

# PRCA Safeguarding & Prevent Policy

## How to contact us

PRCA Apprenticeships take our Safeguarding & Prevent responsibilities very seriously. If you wish to report anything to us, please immediately contact us using one of the below methods.

The Head of Apprenticeships at PRCA is available 9am – 5:30pm Monday to Friday on 020 7233 6026 or email us at [prapprenticeships@prca.org.uk](mailto:prapprenticeships@prca.org.uk)

Outside these hours you can contact any of the following free: SAMARITANS on 116 123, MIND on 0300 123 3393, FRANK on 0300 123 6600, or CHILD LINE on 0800 1111

## Our commitment

We will:

- Provide a safe environment for all employees and apprentices to work and learners to train
- Promote the health, safety and welfare of children and vulnerable adults by providing opportunities for them to undertake their training/employment safely
- Respect and promote the rights, wishes, feelings and values of children and vulnerable adults
- Promote and implement appropriate procedures to safeguard the well-being of children and vulnerable adults
- Protect children and vulnerable adults from abuse, harm, and neglect
- Provide training and advice to employees and learners on the potential of extremism, the dangers of radicalisation and promote British Values
- Recruit, train, and support employees to adopt good practice to safeguard and protect children and vulnerable adults from abuse, harm, and neglect, and to minimise the risk to themselves
- Require employees to adopt and abide by this policy statement and the procedures set within
- Respond to any allegations of misconduct or abuse of children and vulnerable adults in line with this policy and the procedures set within, as well as implementing, where appropriate, the relevant disciplinary and appeals procedures
- Ensure through safer recruitment and the PRCA Apprenticeships selection processes, that Disclosure and Barring Service (DBS) checks and references that refer to candidates' suitability to have substantial access to children and vulnerable adults are taken up for all appropriate posts



Francis Ingham – Director General

Date: January 2022

## Introduction

Public Relations and Communications Association Ltd (PRCA Apprenticeships) recognises its responsibility to take all reasonable steps to promote safe practice, to protect children and vulnerable adults from abuse, harm and neglect and prevent people being drawn into terrorism.

PRCA Apprenticeships also acknowledges that the welfare of children and vulnerable adults is everyone's responsibility and expects all employees, learners and visitors to operate in an inclusive manner.

This policy and the following procedures have been developed in accordance with guidance issued by OFSTED and other relevant bodies. This policy applies to all staff and external contractors working within PRCA. The word "staff" is used for ease of description. This policy will be updated regularly to take account of national legislative changes. In addition, it will be reviewed following any organisational changes.

This policy and the procedures set within are based on the following principles:

- The welfare of children and vulnerable adults is a primary concern
- All children and vulnerable adults, whatever their age, culture, disability, gender, language, racial origin, social-economic status, religious belief, and/or sexual identity etc. have the right to be protected from abuse, harm and neglect
- It is everyone's responsibility to report potential radicalisation, abuse, harm and neglect. In such instances, PRCA Apprenticeships will act responsibly and where applicable report concerns to the appropriate authorities
- All incidents of alleged poor practice, misconduct or abuse, whether reported via the whistle-blowing policy or otherwise, will be taken seriously and dealt with appropriately
- All personal data will be processed in accordance with the requirements of the General Data Protection Regulation (GDPR) (EU) 2018

In order to safeguard and promote the welfare of children and vulnerable adults, PRCA will act in accordance with the following legislation and statutory guidance:

- Safeguarding Vulnerable Groups Act 2006
- Working Together to Safeguard Children 2018
- The Children Act 1989 (as amended)
- Education Act 2002 (section 175)
- The Children and Young Person Act 2008
- The Safeguarding Vulnerable Groups Act 2006
- Safeguarding Children and Safer Recruitment in Education (DfES 2006)
- The Education (Pupil Information) (England) Regulations 2005
- Dealing with Allegations of Abuse Against Teachers and Other Staff (DfE 2011)
- The Children and Social Work Act 2017

## Scope

This document is the Safeguarding & Prevent Policy for PRCA Apprenticeships and takes into account all those who are in receipt of or providing different PRCA Apprenticeships services (irrespective of age and circumstance).

This policy sets out the procedures that PRCA Apprenticeships would expect to be used to:

- Ensure service providers are doing their utmost to protect children, and vulnerable adults with whom they work
- Ensure service providers protect themselves from harm and potential false allegations

## Aim

PRCA Apprenticeships aims to implement these procedures by:

- Respecting and promoting the rights, wishes and feelings of children and vulnerable adults
- Providing all employees with information, instruction and training that will ensure that they are properly equipped to:
  - identify where there might be a problem
  - refer concerns PRCA Apprenticeships
  - protect themselves from false accusations of abuse, harm, or neglect
- Ensuring that all suspicions or allegations involving learners and employees are dealt with effectively and efficiently, and that, where appropriate, PRCA Apprenticeships disciplinary and appeals procedures are implemented
- Ensure that employees whose work is directly with learners are subject to the appropriate level of Disclosure & Barring Service (DBS) check before beginning work. This check will be repeated every three years.

## Principles

Key principles underpinning this policy are:

- The welfare of the individual is paramount
- Everyone has the right to protection from abuse, harm and neglect
- Apprentices, learners and employees know how to keep themselves safe from the dangers of radicalisation and extremism
- Employees should work in an open and transparent way
- Employees should avoid any conduct which would lead any reasonable person to question their motives or intentions

## Background

The 'Children Act 2004' places a duty on key statutory agencies to safeguard and promote the welfare of children and adults, i.e., to ensure services safeguard and promote the welfare of children and adults and ensure that anyone else providing services also provides safe practices.

In practical terms, this means that PRCA Apprenticeships has a responsibility to provide a safe environment for children and vulnerable adults, in which their welfare is of paramount importance. PRCA Apprenticeships aims for every learner (regardless of background or circumstances) to have the support they need to stay safe, be healthy, enjoy and achieve, as well as advice on the following:

- Protection from abuse, harm or neglect

- Prevention of development or health impairment
- Living in safe circumstances
- Access to effective care

## Sharing concerns

PRCA Apprenticeships is committed to working in partnership with parents, guardians, carers and other outside parties involved (local employers, schools, social services, local children's boards). Therefore, in some situations it is important for the Head of Apprenticeships or mentor to discuss concerns with them. For example, if a learner seems withdrawn, it might be useful to communicate with a relative or social worker.

In some circumstances, a child or vulnerable adult might be placed at greater risk if such concerns are shared (e.g., a parent/carer might be responsible for abuse and or might not respond to the situation in the child or vulnerable adult's best interests). The Head of Apprenticeships or Mentor will decide upon what is the appropriate action in terms of informing a parent, guardian or carer; the child or vulnerable adults' welfare being the priority.

## Working with external contractors and partner organisations

Any contractor or sub-contractor engaged by PRCA Apprenticeships in areas where they are likely to come into contact with learners i.e., children or vulnerable adults, should be shown this policy and be asked to comply fully with the terms of this policy. Workers with the potential to come into contact with learners i.e., children or vulnerable adults, will be subject to the appropriate level of DBS check according to their role.

## Roles and responsibilities

### Leadership and management

The Director General has overall responsibility for Safeguarding & Prevent strategy at PRCA Apprenticeships. The Head of Apprenticeships undertakes the role of the Senior Lead and drives the implementation of safeguarding and raising of awareness across the business teams. The Head of Apprenticeships is responsible for overseeing the implementation of Safeguarding & Prevent and for managing the performance of these activities. All employees and apprentices are responsible for reporting any safeguarding issues or concerns.

### Head of Apprenticeships

The Head of Apprenticeships reports to the Training & Development Director who reports to the Director General. The Head of Apprenticeships is responsible for how Safeguarding is implemented across the Apprenticeships programme, working directly with the Training & Development Director to ensure there is a link between Safeguarding, Prevent and the Quality Improvement Plan whilst identifying training needs and the monitoring and implementation of Safeguarding within the organisation.

The Head of Apprenticeships will have responsibility for:

- Implementing and promoting PRCA Apprenticeships children and vulnerable adults safeguarding policy and its procedures

- Regularly reporting to the Senior Management Team about identified performance indicators based on safeguarding of children and vulnerable adults
- Ensuring all relevant information is communicated to all designated persons
- Keeping abreast of developments and understanding the latest information on data protection, confidentiality and other legal issues that impact on the protection of children and vulnerable adults
- Encouraging good practice and supporting procedures to protect children and vulnerable adults
- Establishing and maintaining contact with local statutory agencies including the local authority, police and Prevent co-ordinators
- Working (HR, if relevant) to maintain confidential records of reported cases and actions taken, and liaising with the statutory agencies to ensure they have access to all necessary information
- Taking the lead with specific allegations where there are suspicions of abuse, harm or neglect of a child or vulnerable adult
- To respond to employees' referrals as Head of Apprenticeships
- Escalate all reported issues to the Training & Development Director so that details can be logged
- Offer advice to employees and employers in relation to safeguarding of apprentices
- Keep up to date with legislation and guidance in relation to safeguarding apprentices

## Designated Safeguarding Lead

The Designated Safeguarding Lead (DSL) is a senior member of the management team and has a key duty to take lead responsibility for raising awareness within the staff of issues relating to the welfare of young or vulnerable people, and the promotion of a safe environment for delegates/apprentices on PRCA courses where the training of young people takes place. The DSL with lead responsibility for safeguarding issues is **Karen Wilkinson**. The DSL has received training in young or vulnerable learner protection issues and inter-agency working and will receive appropriate refresher training and or updates.

The Designated Safeguarding Lead is responsible for:

- Overseeing the referral of cases of suspected abuse or allegations to the relevant investigating agencies.
- Providing advice and support to other staff on issues relating to young or vulnerable people's protection.
- Maintaining a proper record of any protection referral, complaint or concern (even where that concern does not lead to a referral).
- Ensuring that parents of young or vulnerable learners are aware of PRCA's protection policy.
- Ensuring that all Directors are briefed of any relevant Safeguarding incident or issues that arise.
- Liaising with local authorities, Children's and adult services, and other appropriate agencies where necessary.
- Providing guidance to parents, learners and staff about how to obtain suitable support relating to safeguarding issues and how to access the policy.



- Ensuring that staff receive basic training in protection issues and are aware of the protection procedures.

### PRCA Apprenticeships Team

When recruiting new employees PRCA Apprenticeships will ensure appropriate checks are made and records kept. They will also deal with any employee safeguarding/welfare issues, as appropriate. They:

- Will ensure that Safeguarding and Prevent training is part of the induction programme for all new employees
- Will, through safer recruitment and selection processes, ensure that the appropriate level of DBS checks and references that refer to candidates' suitability to have substantial access to children and vulnerable adults are taken up before commencement of post, where appropriate
- Will maintain a record of all employees who have completed a DBS check and are considered suitable for work involving substantial access to children and vulnerable adults
- Will ensure that DBS disclosures and references are kept secure and confidential, in line with the current DBS Code of Practice

### Mentors/Coaches

Mentors/coaches need to monitor apprentices in order to ensure that the PRCA Apprenticeships safeguarding policy and procedures are adhered to. They:

- Are responsible for making sure that their apprentices are aware of, understand and act in accordance with this policy and related guidance, regardless of the hours their apprentices' work
- Must make sure that any contractors, agents, or other representatives whom they engage to undertake duties on their behalf which involve contact with learners and adults, understand and comply with this policy
- Will (in conjunction with PRCA Apprenticeships) through safer recruitment and selection processes, ensure DBS checks are taken up for all appropriate posts

### PRCA Employees

- Should attend appropriate Safeguarding and Prevent training if their role involves substantial access to children or vulnerable adults. This training will form part of the overall employee's training plan
- Should not begin any unsupervised activity involving substantial access to children or vulnerable adults prior to a DBS check being in process
- Should be aware of what constitutes appropriate and inappropriate conduct for those employees in charge of children and vulnerable adults
- Should know who the Head of Apprenticeships is and how to contact them
- Have a responsibility to inform a nominated person of any allegation of abuse, harm, or neglect

## Definitions

Children:	Anyone under the age of 18 years
Vulnerable adult:	Anyone 18 and over who is or may be: <ul style="list-style-type: none"><li>• In need of community care services</li><li>• Unable to care for themselves</li><li>• Unable to protect themselves against significant harm or exploitation</li><li>• Physically or mentally ill</li><li>• Vulnerable due to another factor not noted above (for this reason we class all PRCA Apprenticeships learners as being potentially vulnerable adults, and offer safeguarding support to all learners)</li></ul>
Employee:	Anyone working for, or on behalf of PRCA Apprenticeships, whether paid or voluntary
Employers:	Those employing apprentices in their own workplace
Substantial Access:	Where an individual is regularly caring for, training or supervising a child or vulnerable adult Where an individual has sole charge of children or vulnerable adults

## What is defined as abuse?

Abuse occurs when a person or group of people, harms a child or vulnerable adult. The following are viewed by PRCA Apprenticeships as being the main categories of abuse:

Neglect:	Neglect is the persistent or severe failure to meet a person's basic psychological needs. It may also include neglect of, or responsiveness, to a child's basic emotional needs. It will result in serious impairment of the person's health or development. Neglect may occur during pregnancy as a result of maternal substance abuse.
Physical abuse:	Physical abuse causes harm to a person. It may involve hitting, shaking, throwing, poisoning, burning, scalding, drowning or suffocating. It may be done deliberately or recklessly, or be the result of a deliberate failure to prevent injury occurring.
Sexual abuse:	Sexual abuse involves a person being forced or coerced into participating in or watching sexual activity. It is not necessary for the person to be aware or understand that the activity is sexual and the apparent consent of the person is irrelevant. The activities may involve physical contact, including assault by penetration (for example, rape or oral sex) or non-penetrative acts such as masturbation, kissing, rubbing and touching outside of clothing.



Emotional abuse: Emotional abuse occurs where there is persistent emotional ill treatment or rejection. It causes severe and adverse effects on the person's behaviour and emotional development, resulting in low self-worth. Some level of emotional abuse is present in all forms of abuse.

*(Ref - definitions taken from Herts County Council Children's services model policies for schools 2012)*

Financial abuse: Where a child or vulnerable adult is exploited for the financial gain of an individual or organisation. Examples include identity theft and money laundering.

Online abuse: Any type of abuse that happens on the internet. It can happen across any device that's connected to the web, like computers, tablets and mobile phones. And it can happen anywhere online, including social media, text messages and messaging apps, emails, online chats, online gaming, and live-streaming sites.

This policy will be communicated to all employees on appointment to the organisation, and ongoing updates will be disseminated via managers and training.

Relevant aspects of this policy will be explored with learners during induction and throughout the apprenticeship.

## Annex 1 - Safeguarding

PRCA Apprenticeships Safeguarding is underpinned by the following principles:

- Learners first
- Independence
- Accountability and transparency

### The principles to Safeguarding learners

The six principles below have been incorporated into the Care Act 2014 statutory guidance and should inform all safeguarding practice:

- Empowerment – people being supported and encouraged to make their own decisions and give informed consent
- Prevention – it is better to take action before harm occurs
- Proportionality – the least intrusive response appropriate to the risk presented
- Protection – support and representation for those in greatest need
- Partnership – local solutions through services working with their communities
- Accountability – transparency in delivering safeguarding

We recognise that:

- The welfare of the learner is paramount
- All children, regardless of age, disability, gender reassignment, race, religion or belief, sex, or sexual orientation have a right to equal protection from all types of harm or abuse
- Some learners are additionally vulnerable because of the impact of previous experiences, their level of dependency, communication needs or other issues
- Working in partnership with children, their parents, carers, and other agencies is essential in promoting welfare

We will seek to keep learners safe by:

- Valuing, listening to and respecting them
- Using our safeguarding procedures to share concerns and relevant information with agencies who need to know, and involving children, parents, families, and carers appropriately
- Creating and maintaining an anti-bullying environment and ensuring that we have a policy and procedure to help us deal effectively with any bullying that does arise developing and implementing an effective online safety policy and related procedures
- Recruiting employee safely, ensuring all necessary checks are made
- Providing effective management for employee and contractors through supervision, support, training, and quality assurance measures
- Recording and storing information in a professional manner
- Ensuring that we provide a safe physical environment for our learners, employees, and contractors, by applying health and safety measures in accordance with the law and regulatory guidance



## Responding to suspicions and allegations of abuse, harm and neglect

Safeguarding is the responsibility of every employee. There is a further responsibility to recognise, respond, report and record all suspicions of abuse, harm or neglect of children, and vulnerable adults. PRCA Apprenticeships is committed to responding to and reporting safeguarding concerns appropriately and trains its employees in accordance with this.

PRCA Apprenticeships recognises that information received about a child or vulnerable adult might fall into one of the categories below:

- Suspicion/allegation of abuse, harm, or neglect where a PRCA employee are the alleged perpetrator
- Suspicion/allegation of abuse, harm, or neglect where a child or vulnerable adult is the alleged perpetrator
- Suspicion or allegation of abuse, harm, or neglect where a third party is the alleged perpetrator
- Suspicion/allegation of inappropriate conduct (e.g., accessing pornographic images of under-18s)

Any employee, whether a recipient of or provider of PRCA Apprenticeships services is expected to respond appropriately and report any suspicion or allegation of abuse, harm or neglect to the Head of Apprenticeships.

The responsibility to seek advice and decide whether to refer suspicions of abuse, harm and neglect to a local authority children's service or any other applicable agency is only that of the Head of Apprenticeships, and not that of any other employee. In extenuating circumstances however, a member of the Senior Management Team might need to make a referral.



## Useful links

- Channel Strategy and Prevent Duty  
<https://www.gov.uk/government/publications/counter-terrorism-strategy-contest>
- Home Office - [www.homeoffice.gov.uk](http://www.homeoffice.gov.uk)
- Disclosure & Barring Service (and related links) <https://www.gov.uk/dbs-update-service>
- Ofsted - [www.ofsted.gov.uk](http://www.ofsted.gov.uk)
- The “safe learner” concept - <http://www.safelearner.info/>

## Annex 2 – Prevent

### The Prevent strategy

The strategy covers all forms of terrorism, including far right extremism and some aspects of non-violent extremism. PRCA Apprenticeships will always support children and vulnerable adults who are at risk of being drawn into terrorist activity through the Channel process, which involves several agencies working together to give individuals access to services such as health and education, specialist mentoring and diversionary activities.

- Reacts to the ideological challenge we face from terrorism and aspects of extremism, and the threat we face from those who promote these views
- Delivers practical support to prevent people from being drawn into terrorism and ensure they are given appropriate advice and support
- Collaborates with a wide range of sectors (including education, criminal justice, faith, charities, online and health) where there are risks of radicalisation

### How to react to concern, allegation or disclosure

In line with the 5 Rs approach, the ability to recognise signs that might indicate abuse is of fundamental importance. Whether the abuse occurs on PRCA premises, in the home, at work or in any other setting, all those involved in meeting learners' needs should be aware of the 5 Rs. Possible abuse can then be recognised, investigated, and acted upon seamlessly and effectively.

Signs and symptoms of abuse of children or vulnerable adults can include an abuse disclosure. PRCA will train those employees with regular contact with apprentices to understand signs of possible abuse, and to know how/to whom to report concerns. The process should be:

1. Recognise
2. Respond
3. Report
4. Record
5. Refer (*only for approved individuals*)

#### Recognise:

Employees who work with children and vulnerable adults are trained to recognise that the following might indicate that abuse has taken place: excessive tiredness, external injuries, tearfulness, changes in appearance, excessive gifts, STIs, pregnancy, unusual aggression, emotional withdrawal and homelessness. This is not an exhaustive list

#### Respond:

PRCA recognises that an appropriate response is vital. No report of or concern about possible abuse should never be ignored. In order to determine the most appropriate response, it must be determined whether an allegation involves employees, a fellow learner, or another. Clarity is vital.

In the event of a disclosure, do not lead or probe with questions. Remain calm and demonstrate attentiveness and concern. Listen well. Inform the person sharing the disclosure with you that the concern they have raised must be recorded and passed on. Inform the person that this will be done on a limited 'need to know' basis, with as few persons as possible knowing the identity of the complainant. Also mention that confidentiality cannot be guaranteed, for example if the alleged victim is under 18.

Reassure the person they have done the right thing in reporting their concerns, and state that you will do everything you possibly can to support them. Do not make unrealistic promises. Ensure that the complainant and the subject of the allegation are treated in line with policy and guidance.

It is vital to listen carefully to any information that a child or vulnerable adult discloses with reference to abuse, harm or neglect. Whilst listening, the following good practice is essential

*Do:*

- React calmly: try not to show disbelief or project other emotional reactions
- Avoid saying 'I believe you'. Instead tell the child or vulnerable adult that victims are never to blame for abuse/harm/neglect and that any victim has the right to make a disclosure
- Take the information seriously, recognising the difficulties in interpreting what a child or vulnerable adult says
- Keep questioning to a minimum, to ensure clear and accurate understanding of what has been said
- Inform the Head of Apprenticeships immediately
- Make a full record of what has been said, heard or seen. Do this as soon as possible, noting down the individual's own words

*Don't:*

- Ask leading questions (for legal reasons, amongst others)
- Verbally speculate about what might have happened
- Introduce personal information from your own experiences
- Apportion blame or pass judgment
- Approach an alleged abuser
- Guarantee confidentiality.
- Tell the learner that 'everything will be alright'

*Report:*

Report your concerns by telephone to the DSL that working day. In the event of this not being possible, report your concerns to the Head of Apprenticeships. In all cases, when a report is received your report should, without delay and having carefully recorded the information, report this to the DSL.

Once you have reported concerns about abuse to the DSL, the responsibility for taking any further decisions and/or actions resides with the DSL.



Record:

Once you have spoken to the DSL make notes using the PRCA Apprenticeships abuse disclosure form

Refer (to external authorities):

This is the responsibility of the DSL only – or of a member of the senior management team in extenuating circumstances.

## Curriculum

PRCA Apprenticeships learners develop critical thinking skills which will support them in resisting extremism. There exist opportunities for apprentices to discuss challenging topics and events in a supported environment. PRCA Apprenticeships team continuously develop their own approaches to implementing British values to support apprentices in resisting extremism while developing their political views.

## Clear agreed referral channels

Every person at PRCA, including apprentices know what they need to do if they are concerned about a peer or employee. The process of referral within PRCA and externally is clear and unambiguous. Complying with the Prevent duty includes promoting and exemplifying British values: i.e., democracy, rule of law, individual liberty, tolerance and mutual respect and different faiths and beliefs.

All PRCA Senior Management Team must attend Safeguarding and Prevent duty training and report any Safeguarding and Prevent concerns to the DSL. All employees are always expected to uphold the values embedded within the Equality Act 2010. They should use any relevant opportunities to promote the British values.

Identification of concerns might include the following, although this list is not exhaustive:

- Expression of views which are discriminately against protected groups or individuals
- Third party reports of concerns about behaviour e.g., plans to travel abroad or extremist activities
- Evidence of discriminatory treatment of other groups or individuals
- Evidence of bullying behaviour or harassment
- Evidence of non-compliance with the providers and employers' expectations of behaviour
- Possessing, accessing extremist materials
- Evidence of family concern about vulnerability to extremism
- Expression of extremist views including on social media
- Use of extremist language
- Threats of violence

PRCA Apprenticeships is committed to supporting vulnerable learners through its safeguarding and prevent agenda in order to prevent potential radicalisation and maximise the learning experience to enable successful destinations, careers and life prospects.

## Annex 3 – Safer recruitment

PRCA Apprenticeships will take all reasonable steps to ensure unsuitable people are prevented from working with learners. PRCA Apprenticeships will carry out employee selection and recruitment process for all employees who have contact with children and vulnerable adults on a regular basis. These employees will undergo the appropriate level of DBS check, which is to include volunteers where they are required to work with children and vulnerable adults.

PRCA Apprenticeships request that all of its contractors, temporary or volunteer employees undergo employee selection and recruitment process where they are required to work with children and vulnerable adults.

### References

References will be sought as required. Where possible, at least one of the two required references will be sought from an employer/voluntary organisation in which the applicant worked with children and adults.

### Process

Full details of the arrangement for selecting and engaging employees is set out in the PRCA employee recruitment policy.

### Induction

Induction process for the newly appointed employees will include the following:

- Health & Safety
- Safeguarding & Prevent policies and procedures
- Administration
- Assessment of training
- Roles and responsibilities

### Probation

Newly appointed employees will complete an agreed period of probation upon commencement of their employment, during which their understanding of safeguarding will be developed through mandatory Safeguarding and Prevent training. This training will be provided as soon as possible after commencement of post (in all cases within three months). Refresher training will be provided annually.

### Information, instruction and training

Appropriate training will be provided to all PRCA employees. The level of training required will be identified in accordance with the responsibilities of the post, but will include:

- Working with and protecting children and vulnerable adults
- Other identified training needs
- On-going support and guidance where needed

What if an employee is accused of poor practice in terms of safeguarding?

Senior management in line with HR may withdraw their duties at the earliest opportunity, dependent on the severity of the practice, and suspend on full pay.

HR will investigate the allegations and make a written record of the details of the event.

If found to be poor practice rather than abuse, harm or neglect, then the Line Manager and HR will consider:

- Appropriate training and supervision
- Reviewing general company practice in relation to safeguarding children and vulnerable adults
- Implementing standard disciplinary procedures

What if an employee is accused of abuse, harm or neglect?

Suspension of the individual will be carried out by HR in accordance with the disciplinary procedure. At the time of suspension, the individual will be informed of the reason for the suspension and will be given the opportunity to make a statement should they wish to do so. Notification of the suspension and reasons will be conveyed in writing to the employee in accordance with disciplinary procedures. HR will investigate the allegations and make written record of details of the event. If abuse is confirmed:

- Relevant agencies will be notified
- Disciplinary procedures will be implemented
- General company practice in relation to safeguarding children and vulnerable adults will be reviewed if necessary

Managing false or malicious allegations

If the allegation is found to be false or malicious then the individual will receive an account of the circumstances and/or investigation if appropriate, and a letter confirming the conclusion of the matter.

## Code of practice and behaviour

This document is designed to:

- (a) protect children and vulnerable adults
- (b) allow employees to safeguard themselves (against malicious or misplaced allegations at work, amongst other things)

As this guidance cannot cover all eventualities; employees must take responsibility for ensuring that they avoid actions which would lead any reasonable person to question their motives and intent. If in doubt about the appropriateness of certain actions, speak to HR.

### Lone workers (i.e., being the only person on PRCA premises)

Where possible, completely avoid lone working. Familiarise yourself with periods at which the offices are unmanned and/or colleagues are on annual leave so that you can plan around this in advance.

If lone working seems likely (e.g., if a colleague needs to go home due to illness), contact your line manager immediately. If the employee feels that lone working is appropriate, arrangements will be made to contact them later that day. Discussion about issues such as medical needs, lighting, fire evacuation procedure, locking up, carrying a phone etc. might also be necessary.

### Working one-to-one with learners

If possible, within your job role, avoid working one-to-one with apprentices. If one-to-one working is necessary, ensure:

- That it is approved by your line manager and use a room in which you can be seen by others, keep the door open, and sit by a glass panel where possible. In addition, inform a colleague (in the presence of the apprentice) where you will be working and why
- You never meet an apprentice for work reasons away from PRCA or the employer's premises without permission from the Head of Apprenticeships.

### Allowing apprentices to work without employee supervision

- Avoid allowing apprentices to work in a training room without employee supervision if possible
- Arrange a system with your colleagues whereby every room is confirmed to be empty before locking up – be sensitive to the fact that a visual check of each room is necessary

### Being alone with apprentices

Never put yourself in a position where you are the only employee in a building with an apprentice. Bear in mind that it is important not to overlook this issue early in the morning or during lunch breaks.

### Reporting incidents

Always report, record and inform (the Head of Apprenticeships) if the following occurs:



- An apprentice makes an abuse/harm/neglect disclosure inform the DSL by telephone that working day
- An apprentice is accidentally or deliberately hurt by an employee/another apprentice
- First aid is performed on an apprentice
- An apprentice seems very distressed
- An apprentice significantly misunderstands or misinterprets something that an employee/another apprentice has said
- An apprentice/employee/appears to be sexually aroused by an employee/apprentice
- An apprentice is restrained in self-defence

## Annex 3 – IT Security

The use of technology has become a significant part of many safeguarding issues, child sexual exploitation radicalisation, sexual predation and often provides the platform that facilitates harm. Increasingly, learners are required to learn online, often in their home environment, and PRCA ensures that staff are fully aware of the breadth of risks that exist, which can be categorised into three areas:

- Content: being exposed to illegal, inappropriate or harmful material, for example pornography, fake news, racist or radical and extremist views;
- Contact: being subjected to harmful online interaction with other users, for example commercial advertising as well as adults posing as children or young adults; and
- Conduct: personal online behaviour that increases the likelihood of, or causes, harm, for example making, sending and receiving explicit images, or online bullying

An effective approach to online safety empowers a training body to protect and educate the delivery team and immediate apprenticeship community in their use of technology and establishes mechanisms to identify, intervene in, and escalate any incident where appropriate.

PRCA commits to educating its learners to be able to recognise them and to escalate their concerns where appropriate. Our access to specialist technical support enables us to monitor and review IT usage where there are concerns. Staff must only access and use IT equipment, systems and data where they are authorised to do so and only for the purpose of fulfilling their duties.

Misuse will be investigated, and appropriate action taken.

## Addendum Covid-19 – Safeguarding and Prevent

This is an addendum to the Safeguarding and Prevent Policy held which maintains use throughout the pandemic.

### Safeguarding contact details:

The Head of Apprenticeships and the Designated Safeguarding Lead, there has been no changes to how apprentices or employees raise concerns for the welfare of our learners to the DSL.

- Stephanie Umebuani (Head of Apprenticeships)  
Contact: [prapprentices@prca.org.uk](mailto:prapprentices@prca.org.uk)  
Telephone: 0207 233 6026
- Karen Wilkinson (Designated Safeguarding Lead)  
Contact: [karen.wilkinson@prca.org.uk](mailto:karen.wilkinson@prca.org.uk)  
Telephone: 0207 233 6026

### Context:

- Coronavirus has presented itself in extraordinary circumstances and we continue to deliver our products with some changes, from face-to-face delivery to fully online delivery for some of our programmes. We understand we are working in a difficult period.
- This addendum does not remove the Safeguarding and Prevent Policy we have in place but counts as an addition to.

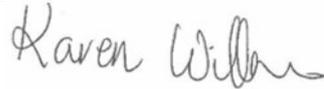
### Instruction:

- When validating proof of identity documents to apply for a DBS check, we will initially accept verification of scanned documents, rather than being in physical possession of the original documents. This approach is in line with revised guidance from the Disclosure and Barring Service
- Employees now complete all tuition, reviews, and meetings (internal and external) remotely.
- All employees and apprentices continue to be covered by the PRCA Safeguarding and Prevent policy.
- Apprentices maintain their relationship with their mentors, and a record of wellbeing is maintained in their file.
- Apprentices have been contacted individually to check on wellbeing
- Prevent updates and training continue remotely via webinars and email
- Our website has been frequently updated with COVID-19 updates for all our customers - COVID-19 Updates



## Review

The effectiveness of this policy and associated arrangements will be reviewed annually under the direct supervision of the Director General.

Date	Status/Summary of Changes	Approved By	Signature	Next Review
Jan 2022	IT & remote delivery	Karen Wilkinson		Jan 2023