to support.
- Where remaining in the same organisation as the falsely accused member of staff would be prejudicial either to that member of staff or the child/young person/vulnerable adult consideration should be given identifying suitable support/training opportunities elsewhere.

Permanent exclusion should be considered only as a last resort.



**Appendix 1 Designated Safeguarding Officers and Champions
Contact Details**

	Name	Email Address	Tel. Number
Designated Safeguarding Officer	Linda King	safeguarding@paramountint.com	0808 501 5246
Deputy Safeguarding Officer	Claire Hunt	safeguarding@paramountint.com	0808 501 5246



Appendix 2 Safeguarding Alert Form

SAFEGUARDING ALERT

This form is to be used by anyone who wishes to report concerns about the abuse of a child/young person or vulnerable adult or who has had a disclosure of abuse made to them. Please complete it as soon as possible and forward it to the Designated Safeguarding Officer or Safeguarding Champion. If you do not have all the information asked for please fill in the parts you can and pass it on within the same working day.

1. Your Details

Name.....

Organisation/Division.....

Address.....
.....
.....

Position.....

E-mail.....

Telephone Number

2. Details of the Child/Young Person or Vulnerable Adult (underline as appropriate)

NameDate of Birth.....

Address.....
.....
.....

Telephone Number



3. Are they currently in receipt of Health or Social Care Services?

Yes No

Name of Provider

Address

4. Details of the Alleged Perpetrator

Name

Address.....

.....

.....

Telephone Number

5. Employer Contact Details

Manager

Contact Number

Employer Contact Name (*if different to Manager*)

Address.....

.....

E-mail.....

Telephone Number



When completed as fully as possible please forward to the Designated Safeguarding Officer or Champion.

6. This form was sent to:

Name

Organisation..... Position

Address.....

.....

Date..... Time.....

To be completed by receiving worker

Received by:

Name Position

Organisation Date

Are you the designated referral person Yes No

Are you the Designated Safeguarding Officer Yes No

Sent to Referral Agency Yes No

Name of Agency

Name of team within Agency

Date Time

The Safeguarding Champion should forward a copy of this form to the Paramount International Ltd Designated Safeguarding Officer for records or referral.



Appendix 3 Code of Conduct for Staff working with Children/Young People and Vulnerable Adults

This code has been written to assist staff in maintaining proper and professional relationships with learners and/or vulnerable adults.

As an employee of Paramount International, staff are required to demonstrate high standards in their exercise of authority, their management of risk, and the active protection of learners and/or from discrimination and avoidable harm. This document is designed to be useful for staff to provide a safe environment for learners who are under 18 and/or vulnerable adults in avoiding situations that might lead to allegations against them (staff).

Staff need to be prudent about their own conduct and vigilant about the conduct of others, so that their relationships with learners and/or vulnerable adults remain, and are seen to remain, entirely proper and professional. It is recognised that staff can be vulnerable to the possible consequences of their close professional relationships with learners and/or vulnerable adults and to the potential for malicious and misplaced allegations being made, whether deliberately or innocently, arising from the normal and proper associations that staff may have with them.

Many staff have a close working relationship with a number of learners and/or vulnerable adults, which contributes to the quality of provision offered to this group of customers/learners. The guidelines outlined below are not intended to make members of staff unduly anxious about working with learners under 18 and/or vulnerable adults but are, in fact, intended to give them confidence in offering guidance on appropriate behaviour and a professional approach.

Code of Conduct for Staff placing Children/Young People and Vulnerable Adults into work placements

A Risk Assessment will be carried out by Paramount International employees for any learner / client required to carry out a work placement with another organisation or charity (**Appendix 4**). Any Regulated activity will require DBS checks to be carried out prior to any work placement starting. Unsatisfactory DBS checks will mean that the learner / client cannot take part in that regulated activity.

The Flowchart describing Paramount International internal referral process for safeguarding concerns about Vulnerable Adults and Children/Young People conducting work placements are attached at (**Appendix 6 & 7**)

Induction / Training

- All staff will undertake Level 1 mandatory training on Safeguarding.
- Safeguarding Champions will undertake Level 2 training.
- Designated Safeguarding Management Team will undertake Level 3 training.



- All staff must accept and recognise their responsibilities in relation to good practice and the reporting of suspected poor practice and allegations or concerns about abuse.
- Everyone with substantial access to learners and/or vulnerable adults will have training on indicators of abuse, good practice, practices never to be sanctioned and any changes in legislation.

Key principles for the Safeguarding of Children/Young People and Vulnerable Adults

The guidance on Safeguarding Children and Vulnerable adults applies to:

- Those working with vulnerable adults and learners who are under 18 and/or are in a position of trust
- All learners and/or vulnerable adults, whatever their gender, racial origin, culture, religious belief and/or sexual identity have the right to be treated with respect, have their dignity maintained and an entitlement to protection from mistreatment and abuse.
- All learners and/or vulnerable adults have the right to access learning/support with as much independence as is appropriate and within their capabilities.
- All incidents and allegations or suspicions of abuse should be taken seriously and responded to swiftly and appropriately.

GUIDANCE AND GOOD PRACTICE

Good Practice Guidelines

All staff will be encouraged to demonstrate exemplary behaviour in order to protect themselves from false allegations. Some examples are below:

- Encourage an open environment – no secrets.
- Be mindful of where you work with a learner and/or vulnerable adults of the potential risks, which may arise from working with a learner and/or a vulnerable adult in private. For example, as per the Paramount International Ltd Lone Working policy.
- Treat all learners/vulnerable adults with respect and dignity.
Maintain a safe and appropriate distance.
- As a general principle, staff should not have unnecessary physical contact with learners and/or vulnerable adults. There may be very limited occasions when a learner/vulnerable adult needs comfort or reassurance, which may include physical comforting. Any such comforting gestures must always be acceptable to the learner/vulnerable adult concerned. A member of staff



should be aware, however, that any physical contact may be misconstrued by a learner/vulnerable adult, parent/carer or observer. Staff administering first aid should ensure wherever possible that another adult is present if they are in any doubt as to whether necessary physical contact could be misconstrued.

- Personal care should not be necessary but in cases where it is necessary to assist with personal care staff should, wherever possible, be of the appropriate gender and be careful to protect the dignity of the learner/vulnerable adult. Wherever possible, two members of staff should be present when carrying out personal care.

Practices to be avoided

- Spending excessive amounts of time alone with children and vulnerable adults away from others;
- Straying from the specified task or assignment;
- Being unnecessarily inquisitive;
- Saying anything that may make a child or vulnerable adult feel uncomfortable, or that could be interpreted as aggressive, hostile or impatient;
- Being drawn into personal conversations;
- Sitting or standing too close;
- Meeting other than at the prearranged venue;
- Exchanging personal details;
- Making contact via social internet contact sites.

Practices never to be sanctioned You

should never:

- Let allegations made by a child or vulnerable adult to go unrecorded or not acted upon;
- Promise a child or vulnerable adult that their confidences will be kept secret;
- Allow children or vulnerable adults to use inappropriate language unchallenged;
- Reduce a child or vulnerable adult to tears as a form of control;
- Allow or engage in any form of touching or make suggestive comments to a child or vulnerable adult.
- Using suggestive comments, even in fun
- Doing things of a personal nature when the learner/vulnerable adult can do it for him/herself.
- Providing a lift in your car for a learner/vulnerable adult.
- Visiting learners/vulnerable adults in their homes except in clearly agreed circumstances pre agreed.
- Administering medication unless trained and approved to do so.

POLICY FOR STAFF



Paramount International is committed to a policy in which:

Recruitment procedures comply with safeguarding best practice and will be followed in the appointment of all staff in roles that are eligible for a check as identified by the Disclosure and Barring Service – DBS (formerly Criminal Records Bureau - CRB) *Until these references and reports have been received new staff will not be appointed or allowed to work with learners under 18 and/or vulnerable adults.*

- HR will refer to the DBS eligibility guidance lists to identify if a role is eligible for a DBS check. Paramount International Ltd must not apply for a check unless the job or role is eligible for one and we will tell applicants why they are being checked and where they can get independent advice.
- Existing members of staff moving into roles that are eligible for a DBS check will be required to complete DBS forms and provide relevant identification documents;
- The recommended maximum time between DBS checks is 3 years - Paramount International will follow this guidance, unless contracts dictate otherwise.
- All new employees will be made aware of and issued with this policy as part of their induction, and staff will be updated of any changes made to this policy. Any member of staff found in breach of the guidance will be subject to disciplinary procedures in accordance with the Paramount International policy;
- All new members of staff and learners who are under the age of 18 will have a Young Persons Risk Assessment carried out as per the Health and Safety Policy Statement;
- As part of the initial advice and guidance session or induction session, all new learners will be shown the Safeguarding Children and Vulnerable Adults Policy. This will be followed by discussion and checking of understanding, and periodically reviewed at a formal review meeting.

All children and vulnerable adults within the organisation will be informed that their assessor or tutor will be their nominated contact point for any concerns they may have regarding safeguarding. In addition, they will be given details of the DP, and asked to report any concerns to their assessor or tutor, or DP;

- Staff must keep a secure and up to date record of all children and vulnerable adults either working in or learning within the organisation. They should monitor their progress on a regular basis to check they are safe from abuse and harm whilst on the qualification.

ROLES AND RESPONSIBILITIES



Members of staff with responsibility for issues relating to the safeguarding of children/young people and vulnerable adults in Paramount International are referred to in this document as “Designated Safeguarding Champions” or “Paramount International’s Safeguarding Officer”. A list of names, titles and contact details for these managers, other relevant members of staff and other relevant agencies is attached at **Appendix 1**.

Director

- Allocate required resources and time to provide adequate safeguarding measures;
- Provide leadership in ensuring the safety of children and vulnerable adults;
- Review and approve policy annually;
- Review systems and procedures to report to the Paramount International Ltd Management Board.

Designated Safeguarding Officer

- Put in place a comprehensive training programme to ensure all staff have a competent understanding of safeguarding that is relevant to their role;
- Ensure all staff have been thoroughly vetted prior to undertaking duties;
- Audit and review each divisional areas performance against safeguarding procedures;
- Review and update safeguarding procedures;

Designated Person(s) & Safeguarding Champions

- Manage the application of safeguarding procedures in their centre;
- Act as the focal point for safeguarding in their centre;
- Ensure all staff are competent to undertake their safeguarding duties;
- Clearly communicate the safeguarding policy to all staff;
- Liaise with partner agencies as required, including Local Safeguarding Children Board (LSCB).
- Ensure publicity and organisational position statement are supplied to relevant sites with up to date information on contact details;
- DP will, where necessary, inform relevant agencies of concerns over safeguarding issues as relevant to their role.

Employees

- Ensure that all staff are aware of any children and vulnerable adults within their group or caseload;
- Comply with policy and procedures;
- Promote a safe learning environment;
- Ensure all learners and employers are aware of the safeguarding policy;
- Report any concerns to DP immediately or where necessary LSCB.



Appendix 4 – Paramount International Ltd Safeguarding Risk Assessment for use with Work Placements

Work Placement details:

Work Placement name:		No. of employees	
Nature of business:		Date completed	
Workplace address:		Main contact (name and Tel. no)	
Learner (s) Names			
Supervisor(s) Name(s)			
Type of work carried out at workplace location:			
Is the client / learner in Regulated Activity		If Yes, client / learner must be DBS checked before engaging in this activity	
Enforcement action: (Prosecutions, Notices)			
Health & Safety committee / safety representation			



Safeguarding measures:

		Yes / No	Evidence / comments
1	Is the work placement provider willing to sign up to the work placement agreement with Paramount International Ltd?		
2	Has the work placement replacement representative signed the work placement agreement?		
3	Have all the necessary employers at the work placement been notified of the agreement?		
4	Has a named designated contact been identified at the work placement?		
5	Are the contact details for the named		



	person widely available for all?		
6	What Safeguarding awareness training has the designated contact completed?		
7	Has a Health & Safety risk assessment previously been undertaken?		
8	What was the outcome of the last risk assessment?		
9	Are there any outstanding actions from the risk assessment?		
10	When is the next Health & Safety risk assessment due to be completed?		
11	Has it been identified which work placement employee DBS checks are required?		If no, complete DBS risk assessment below
12	Have all necessary work placement DBS checks been completed?		If no, what action is taken to ensure Customers / learners are protected.
13	What action is taken if any adverse DBS checks are received?		



DBS Risk Assessment:

		Yes / No	Evidence / comments
1	Will any work placement employees have regular unsupervised contact with customers / learners		If yes then relevant DBS check required
2	Will any work placement employees have a high degree of travel on a one to one basis with any customer / learner as part of their work placement		If yes then relevant DBS check required
3	Will the customer/ learner work in isolated environments with work placement employees		If yes then relevant DBS check required
4	Will there be any regular lone working with a supervisor or other employee at the work placement ?		If yes then relevant DBS check required



Please complete Action Plan as appropriate:

Ref as above	Action	Owner	Completion Date	Progress

Action Plan agreed with:

Work Placement Representative: (Print name)

Signed

Dated

Paramount International Representative: (Print Name)

.....

Signed

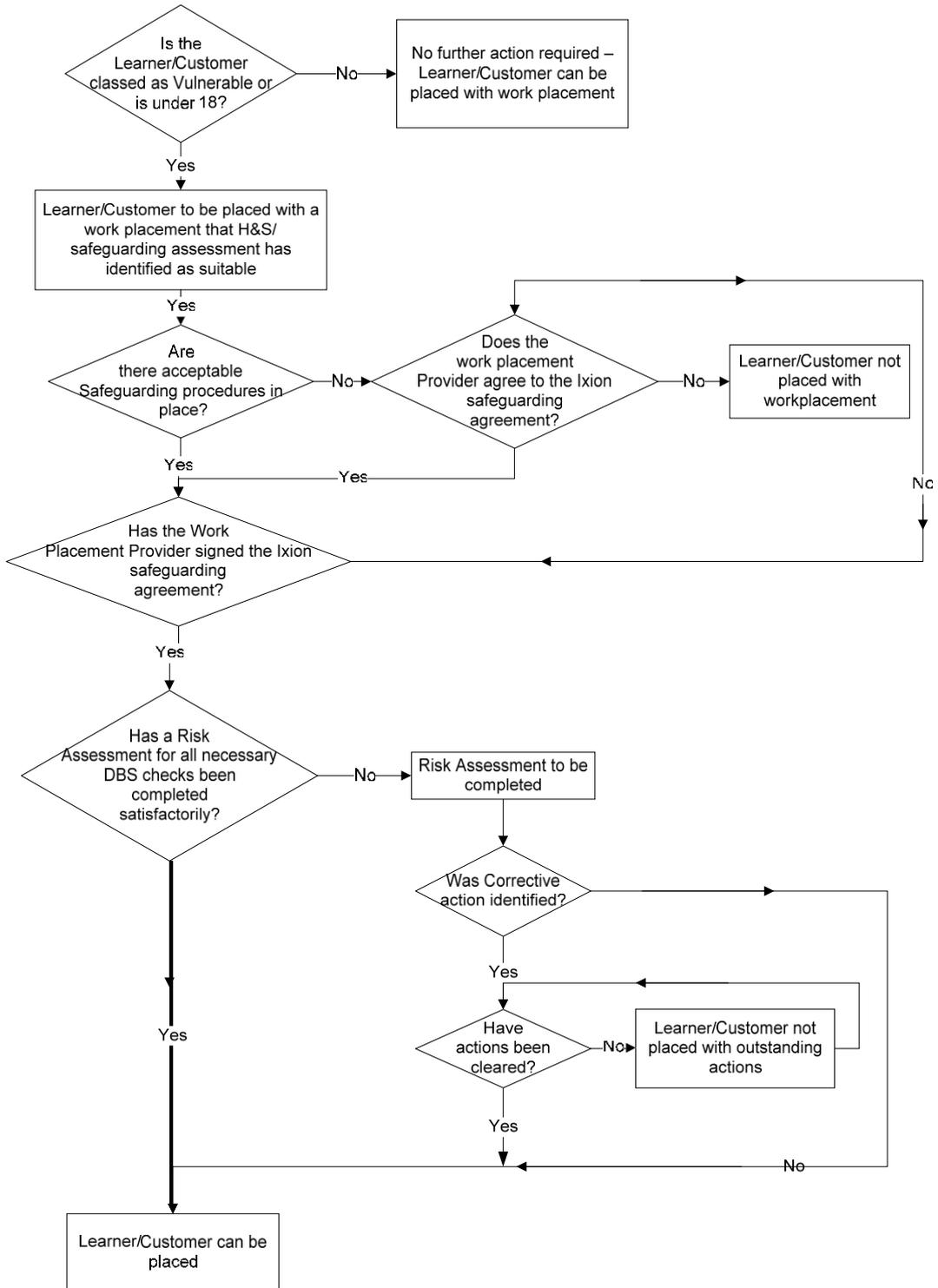
Dated

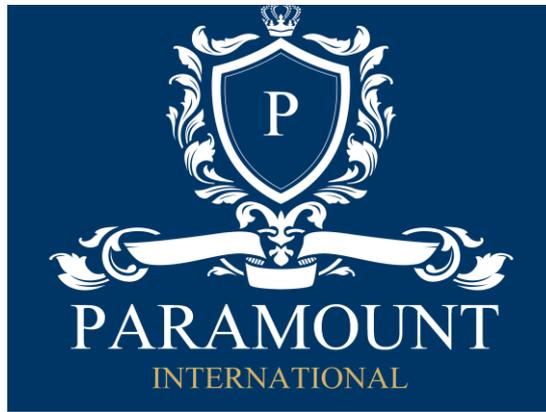
Action Plan Review Date:



Appendix 6 – Paramount International Ltd Safeguarding Work Placement Referral Flowchart

Safeguarding – placed with a work placement





Appendix 7 – Paramount International Safeguarding Work Placement Referral Flowchart – Regulated Activity

Learner/Customer placed in Regulated activity through the Subcontractor

