



Safeguarding and Prevent Policy

Responsible officer	Managing Director
Approved by	Amerjit Singh & Board
Position	Managing Director
Approved date	January 2022
Signed	
Next review date	January 2023



1. Introduction

Skills 4 Pharmacy is the trading name of I & F limited. Skills 4 Pharmacy is a niche training provider offering apprenticeship training programmes to community pharmacies, hospitals, hubs and primary care networks.

We believe that it is always unacceptable for a child or adult to experience abuse or discrimination of any kind and recognises its responsibility to safeguard the welfare of all children and adults at risk will be treated less favourably than others in being able to access services which meet their specific individual needs.

This policy has been developed to describe the responsibilities of everyone for the recognition and prevention of abuse and to clarify the actions to take when abuse is suspected or identified. Therefore, the aim of this policy is to ensure that we fulfil its responsibilities towards the protection, welfare and safety of children and vulnerable adults.

Safeguarding board

This policy has been agreed, sponsored, and approved by the board and safeguarding team below.

Name	Role
Amerjit Singh	MD with overall accountability for Safeguarding and Prevent.
Bev Harland	Board member Safeguarding and Prevent Sponsor
Jamie Crinigan	Safeguarding and Prevent Lead
Judi Oliver	Safeguarding and Prevent Officer

Applies to:

Staff, Associates, Volunteers, Delivery Partners (for the purpose of this procedure we will use the term staff).

Reason for Policy:

This policy forms part of our Safeguarding framework and is in place to ensure that anybody who has cause to come into contact with any of our learners, young people or adults at risk knows what is expected of them and can safeguard others.

- All complaints, allegations or suspicions of abuse must be taken seriously, and all colleagues must adopt a 'could happen here approach'.
- Absolute promises of confidentiality must not be given as the matter may develop in such a way that these might not be able to be honoured. This must be made clear at the outset to the individual who is making the disclosure, with reassurance that they are doing the right thing and information will only be passed on to those who need to know this to safeguard them and others.

- If the complaint/allegation comes directly from a young person, questions should be kept to a minimum necessary to understand what is being alleged. Leading questions must also be avoided.

Policy Statement:

We are committed to protecting children and vulnerable adults from harm of any kind. We accept our statutory responsibility for the well-being and safeguarding of all stakeholders.

We recognise our responsibility and acknowledge that it is the duty of our workforce in its entirety to uphold British Values and Safeguard the welfare of all stakeholders by creating an environment that protects them from harm and reduces any potential risks of being exposed to violence, extremism, exploitation, or victimisation. Therefore, employees, apprentices, volunteers, and contractors will show respect and always understanding for the rights, safety and welfare of all parties and conduct themselves in a way that reflects the principles, values, and cultures of our organisation. They will also be aware of and follow current legislation regarding the safeguarding of all stakeholders.

It is our intention to:

- Build a safeguarding culture where all stakeholders treat each other with respect and are comfortable sharing concerns.
- Ensure that all stakeholders are protected from abuse, regardless of their protected characteristics.
- Ensure that staff are appropriately trained in safeguarding and to understand the risk of radicalisation, challenging extremism, their role in implementing the Prevent Duty and the impact this has on their job role, and how to refer an individual who they feel is at risk.
- Appoint suitably experienced and skilled Safeguarding and Prevent leads to manage concerns raised.
- Take the necessary steps to inform all stakeholders of relevant policies and procedures and Code of Conduct.
- Regularly review and monitor our policies and procedures to ensure our legal, moral, and social responsibilities are met.
- Take all suspicions and allegations of abuse and risks of radicalisation extremely seriously and to respond to concerns with due speed and consideration.
- Work in Partnership and in accordance with organisations' procedures, where required, including Designated Person/s in Local Authority, Safeguarding Partners, Safeguarding Adults Boards, and the Channel multi-agency panel.
- Comply with and maintain knowledge of all relevant legislation, codes of practice and appropriate guidance and any amendments.
- Ensure that relevant employment and security checks are undertaken, as required.
- Ensure that all personal information is confidential and should only be shared with the permission of the individual concerned (and/or those with parental responsibility), unless the disclosure of confidential information is necessary to protect a child or adult at risk from serious harm or to promote their welfare on a 'need to know' basis.



Amerjit Singh
Managing Director

2. Policy

Statutory Obligations

Skills 4 Pharmacy has a statutory duty under Section 175 of the Education Act (2002) and must have in place arrangements for carrying out its duties with a view to safeguarding and promoting the welfare of children, young people and adults who may be at risk of harm or abuse. Skills 4 Pharmacy have a legal obligation to fulfil the Prevent Duty. This policy sets out a framework for those arrangements and should be read in conjunction with the associated Skills 4 Pharmacy policies and procedures listed, the web links provided, and various appendices attached, including our Safeguarding Procedures that link to the Local Authority Safeguarding Procedures. This policy considers, amongst others, the following publications, including recent / relevant guidance and legislation in this area:

Keeping Children Safe in Education (KCSIE): Statutory guidance for schools and colleges. (Department for Education, September 2021)

https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/1021914/KCSIE_2021_September_guidance.pdf

Working Together to Safeguard Children: A guide to inter-agency working to safeguard and promote the welfare of children. (Her Majesties Government, July 2018)

<https://www.gov.uk/government/publications/working-together-to-safeguard-children-2>

The Care Act (2014). Statutory guidance: Care and support statutory guidance updated June 2020 that provides a detailed guidance on all aspects of implementing the requirements contained in Part 1 of the Care Act (2014) to local authorities, the NHS, police and other partner organisations. (Department of Health and Social Care)

<https://www.gov.uk/government/publications/care-act-statutory-guidance/care-and-supportstatutory-guidance>

The Prevent Duty: Departmental advice for schools and childcare providers (Department for Education. June 2015).

<https://www.gov.uk/government/publications/protecting-children-from-radicalisation-theprevent-duty>

Policy Principles

We endeavor to safeguard children and adults at risk by:

- Valuing, listening to and respecting them.
- Adopting policies, guidelines, a Code of Conduct and behaviour for employees, volunteers and contractors
- Sharing information about concerns with agencies which need to know and involving parents and children appropriately.
- Ensuring that the DBS, in accordance with their guidelines, checks all staff, volunteers with responsibilities for children and adults at risk, including relevant non-delivery roles.
- Recruiting staff, associates, volunteers, and contractors who are aware of our Safeguarding and Prevent Policy and procedures

- Providing all staff, volunteers, with safeguarding training
- Ensuring that all children, adults at risk, their parents and carers are aware of our Safeguarding and Prevent Policy and procedures
- Ensuring that all staff and stakeholders are aware of their role and responsibilities in relation to safeguarding.

We are committed to be alert to a young person who:

- Is disabled and has specific additional needs.
- Has special educational needs (whether they have a statutory Education, Health and Care Plan)
- Is a young carer.
- Is an apprentice.
- Is showing signs of being drawn into anti-social or criminal behaviour, including gang involvement and association with organized crime groups.
- Is frequently missing / goes missing from care or from home.
- Is at risk of modern slavery, trafficking, or exploitation.
- Is at risk of being radicalised or exploited.
- Is in family circumstance presenting challenges for the child, such as drug and alcohol misuse, adult mental health issues and domestic abuse.
- Is misusing drugs or alcohol themselves.
- Has returned home to their family from care.
- Is a privately fostered child.

We are committed to reviewing our policies and good practice annually, unless there is a change to legislation, or if there has been a significant change within the organisation. The Lead DSPO is responsible for updating the policy with support from the strategic management Board.

We operate a culture of openness and transparency and embeds the principles of the '4 R's' across all our services, ensuring that all staff, volunteers, and contractors understand their responsibilities with regards to safeguarding.

Responsibilities

The Lead DSPO and the Safeguarding Board

We have appointed a Lead and a Safeguarding Board who have overall responsibility for issues related to safeguarding children and vulnerable adults and are supported by a DSPO. The DSPO is responsible for acting as a source of advice on child and adult at risk safeguarding matters, for coordinating action within the organisation and for liaising with health, children's service, adult services and other agencies about suspected or actual causes of abuse. The Lead DSPO will be assisted by other designated members of staff drawn from senior management and suitably experienced staff. Designated members of staff have a key responsibility for raising awareness, within the staff, of issues relating to the welfare of children and adults at risk and the promotion of a safe environment for children and adults at risk.

The Lead DSPO has governance over safeguarding and Prevent matters across the business, and the MD has overall responsibility for safeguarding and Prevent at Board level. The MD will ensure that resources, support, and all relevant training are available and in place for staff. The MD will support the Safeguarding and Prevent Team in meeting their responsibilities and will ensure that we meet these

commitments. There is a clear and robust job description for the DSPO role , the Lead DSPO is responsible for reviewing the child and adult at risk Safeguarding and Prevent Policy annually, or more frequently if there is a change to current legislation, along with any policies linked to the Safeguarding and Prevent Policy and processes and procedures that support the embedding and working practices of this policy.

The Skills 4 Pharmacy Board

The Skills 4 Pharmacy Board are responsible for ensuring we safeguard our learners in accordance with the statutory guidance set out in Part Two of KCSIE (2021) and related guidance or legislation. This includes that:

- A member of the Board is appointed to oversee safeguarding matters and undertakes appropriate training in this, supported by another member of the Board to act as their deputy.
- Skills 4 Pharmacy has a child protection and safeguarding policy and associated procedures in place that are in accordance with statutory requirements and local authority guidance and that these are published and reviewed annually or where required due to changes in policy, ensuring that any deficiencies or weaknesses regarding safeguarding arrangements are remedied without delay.
- Effective training is in place for all staff, appropriate to their roles, and it complies with the statutory requirements and takes account of local authority guidance.
- The Board receives and considers regular safeguarding update reports.
- Skills 4 Pharmacy operates 'safer recruitment procedures' in accordance with statutory requirements and guidance.
- Allegations or concerns against staff are dealt with in accordance with statutory guidance and local authority procedures.
- Skills 4 Pharmacy contributes to multi-agency and channel panel working in line with statutory guidance.
- Ensure that staff have the skills, knowledge and understanding to keep safe our vulnerable learners.
- Prevent – Deal with any issues raised by apprentices or employees to include referral to multi-agency and channel panel

Designated Safeguarding and Prevent Officers

Designated members of staff receive training in safeguarding children and adults at risk and interagency working as required by the LSCB. They also receive refresher training annually as required by us. The team are required to keep up to date with developments in safeguarding children and adults at risk.

- The DSPO team / relevant contract manager is responsible for ensuring the child and adult at risk policy is available publicly and to parents and carers, that parents and carers are aware that suspected abuse referrals may be made, and our role in this.
- The DSPO team will alert the DBS when a person has been dismissed or left due to risk to or harm that they presented, or may have presented, to a child or vulnerable adult.
- Being aware of how to make referrals to children's social care and adult's social care for statutory assessments via the local authority multi-agency

safeguarding units, along with the role they might be expected to play in such assessments

- The DSPO team will alert the police when a crime may have been committed.
- All DSPOs foster strong links with the LSCB and Designated Local Authority Person.
- The DSPO team refer all cases of suspected abuse to the local authority, children's social care agency or, in the case of a vulnerable adult, to the local authority adult's social care.
- The Lead DSPO will refer to the ESFA should we be subject to an investigation regarding our safeguarding practices.
- The Lead DSPO will refer all reportable safeguarding matters to the funding partner, where we are not the funder.
- All DSPOs liaise with senior management to inform them of issues, especially on-going enquiries, and police investigations.
- All DSPOs maintain a proper record of any safeguarding referral, complaint, or concern, even when that concern does not lead to a referral.
- All DSPOs act as a source of advice, support, and expertise to staff on matters of safety and safeguarding.
- All DSPOs liaise with relevant agencies following a referral to ensure it has been dealt with effectively and identify whether a resolution has been achieved. DSPOs ensure that we work with employers and other training organisations that provide apprenticeships and / or work placements for children or adults at risk, to ensure that appropriate safeguarding's are in place.
- The MD, with support from the Head of Operations, ensures that all staff, associates, volunteers, receive training in safeguarding children and vulnerable adults, are aware of procedures for protecting children and adults at risk and that refresher training takes place annually.
- The Lead DSPO provides information monthly to the Board setting about how we have discharged our duties. The Lead DSPO is also responsible for reporting deficiencies in procedure or policy identified by the LSCB at the earliest opportunity.
- If the Lead DSPO is absent from the business, the Deputy Lead DSPO's will be responsible for undertaking Lead DSPO duties.

All staff

All colleagues / volunteers are responsible for:

- Reading and understanding Keeping children safe in education: Statutory guidance for schools and colleges Part 1: Information for all school and college staff (Department for Education, September 2021)
- Providing a safe environment in which children, young people and adults at risk of harm, abuse or neglect can learn.
- Being prepared to identify children, young people and adults at risk of harm, abuse or neglect, who may benefit from early help and understand the early help process and their role in it, together with the completion or assisting with the completion of a risk assessment or support plan where required.
- Following the framework described in the Safeguarding referral procedure, know where to go and what to do if they have any safeguarding concerns.
- Attending safeguarding and child protection training and updates as required, on induction and an update at least once every year.

- Reading and familiarising themselves with associated policies via the Skills 4 Pharmacy website.
- Reading safeguarding newsletters, hot topics and associated guidance when published.
- Promoting awareness of safeguarding issues/support amongst learners, colleagues and other stakeholders.
- Protecting themselves by being familiar with and adhering to the Staff Professional Code of Conduct, safer working practice and other key safeguarding standards.
- Wearing their staff ID badge always when working on or off Skills 4 Pharmacy sites.
- Reporting to a DSPO any learner welfare concerns that they may have or may need support with.
- Reporting to the Head of Operations or MD any potential criminal charges or personal issues that may have a bearing on their on-going 'suitability' to work in an educational environment with children, young people and adults at risk of harm, abuse or neglect.
- Reporting to the Lead DSPO or MD any concerns they may have about the conduct of colleagues in relation to Safeguarding and / or Professional Staff Code of Conduct.
- Maintaining an appropriate level of confidentiality whilst at the same time liaising and sharing information with relevant professionals.
- Identify changes in the behaviour of apprentices and employees and report to the Lead DSPO or MD.

Learners

Learners are responsible for:

- Maintaining vigilance and a pro-active approach to the safety and welfare of themselves, their peers and others on site.
- Reporting any concerns to a member of staff or directly to a DSPO with whom they feel comfortable discussing these concerns.
- Abiding by the Skills 4 Pharmacy learner code of conduct which is designed to safeguard all those on our sites or using our facilities, including the IT network.
- Behaving in a way that does not compromise them or lead to allegations of a criminal or safeguarding nature.

Safer Recruitment and Training for Staff

Skills 4 Pharmacy will select and recruit in accordance with the statutory guidance set out in Part 3 of KCSIE (2021), which details Safer Recruitment pay due regard to the Safeguarding Vulnerable Groups Act 2006 and the Protection of Freedoms Act 2012. The recruitment policy and procedures ensure that all appropriate measures are applied in relation to everyone working in Skills 4 Pharmacy, including staff, volunteers and staff employed by external partners / contractors. The Safeguarding Board will ensure that a single central record is maintained of all pre-appointment checks. DBS checks are undertaken in line with government guidance and current legislation, alongside appropriate references being obtained and ensuring qualifications are verified.

Newly appointed staff will have a job role induction in line with our probation policy over a 6-month period or other depending on role. We ensure that all employees are

made aware of the standards expected of them and implements the appropriate support, training feedback to achieve these standards. Employees will be made aware of the relevant Safeguarding and Prevent procedures as part of that induction program and will be given a copy of our Safeguarding Policy.

Individual / Group	Training	Frequency
All new staff and annual updating	<ul style="list-style-type: none"> • Safeguarding • Prevent Duty • Policy review (internal and external) • Identified essential reading (KCFE part 1) • Hot topics, Newsletter , videos and CPD training events by the DSPO team 	At induction and annual updating or at time of changes
Safeguarding Leads (DSPO)	<ul style="list-style-type: none"> • Identified essential reading • Specialism divided by the team to ensure full coverage • Designated Safeguarding Officer Training 	Complete and appropriate updating
Board and Senior Managers	<ul style="list-style-type: none"> • Annual training and updating 	Complete and appropriate updating

Confidentiality

The Data Protection Act (2018) and General Data Protection Regulations (GDPR) do not prevent, or limit, the sharing of information for the purposes of keeping children safe. Fears about sharing information must not be allowed to stand in the way of the need to promote the welfare and protect the safety of children, young people and adults at risk of harm, abuse or neglect.

Colleagues should never promise that they will not tell anyone about an allegation or disclosure, as this may ultimately not be in the best interests of the child, young person or adult at risk of harm or abuse. All suspicions, allegations and investigations will be kept confidential and shared only with those who need to know in accordance with GDPR and Data Protection Act (2018), following government advice and guidance.

- Remember that the General Data Protection Regulation (GDPR), Data Protection Act 2018 and human rights law are not barriers to justified information sharing but provide a framework to ensure that personal information about living individuals is shared appropriately.
- Consider safety and well-being:
- base your information sharing decisions on considerations of the safety and well-being of the individual and others who may be affected by their actions.

- ensure that the information you share is necessary for the purpose for which you are sharing it, is shared only with those individuals who need to have it, is accurate and up to date, is shared in a timely fashion, and is shared securely.
- Keep a record of your decision and the reasons for it – whether it is to share information or not. If you decide to share, then record what you have shared, with whom and for what purpose.

Use of Equipment

Technology forms an integral part of the wider world and Skills 4 Pharmacy seeks to embed this in all of its programmes. Effective and robust IT monitoring and filtering systems are in place to safeguard students while they are online and using Skills 4 Pharmacy facilities. Staff remain vigilant at all times; they investigate and escalate matters when there are concerns about individuals/groups of students.

Our IT equipment (including computers, laptops, mobile phones etc.) must not be used to view, download, create or share (with colleagues or children) illegal content, including abusive images of children or young people.

Learner Recruitment

When joining a programme, a detailed record of learner needs will be kept, and an Individual Learning Plan prepared to ensure all the needs are planned for. All learners receive a learner handbook through our e-portfolio system, detailing our support policies and key contacts. There is also follow up review points to capture their journey and do their needs are being met. Delivery staff will work closely with the designated employer contact ensuring a tri-party support system is in place. The safety of all our learners is paramount and where a learner wishes to join a course from a referral agent or has disclosed behaviors that may be as a concern a risk assessment will be complete to assess course suitability and if the required support plan can be put in place prior to a course offer.

External speakers and events

An external speaker or visitor is used to describe any individual or organisation who is not a member of staff or learner working with us, or one of its contracted partners, who has been invited to speak to staff/learners.

The Prevent duty does not seek to ban any speakers or impinge on freedom of speech. What the duty does is ensure that the right processes are in place to manage events and speakers. This could mean:

- Ensuring a reasonable notice period for checks to be made, which could potentially be from an open source. This could include looking into instances where potential hate speech may have taken place at previous events.
- Processes or protocols to demonstrate how information about the speaker is used to decide about whether to allow their event to take place or not (risk assessed)
- A requirement for speakers to sign up to the organisation's equality and diversity policy.
- Evidence of the final decision made about whether to allow the speaker into the organization, including the mitigation measures put in place.

Anti-Bullying and Harassment

Our policy on bullying and harassment is set out in a separate policy Learner Anti-Bullying and Harassment Policy and acknowledges that allowing or condoning bullying or harassment may lead to consideration under safeguarding children or vulnerable adult's procedures. All incidents of bullying and harassment, including cyber-bullying, racist, homophobic, and gender-related bullying, will be dealt with in accordance with our anti-bullying policy. We recognise that children and young adults at risk with special needs and/or disabilities are more susceptible to being bullied. We maintain a log of bullying incidents in our programs. Our policy on bullying and harassment is explained at the induction process for new learners and their parents and carers.

Communications

- When communicating with young people / vulnerable adults online, observe the same rules of behaviour as if speaking with them in person by being professional: polite, respectful, not swearing or saying anything (using the written word, images, or icons) that could be regarded as sexual innuendo, bullying or discrimination.
- Ask yourself whether the content of any online communication has a clear work purpose.
- Do not use any text speak abbreviations or symbols / emoticons, even if you ordinarily use these in your personal life.
- Never disclose non-public and confidential information about us, our staff, associates, volunteers, or the young people with whom we are working.
- Do not say anything or re tweet any posts that could be deemed offensive, controversial, or socially inappropriate in any way.
- Contact with young people or adults at risk online should only be a recognized element of your work and done strictly for business purposes.
- Do not send any illegal or inappropriate content (written, images or icons), including sexting via mobile phones.

Openness and scrutiny

- Always communicate with young people in a way that is open for others to see, if necessary
- Do not use private messaging facilities on social networks or apps; if it needs to be private, then do this by email exchange or phone and note the conversation afterwards.
- Ensure there is always a record of such communication that would be open for others to check, to check, if necessary
- It should always be clear who the communication is from when we are communicating with a young person or a vulnerable adult.
- There should be no use of anonymous apps, where the sender can remain anonymous.

3. Definitions

TERM	Explanation
Children	any persons up to the age of 18 years.
Adult at risk	those aged 16 years and over who: are unable to safeguard their own wellbeing, property, rights or other interests
DSPO	Designated Safeguarding and Prevent Officer
Harm	Harm includes ill treatment (including sexual abuse, exploitation and forms of ill treatment which are not physical); the impairment of health (physical or mental) or development (physical, intellectual, emotional, social or behavioural); self-harm and neglect; unlawful conduct which adversely affects a person's property, rights or interests (for example, financial abuse).
Radicalisation	the process by which people come to support terrorism and extremism and, in some cases, to then participate in terrorist groups.
Extremism	vocal or active opposition to fundamental British values, including democracy, the rule of law, individual liberty and mutual respect and tolerance of different faiths and beliefs
Exploitation	exploitative situations, contexts and relationships where a person or persons receive 'something' (e.g., food, accommodation, drugs, alcohol, cigarettes, gifts, money, affection) because of them completing a task on behalf of another individual or groups of individuals.

Victimisation

Treating someone badly

Welfare

The health and happiness of a person or group

Abuse

the violation of an individual's human rights. It can be a single act or repeated acts. It can be physical, sexual, or emotional. It also includes acts of neglect or an omission to act.

Data Protection

legal control over access to and use of data stored in computers.

4. Related policies

The following policies demonstrate and support a shared commitment to safeguarding and promoting the welfare of its stakeholders.

- Bullying and Harassment
- Code of Conduct
- Grievance
- Data Protection (GDPR)
- Equality and Diversity
- E-Safety
- Public Interest Disclosure (Whistleblowing)
- Recruitment and Selection
- Learner Behaviour
- Lone Working
- Complaints
- IT Security and Information Policies