


Serco Ltd. Safeguarding Policy

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This policy should be read in conjunction with the Serco Ltd. Prevent Policy

DOCUMENT CONTROL

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Serco Ltd.
UKPRN 10005752
Apprenticeships and AEB Learners

INTRODUCTION

Serco Ltd. has a primary responsibility for the care, welfare and safety of the external apprentices and adult learners on our West Midlands Combined Authority contract and is fully committed to safeguarding and promoting the welfare of all. Apprentices, learners and staff, regardless of age, disability, gender, racial heritage, religious belief, sexual orientation or identity have the right to equal protection from all types of harm or abuse.

It is always unacceptable for anyone to experience abuse of any kind and Serco Ltd. recognises its responsibility to safeguard the welfare of our apprentices and learners, particularly children and vulnerable adults, through a commitment to practice which protects them. We will carry out our responsibilities through adhering to, amongst other policies, our Safeguarding Policy, which aims to provide a caring, supportive and safe environment and values individuals for their unique talents and abilities, in an environment where all of our apprentices and learners can learn and develop to their full potential.

All staff, including facilitators, coaches, tutors, assessors and support staff will be required to complete Serco Education's Safeguarding Training upon joining the company/ team and this must be updated every twelve months. Staff are expected to uphold and promote the fundamental principles of British Values, including democracy, the rule of law, individual liberty and mutual respect, and tolerance of those with different faiths and beliefs. To ensure we are meeting our responsibilities, all staff, facilitators, coaches, tutors, assessors and support staff will be required to complete the Home Office Prevent training module and the Education and Training Foundation's Side by Side modules upon joining the company/ team and again, this must be updated every twelve months.

It is understandable that when a member of staff is faced with a safeguarding incident it can, in that moment, feel stressful and personally challenging. It is important that all staff, facilitators, coaches, tutors and assessors who become involved in reporting and escalating safeguarding incidents feel suitably equipped and able to support our apprentices and learners and act in their best interest.

This guidance has been prepared to support staff to navigate their way through what can feel like a daunting and difficult process. Serco has in place a network of designated safeguarding officers (DSO's) who are on hand to provide 1-2-1 support as well as designated safeguarding leads (DSL), who can provide further support.

PURPOSE

The purpose of this policy is:

- To provide a framework for protecting the apprentices and AEB learners that we work with from abuse of any kind.
- To ensure a safe environment for apprentices and learners to learn in.
- To ensure all staff recognise their responsibilities (through guidance, support and training), minimise risk and avoid situations where abuse or neglect might be alleged.
- To ensure staff are clear that they are responsible for their own actions and behaviours and avoid any conduct which would lead any reasonable person to question their motivation and intentions.
- To provide staff with guidance on procedures to adopt in the event that they suspect an apprentice or learner may be experiencing, or be at risk of, harm.
- To ensure Serco Ltd. learners are safe and protected within partner providers' provision.

SCOPE

At Serco Ltd., we:

- Believe that all staff have a collective and individual duty to provide a caring, safe and supportive environment that positively promotes the health and wellbeing of each individual apprentice and learner along with their social, physical and moral development.
- Recognise that all staff have a responsibility to protect our apprentices and learners from harm, ensuring a consistent learner-centered approach to support, based on a clear understanding of apprentices' and learners' individual needs and views and of the Serco Ltd. Safeguarding Procedures.
- This policy applies to all Serco staff who are responsible for interacting with Serco Education apprentices and the West Midlands Combined Authority AEB learners.
- Partner providers may use their own Safeguarding Policy which has been approved by Serco Ltd. Should a partner provider not have an up-to-date Safeguarding Policy that is approved by Serco Ltd., then this policy will apply to all their staff who are responsible for interacting with AEB learners. Further details on the requirements for partner providers safeguarding policies can be found in Appendix 2.
- All Serco Ltd. staff, apprentices, learners and partner providers have access to this policy, the referral procedure and any supporting documentation.

Note: from this point forwards, we use the term 'learner' to apply to both AEB learners and our external apprentices.

STATUTORY FRAMEWORK

This policy covers the legislative requirements and recommendations pertaining to the protection of young people and adults at risk in the UK, in accordance with statutory guidance on safeguarding and promoting the welfare of learners in education.

This policy has been created in line with:

- The Equality Act 2010, which legally protects people from discrimination in the workplace and in wider society.
- Safeguarding Vulnerable Groups Act 2016, was passed to help avoid harm, or risk of harm, by preventing people who are deemed unsuitable to work with children and vulnerable adults from gaining access to them through their work.
- Data Protection Act 2018 controls how personal information can be used and your rights to ask for information about yourself.
- Health and Safety Act 1974 and the Safety, Health and Welfare at Work Act 2005, set out the rights and obligations of both employers and employees. It also provides for substantial fines and penalties for breaches of the health and safety legislation.
- Human Rights Act 1998 gives you legal protection of your human rights, such as your right to a fair trial.
- Modern Slavery Act 2015, which is designed to combat modern slavery in the United Kingdom and consolidates previous offences relating to trafficking and slavery.
- Counter-Terrorism and Security Act 2015 the Act places a duty on certain bodies, in the exercise of their functions, to have "due regard to the need to prevent people from being drawn into terrorism". The act included putting into law the Prevent Duty, which is part of the overall counter-terrorism strategy, CONTEST. The aim of the Prevent strategy is to reduce the threat to the UK from terrorism by stopping people becoming terrorists or supporting terrorism.
- Public Interest Disclosure Act 1998 is the law that protects whistleblowers from negative treatment or unfair dismissal. It is part of the Employment Rights Act 1996.
- Local Safeguarding Boards that bring together all services for vulnerable people in a local area to focus on improving outcomes for all.

PROCEDURES



Recognise

The ability to recognise possible indicators of abuse is of fundamental importance, whether the abuse may occur in the learner's workplace or in any other setting. All those playing a role in meeting the learner's needs should be aware and informed so that possible abuse can be recognised, investigated and acted on seamlessly and effectively.

Signs and symptoms of abuse may include direct disclosure. Other people in a position to identify concerns include assessors, coaches, facilitators, partner provider tutors, business support staff, immediate colleagues and peers. All of these persons will be trained to understand the signs of abuse and know how where and who to report concerns to.

Respond

An appropriate response is vital. No report of, or concern about, possible abuse should be ignored. To determine the most appropriate response, find out whether you are dealing with an allegation from a learner against a member of staff or a member of a partner provider's staff, a fellow learner or someone else. Is this a disclosure from an individual alleging abuse to themselves or to another? Is the reporting of concern or suspicion? What precisely is alleged to have happened? Clarity is vital.

Do not lead or probe with questions, remain calm and demonstrate interest and concern while investigating. Listen carefully. Inform the person sharing a concern with you that what they have raised must be recorded and passed on so that possible abuse can be dealt with, and this will be done on a limited "need to know" basis with as few others as possible knowing the identity of the complainant and all in the chain of reporting will respect confidentiality.

Reassure them that they have done the right thing in reporting their concerns and that you will do everything you can to help. Do not make unrealistic promises. Ensure that testimony is recorded and reported, and that the complaint and the subject of the complaint are treated in line with Serco Ltd.'s safeguarding policy and procedures.

Report

Report your concerns to the relevant programme manager or your line manager in the first instance. Should this be inappropriate you should report directly to the DSL or DSO responsible for dealing with all issues relating to safeguarding. If this is not possible you should report your concern to a relevant member of the Serco Ltd. ESE Senior Management Team. Once you have reported the cause for concern by completing safeguarding record sheet (Appendix 1) and informed your DSO, the responsibility resides with them.

Record

You should record precisely what has been alleged, using the words of the complainant. Your record should use accurate quotation. It should also, if felt appropriate, include factual observations about the physical and emotional state of the individual sharing their concerns with you. This information should be recorded and stored securely, in line with Serco's Information & Data Privacy Group Standard and should be accessible only to those who need to access it as part of the action taken. Please record all safeguarding incidents on Appendix 1 and send securely to your DSO or if appropriate, the DSL.

Refer

It is the Designated Safeguarding Lead or the deputies who can make decisions to refer a complaint or allegation, having gathered and examined all relevant testimony and information.

However, in exceptional circumstances where people are at immediate risk of harm OR where the DSO is acting inappropriately, anyone can make this referral. If a member of staff does make the referral, then they need to ensure they still report this to the DSL.

Only the Designated Safeguarding Lead or their deputies should initiate an enquiry into complaints, allegations or suspicion of abuse. An enquiry may include questioning colleagues, learners, assessors or subcontractors including partner providers. Actions of these sorts carried out by someone other than the designated safeguarding lead or deputy could be construed as unjustified interference which could jeopardise an enquiry and any possible subsequent actions.

RESPONSIBILITIES

Serco Ltd. Delivery Teams

All members of the Serco Ltd. delivery teams **working directly with our external apprentices and/or AEB learners** have a duty to:

- Understand and fulfil their safeguarding responsibilities as outlined in this policy
- Ensure that all learner data is kept confidential in line with the Learning Agreement Contract and Serco Data Protection Policy
- Report any safeguarding concerns or disclosures immediately to their Designated Safeguarding Lead/Officer in line with the reporting concerns procedure outlined in this policy
- Follow the formal safeguarding referral procedure implemented in support of this policy
- Maintain strict confidentiality with learners in line with this policy and guidance from the Designated Safeguarding Lead/Officers.
- Engage in all safeguarding training (Serco Ltd. Safeguarding training, Home Office Prevent training and ETF's Side by Side modules). These must be updated on an annual basis
- Act on the basis that the welfare of the learner is of paramount concern and if in doubt, to immediately seek advice from the Designated Safeguarding Lead/Officers.
- Sign and return Appendix 3 annually to confirm understanding of this policy

Designated Safeguarding Lead (DSL):

Serco Ltd. have a Designated Safeguarding Lead with overall responsibility for Safeguarding. Their responsibilities include:

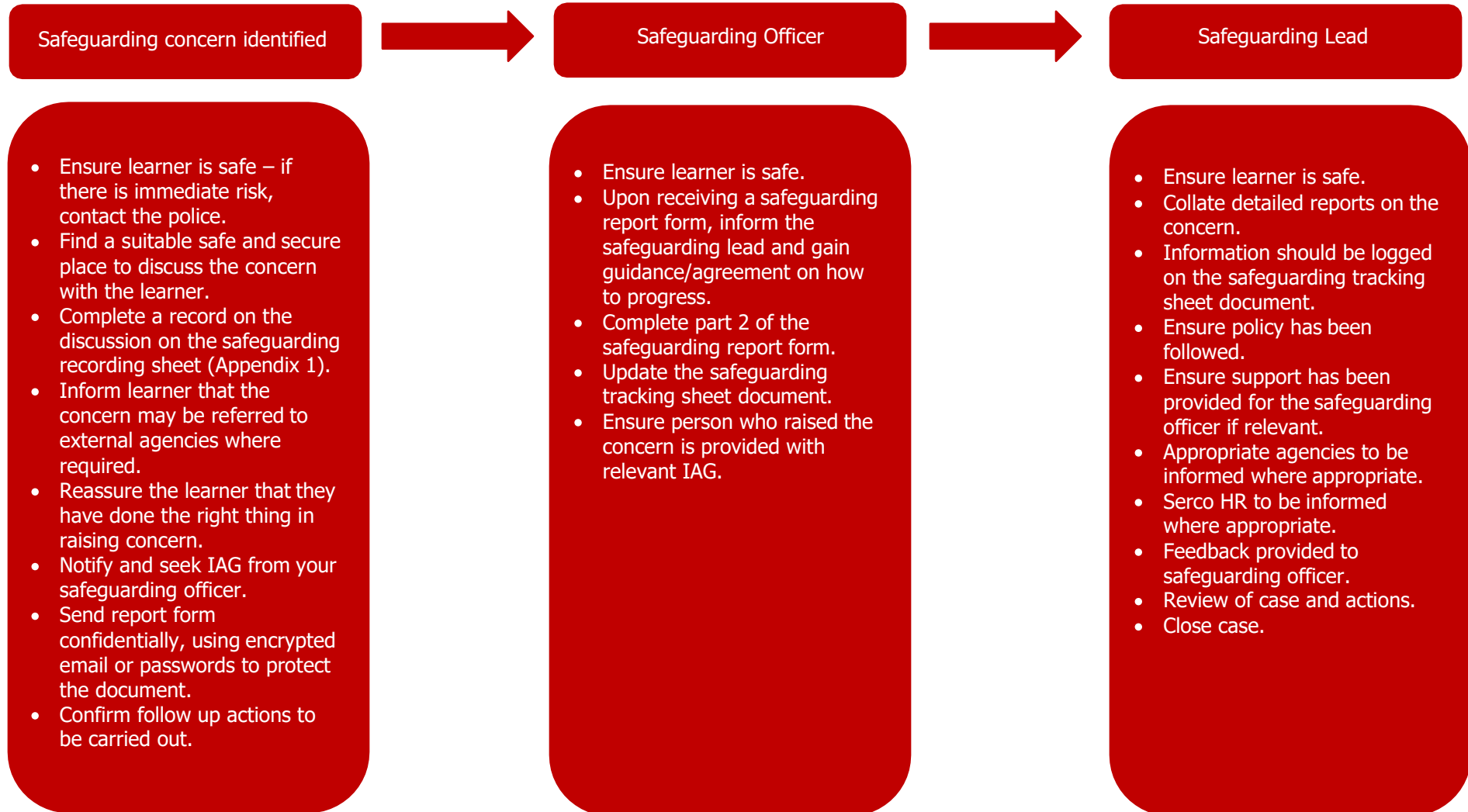
- Completion of a relevant Safeguarding qualification (including annual refresher training) and to undertake regular CPD, including attending ETF's safeguarding forums and sessions with local Prevent Coordinator, sharing the forums etc. with the Designated Safeguarding Officers.
- Updating the Serco Safeguarding Policy on an annual basis.
- Ensuring there is at least one Designated Safeguarding Officer (DSO) to support both apprenticeships and AEB and who is qualified to level three.
- Providing support and advice to staff (including DSOs) who share a concern or disclosure about a learner.
- Maintaining appropriate records of concern, incident or disclosure on a secure central risk register.
- Developing, delivering and reviewing staff training in safeguarding.
- **Ensuring all staff complete safeguarding training as part of their induction** and have up to date, relevant safeguarding training (including Serco Ltd.'s safeguarding training, the Home Office Prevent training and ETF's Side by Side modules).
- Ensuring that all non-confidential documentation relating to Serco Ltd. safeguarding policy and procedures is made available to all Serco staff involved in the delivery of our external apprenticeships and AEB provision as well as learners and providers.
- Analyse information on the central register of safeguarding concerns to feed into continuous improvement of Serco training programmes, for example, ensuring our Apprentice/Provider newsletters contains useful information to address common safeguarding themes.

Designated Safeguarding Officer (DSO):

Serco Ltd. apprenticeship and AEB provision will include a minimum of two trained Safeguarding Officer who will support the Designated Safeguarding Lead. These DSO's will:

- Hold a level 2 qualification in safeguarding, including annual refresher training.
- In partnership with the DSL, share attendance at ETF's safeguarding forums and sessions with local Prevent Coordinator
- Provide support and advice to staff who share a concern or disclosure about a learner and update a central register of concerns as above
- Immediately investigate significant concerns and refer to the appropriate Adult Safeguarding Board when necessary
- Ensure Serco Education and Serco AEB have safe recruitment procedures and keep a register of staff requiring DBS checks and the results of such checks.
- Input to and deliver Serco Ltd. apprenticeship and AEB provision staff training in safeguarding.
- Work as part of the central safeguarding team to provide cover for other DSO's.
- Ensure that all non-confidential documentation relating to Serco Ltd. safeguarding policy and procedures is made available to all staff, learners and providers.

RESPONSIBILITIES



SAFER RECRUITMENT

Serco Ltd. will undertake safe recruitment to ensure that staff are suitable to work in a training provider setting with potentially vulnerable learners. It reserves the right to refuse to employ staff whom it has a reasonable belief may pose a risk to its learners.

Serco Ltd. has systems in place to prevent unsuitable people from working with vulnerable adults and to promote safe practice. These systems apply to all new staff and require the following checks to be made prior to appointment:

- Documentary evidence checks to identify nationality, residency and right to work status.
- If the individual will be having direct contact with apprentices and/or learners, DBS checks of at least a Standard disclosure (Disclosure & Barring Service).
- Where subcontractors are delivering courses on behalf of Serco Ltd., the provider must provide written assurance that all relevant staff have been DBS checked.

In accordance with the Regulations, records of all checks carried out are kept in a single central record.

If a DBS check is delayed for any reason the staff member will not be subject to lone working with learners. They must always have a member of staff present who is fully DBS checked until the point they receive a full DBS check. Should the DBS check be considered unsatisfactory by the DSL, the staff member may be moved into a non-contact role with learners, or their position may be terminated.

All newly appointed staff must complete safeguarding training as part of their induction, complete annual refresher training and participate in all safeguarding training offered to the team.

ALLEGATIONS AGAINST MEMBERS OF THE DELIVERY TEAM

Serco Ltd. take allegations against any member of the delivery team seriously and believe it is essential that all cases of suspected maltreatment or significant harm are investigated quickly and professionally whatever the validity.

Staff should take care not to place themselves in a vulnerable position with a learner or a situation which could be misconstrued.

As our delivery teams regularly work alone with learners, it is important that the Designated Safeguarding Lead/Officer is made aware of any potential concerns that arise.

If a member of staff suspects any other member of staff of safeguarding malpractice, it is their responsibility to immediately bring these concerns to the DSO or DSL in the interest of the learner and the business.

If the DSO or DSL is unavailable, then this concern should be immediately reported to a member of the Senior Management Team (SMT) instead.

The Designated Safeguarding Officer/ Lead will:

- Provide support and advice to the reporting member of the delivery team including referring to and adhering to Serco Ltd.'s Whistleblowing Policy.
- Ask the reporting member of the delivery team to provide a written record of their concern following procedures for reporting concerns, which will be housed in the secure safeguarding single central file.
- Consult with a member of the SMT as appropriate.

- In the interest of the business and the learner, immediately seek advice from the Local Authority Designated Officer and/or from the relevant Local Adult Safeguarding Board if the DSL considers referral is required.
- Efficiently act on advice, whether this is to take further investigative action or not.

Any allegation made against a Designated Safeguarding Lead should be reported directly to a member of the SMT, who will act as above, without notifying the Designated Safeguarding Lead.

All staff should be aware of their responsibility to immediately raise concerns, where they exist, about any member of staff, including the Designated Safeguarding Leads. We recognise that our learners cannot be expected to raise concerns in an environment where staff fail to do so.

CONFIDENTIALITY AND INFORMATION SHARING

Serco Ltd. recognise that all matters relating to safeguarding are confidential, but all members of the delivery team must act on the basis that the safety of the learner is the overriding concern. The degree of confidentiality will be governed by the need to protect the learner.

The Designated Safeguarding Officer will disclose any information about a learner or concern to other members of staff, the learner's employer or other external agencies on a need-to-know basis only.

All staff must be aware that they have a responsibility to immediately disclose information which if not shared, may compromise a learner's safety or welfare; all staff will be fully supported by their Designated Safeguarding Lead/Officer.

A GUIDE TO SAFEGUARDING

This guide is to inform staff, sub-contractors, partner providers, employers, apprentices and other learners about safeguarding and the responsibilities placed on Serco Ltd. as a training provider.

It is a requirement of all our stakeholders to be aware of their safeguarding responsibilities and report any concerns that they might have regarding the welfare of our staff, delivery team, apprentices and learners.

Safeguarding aims to protect the welfare of individuals from sexual, physical or emotional harm or abuse. This involves putting in place a number of measures to create a safe environment in which learners can thrive and achieve, as well as creating a safe, transparent and professional environment for staff, members of the delivery team and our apprentices and learners.

Safeguarding applies to children (learners under the age of 18) and vulnerable adults. All learners could be classed as vulnerable adults due to the nature of their work and study programmes.

Serco Ltd. has a dedicated safeguarding team who are trained to the appropriate level in safeguarding responsibilities. The team is led by a Designated Safeguarding Lead (DSL), with two supporting DSLs and also has 4 nominated Designated Safeguarding Officers (DSOs). Additionally, all Serco Ltd. staff receive internal training and support on safeguarding to an appropriate standard.

Safeguarding Referrals:

It is the responsibility of all stakeholders including a learner's line manager, fellow learners, training managers, tutors, skills and development coaches and other Serco Ltd. staff to refer any concerns that they have via the Safeguarding Referral Procedure outlined in Appendix 1.

Safeguarding concerns (and examples of possible signs and symptoms) might include:

- **Physical Abuse** - unexplained and or frequent bruising, burns, bites and or scars.
- **Domestic Abuse** – an incident or pattern of incidents of threatening, coercive, controlling, degrading or violent behaviour.
- **Sexual Abuse** - altered attitudes to particular adults, behavioural concerns such as depression, self-harm, over or under eating or absence from the workplace / college.
- **Emotional/Psychological Abuse** - low self-esteem, lack of confidence, aggression and behavioural issues such as petty crime, telling lies and being disruptive.
- **Neglect** - undernourished, dirty skin, hair and or clothing, inappropriate clothing for the weather, tiredness and hunger (self and other).
- **Addiction (for example, drugs, alcohol, gambling, shopping)** – not having control over using, doing or taking something to the point where it could be harmful to you
- **Female Genital Mutilation (FGM)** – any procedure that entails partial or full removal of genitalia for non-medical reasons
- **Financial abuse** - having money and or possessions taken from them by someone they do, or do not, know.
- **Forced marriage** - different to arranged marriage, forced marriage is where coercion is used, and the marriage is without the consent of either or both parties.
- **County lines** – a form of criminal exploitation where urban gangs persuade, coerce or force vulnerable people to store and distribute drugs/money
- **Modern Day Slavery** – seeming to be under the control or influence of others, appearing to be malnourished or withdrawn, living in dirty, cramped or overcrowded conditions, lack of personal effects or identification documents.
- **Sexual Harassment** – is unwanted conduct of a sexual nature, this can be physical or verbal.

As well as the above, the Safeguarding team will also support an individual's additional welfare needs that might include the following:

- Exam stress and anxiety.
- Financial matters.
- Bullying, harassment or victimization.
- The threat of radicalisation.
- Additional learning support needs.
- Issues raised by current events, for example, Covid-19 or the cost of living

In all such cases, the key point is to make a referral to the Safeguarding Team following our Safeguarding Procedures. From that point the team will be able to provide the right advice and support to ensure the individual is fully supported and safe from harm.

PEER ON PEER ABUSE / HARMFUL SEXUAL BEHAVIOUR INCLUDING SEXUAL VIOLENCE AND SEXUAL HARASSMENT

Sexual Harassment

An Ofsted review report of sexual abuse in schools and colleges (June 2021) has identified how prevalent sexual harassment and online sexual abuse is for learners and that for some, incidents are so commonplace that they see no point in reporting them, suggesting that sexual harassment, including online sexual abuse has become normalised for learners. As a result of this report, Serco will ensure that this is tackled with a 'whole provider' approach to address these issues and to create a culture where sexual harassment is not tolerated. This will include regular monitoring of such incidents during the review of learning.

Sexual harassment is unwanted conduct of a sexual nature, this can be physical or verbal.

In most instances, the conduct of learners towards each other will be covered by our Code of Conduct policy. However, some allegations may be of such a serious nature that they may raise safeguarding concerns.

Serco recognises that learners are capable of abusing their peers and it will not be passed off as 'banter' or 'part of growing up'. Sexual harassment may include:

- Domestic abuse – an incident or pattern of actual or threatened acts of physical, sexual, financial and/or emotional abuse, perpetrated by an adolescent against a current or former dating partner regardless of gender or sexuality.
- Child Sexual Exploitation – children under the age of 18 may be sexually abused in the context of exploitative relationships, contexts and situations by peers who are also under 18.
- Harmful Sexual Behaviour – learners presenting with sexual behaviours that are outside of developmentally 'normative' parameters and harmful to themselves and others.
- Upskirting - is now a criminal offence and is defined as 'taking a picture under a person's clothing without them knowing, with the intention of viewing their genitals or buttocks to obtain sexual gratification, or cause the victim humiliation, distress or alarm.' (DfE, 2019).

RADICALISATION AND EXTREMISM

As part of our safeguarding requirements under the Prevent Duty, it is the responsibility of Serco Ltd. to help protect our staff, delivery teams, apprentices and learners from all types of radicalisation and extremism. We will provide all of our learners with training in Prevent, and in radicalisation and extremism, including the Home Office and ETF's training materials.

Radicalisation is defined as the process by which people come to support terrorism and extremism and, in some cases, to then participate in terrorist activity.

The Prevent Duty is the duty in the Counterterrorism and Security Act 2015 on specified authorities, in the exercise of their functions, to have due regard to the need to prevent people from being drawn into terrorism.

Indicators that learners might be vulnerable to radicalisation include:

Identity

- The learner is distanced from their cultural /religious heritage and experiences
- Discomfort about their place in society
- Personal crisis – the learner may be experiencing family tensions
- A sense of isolation

- Low self-esteem
- They may have dissociated from their existing friendship group and become involved with a new and different group of friends
- They may be searching for answers to questions about identity, faith and belonging.

Further details may be found in our Prevent Policy.

Personal Circumstances

- Migration
- Local community tension
- Events affecting the learner's country or region of origin may contribute to a sense of grievance that is triggered by personal experience of racism or discrimination or aspects of Government policy.

Unmet Aspirations

The learner may have:

- Perceptions of injustice
- A feeling of failure
- Rejection of civic life.

Experiences of Criminality

- Involvement with criminal groups
- Imprisonment
- Poor resettlement or reintegration on release.

Special Educational Needs

- A lack of or inability to participate in social interaction
- A lack of or inability to empathise with others
- Not understanding the consequences of their actions
- A lack of awareness of the motivations of others.

More critical risk factors could include:

- Being in contact with extremist recruiters
- Accessing violent extremist websites, especially those with a social networking element
- Possessing or accessing violent extremist literature
- Using extremist narratives and a global ideology to explain personal disadvantage
- Justifying the use of violence to solve societal issues
- Joining or seeking to join extremist organisation
- Significant changes to appearance and/or behaviour
- Experiencing a high level of social isolation, resulting in issues of identity and/or personal crisis.

COVID-19

Coronavirus disease (COVID-19) is an infectious disease caused by a coronavirus first identified late in 2019.

Most people infected with the COVID-19 virus will experience mild to moderate respiratory illness and recover without requiring special treatment. Older people, and those with underlying medical

problems like cardiovascular disease, diabetes, chronic respiratory disease, and cancer are more likely to develop serious illness.

Although the vaccination programme is now advanced within the UK, the best way to prevent and slow down transmission is to be well informed about the virus, the disease it causes and how it spreads. Protect yourself and others from infection by washing your hands or using an alcohol-based sanitiser frequently and not touching your face. The COVID-19 virus spreads primarily through droplets of saliva or discharge from the nose when an infected person coughs or sneezes, so it's important that you also practice respiratory etiquette (for example, by coughing into a flexed elbow).

Serco Ltd.'s apprentices and learners will no doubt be very knowledgeable on the disease following its prevalence within the healthcare and education sectors, but the situation is very fast-changing and bouts of 'fake news' seem to follow each new announcement and variant, so it is important to stay informed about the facts of the pandemic and its effects.

The World Health Organisation have some very useful 'myth buster' documents on their website, which you can find at <https://www.who.int/emergencies/diseases/novel-coronavirus-2019/advice-for-public>, along with all of the current advice and up-to-date information on the Covid-19 outbreak.

We are still learning about the short- and long-term effects of the disease, so it is important for Serco Ltd. to adhere to all the government advice to keep our learners safe. As many of our learners work on the frontline, this is even more imperative. Serco Ltd. will continue to stay informed and will work at all times to ensure a supportive and flexible approach is taken with our learners at all times.

ONLINE SAFETY

In simple terms, online safety refers to the act of staying safe online. It is also commonly known as internet safety, e-safety and cyber safety. It encompasses all technological devices which have access to the internet from PCs and laptops to smartphones and tablets.

Being safe online means individuals are protecting themselves and others from online harm and risks which may jeopardise their personal information, lead to unsafe communications or even effect their mental health and wellbeing.

Operating within an online space is something most of us do subconsciously, but few people consider the potential dangers which exist on the web. A recent Ofcom report found that people are more engaged online than ever before. Ownership of smart devices is increasing and the range of content they are viewing is expanding.

In an ever-changing world, ensuring our and our learner's safety online has never been more important. It's an all-encompassing duty and something every Serco Ltd. employee and sub-contractor must be vigilant of.

What are the risks?

It goes without saying that the internet can be an unforgiving place. Aside from the more obvious risks such as online bullying, grooming or device addiction, the way we and our learners are engaging with the online world means that we all have to take stock of our mental health and wellbeing, the type of content we are viewing and what we are posting online.

This includes the heightened concern around 'fake news' and what impact social media influencers may be having on people's behaviour. It also includes the ongoing debate as to whether online gaming and certain features of online gaming, such as loot boxes and skins, are categorised as gambling and are encouraging gambling habits.

The number of varying social media applications continues to grow too. Previously, if you educated yourself on the mechanics of Facebook, TikTok, Snapchat and Instagram, you might be up to date. However, we are now in an age where a multitude of apps exist, and they are more complex than ever before. Whilst the above remain popular, more apps are being created all the time and many of them are free to download and available at the touch of a button.

Such are the range of risks we now need to be aware of and the different platforms that individuals can access, it is not easy to keep up to date.

What should we do?

It is important for all employees of Serco Ltd. and for the overall delivery team to stay up to date on the latest risks and ensure we are doing all we can to keep our learners safe online.

Our facilitators and apprenticeship delivery teams should regularly review the Serco Education apprentice forums on the Leadership Learning Centre.

Partner Providers are required to regularly review their online materials and this should be checked by the quality team during any provider reviews.

REPORTING AN INCIDENT

If you suspect or know that a Serco Ltd. learner is at risk, then you **must** report this to the safeguarding team. This can be done by completing a reporting form (appendix 1 of this policy).

If you do not feel that the learner is at immediate risk, then this can be via phone call or by completing and sending Appendix 1.

If, however, you feel that the learner is at immediate risk then it is your responsibility to ensure that you speak directly to a designated safeguarding officer or lead within Serco Ltd. and that they acknowledge this. It is not acceptable to leave a message.

Report such concerns by telephoning your Designated Safeguarding Lead or, if they are unavailable, the Designated Safeguarding Officer. In the event that the DSL is unavailable, then you must report this to a member of the Serco Education SMT.

<p>Designated Safeguarding Lead Jo Winwood Phone: 07718085572 Email: jo.winwood@serco.com</p>	
<p>Designated Safeguarding Officer Dave Hawkes Phone: 07458 141872 Email: dave.hawkes@serco.com</p>	<p>Designated Safeguarding Officer Sarah Walters Phone: 07458 145203 Email: sarah.walters@serco.com</p>
<p>Designated Safeguarding Officer Chloe Worton Phone: 07458 061422 Email: chloe.worton@serco.com</p>	<p>Designated Safeguarding Officer Bronach Grewal Phone: 07458 108165 Email: bronach.grewal@serco.com</p>
<p>Or email us in confidence at safeguarding.educ@serco.com</p>	

MONITORING AND REVIEW OF THIS POLICY

This policy is to be reviewed at least annually by the Designated Safeguarding Lead and approved by the governance board.

The policy is due to be reviewed on or before: 1st August 2023

Appendix 1: Reporting an Incident

SAFEGUARDING RECORD FORM

Incident number:

Full Name of Safeguarding Subject:	DOB:
Contact details:	Additional needs:
Qualification:	Role:
Name of person reporting the concern	Telephone: E mail:
Any other safeguarding records held relating to this person? YES/NO Provide reference:	
Other Agency Involvement? YES/NO NAME:	

Complete for all incidents of concern. If one has been completed previously then please add incident number to cross reference.

Logging a concern about a learner's safety and welfare

Part 1 (for use by any staff member)

Date and Time of Incident:		Date and Time of record:	
Print Name (Reporter):		Contact Details:	
Record details of the concern/disclosure/incident factually: What are you worried about? Who? What (if recording a verbal disclosure by a learner use their words)? Where? When (date and time of incident)? Any witnesses?			

<p>Is the person making the report expressing their own concerns, or passing on those of somebody else? Please record details below:</p>			
<p>Are there any immediate signs for concern (physical, behavioural emotional or indirect)?</p>			
<p>Any other relevant information (distinguish between fact and opinion). Previous concerns etc.</p>			
<p>Is the learner safe? (if no please contact the DSO/L immediately) Do not send an email or leave a phone message. If you are unable to contact a DSO/L then please speak to a member of the ESE Leadership Team</p>			
Print Name:			
Signature		Date:	

Check to make sure your report is clear to someone else reading it.

Please pass this form securely to your Designated Safeguarding Officer.

Action following concern about a learner's safety and welfare

Part 2 (for use by DSO/I)

DSO/L Name		Email	
Time and date information received		Telephone	
Advice sought – if required (date, time, name, role, organisation and advice given).			
Action taken – IAG/Referral with reasons. <i>Note time, date, names, who information shared with and when etc.</i>			
Parent/Guardian/carer informed? (if applicable) Y/N and reasons.			
Outcome Record names of individuals/agencies who have given information regarding outcome of any referral (if made)			

Print Name		Signature	
Signature		Date:	Incident logged Yes/No

Upon completion of this form please ensure details recorded are added to Serco National safeguarding log and ensure that the Designated Safeguarding Lead is updated.

Appendix 2: Sub-Contractor's Safeguarding Policy Checks

AEB partner providers may use their own Safeguarding Policy which has been approved by Serco Ltd. Should a partner provider not have an up-to-date Safeguarding Policy that is approved by Serco Ltd., then Serco's policy will apply to all their staff who are responsible for interacting with Serco Ltd.'s learners.

In order to be acceptable, a partner provider safeguarding policy must include:

- The organisation name that matches the organisation that we contract with.
- A safeguarding commitment statement/aims.
- Responsibilities of staff.
- Reference to relevant legislations.
- Named safeguarding officer/s.
- Details of the reporting process.
- It must be in date and include the next review date.

Appendix 3: Delivery Team Confirmation

To be completed by each member of the delivery team including facilitators, coaches, leadership, management and administration annually.

Partner providers are also required to complete this appendix annually.

Name:		Role:	
Working with: (delete if not applicable)	Apprenticeships/AEB		
I confirm that I have read and understood this safeguarding policy			
Signature		Date:	