

ELA TRAINING SERVICES

Safeguarding Policy

Key Elements

This document sets out the responsibilities and expectations for all employees of The ELA Group in relation to and promoting the health, safety, wellbeing, ethical and professional conduct and safeguarding of all stakeholders of the ELA Group. Implementation is monitored by the Managing Director and supported by the board of Directors.

Agreed by:
Inderjot Singh,
Managing Director,
ELA Group

Specific Safeguarding Policy Content	
Content	Page
Directors' statement of commitment	2
Introduction	3
Application of this policy	5
Policy aims	5
ELA safeguarding principles	5
ELA staff roles and responsibilities	6
Implementing the ELA Training Services Safeguarding Policy	6
ELA Safeguarding Policy: definition; responding to concerns and disclosure	13
Safer Recruitment Policy	15
Whistleblowing Policy	18
Bullying Policy and Procedure	19
E-Safety Policy and Procedure	21
Health, Safety and Welfare Policy	26
Prevent Policy	30
Record of concern reporting	34
Accident/Incident/Near Miss reporting	36
Safeguarding 1 to 5 steps	37
Record of concern form	38
Accident/Incident/Near Miss reporting form	39
Monitoring and Review	40

Directors' statement of commitment to an unbiased, non-partisan, non-discriminatory and ethical workplace.

The Directors of the ELA Group wish to make it clear that the propagation of extremist religious views, partisan political views and discriminatory practices by employees and stakeholders will not be tolerated.

All employees are expected to offer a balanced presentation of views and opinions to learners while carrying out their duties and taking part in extra-curricular activities that are provided or organised by or on behalf of the ELA Group including through the distribution of promotional materials. Extremist religious views, partisan political views and discriminatory practices by employees and stakeholders **MUST** be reported and followed up on robustly.

We take our commitment to providing an **unbiased, non-partisan, non-discriminatory and ethical workplace** seriously. Failure to observe the above could lead to disciplinary action (including summary dismissal) and referral to government, regulatory organisations and education authorities.



ELA Training Services is committed to protecting the health, safety and welfare of our stakeholders. It is our policy to ensure, as far as is reasonably practicable, that all required tasks and activities are carried out with the minimum of risk to all of our stakeholders.

Taking advice from policies like Keeping Children safe in Education (Sept 2018) and No Secrets guidance (2015), we have including all relevant polices into our Safeguarding Policy so as to make this document as comprehensive as possible.

1. Introduction

We define **stakeholders** as all who are, and who are perceived to be affected by the operations of ELA Training Services. This especially includes and is not restricted to **employees, vulnerable people, children and young people** with whom our work brings us into contact. We define vulnerable people as people who are or may be for any reason unable to take care of themselves, or unable to protect themselves against significant harm or exploitation. **We make it clear that although most the procedures and guidelines are designed to be used by ELA Training Services staff to safeguard ELA Training Services learners, the procedures and guidelines are also intended to be used with reasonable discretion by stakeholders to protect other stakeholders.**

In the context of child protection, **children and young people** refers to anyone under 18 years of age. It is the responsibility of everyone at ELA Training Services to promote the protection of all stakeholders, especially vulnerable people, children and young people.

We define **Safeguarding** as the action we take to promote the welfare of stakeholders and protect them from harm. It means caring for learners appropriately and protecting them from that which is not in their best interests; as such, it includes health and safety, child and vulnerable people protection and pastoral care. Connected to safeguarding is the phrase '**Duty of Care**'; there is a legal responsibility that all employees who work with stakeholders have a duty to look after them properly; children and vulnerable people especially depend on adults for their safety and well-being.

ELA Training Services acknowledges the duty of care to safeguard and promote the welfare of children and is committed to ensuring safeguarding practice reflects statutory responsibilities, government guidance and complies with best practice and regulatory requirements. The policy recognises that the welfare and interests of children are paramount in all circumstances. It aims to ensure that regardless of age, gender, religion or beliefs, ethnicity, disability, sexual orientation or socioeconomic background, all people are equally regarded.

ELA Training Services is committed to safeguarding the welfare of ELA Training Services stakeholders and has developed this Safeguarding Protection Policy and Procedure to support all stakeholders in putting into practice this commitment.

This policy establishes the roles and responsibilities of everyone who works for ELA Training Services in relation to the protection of all stakeholders, especially vulnerable people, children and young people with whom their work brings them into contact. In following this policy, staff are always expected to maintain a sense of proportion, apply common sense to situations and protect the child's welfare as priority. This policy is based on, and reflects, the principles of both UK legislation and guidance and other relevant ELA Training Services policies and procedures. The approach has been developed in such a way as to be consistent with 'Best Practice' within the field of safeguarding.

The welfare of the child or young person is the paramount consideration. All children and young people, regardless of age, disability, gender, racial or ethnic origin, religious belief and sexual identity have a right to protection from harm or abuse.

It is also the duty of ELA Training Services to ensure that persons are not placed in situations where abuse might be alleged. It is not intended that the policy should restrict staff from normal ways of working, but Trainers/assessors and Members of Staff always need to consider how an action or activity may be perceived as opposed to how it is intended.

ELA Training Services promote well-being by applying principles of good practice by undertaking to:

- treat stakeholders with care, respect and dignity
- recognise that those working for ELA Training Services will be perceived by stakeholders and young people as trusted representatives of ELA Training Services

- ensure communication with stakeholders is open and clear
- assess the risks to stakeholders of its activities

ELA Training Services will fulfil our local and national responsibilities as laid out in the following documents :

1. The Procedures of the Borough of Hounslow's Safeguarding Boards (Jan 2018)
2. Keeping Children Safe in Education: Statutory guidance for schools and colleges (DfE Sept 2018)
3. The Data Protection Act (2018)
4. The General Data Protection Regulation (GDPR) (Regulation (EU) 2018)
5. No Secrets (2015)
6. The Prevent Duty (March 2016) as part of the Counter-Terrorism and Security Act (2015)
7. Working Together to Safeguard Children (DfE 2015)
8. Mental Health and Behaviour in Schools: Departmental Advice (DfE 2014)
9. The Education Act 2002 s175 / s157

2. Application of this Policy

This policy and procedures are widely promoted and are mandatory for everyone involved in ELA Training Services: for ELA Training Services staff and trainers/assessors and stakeholders. It details what ELA Training Services thinks about safeguarding, and what we do to keep stakeholders safe.

ELA Training Services is committed to safeguarding the welfare of every Guardianship child in its care and all adults associated with our organisation will be expected to share our ethos and actively engage in looking after under 18s safely.

It is essential that the ELA Training Services Safeguarding Policy and Guidance is known to all trainers/assessors.

Failure to comply with the policy and procedures will be addressed without delay and may ultimately result in dismissal/exclusion from the organisation.

3. Policy Aims

- To provide protection for the stakeholders and young people who receive ELA Training Services' services, including the stakeholders of our trainers/assessors via the learner code of conduct.
- To provide ELA Training Services staff, trainers/assessors and their families with guidance on procedures they should adopt in the event that they suspect a child or young person may be experiencing, or be at risk of, harm.

4. ELA Training Services Safeguarding Principles

We will seek to safeguard stakeholders and learners by:

- valuing, listening to and respecting them;
- adopting safeguarding guidelines through procedures and a code of conduct for staff, trainers/assessors and stakeholder;
- promoting and prioritising the safety and wellbeing of stakeholders and young people;
- recruiting staff and trainers/assessors safely, ensuring all necessary checks are made, preventing the employment/deployment of unsuitable individuals;
- sharing information about safeguarding and good practice with ELA Training Services Guardianship stakeholders, employers, staff, trainers/assessors and their families;
- sharing information about concerns with agencies who need to know, and involving employers and stakeholders appropriately;
- providing effective management for ELA Training Services staff and trainers/assessors through supervision, support and training;
- providing a safe and secure environment for all stakeholders;
- ensuring all stakeholders are safe and secure and protected from harm;
- ensuring that all ELA Training Services Guardianship stakeholders know who to turn to for help, advice or support, and have access to 24 hour support;
- appointing a Designated Safeguarding Lead who has overall responsibility for the safeguarding and welfare of all ELA Training Services Guardianship stakeholders;
- ensuring that everyone understands their roles and responsibilities in respect of safeguarding and is provided with appropriate training to recognise, identify and respond to signs of abuse, neglect and other safeguarding concerns relating to stakeholders and young people;
- ensuring that all staff and trainers/assessors follow ELA Training Services policies and procedures relating to safeguarding and welfare and are aware of who in ELA Training Services is responsible for safeguarding;

- ensuring that the relevant persons are aware of the special needs or particular vulnerabilities of individual ELA Training Services stakeholders;
- ensuring appropriate action is taken in the event of incidents/concerns of abuse and support provided to the individual/s who raise or disclose the concern;
- ensuring that confidential, detailed and accurate records of all safeguarding concerns are maintained and securely stored.

5. ELA Training Services staff roles and responsibilities

At ELA Training Services safeguarding is everyone's responsibility. Within ELA Training Services, the Directors oversee the day to day welfare and safeguarding matters, placement of ELA Training Services learners with assessors/trainers, induction and recording systems.

Chris Kistan (Director) is the Designated Safeguarding Lead (DSL) and has responsibility for implementing the ELA Training Services Safeguarding Policy. Chris Kistan is trained to Level 3 in Safeguarding. The Safeguarding Officer is responsible for reporting any allegations of abuse and concerns that occur.

6. Implementing ELA Training Services' Safeguarding Policy

- ELA Training Services considers it the duty of Trainers/assessors and Members of Staff to protect stakeholders and young people who they come into contact with from abuse. This is part of our safeguarding stakeholders procedure.
- All trainers/assessors and adults in the training environment must understand their responsibilities in being alert to the signs of abuse and responsibility for referring any concerns to the designated senior person responsible for child protection.
- All trainers/assessors and adults in the training environment must understand the responsibility placed on ELA Training Services for child protection.
- Not all concerns about stakeholders or young people relate to abuse, there may well be other explanations. It is important to keep an open mind and consider what you know about the child and their circumstances.
- If you are worried, it is not your responsibility to investigate and decide if it is abuse. It is your responsibility to act on your concerns and do something about it.

Recognising abuse is one of the first steps in protecting stakeholders. There could be signs or behaviour that make you feel concerned.

Any change in behaviour without a safe explain must always alert staff to a concern. This awareness promotes staff to get to know stakeholders and is in keeping with the company ethos of ELA Training Services.



All Trainers/assessors and Members of Staff should be alert to the following types of behaviour in stakeholders:

- becoming excessively aggressive, withdrawn or clingy
- seeming to be keeping a secret
- personality changes – becoming insecure
- unreasonable fear of certain people or places
- acting out in an inappropriate way perhaps with adults, other stakeholders, toys or objects
- inconsistent explanations of bruising, injuries or burns
- sexually explicit language or actions

Definition of Abuse

Taking advice from policies like Keeping Children safe in Education (Sept 2018) and No Secrets guidance (2015), we train staff to identify and respond to the following types of abuse.

1. **Physical Abuse** – This relates to any form of malpractice involving an individual's physical wellbeing. More commonly known examples include hitting or kicking a patient or adult in a care setting, but can also extend to misuse of medication and inappropriate use of restraint. **This includes Female Genital Mutilation, Bullying and Peer or Peer Abuse.**
2. **Emotional/ Psychological Abuse** – Usually a repeated form of verbal abuse, where an individual is subjected to threats of harm, isolation or seclusion from services, harassment or intimidation, as well anything that alters the person's behaviour from the way they'd like to live. **Child Sexual Exploitation and Peer or Peer Abuse is included in here.**
3. **Financial Abuse** – Where someone in a caring role misuses the finances of the individual they care for. This could be for personal gain or in a way originally intended to help the adult receiving care, but using someone's money without their consent is a crime.
4. **Sexual Abuse** – If the adult in need of social care is subjected to sexual activity that they did not or could not consent to, including anything from inappropriate touching to rape, the perpetrator is guilty of sexual abuse. **Child Sexual Exploitation and Peer or Peer Abuse is included in here.**
5. **Organisational Abuse** – This is defined as a service, agency or care home putting its own needs before those of the service users. From imposing inflexible daily routine to reorganising a staff rota to suit its own costs, organisational abuse can damage the service users' lives.

6. **Neglect** – Instances of a care worker ignoring the care needs of an individual and failing to provide the care services they require is neglect. Extreme cases can lead to irreparable psychological damage and even death.
7. **Discriminatory Abuse** – Refusing to acknowledge the different care needed for each individual. This could mean purposefully ignoring someone's religion, personal beliefs, dietary views or any number of personal preferences. **This includes Cyber-bullying, Peer or Peer Abuse and Bullying.**
8. **Domestic Violence** – One of the new introductions to the list of safeguarding adults in care settings, domestic violence is now recognised as the jurisdiction of the Safeguarding Adults Boards across the country when it is committed against an adult in need of care services. **This could include Female Genital Mutilation.**
9. **Modern Slavery** – Another new category, the use of individuals working for little or no wages is now the business of the Safeguarding Adults Boards across the country. This could be perpetrated by care service employers, the adult in need to care themselves, or someone connected to that person.
10. **Self Neglect** – A newly defined form of abuse, self-neglect is a condition affecting behaviour, where the individual refuses to attend to their personal care and hygiene, their environment or even refusal of care services offered to them. Care workers should be educated on this condition and prepared to work with the individual to improve their situation.

Historical Abuse

There may be occasions when a stakeholder will disclose abuse (either sexual or physical) which occurred in the past. This information needs to be treated in exactly the same way as a disclosure of current stakeholder abuse. The reason for this is that the abuser may still represent a risk to stakeholders now.

Confidentiality and Appropriate Disclosure of Information

Records of Concern and Incident Reports must be used as detailed in their protocols. Confidentiality is crucial to all our relationships, but the welfare of the child is paramount. The law does not allow anyone to keep concerns relating to abuse to themselves. Therefore, confidentiality may not be maintained if the withholding of information will prejudice the welfare of the child.

All information that has been collected on any child will be kept locked and secure and access will be limited to the appropriate staff, management and relevant agencies.

In the event of an investigation it is essential that no information on safeguarding concerns relating to a child are disclosed inappropriately. Any such leaks could have serious consequences for both the child concerned and any investigation.

Whilst employers / carers have the right to see any records kept on their child, this might not always be appropriate, and should not put the child or yourself at risk.

It is very important that only those who need to know (the designated Safeguarding lead at ELA Training Services), actually know, to avoid rumour and gossip that could affect the learner and/or employer.

Current areas of focus for Safeguarding

Following advice from organisations and professional in the field of safeguarding, we make staff particularly aware of the following areas of concern.

Child Sexual Exploitation (CSE)

Following the Department of Education (DfE)'s "Definition and a guide for practitioners, local leaders and decision makers working to protect children from child sexual exploitation" (Feb 2017), we define CSE as a form of child sexual abuse.

It occurs where an individual or group takes advantage of an imbalance of power to coerce, manipulate or deceive a child or young person under the age of 18 into sexual activity

- (a) in exchange for something the victim needs or wants, and/or
- (b) for the financial advantage or increased status of the perpetrator or facilitator.

The victim may have been sexually exploited even if the sexual activity appears consensual. Child Sexual Exploitation does not always involve physical contact; it can also occur through the use of technology.

CSE is a form of sexual abuse where children are sexually exploited for money, power or status. It can involve violent, humiliating and degrading sexual assaults. In some cases, young people are persuaded or forced into exchanging sexual activity for money, drugs, gifts, affection or status. Consent cannot be given, even where a child may believe they are voluntarily engaging in sexual activity with the person who is exploiting them. Child sexual

exploitation doesn't always involve physical contact and can happen online. A significant number of children who are victims of sexual exploitation go missing from home, care and education at some point.

Some of the following signs may be indicators of sexual exploitation:

- Children who appear with unexplained gifts or new possessions;
- Children who associate with other young people involved in exploitation;
- Children who have older boyfriends or girlfriends;
- Children who suffer from sexually transmitted infections or become pregnant;
- Children who suffer from changes in emotional well-being;
- Children who misuse drugs and alcohol;
- Children who go missing for periods of time or regularly come home late; and
- Children who regularly miss school or education or don't take part in education.

Female Genital Mutilation (FGM)

Female genital mutilation (**FGM**) is a procedure where the female genitals are deliberately cut, injured or changed, but where there's no medical reason for this to be done. It's also known as "female circumcision" or "cutting", and by other terms such as sunna, gudniin, halalays, tahur, megrez and khitan, among others.

FGM is illegal in the UK and there is a legal duty to report if you know it has happened to an under 18.

All ELA stakeholders must report concerns regarding FGM using the reporting protocol on Page 32.

What to do if a person makes a disclosure

Follow the ELA Training Services' Reporting Protocol on Page 32.

ELA Training Services is committed to ensuring that it meets its responsibilities in respect of safeguarding by treating any allegation seriously and sensitively. Records of Concern and Incident Reports must be used as detailed in their protocols.

Follow the Safeguarding 5 Step Flowchart to support your response.

- Stay calm.
- Listen to what the child/young person is actually saying.
- Reassure them that they have done the right thing by telling you.
 - Do not promise the child that this can be kept secret, as subsequent disclosure could then lead to the child feeling betrayed. Explain that you are obliged to inform other people.
 - Reassure the child that the people who will be informed will be sensitive to their needs and will be looking to help protect them. Inform them that it is not in their interests to keep the disclosure confidential and it will have to be passed on to the appropriate agencies.
 - Make a note of any conversations with the child, trying to make these as detailed as possible, including when and where the conversations took place. Draw a diagram, if appropriate, to show the position of any bruises or marks the child or young person shows you, trying to indicate the size, shape and colour.
- Record as soon as possible and use the **actual words** used by the child.
 - Keep all records factual. Be aware of not making assumptions or interpretations of what the child/young person is telling you. Store all records securely.
 - **Do not interrogate** the child, or push for more information. Ensure that any questions asked are open, not leading closed questions. Do not ask the child/young person to repeat what they have they told you, for another person. Record accurately.
- Discuss your concerns with the ELA Training Services Designated Safeguarding Lead (Chris

who will report this information to an appropriate agency (the Designated Officer previously called the Local Authority Designated Officer - LADO).

- The person to whom the disclosure was made should ensure that the child who has disclosed the information is informed about what will happen next, so they can be reassured about what to expect.
- You may report your concerns directly to your local Designated Officer if you are not satisfied with the response from ELA Training Services. You will find contact details for your local Social Care Referral and Assessment Team online. The details will be on your Local Council website.

Allegations against under 18s

Under 18s facing an accusation of child abuse will need additional support, especially as their employers will be overseas.

What to do if Abuse is Suspected

Follow the ELA Training Services' Reporting Protocol on Page 32

- The trainer/assessor or Member of Staff should keep monitoring the child's behaviour, making a note of any particular concerns (when, where and what happened).
- Discuss concerns with the ELA Training Services Safeguarding Officer.
 - You should remember that if abuse is taking place, employers are often the last to know.
- Any member of staff can contact the relevant agency to discuss any concerns they have and seek guidance before actually reporting any safeguarding issues. It is appropriate to seek support from the ELA Training Services Safeguarding Officer, as to how to deal with situations and confirm appropriate action to take.
 - If you are still concerned about the welfare of the child/young person, this information must be passed on to the appropriate agency. It is important to remember that if you report concerns, you are not reporting the employers/carers – you are reporting to protect the welfare of the child.
 - If appropriate, inform employers/carers that you are going to report your suspicions or concerns. This might not always be possible and should not put the child or yourself at risk. When you report an incident, the duty officer will ask you if the parent/carer has been informed. If they haven't, they will want to know the reasons why.
 - If your Local Children's Social Care Referral and Assessment Team (Social Services)



has been contacted, they should let you know that they are responding to what you have

told them. It is unlikely that you will be told what action has been taken unless it has implications for the scheme. If you have not heard from the Referral and Assessment Team, it may be appropriate to contact them to ensure that the details you gave them have been taken into consideration and acted upon.

If you suspect a Stakeholder of ELA Training Services Staff of Abuse or Inappropriate Behaviour

Follow the ELA Training Services' Reporting Protocol on Page 32

If it appears that any of the above has:

- behaved in a way that has harmed a vulnerable person, or may have harmed a vulnerable person, or
- possibly committed a criminal offence against or related to a vulnerable person, or
- behaved in an inappropriate way towards a child which may indicate that he or she is unsuitable to work with vulnerable people then these procedures must be followed:
 - record your concerns and report them to the Director
 - the Director will take steps to ensure that particular person is not left in sole charge of any vulnerable person
 - the ELA Training Services Safeguarding Officer will contact the Local Authority Designated Officer (previously know as the LADO) to ask for advice and how to proceed and to give details of the concern
 - ELA Training Services will then follow the LADO's advice on how to deal with allegations against staff
 - while support will be offered to the staff member involved, ELA Training Services staff will ensure that the
 - agencies concerned are given all assistance in pursuing any investigation

Support to Trainers/assessors and Staff

ELA Training Services will fully support all Trainers/assessors and Members of Staff in following this procedure. Following an allegation or investigation, Trainers/assessors and Members of Staff can talk to the Safeguarding Officer and any of the appropriate agencies detailed on p.24 of this Policy.

Recruitment of Trainers/assessors and Staff

We acknowledge that paedophiles and those that pose a threat to children may be attracted to employment that allows them access to children and young people. As part of the ELA TRAINING SERVICES Safeguarding Policy, we will ensure that people working with the children are safe to do so. Our safe recruitment procedures are detailed in [Safer Recruitment Policy and Procedure](#).

Obligation to Report

ELA Training Services must refer details to the Disclosure and Barring Service (DBS) when an alleged person has resigned or they have been dismissed because they have harmed or could harm children or vulnerable adults. The information must be referred to the DBS as soon as it becomes known.

Implementation and Monitoring

- ELA Training Services has appointed a director with responsibility for safeguarding/child protection.
 - This person will receive reports from Trainers/Assessors or Staff of any occasions when there are concerns or issues of Child Protection. These reports will be filed and kept securely by the designated CPO for 5 years. Only the CPO and YL Course Manager will have access to these records.
 - ELA Training Services will review this policy annually to ensure it is being implemented. Appropriate action will be taken if deemed necessary, through consultation with the agencies referred to below.

Further Information

For information about all aspects of Child Protection, including more advice on what to do if you are worried about a child, visit: www.nspcc.org.uk (National Association for the Prevention of Cruelty to Children). They provide a free 24 hour helpline where you can discuss your concerns with a counsellor. You can call the NSPCC on 0808 800 5000 or email: help@nspcc.org.uk

YOUR SAFEGUARDING / SAFEGUARDING CONTACTS

1 ELA Training Services Safeguarding Officer / Designated Safeguarding Lead

The ELA Training Services person responsible for safeguarding is:

Name: Chris Kistan
Position: Director
Mobile: 07731105035

You should call the ELA TRAINING SERVICES Safeguarding Officer / Designated Safeguarding Lead FIRST to report an issue.

2 Referral Agencies

If you think a child is in **immediate danger**: contact the police by calling **999**

Otherwise, **call 101** & ask for the **Safeguarding Coordination Unit**.

3 Support and advice

- Samaritans on 116123
- National Association for the Prevention of Cruelty to Children (NSPCC). Tel: 0800 800 500
- Childline (provides help and advice for children and young people). Tel: 0800 1111

7. Implementing the ELA TRAINING SERVICES Safeguarding Policy

Training and awareness

- ELA Training Services trainers/assessors are trained in face-to-face discussions as part of their induction training;
 - ELA Training Services trainers/assessors are regularly given training as necessary to update their knowledge of safeguarding and compliance to regulations.

Induction

- New ELA Training Services staff and trainers/assessors have safeguarding procedures and their responsibilities included in their induction before they start to have contact with stakeholders.

Monitoring and supervision

- ELA Training Services actively monitors the use and application of the procedures. ELA Training Services trainers/assessors are also asked about safeguarding issues and awareness when discussing their progress and reviewing their work.

Recording and information sharing

- Accurate records are kept within the guidelines of our procedures.

Policy Monitoring and Review

The policy will be reviewed a year after development and then every year, or in the following circumstances:

- changes in legislation and/or government guidance
- as required by the Local Safeguarding Children Board
- as a result of any other significant change or event

ELA Training Services' Safer Recruitment Policy and Procedures for Staff

Creation Date	Review Date	Version	Director
10/2018	31/07/2019	2018.10 (1.4)	Chris Kistan

Introduction

ELA Training Services is committed to recruitment procedures and practices which aim to prevent the appointment of people who may pose a risk to children; this is an essential part of safeguarding. The robust screening of applicants is proven to act as a deterrent for offenders seeking employment with access to vulnerable people in order to harm them.

DBS (Disclosure and Barring Service)

The work of ELA Training Services is classified by the government as regulated activity. This is the term most commonly used to describe roles where a suitability/criminal records check is required – roles involving responsibility for or substantial access to under 18s. In broad terms, regulated activity is any position that has direct contact with children. Any person that is engaged in 'regulated activity' as defined by the Safeguarding Vulnerable Group Act 2006 (England & Wales) and parallel laws in Scotland and Northern Ireland requires an enhanced disclosure check.

ELA Training Services ensures that every person working within ELA Training Services and having access to information about children have a current, clear and valid Enhanced DBS check, registering annually for the update service.

Recruitment

- Job descriptions include reference to ELA Training Services' commitment to safeguarding the welfare of every child in its care and all adults associated with our organisation will be expected to share our ethos and actively engage in looking after our children safely, especially under 18s.
- Two references are requested. References will be followed up and referees will be asked whether there is any reason not to engage the applicant where they have substantial access to under 18s. Follow up phone calls are made to verify the references.
- ELA Training Services will seek a full employment history for prospective staff and reserves the right to approach any previous employer. All gaps in CVs must be explained.

- Proof of identity and qualifications are required (original documents will be checked at interview).
- Interview questions will explore a candidate's attitude to working with under 18s.
 - Interview questions about disability and health will be asked in order to establish whether there may be any physical or mental obstacles to trainers/assessors fulfilling their specific role that cannot be overcome.
 - The interview panel will always include a staff member who has completed the DfE Safer recruitment in education e-learning module: <http://www.nspcc.org.uk/what-you-can-do/get-expert-training/safer-recruitment-education-course/>

Induction

- ELA Training Services is responsible for ensuring that all staff understand their safeguarding responsibilities and are skilled and confident in managing these responsibilities.
- Staff induction includes a detailed description of our policies, procedures, practices and provisions in relation to the safeguarding and welfare of our stakeholders.
- Staff are familiarized with relevant reporting lines and communication channels within ELA Training Services to enable them to effectively raise concerns or issues.
- Staff are informed about and expectations for their own conduct.
- Evidence that all induction procedures have been conducted is retained in staff files.

Safeguarding training

- All ELA Training Services staff have undertake Level 2 safeguarding training.
 - The Safeguarding Officer trained to Level 3 and will keep other staff regularly updated and refreshed with safeguarding information.

Recruitment of ex-offenders

ELA Training Services will not unfairly discriminate against any applicant for employment on the basis of conviction or other details revealed. ELA Training Services makes appointment decisions on the basis of merit and ability, if an applicant has a criminal record this will not automatically bar him/her from employment within ELA Training Services. In view of the fact that all positions within ELA Training Services will amount to “regulated positions” within the meaning of the Protection of Children Act 1999 (as amended by the Criminal Justice and Courts Services Act 2000), they exempt from the

All convictions, cautions, reprimands or final warnings that are not “protected” as defined by the Rehabilitation of Offenders Act 1974 (Exceptions) Order 1975 (as amended in 2013) must be declared when applying for a position at ELA Training Services. Failure to disclose a previous conviction may lead to:

- an application being rejected or, if the failure is discovered after employment has started, may lead to summary dismissal on the grounds of gross misconduct; a failure to disclose a previous conviction may also amount to a criminal offence
- under the relevant legislation, it is unlawful for ELA Training Services to employ anyone who is included on the barred lists maintained by the DBS of individuals who are considered unsuitable to work with children or vulnerable adults

It is a criminal offence for any person who is disqualified from working with children to attempt to apply for a position within ELA Training Services. ELA Training Services will report the matter to the Police and the DBS if:

- ELA Training Services receives an application from a disqualified person
- ELA Training Services is provided with false information in, or in support of an application
- ELA Training Services has serious concerns about an applicant’s suitability to work with children and vulnerable people

ELA Training Services’ Whistleblowing Policy			
Creation Date		Review Date	Version
08/2018	31/07/2019	2018.08 (1.3)	Chris Kistan

What is a whistleblower?

You’re a whistleblower if you’re an employee or agency worker and you report certain types of wrongdoing. This will usually be something you’ve seen at work - though not always. The wrongdoing you disclose must be in the public interest. This means it must affect others, e.g. the general public. As a whistleblower you’re protected by law - you shouldn’t be treated unfairly or lose your job because you ‘blow the whistle’. You can raise your concern at any time about an incident that happened in the past, is happening now, or you believe will happen in the near future.

Complaints that count as whistleblowing

You're protected by law if you report any of the following:

- a criminal offence, e.g. fraud
- someone's health and safety is in danger
- risk or actual damage to the environment
- a miscarriage of justice
- the company is breaking the law, eg: doesn't have the right insurance
- you believe someone is covering up wrongdoing

Complaints that don't count as whistleblowing

Personal grievances (e.g. bullying, harassment, discrimination) aren't covered by whistleblowing law, unless your particular case is in the public interest.

Who to tell and what to expect

You can report your concern to the Director at ELA Training Services. There are other options if you don't want to report your concern to ELA Training Services, e.g. you can get legal advice from a lawyer, or tell a prescribed body such as Ofsted.

Making your claim anonymously or confidentially

You can tell ELA Training Services or a prescribed body anonymously but they may not be able to take the claim further if you haven't provided all the information they need. You can give your name but request confidentiality - the person or body you tell should make every effort to protect your identity. If you report your concern to the media, in most cases you'll lose your whistleblowing law rights.

What ELA TRAINING SERVICES or a prescribed body will do

ELA Training Services or the prescribed body will listen to your concern and decide if any action is needed. You may be asked for further information. You must say straight away if you don't want anyone else to know it was you who raised the concern. You won't have a say in how your concern is dealt with. ELA Training Services or the prescribed body can keep you informed about the action they've taken, but they can't give you much detail if they have to keep the confidence of other people.

ELA TRAINING SERVICES's Anti-Bullying Policy and Procedure

Creation Date	Review Date	Version	Director
08/2018	31/07/2019	2018.08 (1.3)	Chris Kistan

What is bullying?

Bullying can occur in any group of people whatever its type or size or the age of its members. There are many different forms of bullying; at one end of the scale it can be teasing and at the other it becomes serious assault or harassment. Verbal and psychological bullying can be just as harmful and hurtful as physical violence. Sexual and racial harassment are particularly serious forms of bullying. Many children, and adults, are bullied because they are seen to be 'different' – because of their race, religion or culture, because of their sexuality, because of their gender, or because of any special educational needs or disabilities they may have.

Cyberbullying

This is a form of bullying which uses technology to deliberately harm or upset others. This type of bullying can happen in many ways, using mobile phones or the internet and could include:

- sending hurtful messages or using images
- leaving malicious voicemails
- a series of silent calls
- excluding them from chat/messaging rooms/areas
- 'happy slapping' – sending video/images of people being bullied, so others can see

Signs of Bullying

Some of the ways in which children and young people have described bullying include:

- being called names
- being teased
- being pushed or pulled around
- having money or personal possessions taken or damaged
- having rumours spread
- being ignored or left out
- being hit, kicked or physically hurt in some way

Effects of Bullying

The effects of bullying can lead to children and young people:

- becoming depressed
- experience low self esteem
- becoming shy and withdrawn
- experiencing physical complaints, like constant stomach aches and headaches, which are brought on by stress
- feeling anxious

ELA Training Services does not tolerate the bullying of other people in any form whatsoever and all incidents of bullying reported to ELA Training Services will be fully investigated.

ELA Training Services learners and stakeholders are encouraged to:

- respect other people, their space and their belongings
- be kind to others, even if they are not our friends
- not walk away if we see someone being bullied
- try to get help and tell a responsible adult
- ask for help if we are being bullied

ELA Training Services learners and stakeholders are given the following advice about bullying:

- Talk to or contact someone you trust, such as your friend or even contact Childline on 08001111 or Samaritans on 116123 to talk to someone you don't know, safely.
- Be persistent. If the first person you talk to doesn't help, don't give up. Speak to someone else.
 - If you can, write down everything that has been said or done to hurt you. Try to write down how you feel. When you have found someone you can trust, discuss what you have written.
 - Ask the person you talk to not to do anything without telling you about it first. You have a right to know what is being done on your behalf and to say whether you think it is a good idea or not. If you find it difficult to talk to an adult ask someone to talk to an adult on your behalf.
- Telephone ChildLine (Freephone 0800 1111) or Samaritans on 116123. Their helpers provide a confidential helpline for people
- Email ELA Training Services at incident@ela-group.co.uk
 - Most importantly, do something. Sometimes bullying stops quickly, but doing nothing means it may continue until someone is seriously upset or hurt.

ELA TRAINING SERVICES' E-Safety Policy

Creation Date	Review Date	Version	Director
10/2018	31/07/2019	2018.10 (1.4)	Chris Kistan

Purpose

This policy applies to all members of the ELA Training Services community (including staff, children, employers/carers and visitors). It is a statement of the aims, principles, strategies and procedures for e-safety throughout ELA Training Services. The E-Safety Policy should be read in conjunction with our Data Protection and Information Sharing Policy and Safeguarding Policy.

You have a responsibility to the learners in your care to know what they are doing online during their stay with you.

What is E-Safety?

E-Safety refers to safeguarding and safeguarding of both children and adults in the digital world. It is about learning to understand and use technologies in a safe, positive way, also about supporting children and adults to develop safe online behaviours.

Risks to children who use the internet include:

- exposure to inappropriate materials, for example, pornographic pictures and videos
- physical danger and sexual abuse, for example, through 'grooming' by paedophiles
- cyberbullying – persistent bullying through the digital medium
- losing control over pictures and videos
- obsessive use of the internet and ICT, for example, addiction to video games
- damage to online reputation
- inappropriate or illegal behaviour, for example, exposure to hate mail or offensive images
- viruses, hacking and security
- exposure to extremist material and the possibility of radicalisation
- copyright infringement, for example, the illegal sharing of music, pictures, video or documents

E-Safety is largely concerned with internet communications. The internet is accessible from computers, laptops, tablets, mobile phones, games consoles and other devices like the iPod Touch and internet connected TV. Other communication technologies such as texting and phone calls are also covered by the term 'E-Safety'.

Why provide internet access?

The internet is an essential for education, business and social interaction. ELA Training Services encourages the provision of quality internet access to enable learning.

ELA Training Services have content filtering and monitoring software in operation on their routers.

Internet

- ELA Training Services learners will be encouraged to tell their trainer/assessor immediately if they encounter any material that makes them feel uncomfortable.
- Internet access will be filtered appropriate to the age of the learner.

Email

- All emails sent must be professional in tone and content.
- ELA Training Services learners must immediately tell the trainer/assessor if they receive offensive email in an ELA led training session.
 - ELA Training Services learners must not reveal personal details of themselves or others in email communication (such as address or telephone number).
 - ELA Training Services learners should be made aware that the writer of an email (or the author of a web page) may not be the person claimed.

Social Networking

ELA Training Services trainers/assessors shall:

- behave responsibly and professionally at all times in connection with the use of social networking sites and keep up to date with privacy policies of the sites they use
- ensure that all communication with ELA Training Services learners (including on-line communication) takes place within clear and explicit professional boundaries
- use their professional judgment and, where no specific guidance exists, take the most prudent action possible and consult with the Director of ELA Training Services if they are unsure
- co-operate with ELA Training Services in ensuring the implementation of this policy

ELA Training Services Website:

- Website photographs that include ELA Training Services learners will be selected carefully and will only be published with permission.
- ELA Training Services learners' full names will not be used anywhere on the website, particularly in association with photographs.

Cyberbullying

Cyberbullying is the use of the internet and related technologies to harm other people, in a deliberate, repeated, and hostile manner. When learners are the target of bullying via mobile phones, gaming or the internet, they can often feel very alone and, a once previously safe and enjoyable environment or activity, can become threatening, harmful and a source of anxiety. Cyberbullying (along with all forms of bullying) will not be tolerated. All incidents reported will be recorded and investigated.

ELA Training Services Trainer/Assessor Data Security

- ELA Training Services trainers/assessors must not share their user account details and must not leave their computers unlocked and accessible to learners.

ELA Training Services Learners

- All ELA Training Services learners must sign the Code of Conduct and Learner Agreement.
- E-Safety rules will be given to learners in their learner handbook.
 - Any breaches of the Code of Conduct with reference to ICT will be referred directly to ELA Training Services and internet access may be denied.
 - ELA Training Services Guardianship Children will be informed that network and internet use on a homestay host's computer will be monitored.

Employers' Support

- Employers' attention will be drawn to ELA Training Services' E-Safety Policy in the parent handbook.
 - Employers will be asked to read through the ELA Training Services Guardianship Learner Code of Conduct with their learner and for the learner to sign the agreement.

Policy Implementation

All new ELA Training Services trainers/assessors receive e-safety advice and guidance as part of their induction programme to ensure they understand their responsibilities, as detailed in this policy.

ELA Training Services' Photography Policy and Procedure

Creation Date	Review Date	Version	Director
10/2018	09/2019	2018.10 (1.4)	Chris Kistan

Using images of learners: photographs, videos, websites and social media

We live in an age in which digital technology has vastly increased the use, and potential misuse of photography. Photographs for ELA Training Services, learner and trainer/assessor uses and those that appear in the media and ELA Training Services social media, are a source of pleasure, pride and celebration of learner achievement.

However, learners are often abused by someone they know. The risk of a learner being directly targeted for abuse through being identified by a stranger is very small. Providing reasonable steps are taken to ensure an appropriate photograph, and to protect the full name and contact details, photography by ELA Training Services staff and the media is allowed, within safe practice guidelines.

Issues of Consent

The Data Protection Act 2018 affects our use of photography. This is because an image of a learner is personal data for the purpose of the Act, and it is a requirement that consent is obtained from the parent of a young person under the age of 18 years for any photographs or video recordings. It is also important to ascertain the views of the child.

Consent may be sought on the Learner Application form for images to be used by ELA Training Services.

Trainers/assessors and other stakeholders may not use images of ELA Training Services or learners online without the express consent, in writing of ELA Training Services.

Employers retain the right to withdraw consent at any stage, but they need to do so in writing.

ELA Training Services will:

- never use a learner's full name online to accompany a photograph
- use the minimum information necessary to accompany a photograph
- only use images of learners in suitable dress (not children in swimming costumes, for example)
- store photographs securely for authorised ELA Training Services use only
 - only use images of under 18s where permission has been granted

ELA Training Services' Health, Safety and Welfare Policy

Creation Date	Review Date	Version	Director
10/2018	09/2019	2018.10 (1.4)	Chris Kistan

Health and safety

- ELA Training Services recognises its responsibility under the Health & Safety at Work, etc. Act 1974 to provide for the health, safety and welfare of their employees, children, members of the public and any others who may be affected by ELA Training Services' activities.
- To this end ELA Training Services will, so far as is reasonably practicable, fully comply with the requirements of the said Act, and such of its attendant Regulations as may apply, by making suitable and sufficient arrangements.

Within the ELA Training Services Office

ELA Training Services will:

- develop and maintain safe systems of work
- give sufficient information, instruction, training and supervision to ensure the health, safety and welfare of all its staff, vulnerable people and others working within ELA Training Services premises, and during activities and excursions
- protect the health, safety and welfare of visitors to ELA Training Services
- provide equipment that is fit for purpose and maintained in accordance with the necessary requirements
- maintain a safe and healthy place of work, with safe access to that place of work
 - provide induction training which will include but not be limited to the Health & Safety Policy, First Aid arrangements and Fire Precautions/Procedures
- positively consider the environmental impact of all ELA Training Services activities; and, formally consult with employees on all matters having effect on their health, safety and welfare at work
- update staff on latest developments in health and safety
- further, detailed information is provided in the ELA Training Services Staff Handbook.

ELA Training Services will:

- provide competent, professional guidance, training and support as required
- where applicable, issue detailed safety policy, instructions and guidelines to trainers/assessors relating to their activities, and ensure trainers/assessors are conversant with them

Trainers/assessors will:

- follow all health and safety advice and guidance from ELA Training Services
- initiate first aid in the event of an accident, and ensure that the accident is recorded and reported to ELA Training Services
- inform ELA Training Services or any changes to their personal circumstance that would affect their ability to keep themselves and learners safe and healthy.
- Carry out a learning environment risk assessment and message this to the ELA Training Services

It is the duty of all members of ELA Training Services staff, trainers/assessors and learners to take reasonable care for the health and safety of themselves, and of any others who may be affected by their acts or omissions.

Well-being, Welfare, Health and Safety.

ELA Training Services contributes to learner' wider well-being by:

- helping each learner achieve the best possible educational outcomes
- dealing with bullying and discrimination and keeping children safe
- dealing with bullying in accordance with the ELA Training Services' anti-bullying policy
- encouraging learners to behave responsibly

ELA Training Services has policies to:

- prevent unsuitable people working with under 18s
- promote safe practice and challenge poor and unsafe practice
- identify instances where there are grounds for concern about a stakeholders' welfare
- take appropriate action to keep stakeholders safe

A learner may be identified as missing if their whereabouts cannot be confirmed visually, from information provided by the learner or other trustworthy people with regard to their movements or telephone contact with them or their employer.

If a trainer/assessor thinks a learner is missing, they must:

- attempt to ascertain whereabouts from the last people in contact with the learner
- attempt to contact the learner on his/her mobile phone
- check all places in the locality where the learner was last seen (within reason)

If a learner is still missing, the trainer/assessor should contact the employers and ELA Training Services Director by telephone.

ELA Training Services will:

- contact their employers/guardians (with due regard for time zones).
- request assistance as appropriate.

On completion of this and any subsequent searches made, the Director and employers/guardians will continue to be informed of progress.

The Director (or in her absence, the person on duty), will arrange for the Police to be informed.

If the learner is found, or the incident is otherwise resolved:

- the Director will be directly informed directly by the Trainer/Assessor
- the Police will be informed if they have been involved.
 - the Director will initiate a full inquiry, and provide a written report
 - this report and the incident log will be kept securely on the ELA Training Services Server

After the incident:

- the trainer/assessor or Guardianship manager will sensitively discuss the incident with the learner
- the Director will sensitively discuss the incident with the employers/guardian

ELA TRAINING SERVICES's Prevent Policy

Creation Date	Review Date	Version	Director
10/2018	30/09/2019	2018.10 (1.4)	Chris Kistan

What is Prevent

The national Prevent strategy is designed to reduce the number of serious incidents and to catch anyone especially vulnerable people before they enter the criminal justice system.

Meeting our Prevent Duties and Tackling Extremism

ELA Training Services understands its responsibilities under the Counter Terrorism & Security Act 2015 to prevent people of all ages being radicalized or drawn into terrorism and seeks to meet its obligations in the ways shown below.

Context

- ELA Training Services trains learners of ages 16 and above, all year from around the world.
 - ELA Training Services promotes a multi-cultural environment where respect for and tolerance of other beliefs is required.
 - ELA Training Services 's head office is located in one of the boroughs of a multi-cultural city and places trainers/assessors with learners and employers in cities, towns and villages all over the UK.

Prevent Lead

Responsibility for ensuring Prevent Duty lies with Chris Kistan, Director and Designated Safeguarding Lead for the Prevent Strategy.

Understanding terminology

Radicalisation

Act or process of making a person more radical or favouring of extreme or fundamental changes in political, economic or social conditions, institutions or habits of mind.

Extremism

Holding extreme political or religious views which may deny right to any group or individual. Can be expressed in vocal or active opposition to Core British values and can refer to a range of views, e.g. racism, homophobia, right-wing ideology, as well as any religious extremism.

Terrorism

as an action that endangers or causes serious violence to a person/people; causes serious damage to property; or seriously interferes or disrupts an electronic system. The use or threat must be designed to influence the government or to intimidate the public and is made for the purpose of advancing a political, religious or ideological cause.

Risk Assessment and Procedures

- A risk assessment has been produced by the ELA Training Services Lead Contact for the Prevent Strategy and held in the ELA Training Services ; it will be reviewed and updated annually.
- The ELA Training Services Lead Contact for the Prevent Strategy has received training in Prevent policy and risk.
- All members of the ELA Training Services team at head office will undertake Prevent online training.
- All trainers/assessors will receive Prevent guidance from ELA Training Services and will undertake online Prevent training.
 - ELA Training Services will make and maintain contact with the local police/ local authority Prevent coordinator in all areas where we have children to understand their role, the support available, (e.g. via the Channel process) and a list of contacts for referrals.

ELA Training Services will counteract risks by:

- Promoting a safe and supportive safe environment via clear expectations of accepted behaviours and those including radicalization and extremism, not being tolerated.
- Promoting the core British values:
 - I. Democracy
 - II. The rule of law
 - III. Individual liberty
 - IV. Respectful and Tolerance of different faiths or beliefs,through documents given to learners (learner handbook), via information on enrolment on British culture and traditions.
- Where possible, developing critical awareness and thought to counter accepting extremism without question, especially of online material.
- Challenging radical or extremist views in any context (formal or informal) via stated procedures. In most situations this would require an immediate response re the tolerance expected then reporting concerns.
- Being ready to react when world or local events (e.g. Westminster, London Bridge, Paris attacks) cause upset and the likelihood of conflicting feelings being expressed. Prevent lead to take initiative in these situations.
- Asking trainers/assessors to have strong filters on the Internet and clear rules on accessing extremist/terrorist websites/uses of social networks to exchange extremist/terrorist views.
- Trainers/assessors getting to know learners and their circumstances making it easier to spot changes in behaviour.
 - ELA Training Services staff and trainers/assessors being observant and vigilant in

- ELA Training Services staff and trainers/assessors supporting any children identified as vulnerable.
- ELA Training Services staff and trainers/assessors themselves not supporting or funding and extremist organisations.
- ELA Training Services staff and trainers/assessors exemplifying the core British values by:
 1. Ensuring an unbiased, non-partisan, non-discriminatory and ethical learning environment
 2. Being democratic and creating opportunities for democratic processes,
 3. Following the rule of law and compliance bodies advice
 4. Creating opportunities for learner voice and opinion to be communicated
 5. Exemplifying respect and tolerance for all faiths and beliefs

Understanding the risk of extremism

- Staff, learners, children and trainers/assessors may come into contact with ELA Training Services already holding extremist views. They may be influenced by a range of factors: global events peer pressure, media family views, extremist materials (hardcopy or online), inspirational speakers, friends or relatives being harmed, social networks, and more.
- People who are vulnerable are more likely to be influenced.
 - Their vulnerability could stem from a range of causes including: loss of identity or sense of belonging, isolation, exclusion, mental health problems, sense of injustice, personal crises, victim of hate crime or discrimination and bereavement.

What is the ELA Group doing to prevent radicalisation?

Prevent Duty training is delivered on induction. A certificate is issued on successful completion of the course which is assessed by a test.

ELA Group trainers and assessors engage the following resources:

- **Digital Disruption** – This organisation provides chargeable and free resources targeted especially at increasing digital literacy – at how young people use the internet, and critique and challenge information they find on it.
- **Learning Together To Be Safe** – Prepared by the Department for Children, Schools and Families (now Department for Education), this 2008 toolkit to help schools contribute to the prevention of violent extremism was brought out after the first iteration of the Prevent agenda. Although the policy it refers to has been updated, some of its content may still be of use to schools.
- **My Country My Vote** – This project does not seek to tackle issues of extremism directly. However, research has shown that one effective long-term approach to preventing extremism is to engage young people in participatory democracy. This project aims to do just that, and may therefore be a useful model to follow.
- **Prevent Duty Guidance:** for England and Wales – Produced by the UK Government,

- **Prevent for Schools** – This resource was set up following demand from schools in Lancashire, UK. It has been updated to reflect the latest duties (2015), and has links to resources and tools for schools (both primary and secondary).
- **RE-silience** – This project is run by the Religious Education Council of England and Wales, and aims to help RE teachers who want to develop their confidence and competence in dealing with contentious issues in the classroom, particularly those linked to violent extremism.
- **Rewind** – The Rewind project has tackled racism in an area of the West Midlands with a long history of support for far-right views. It has courses available for interested schools. A now-dated review of their services can be found on the Institute for Race Relations website.
- **Safeguarding in Schools** – This consultancy is run by a former headteacher who specialises in providing courses and resources on safeguarding to school staff and headteachers, including on tackling extremism.
- **Think Project** – Running for three years up to March 2015, the Think Project worked with disengaged young white people in Wales. It is unusual in having evaluation built in from the start. The results of this evaluation were discussed in this peer-reviewed article.
- **Victvs** – This consultancy provides training and resources for staff as well as parents on understanding the new Prevent duties as well as the risks from extremism and radicalisation

Follow the ELA Training Services' Reporting Protocol on Page 34 if you have any concerns about Radicalisation, Extremism or Terrorism relating to any stakeholders.

ELA Training Services' Records of Concern Reporting Protocol

1.0 Disclosures and Records of Concern Reporting Protocol

- This protocol is used in conjunction with the “5 Steps to Handling Disclosures and Records of Concern V 2.0 Update March 2018” poster that is included in your pack. **Contact your line manager immediately if you do not have access to this. Do not engage in any ELA Education Group work until you are confident in this procedure.**
- Within **1 hour or immediately (if possible)** of any Disclosure and/or Concern, email a short message about the Disclosure and/or Concern to safe@ela-group.co.uk. An investigating officer should respond within an hour. If not, contact Chris Kistan, the Principal of ELA Group at +44 (0) 7731105035.
- Within **24 (working) hours** of any Disclosure and/or Concern, those involved must complete the correct form (ELA Record of Concern Form v2.0 November 2018) and email it to safe@ela-group.co.uk. An investigating officer should respond within 24

hours. If not, contact Chris Kistan, the Designated Safeguarding Lead at +44 (0) 7731105035.

- Be clear as to the persons involved. These reports must be understood by neutral external stakeholders. Therefore, you should list the full names of persons and their role of everyone at the beginning of the incident report and assign initials to them. For example, Fred Bloggs, staff (FBI), John Smith, pupil (JSm) etc. You can then use their initials in the body of the incident report. Initials allow us to impart a degree of confidentiality.
- Save a copy of the report securely for your professional records.

If any form of Restraint or Physical Intervention is used during the accident, incident or near miss then staff must clearly state the manner and duration of the restraint and the training/rationale that they had to apply the restraint.

NOTES:

- Do not use emotive language eg: “stormed out of a room”. It is more professional and unprejudiced to say “left the room running and slammed the door after them”.
- Do not use any opinion – stick to the facts of the event.
- **If any First Aid is administered, details of this must be included in the form.**

2.0 Follow our Safeguarding Policy Guidelines (What to do if a person makes a disclosure)

- ELA Group is committed to ensuring that it meets its responsibilities in respect of child protection by treating any allegation seriously and sensitively. Records of Concern and Incident Reports must be used as detailed in their protocols.
- Follow the Safeguarding 5 Step Flowchart to support your response.
- Stay calm.
- Listen to what the child/young person is actually saying.
- Reassure them that they have done the right thing by telling you.
- Do not promise the child that this can be kept secret, as subsequent disclosure could then lead to the child feeling betrayed. Explain that you are obliged to inform other people.
- Reassure the child that the people who will be informed will be sensitive to their needs and will be looking to help protect them. Inform them that it is not in their interests to keep the disclosure confidential and it will have to be passed on to the appropriate agencies.
- Make a note of any conversations with the child, trying to make these as detailed as possible, including when and where the conversations took place. Draw a diagram, if appropriate, to show the position of any bruises or marks the child or young person shows you, trying to indicate the size, shape and colour.
- Record as soon as possible and use the actual words used by the child.
- Keep all records factual. Be aware of not making assumptions or interpretations of what the child/young person is telling you. Store all records securely.

- Do not interrogate the child, or push for more information. Ensure that any questions asked are open, not leading closed questions. Do not ask the child/young person to repeat what they have they told you, for another person. Record accurately.
- Discuss your concerns with the ELA Group Designated Safeguarding Lead (Chris Kistan)
- who will report this information to an appropriate agency (the Designated Officer previously called the Local Authority Designated Officer - LADO).
- The person to whom the disclosure was made should ensure that the child who has disclosed the information is informed about what will happen next, so they can be reassured about what to expect.
- You may report your concerns directly to your local LADO if you are not satisfied with the response from ELA Group. You will find contact details for your local Social Care Referral and Assessment Team online. The details will be on your Local Council website.

3.0 Do not engage in any ELA Education Group work until you are confident in this procedure.

ELA Training Services' Incident, Near Miss Accident Reporting Protocol

1.0 Incident, Near Miss or Accident Reporting Protocol

- Within **1 hour or immediately (if possible)** of any accident, incident or near miss, an email a short message about the must be emailed to incident@ela-group.co.uk. An investigating officer should respond within an hour. If not, contact Chris Kistan, the Designated Safeguarding Lead Director at ELA Group at +44 (0) 7731105035.
- Within **24 (working) hours** of any accident, incident or near miss, those involved must complete the correct form (RT Incident Near Miss Accident Form v1.0 Jan 2018) and email it to incident@ela-group.co.uk. An investigating officer should respond within 24 hours. If not, contact Chris Kistan, the Designated Safeguarding Lead Director at ELA Group at +44 (0) 7731105035.
- Be clear as to the persons involved. These reports must be understood my neutral external stakeholders. Therefore, you should list the full names of persons and their role of everyone at the beginning of the incident report and assign initials to them. For example, Fred Bloggs, staff (FBI), John Smith, pupil (JSm) etc. You can then use their initials in the body of the incident report. Initials allow us to impart a degree of confidentiality.
- Save a copy of the report securely for your professional records.

If any form of Restraint or Physical Intervention is used during the accident, incident or near miss then staff must clearly state the manner and duration of the restraint and the training/rationale that they had to apply the restraint.

NOTES:

- Do not use emotive language eg: “stormed out of a room”. It is more professional and unprejudiced to say “left the room running and slammed the door after them”.
- Do not use any opinion – stick to the facts of the event.
- **If any First Aid is administered, details of this must be included in the form.**

2.0 If this incident includes a disclosure or cause for concern, follow our Safeguarding Policy Guidelines or the “5 Steps to Handling Disclosures and Records of Concern V 2.0 Update March 2018” poster that is included in your pack. Contact your line manager immediately if you do not have access to this.

3.0 Do not engage in any ELA Education Group work until you are confident in this procedure.

ELA Training Services’ 5 Steps Reporting Protocol

ELA Training Services' Record of Concern

ELA CS Record of Concern (ROC) v2.0 March 2018

Page 1 of 1

Concerns about something or someone makes a disclosure to you? This is what you MUST do...

- 1
WELLBEING

Ensure that the person is not in immediate danger/harm. Encourage the person to explain and give more detail without the use of leading questions.

Ask Who, What, When and How? Be careful about Why – DO NOT let the person feel responsible or to blame. Let the person know that you must confidentially pass what they have told you on to a person that can help. It is the LAW.

If you concerned about the immediate well-being and safety of anyone, contact 999 IMMEDIATELY.
- 2
REPORT

Contact the Safeguarding Team at ELA within 1 hour of the disclosure/concern.

Ali Khan (ELA Director responsible for Safeguarding and Well-being)
Tel: 07832328587 Email: safe@ela-group.co.uk
- 3
RECORD

Staff: Complete and email an incident report or record of concern. This must be within 24 hours, unless informed otherwise by ELA, and include full details of the person(s) and disclosure/concern.

Volunteers and Visitors: Record the following information

 - Date, place, time • Concern • All facts • Observed injuries • Words of the person

Sign and give to a member of ELA within 1 hour of the disclosure/ concern. See Step 2 for details of who to contact.
- 4
TRUST & WELLBEING

Allow ELA time to address concerns. A disclosure can affect people in ways that we need to prepare for. Keep the person under observation and direct them to seek or report your concern to professional health care. Comfort the person as is appropriate. Make your intentions clear and keep boundaries professional.

Know you have done all you can in keeping everyone safe! Speak to ELA (details above) if the disclosure has affected you in any way.
- 5
BE ROBUST, PERSISTENT AND ESCALATE IF NEEDED.

You have the right to escalate your concern if you are not satisfied with the outcome of your concern or you feel that it is in the person/public's best interest for this concern to be handled by an external authority then contact the Hounslow Adult Social Care: 02085833100; adultsocialcare@hounslow.gov.uk

If you are worried that your concern is not being handled to your expectation then Public Concern at Work <http://www.pcaw.co.uk/index.htm> or call 020 7404 6609 If you concerned about the immediate well-being and safety of anyone contact 999 IMMEDIATELY.



ELA Training Services' Reporting Form

Incident / Accident / Near Miss Event - Reporting Form

(Please see instructions to complete and return a copy to your supervisor)

Complete this form to report an incident, accident, or near miss event involving a child, member of staff, or any other person. Reports must be dated, dated and include an email response to show the investigation.

Title of organisation (name and address)	Project / Activity / Site report	Time of incident/ near miss event
<small>(Please see instructions to complete and return a copy to your supervisor)</small>	<small>(Please see instructions to complete and return a copy to your supervisor)</small>	<small>(Please see instructions to complete and return a copy to your supervisor)</small>

Details of the person involved

(Please see instructions to complete and return a copy to your supervisor)

Full name:

Employee: Person: Agency staff: Contractor: Other:

Male: Female: Age:

Address of home contact:

Number of home contact:

Location for the report, other side of organisation name here:

Details of the incident/accident/near miss event

(Please see instructions to complete and return a copy to your supervisor)

What happened? (Please describe the incident/accident/near miss event in detail, including the date, time, and location of the event.)

How did you report the incident/accident/near miss event? (Please describe the reporting process, including the date, time, and location of the report.)

What actions were taken to investigate the incident/accident/near miss event? (Please describe the investigation process, including the date, time, and location of the investigation.)

What actions were taken to prevent a recurrence of the incident/accident/near miss event? (Please describe the prevention process, including the date, time, and location of the prevention.)

Reporting Process Log of incident/accident/near miss event

(Please see instructions to complete and return a copy to your supervisor)

Other details to be done to make things right?

Reporting points for future improvement:

By the completed by the report/procedure involved in the incident/accident/near miss event (if possible), including the name and title of the individual who acted as a witness:

Name: Signature:

This form must be completed by the person who reported the incident/accident/near miss event, or by a witness to the incident/accident/near miss event, or by a member of staff who was involved in the incident/accident/near miss event.

By the completed by a manager: (Please see instructions to complete and return a copy to your supervisor)

By the completed by a witness: (Please see instructions to complete and return a copy to your supervisor)

By the completed by a member of staff: (Please see instructions to complete and return a copy to your supervisor)

By the completed by a witness: (Please see instructions to complete and return a copy to your supervisor)

By the completed by a member of staff: (Please see instructions to complete and return a copy to your supervisor)

By the completed by a witness: (Please see instructions to complete and return a copy to your supervisor)

By the completed by a member of staff: (Please see instructions to complete and return a copy to your supervisor)

By the completed by a witness: (Please see instructions to complete and return a copy to your supervisor)

This completed form must be emailed to incidents@ela-training.co.uk within 24 hours of the incident, accident or near miss.



Acceptable Behaviour promotes Safeguarding

Our objective is to create a workplace which is free from harassment and bullying and to ensure that all employees are treated with dignity and respect.

Everyone is responsible for promoting this objective and complying with this procedure. It is important to recognise that conduct which one person may find acceptable, another may find totally unacceptable. This includes when you are at work on training courses or on Company social events.

Managers have particular responsibility for creating and respecting a considerate culture within their area (both in the workplace or at work-related events outside of the workplace) and for utilising the support available to ensure that informal and formal complaints are dealt with sensitively, appropriately and in line with the procedures set out in this policy.

The Company's Position on Bullying and Harassment

All employees have a duty not to bully or harass each other nor to help anyone else to do so.

We will not tolerate bullying or harassment in our workplace or at work-related events outside of the workplace, whatever the seniority of the perpetrator and whether the conduct is a one-off act or repeated course of conduct, and whether done purposefully or not. Neither will we tolerate retaliation against, or victimisation of, any person involved in the bringing of a complaint of harassment or bullying. You should also be aware that if a court or tribunal finds that you have bullied or harassed someone you could be liable to compensate the victim. In some circumstances the treatment may amount to a crime punishable by a fine or imprisonment.

We will take appropriate action if any of our employees are bullied or harassed by our customers or suppliers.

Allegations of bullying and harassment will be treated seriously. Investigations will be carried out promptly, sensitively and, as far as possible, confidentially.

4.0 FURTHER INFORMATION

If you require further information contact Chris Kistan, Director and Designated Safeguarding Lead.

Last Review Date	Next Review	Director
10/2018	30/09/2019	Chris Kistan