



Safeguarding Policy

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Policy Purpose

This Safeguarding and Prevent Policy is to ensure the safety and protection of all of our employees, including apprentices from harm and hazards within the workplace, online and offline, as well as away from home. The safety and wellbeing of our employees are of utmost important to us; as such we seek to identify any and all risks, where possible, in order to eliminate, control and/or isolate any events that could potentially harm the personal safety and/or wellbeing of all of our employees.

Policy Scope

This policy applies to all WEC Group employees including apprentices, volunteers, partners and other stakeholders (incl. contractors) and covers our duty of care and legal obligations we adopt to achieve the highest standards possible in relation to the safety and welfare of all our employees including our apprentices.

WEC Group is committed to providing a safe, caring and welcoming environment where every employee including our apprentices can reach their full potential free from harm, abuse and discrimination.

WEC Group will therefore:

- Establish and maintain an ethos where all employees including apprentices feel secure and are encouraged to talk, and are listened to. This will be encouraged with an open-door policy as well as regular reviews. **There is also a dedicated email address that all employees including our apprentices can email if they have any concerns safeguarding@wecl.co.uk**
- Ensure that all employees including apprentices know that there are individuals at WEC Group who they can approach if they are worried or are in difficulty. During inductions information regarding the Safeguarding team will be made available; this will continue to be imparted and strengthened during 1-2-1 reviews. The Designated Safeguard Lead (DSL) can be identified on the Apprentice Engineering Academy training notice board and notice boards throughout the Company. Contact details of the DSL are also available at the end of this policy
- Include safeguarding within the apprenticeship curriculum material which will help apprentices develop realistic attitudes to the responsibilities of adult life and learn how to keep themselves and others safe.
- Ensure that every effort will be made to establish effective working relationships with parents and colleagues from other agencies. E.g. through annual parent information evenings which will form part of our communication strategy
- Ensure we are committed to protecting the safety of all employees including our apprentices by encouraging self-awareness, providing on hand support via the safeguarding team and promoting clear lines of communication with all staff members should a concern need to be raised.
- Follow all correct policies and procedures to ensure that all Safeguarding concerns and referrals which are made are handled sensitively alongside WEC Group's dedicated Safeguarding team

Areas of Scope (Appendix A)

- Safeguarding Allegations
- Modern Slavery Statement
- Types of Abuse
- Peer on Peer abuse

- Child Criminal Exploitation
- Serious Violence
- Online safety
- Equality impact assessment

Our Principles and Values

Here at the WEC Group the welfare of our employees including apprentices is paramount, we ensure that:

- Safeguarding and promoting welfare is everyone's responsibility
- All employees, including apprentices, regardless of age, gender, ability, culture, race, language, religion, sexual identity, have equal rights to effective safeguarding arrangements
- All employees, including apprentices have an equal responsibility to act on any suspicion or disclosure that may suggest an apprentice is at risk of harm
- All employees, including apprentices involved in safeguarding and protection issues will receive appropriate training and support
- Operate a 'zero tolerance' to abuse and other harmful situations

The WEC Group values are:

- 1) **INTEGRITY**- We will operate ethically, reliably and honestly.
- 2) **EXCELLENCE**- We will exceed expectations and strive to be the best we can.
- 3) **POSITIVITY**- We will bring energy and enthusiasm to both our work and learning whilst being supportive of others, our processes, our customers and the Company.
- 4) **TEAMWORK**- We will work together to be more efficient and productive, resulting in increased innovation, higher morale and improved retention.
- 5) **SAFETY**- We will promote a safety culture within the workplace which is fundamental to operational excellence.

We align our values to the British Values, which are:

- 1) **Democracy**- giving everyone a voice of opinion
- 2) **Individual liberty**- Freedom of speech
- 3) **The Rule of Law**- No one is above the law, innocent until proven guilty
- 4) **Respect and Tolerance**- respect for people of all backgrounds, cultures, ages, genders, faiths, sexualities and beliefs

We are committed to developing values that create cohesive working communities within the workplace, at home and within our learning environments. As part of our commitment to this policy, the WEC Group has employed a full time Designated Safeguarding Lead (DSL), Dean Duffy, who is Level 3 qualified, alongside a Deputy Safeguarding Officer/Prevent Lead Jeanette Gledhill.

Key Objectives

The key objectives of this Policy are to:

- 1) Keep all of our employees, including apprentices safe from harm and external influences that may lead to extremist views and/or activities
- 2) To comply with the Safety, Safeguarding and Prevent Laws, as necessary as part of our commitment for delivering apprenticeships
- 3) To risk assess our operations in order to ensure that employees, including apprentices feel safe and secure at work and within the workplace

- 4) To risk assess our operations in order to ensure that employees, including apprentices feel safe and secure online and when using ICT
- 5) To train and develop our employees to identify any behaviours in employees, including apprentices that may appear uncharacteristic
- 6) To monitor and manage all safeguarding concerns to satisfactory conclusion and work with external agencies and experts to signpost employees to if/where necessary
- 7) To monitor the safety of our employees including our apprentices by ensuring safe recruitment of personnel to our business and undertaking verification checks, e.g. DBS checks

Roles and Responsibilities

All Employees (including Safeguarding Governor):

Role	Name	Contact details
Safeguarding Governor/Managing Director	Steve Hartley	01254 773718
Designated Safeguarding Lead	Dean Duffy	01254 773718
Deputy Safeguarding Officer (Prevent Lead)	Jeanette Gledhill	01254 773718
Safeguarding Officer/Group HR Manager	Gemma Kennedy	01254 773718
Safeguarding Officer	Kris Mercer	01254 773718
Safeguarding Officer	Chris Dickinson	01254 773718

Apprentice Engineering Academy staff:

- Will have safeguarding training appropriate to their role and responsibility that is regularly updated.
- In addition, all staff members will receive at least annual updates which can be in the form of emails, bulletins, staff meetings/discussion.
- Will be aware of the signs of abuse and neglect.
- Will be aware of how to respond to specific safeguarding concerns as outlined in this Policy.
- Have a responsibility to identify those who may require early intervention support and what action to take to ensure they are supported appropriately.
- Have a responsibility to identify and respond to an apprentice who is or likely to suffer significant harm and what action they must take, appropriate to their role.
- Must be aware of the importance of multi-agency partnership working and information sharing processes.
- Those who work directly with apprentices and can contribute to early support and safeguarding assessments, will be made aware of the risk and approach to safeguarding.
- Have a responsibility to provide a safe environment in which apprentices can learn (a learning environment safe from harm).

The Governance Board

The Governance Board will ensure that:

- The WEC Group complies with its duties under relevant legislation.
- All Apprentice Engineering Academy staff will undergo safeguarding training (including online safety), updated annually with any legislative and regulatory updates on an annual basis where necessary.

- All Management and staff working directly with apprentices read (at least) Part One of 'Keeping Children Safe in Education'
- This Safeguarding Policy is consistent with local requirements, reviewed and updated annually and made available publicly (available on The WEC Group website).
- Safeguarding training commissioned and/or delivered internally is in line with advice from the Department for Education.
- There are procedures for dealing with allegations of abuse made against members of staff including allegations made against members of the Management Team
- Our Designated Safeguarding Lead (DSL) Dean Duffy will liaise with the appropriate Local Area Designated Officer (LADO)
- Policies adopted are disseminated, followed and understood by all employees including apprentices.
- Appointment of a member of the Apprentice Engineering Academy Team to the statutory role of Designated Safeguarding Lead (DSL)- Dean Duffy.
- Apprentices are taught about safeguarding (including online safety) through teaching and learning opportunities, as part of providing a broad and balanced curriculum and prepared for independence and further employment within the Group.
- There are written recruitment and selection procedures that include the requirement for appropriate pre-employment checks and at least one person on any appointment panel has undertaken safer recruitment training.
- Procedures are in place to handle allegations of peer-on-peer abuse.
- There are appropriate safeguarding responses to apprentices who go missing from education, particularly on repeat occasions, to help identify the risk of abuse and neglect including sexual abuse or exploitation and to help prevent the risks of them going missing in the future.
- The apprentice's wishes and feelings are taken into account when determining what action to take and what services to provide to protect individuals. Ensuring there are systems in place for apprentices to express their views and give feedback.
- There is a recognition of the importance of information sharing between professionals and the local authority.
- Ensure the ICT Policy addresses the safety of apprentices in accessing inappropriate material when accessing the internet and that appropriate filtering and monitoring systems are in place.

The Managing Director, Steve Hartley

WEC Group Managing Director, Steve Hartley, will ensure this Policy and associated Procedures are implemented and followed by all WEC Group employees including apprentices. The Managing Director will:

- Allocate enough time and resources to enable the DSL (Dean Duffy) and any deputies to carry out their roles effectively, including the assessment of apprentices and attendance at strategy discussions and other necessary professional meetings.
- Ensure that all employees including apprentices feel able to raise concerns about poor or unsafe practice and that such concerns are handled sensitively and in accordance with the WEC Group Whistleblowing Policy (found on the HR page of the Intranet).
- Ensure that the safety and welfare of apprentices is addressed through the Curriculum Manager.
- Provides a signed copy of the WEC Group's Safeguarding Annual report to the Governance Board.

The Designated Safeguarding Lead (DSL), Dean Duffy

The WEC Group Designated Safeguarding Lead (DSL) is expected to:

- Refer cases of suspected abuse to the local authority children's/ adult social care as required (details on the useful contacts list).
- Refer cases to the Channel Panel where there is a radicalisation concern as required.
- Support employees including apprentices who make referrals to the local authority and the Channel Panel.
- Refer cases where a person is dismissed or left due to risk/harm to a young person to the Disclosure and Barring Service as required and also to the HR Department.
- Refer cases where a crime may have been committed to the Police as required.
- Work with other safeguarding agencies and local partnerships.
- Liaise with the Managing Director and Governance Team to inform of ongoing enquires.
- As required, liaise with the Local authority designated officer (LADO) for all safeguarding allegations/ cases made against a WEC Group employee (details on the useful contacts list).
- Liaise with the Apprentice Engineering Academy Training Manager and Health and Safety Officer on matters of safety and safeguarding when deciding whether to refer by liaising with relevant agencies.
- Acting as a source of support, advice and expertise for all employees including apprentices.

The Designated Safeguarding Lead must:

- Understand the assessment process for providing early help and intervention, for example through locally agreed common and shared assessment processes such as early help assessments.
- Ensure each member of Apprentice Engineering Academy has access to and understands the WEC Groups Safeguarding Policy.
- Be alert to the specific needs of apprentices identified as 'in need', those with special educational needs and young carers.
- Be able to keep detailed, accurate, secure written records of concerns and referrals by liaising with the HR department.
- Understand and support WEC Group with regards to the requirements of the Prevent Duty (please refer to the Prevent Policy) and is able to provide advice and support to Apprentice Engineering Academy staff and Managers on protecting apprentices from the risk of radicalisation, alongside the Prevent Lead.
- Obtain access to resources and attend any relevant or refresher training courses, as necessary.
- Understand the current risks associated with online safety including recognition of the additional risks associated with SEN and disabilities e.g. cyber-bullying, grooming and radicalisation and support SEND individuals to stay safe online.
- Encourage a culture of listening to apprentices and taking account of their views and feelings, amongst all employees, in any measures the WEC Group may put in place to protect them.

Raising Awareness

The Designated Safeguarding Lead is expected to:

- Ensure the WEC Group Policies are known, understood and used appropriately

- Ensure this Policy is reviewed annually, procedures and implementation are updated and reviewed regularly, and work with governing bodies regarding this
- Ensure this Policy is available publicly on the WEC Group website and parents/carers are aware of the fact that referrals about suspected abuse (including peer on peer abuse) or neglect may be referred to external agencies.
- Link with the local safeguarding partnership arrangements to make sure staff are aware of training opportunities and the latest local policies on safeguarding
- Where apprentices leave the WEC Group ensure their safeguarding file is transferred to the new training provider as soon as possible. This should be transferred separately from the main student file, where possible using the CPOMs safeguarding platform.

Particular Vulnerabilities

Any apprentice may benefit from early help and support, but Apprentice Engineering Academy staff and Managers must be particularly alert to the potential need for early help for apprentices with the following additional vulnerabilities:

- Have a disability and/or specific additional needs.
- Have Special Education Needs (whether or not they have a statutory Education, Health and Care Plan).
- Is a young carer.
- Are showing signs of being drawn in to anti-social or criminal behaviour.
- Frequent missing episodes/goes missing from Home/Engineering Academy.
- Is at risk of modern slavery, trafficking or exploitation.
- Is at risk of being radicalised or exploited.
- Where family circumstances present challenges for the apprentice, such as drug and alcohol misuse, adult mental health issues and domestic abuse.
- Is a privately fostered young person.

Availability

The Designated Safeguarding Lead (or safeguarding officers) will always be available (during working hours) for employees including apprentices at work to discuss any safeguarding concerns.

If the DSL is on annual leave or absent due to sickness then the safeguarding deputy lead and officers along with the HR department will be available. See contact details below.

Training

The DSL (and safeguarding officers) will undergo training that provides them with the knowledge and skills required to carry out their roles. They must also undertake Prevent awareness training as necessary (please refer to the Prevent policy).

DSL skills and knowledge should be refreshed at regular intervals and at least annually and this can involve e-bulletins, meeting other DSL at conferences and networking events or simply taking the time to read and digest safeguarding materials.

Implementation of this Policy

In order to implement this safeguarding policy in the workplace we will:

- Conduct safeguard training- this will be embedded throughout the curriculum and the learner journey during our classroom sessions and also in all employee inductions.
- Regularly discuss any potential concerns during informal and formal progress reviews.
- Promote our Mental Health First Aider (Gemma Kennedy) and arrange for regular 'open door' slots to take place.
- Promote our Employee forums and anonymous feedback forms- allow our employees including our apprentices to discuss their issues or concerns openly, yet confidentially. By doing this we aim to monitor the mental health (stress, anxiety, financial worries, sexual harassments concerns) of all our employees including our apprentices- once we are aware of these conditions we can look at addressing them with a view to improving morale and overall performance.
- Promote the UK Healthcare confidential counselling helpline number to ensure our employees including our apprentices are receiving as much support as possible.
- Signpost all our employees including our Apprentices to key local professional organisations i.e. Shads Chefs in Blackburn which run a male orientated Group on a Thursday evening.
- Embed this Safeguarding Policy in other policies across the Group including the ICT policy, Health and Safety Policy and the Prevent Policy.
- Run online safety checks and monitor internet usage.
- Work alongside agencies and partners and understand the main issues and risk that people can be drawn into in your local area/regionally and nationally.
- Be aware of the threats online.
- Carry our regular risk assessments (including online).
- Report on safeguarding and how to identify vulnerable persons to the Governance Board.

Actively Promote this Policy

This Policy will be reviewed annually and modified as necessary. Any changes will be brought to the attention of all employees including apprentices by way of email, noticeboard communication and intranet updates.

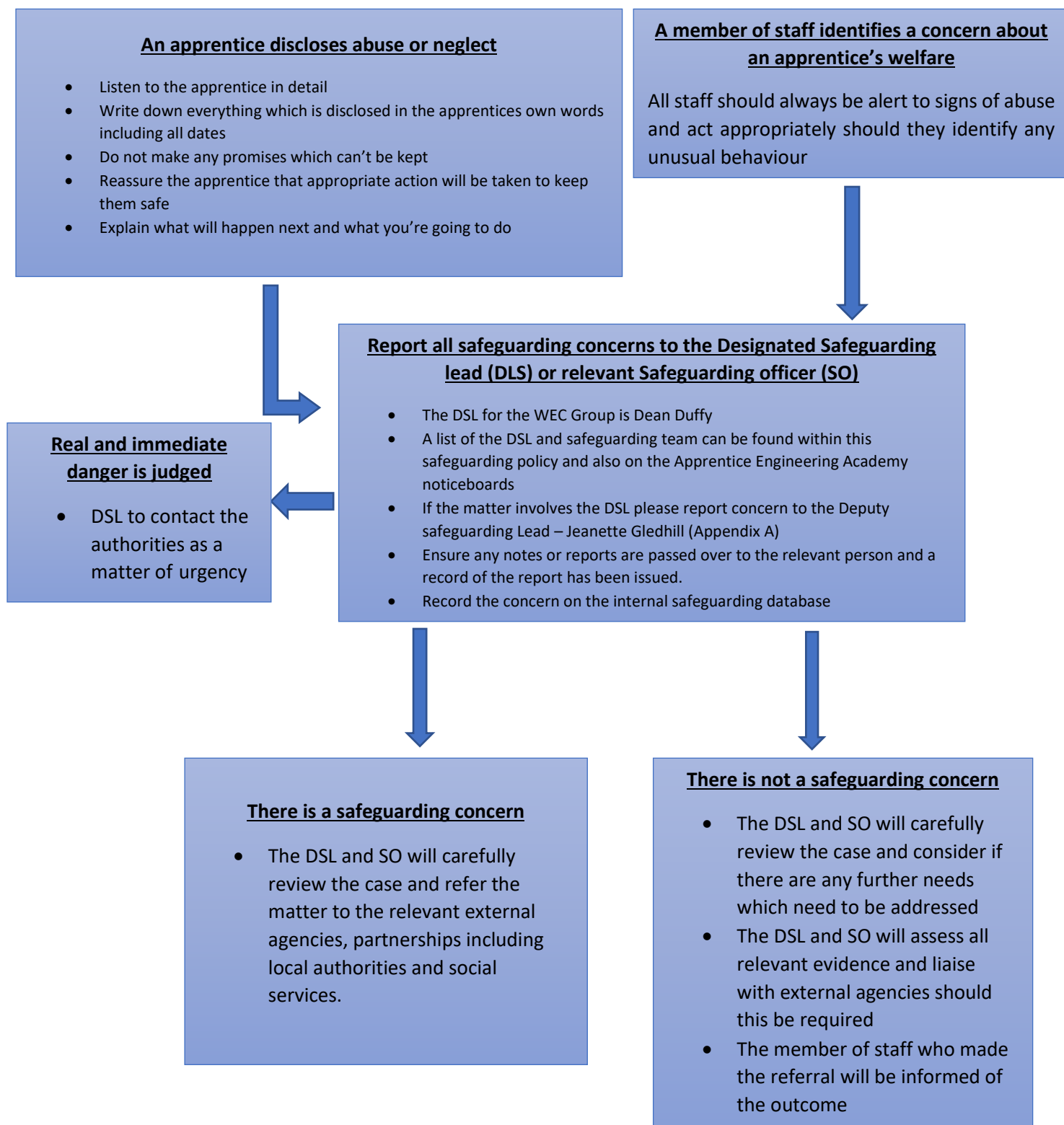
Employ a Designated Safeguarding Lead

All of WEC Group's employees, led by the DSL, Dean Duffy, are crucial in the championing and monitoring the impact of the implementation of this policy. Our DSL is there to advise all employees including apprentices on how to best manage any safeguarding concerns and to adhere to up to date legislation across the Group.

The Apprentice Engineering Academy based in Blackburn will undergo extra checks in relation to the Management and Trainers we employ. All our Academy staff are vetted (Enhanced DBS checks and referencing) before they work in proximity of young learners, vulnerable adults and apprentices.

Reporting and Recording Activity

In the event of a safeguarding concern the correct procedure is as follows:



It is important to note that all concerns and correspondence will be kept in a secure, confidential file on our internal database. The apprentices circumstances will be kept under review at all stages and a referral will be made again if it is appropriate for improving the apprentice's circumstances. The WEC Group identifies the apprentices best interests must always come first and any case will be dealt with appropriately.

Review and Continuous improvement

The safety of all our employees including our apprentices is key and is a fundamental core value here at the WEC Group and is part of our culture.

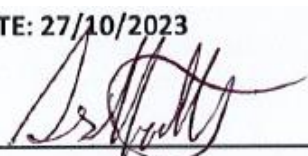
To ensure we are continuously improving the safety for our employees, including our apprentices (at work, online or at home) we ensure that:

- We are regularly reviewing our Safeguarding Policies and Procedures whilst learning from any serious incidents.
- We are regularly monitoring safeguarding incidents focusing on any reported in the last year specifically reviewing the outcomes and actions taken as a result.
- Produce incident/ near miss reports for the Governance team from the in-house safeguarding database. These reports will be in the format of chart/ tables with figures reported confidentially

This Safeguarding Policy is reviewed annually - additional reviews may be needed during the year in the event of any safeguarding incidents.

NEXT REVIEW DATE: 27/10/2023

SIGNED: _____



DATE: _____

27/10/22

Steve Hartley, Managing Director

Useful Contacts

WEC Group Designated Safeguarding Lead: Dean Duffy	07570 808267/ 01254 773718	Dean.duffy@wecl.co.uk
WEC Group Safeguarding officers: Jeanette Gledhill, Prevent Lead Gemma Kennedy Chris Dickinson Kris Mercer	07803 591837 07384 460546 07825 870943 07493 969929	Jeanette.gledhill@wecl.co.uk Gemma.kennedy@wecl.co.uk Chris.dickinson@wecl.co.uk Kris.mercer@wecl.co.uk
WEC Group Engineering Academy Governing Team: Steve Hartley- Chair of Governors Gemma Kennedy- Governor	07774 768342 07384 460546	steve@wecl.co.uk gemma.kennedy@wecl.co.uk

Human Resources: Gemma Kennedy, Group HR Manager	07384 460546	Gemma.kennedy@wecl.co.uk
IT Department: Ian Bray, Group IT Manager	07525 668082	ian.bray@wecl.co.uk
The Designated Officer for Blackburn with Darwen:		
Emma Boyle (Professional abuse allegations)	01254 666400	LADO@blackburn.gov.uk
Blackburn with Darwen Children's Advice and Duty Service (CADS)	01254 666400	
Blackburn with Darwen Emergency Duty Team (EDT)	01254 587547	
Contact Child Action North West	01254 244595 or 01254 248282	

Legislative requirements

WEC Group has a statutory and moral duty to ensure that it functions with a view to protecting, safeguarding and promoting the welfare of apprentices who are participating in any education and training within its group of companies.

The WEC Group statutory responsibilities include the requirement to have due regard to the need to prevent people from being drawn into terrorism (Prevent Duty Policy). WEC Group recognise that for apprentices, high self-esteem, confidence, supportive friends and clear lines of communication with a trusted adult helps prevention.

The WEC Group therefore:

As mentioned above, will ensure the apprentices know that there are adults within The WEC Group who they can approach if they are worried or are in difficulty.

- Curriculum staff will ensure that apprentices are aware of their role in this area.
- Include within the curriculum discussions which will help apprentices develop realistic attitudes to the responsibilities of adult life.
- Ensure that wherever possible, every effort will be made to establish effective working relationships both with parents/carers and with colleagues from other relevant agencies.
- Follow safer recruitment practices when hiring staff, which includes a check of the 'List of those Barred from Working with Children and Vulnerable Adults'.

The Policy is informed by the following legal/statutory regulations:

- Revised Prevent duty guidance: for England and Wales: on the duty of schools and other providers in the Counter-Terrorism and Security Act 2015
- Children and Social Work Act 2017
- GDPR 2018

- Data Protection Act 2018
- Modern Slavery Act 2015
- Safeguarding Children and Young People from Knife Crime (Ofsted) 2019 Education and Training (Welfare of Children) Act 2021
- Keeping Children safe in Education

[health- safety-2022.pdf](#)

[prevent-radicalisation-2022.pdf](#)

[ICT-Policy-2022.pdf](#)

Appendix A

Safeguarding allegations against members of staff

WEC Group employees including apprentices who are concerned about the conduct of a colleague towards an apprentice are undoubtedly placed in a very difficult situation. They may worry that they have misunderstood the situation and they will wonder whether a report could jeopardise their colleague's career. All employees must remember that the welfare of the apprentice is paramount.

All WEC Group employees who are working with children, young people and vulnerable adults are in a position of trust and authority. The Employee Handbook and Employee Disciplinary Policy and Procedure will be used to manage any allegations or potential misconduct of staff. This will include where a member of staff is involved in an incident outside of the WEC Group which did not involve children but could have an impact on their suitability to work with children. In such instances the matter must be referred to the HR Department and the Designated Safeguarding Lead.

Any allegations against employees including apprentices should be reported to the DSL, Dean Duffy, by emailing safeguarding@wecl.co.uk in the first instance, who will liaise with Human Resources. The DSL will determine whether the matter should be referred to the Local authority designated officer prior to any formal investigation.

Modern Slavery Statement

The WEC Group is committed to meeting obligations under section 54 of The Modern Slavery Act 2015 and to ensuring all its operations, collaborations and business relationships are carried out with integrity and ethically. WEC Group will implement systems and controls to ensure any form of exploitation of an individuals' liberty and freedoms by another person for commercial gain is not taking place within any business operations.

The Modern Slavery Act Statement is published on the WEC Group Intranet page.

Types of Abuse

Here at the WEC Group we have a zero tolerance policy to any abuse. Abuse is behaviour towards a person that either deliberately or unknowingly causes a person harm, or endangers their life or their human and civil rights. It can be passive e.g. failing to take action to care for someone, or failing to raise the alert about abuse; or active e.g. hitting, stealing or doing something that causes harm. Abuse can be a one off or something that is repeated.

Abuse can be: -

- Physical

- Sexual
- Financial
- Psychological/emotional (including the use of texts, social media/network sites and email)
- Neglect or acts of omission e.g. being left in dirty, wet or soiled clothing or malnutrition
- Discriminatory in nature e.g. racial, sexual or religious harassment

The above list is not exhaustive

Peer on Peer abuse

This includes all types of bullying (including cyber bullying); but is not limited to sexual violence and sexual harassment; physical abuse such as hitting, kicking, hair pulling or otherwise causing physical harm; sexting and initiating/hazing type violence and rituals; child sexual exploitation; gang activity and youth violence. Teenage relationship abuse is defined as a pattern of actual or threatened acts of physical, sexual and/ or emotional abuse, perpetrated by an adolescent (between the ages of 13 and 18) against a current or former partner. Abuse may include insults, coercion, social sabotage, sexual harassment, threats and / or acts of physical or sexual abuse. Sexual violence and sexual harassment can occur between two children of any sex. They can occur through a group of children sexually assaulting or sexually harassing a single child or a group of children.

Child Criminal Exploitation (CCE)

Children who are trafficked, exploited or coerced into committing crimes are victims in need of safeguarding and support. They may be coerced into carrying weapons such as knives or begin to carry a knife for a sense of protection from harm from others. As children involved in criminal exploitation often commit crimes themselves, their vulnerability as victims is not always recognised by adults and professionals, (particularly older children), and they are not treated as victims despite the harm they have experienced.

Serious Violence

All employees including apprentices should be aware of the indicators, which may signal apprentices are at risk from, or are involved with serious violent crime. These may include increased absence from work, a change in friendships or relationships with older individuals or groups, a significant decline in performance, signs of self-harm or a significant change in wellbeing, or signs of assault or unexplained injuries. Unexplained gifts or new possessions could also indicate that apprentices have been approached by, or are involved with, individuals associated with criminal networks or gangs.

Online safety

The WEC Group will promote safe use of the internet to prevent and intervene cyber-bullying and protect our employees including our apprentices from harmful and inappropriate online material. The WEC Group has in place appropriate filters and monitoring systems to protect employees/apprentices from harmful online materials. The breadth of issues classified within online safety is considerable, but can be categorised into four areas of risk:

- **Content:** being exposed to illegal, inappropriate, or harmful content, for example: pornography, fake news, racism, misogyny, self-harm, suicide, anti-Semitism, radicalisation, and extremism.
- **Contact:** being subjected to harmful online interaction with other users; for example: peer to

peer pressure, commercial advertising and adults posing as children or young adults with the intention to groom or exploit them for sexual, criminal, financial or other purposes.

- **Conduct:** personal online behaviour that increases the likelihood of, or causes, harm; for example, making, sending, and receiving explicit images (e.g. consensual and non-consensual sharing of nudes and semi-nudes and/or pornography, sharing other explicit images and online bullying; and
- **Commerce:** risks such as online gambling, inappropriate advertising, phishing and or financial scams.

If employees including apprentices are at risk, this will be reported it to the Anti-Phishing Working Group (<https://apwg.org/>). The WEC Group Company Handbook highlights detail in respect of acceptable use of computers and access to on-line materials. See link to our ICT Policy above.

Equality impact assessment

The WEC Group is committed to the promotion of equality, diversity and providing a supportive environment for all members of our community. Our commitment means that this policy has been reviewed to ensure that it does not discriminate (either intentionally or unintentionally) any of the protected characteristics of age, disability, gender (including gender identity), race, religion or sexual orientation and meets our obligations under the Equality Act 2010. Therefore, this policy has no adverse impact on any of the above protected groups.