

## Single Safeguarding Policy and Procedure - 2021/2022

<b>Policy Title:</b>	Single Safeguarding Policy and Procedure
<b>Version:</b>	3
<b>Responsibility:</b>	Dan Gagg – Quality Manager and Deputy Safeguarding Lead 07951111778 dgagg@pareto.co.uk
<b>Last Update:</b>	21/01/2022
<b>Effective From:</b>	28/01/2022
<b>Next Update:</b>	31/07/2022
<b>Authority:</b>	Benjamin Drain – Apprenticeship Operations and Quality Director (including Designated Safeguarding Lead)



Our safeguarding processes and key safeguarding information is promoted and delivered as key aspects of our apprentice and employer 'Engage' and 'Enrol' sessions and is further promoted throughout the duration of the programme of learning.

Pareto will promote this policy and ensure commitment towards the policy is secured through the staff induction programme and through continuous training of our employees in implementing the policy so that we can protect our apprentices and prevent abuse towards our apprentices. This will be achieved through a combination of regular internal and external continuous professional development that will continuously improve and maintain the knowledge and skills of all staff to effectively and consistently apply robust and thorough safeguarding practises. Our delivery staff will continuously develop and maintain their confidence and ability in effectively embedding meaningful and relevant safeguarding content into their delivery and review content to ensure our apprentices and their employers know how to keep themselves and their colleagues safe.

This policy will be reviewed at least annually.

### **What to do (Apprentices and Employer/Partners)**

If an apprentice or employer/partner needs to raise a safeguarding concern they should speak to their Skills Coach for support and guidance in raising the concern.

If the concern requires immediate attention they should call the Deputy Safeguarding Lead on 07951111778 and email [Safeguarding@pareto.co.uk](mailto:Safeguarding@pareto.co.uk) providing as much detail as possible about the concern.

### **Scope and Purpose**

Pareto Law is committed to the safety and well-being of its learning community. In doing so, this single policy will be adopted through divisional procedures and strictly adhered to.

This policy covers all aspects of the work of Pareto Law Apprenticeships, including:

#### **Apprentices**

- Provision of a safe learning environment
- Clear system of personal care where appropriate, and personal safety
- Behaviour, discipline and exclusions

#### **Staff**

- Provision of a safe working environment
- Regular review of systems and procedures to ensure they're appropriate and effective
- Training and professional development
- Wearing of Staff ID whilst on-site or in Employer premises

#### **External Agencies**

- Actively seek support and advice
- Collaboration with external bodies/stakeholders
- Contracting and sub-contracting arrangements

#### **Employers**

- Collaboration with Employers
- Training and Awareness

The Care Act sets out the following principles that should underpin the safeguarding of adults.

- **Empowerment**  
Putting people first and helping those who lack mental capacity feel involved and informed
- **Protection**  
Supporting victims so they can take action
- **Prevention**  
Responding quickly to suspected cases of abuse
- **Proportionality**  
Making sure what we do is appropriate to the situation and for the individual
- **Partnership**  
Sharing the right information in the right way

## 1.0 Safeguarding Young People

In June 2004 Section 175 of the Education Act 2002 came into force. The provisions of Section 175 make explicit the responsibility of governing bodies for safeguarding and promoting the welfare of children as part of fulfilling their common law duty of care towards the children for whom their organisation is responsible. In addition, arrangements must be made in accordance with any guidance issued by the Secretary of State.

Keeping Children Safe in Education (KCSIE) is statutory guidance from the Department for Education issued under Section 175 of the Education Act (2002), the Education (Independent School Standards) Regulations (2014) and the Non-Maintained Special Schools (England) Regulations (2015). Schools and colleges must have regard to it when carrying out their duties to safeguard and promote the welfare of children. This means that they should comply with it unless exceptional circumstances arise.

KCSIE (2021) defines safeguarding and promoting the welfare of children as:

- Protecting children from maltreatment;
- Preventing impairment of children's health or development;
- Ensuring that children grow up in circumstances consistent with the provision of safe and effective care; and taking action to enable all children to have the best outcomes.

This policy and the derivative divisional procedures have been developed in response to KCSIE. The Children Act (2021) defines a child as any person under the age of 18 years. This includes all 14–16 year old children attending any Apprenticeships at Pareto Law for whom additional procedures apply. The principles of this policy also apply to Scotland, which has a different legislative framework, primarily the Children (Scotland) Act (1995), and which defines a child as any person under the age of 16.

## 2.0 Safeguarding Adults at Risk

This policy and the derivative procedures have been developed in response to guidance issued on the protection of adults considered vulnerable in the DfES/NIACE publication "Safer Practice, Safer Learning" (2007). The guidance applies to all education providers of post-16 learning and skills.

The Care Act (2014) Section 14.2 states: The safeguarding duties apply to an adult who: has needs for care and support (whether or not the local authority is meeting any of those needs) and; is experiencing, or at risk of, abuse or neglect; and as a result of those care and support needs is unable to protect themselves from either the risk of, or the experience of abuse or neglect. An adult is an apprentice aged 19 or above at the point of enrolment.

This policy also applies to Scotland which has different legislation "The Protection of Vulnerable Groups (Scotland) Act (2007) which defines a protected adult as "an individual, aged 16 or over who receives one or more types of care or welfare services".



The term 'Adult at Risk' is used to describe a vulnerable adult.

Section 42 of the Care Act (Enquiry by local authority) states:

Where a local authority has reasonable cause to suspect that an adult in its area (whether or not ordinarily resident there)—

- (a) Has needs for care and support (whether or not the authority is meeting any of those needs),
- (b) Is experiencing, or is at risk of, abuse or neglect, and
- (c) As a result of those needs is unable to protect himself or herself against the abuse or neglect or the risk of it.

(2) The local authority must make (or cause to be made) whatever enquiries it thinks necessary to enable it to decide whether any action should be taken in the adult's case (whether under this Part or otherwise) and, if so, what and by whom.

(3) "Abuse" includes financial abuse; and for that purpose "financial abuse" includes—

- (a) Having money or other property stolen,
- (b) Being defrauded,
- (c) Being put under pressure in relation to money or other property, and
- (d) Having money or other property misused.

The Mental Capacity Act 2005 states:

A person must be assumed to have capacity unless it is established that he lacks capacity.

A person is not to be treated as unable to make a decision unless all practicable steps to help him to do so have been taken without success.

A person is not to be treated as unable to make a decision merely because he makes an unwise decision.

An act done, or decision made, under this Act for or on behalf of a person who lacks capacity must be done, or made, in his best interests.

Before the act is done, or the decision is made, regard must be had to whether the purpose for which it is needed can be as effectively achieved in a way that is less restrictive of the person's rights and freedom of action.

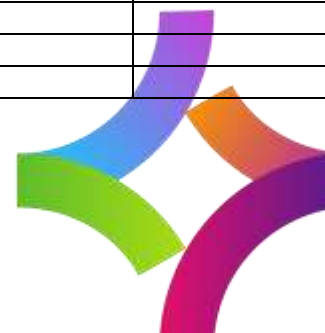
### 3.0 The Types and forms of Abuse

Abuse is described as 'a violation of a person's human or civil rights by any other person or persons'.

There are five main categories of abuse that apply to both children and adults at risk:	There are additional categories of abuse for adults at risk:
Physical	Modern Slavery/Exploitation
Emotional	Organisational/Institutional
Neglect	Discriminatory
Sexual	Financial
Racial	Domestic
	Self-Neglect

There are various signs and indicators to be aware of and these can be separated into two categories - physical and behavioural/emotional.

Keeping Children Safe in Education (2021) defines a further 16 specific safeguarding issues, including:		
Bullying including Cyber Bullying	Gender based Violence	
Child Sexual exploitation	Violence against Women and Girls (VAWG)	
Domestic Violence	Mental Health	
Drugs	Private Fostering	
Fabricated or Induced illness	Radicalisation	
Faith Abuse	Sexting	
Female Genital Mutilation (FGM)	Trafficking	
Forced Marriage	Gangs and Youth Violence	
Teenage Relationship Abuse		



### 3.1 Sexual Harassment

In the September 2021 KCSIE update, staff are also requested to be vigilant around issues associated with sexual violence and sexual harassment between children in schools, colleges and training providers. The update also provided clarity of managing peer-on-peer abuse and additionally physical relationships between children. Colleagues are additionally expected to be vigilant around harmful online material that may constitute one or more types of abuse.

The Education and Training (Welfare of Children) Act 2021 will apply similar expectations to other further education and skills providers. Pareto Law Apprenticeships, will of course, protect any adult apprentice and engage with adult social care, support services and the police as required.

Sexual Harassment will not be tolerated in any form at Pareto Law Apprenticeships. Any incident can have an impact on people's lives. Rubbing against someone, touching someone inappropriately, making unsolicited remarks of a sexual nature, revealing intimate body parts, sending or showing sexual content and taking photos under someone's clothes. It is all sexual harassment and Pareto Law take it very seriously.

Pareto Law Apprenticeships will require every staff member to be trained in Sexual Consent & Harassment. We will ensure staff understand how to handle reports of harmful sexual behaviour between apprentices both on and outside our premises.

Pareto Law Apprenticeship will train staff to:

- Have a good awareness of the signs that a child/young person or adult who is an apprentice is being neglected or abused.
- Be confident about what to do if an apprentice reports that they have experienced sexual harassment, online sexual abuse or sexual violence involving another apprentice
- Ensure that apprentices are taught about safeguarding risks, including online risks
- Support apprentices to understand what constitutes a healthy relationship, both online and offline

We will ensure every apprentice will be trained in Sexual Consent & Harassment as part of their whole learning journey through effective, meaningful and relevant embedded learning content.

Pareto Law Apprenticeship will teach apprentices and their employers to:

- Have a good awareness of the signs that a child/young person or adult who is an apprentice is being neglected or abused.
- Be confident about what to do if an apprentice or colleague reports that they have experienced sexual harassment, online sexual abuse or sexual violence involving another apprentice
- Support apprentices and colleagues to understand what constitutes a healthy relationship, both online and offline.

### 4.0 Wellbeing

'Wellbeing' is a broad concept and is described as relating to the following areas in particular:

- Personal dignity (including treatment of the individual with respect)
- Physical and mental health and emotional wellbeing
- Protection from abuse and neglect
- Control by the individual over their day-to-day life (including over care and support provided and the way they are provided)
- Participation in work, education, training or recreation
- Social and economic wellbeing
- Domestic, family and personal domains
- Suitability of the individual's living accommodation
- The individual's contribution to society



There is no hierarchy in the areas of wellbeing listed above – all are equally important. There is also no single definition of wellbeing, as how this is interpreted will depend on the individual, their circumstances and their priorities.

Wellbeing encompasses several areas of life. Therefore, using a holistic approach to ensure a clear understanding of the individual's views is vital to identifying and defining wellbeing in each case.

## 5.0 Policy Statement

It is important that all children and adults at risk are protected from abuse. They have the right to access education and training free from fear of harm and will be protected from mistreatment and abuse.

Pareto Law recognises that the board, members of staff and apprentices each have a role to play in safeguarding the welfare of children and adults at risk and preventing their abuse with specific attention paid to the particular safeguarding risks of Looked after Children and children / adults at risk who have additional support needs. In accordance with the statutory guidance across the UK provided in “Keeping Children Safe in Education” (2021) and “Safer Practice, Safer Learning”(June 2019), the following arrangements apply to the Apprenticeship division of Pareto Law:

The guidance is to be available on the Apprenticeship shared folder and managers will be responsible for ensuring all staff have read it.

Pareto Law's Safeguarding Single policy is made available to parents/carers, apprentices and customers on request;

Procedures are developed and updated within the framework. These procedures are:

- Developed in accordance with local authority guidance and locally agreed interagency procedures; DfE Guidance Keeping Children Safe in Education (2021) and Safer Practice, Safer Learning (June 2019)
- Include guidelines for dealing with allegations of abuse against members of staff and volunteers;
- Reviewed and updated annually by Safeguarding Leads
- Approved by the Board and adopted as procedures by Senior Management team

Pareto Law operates safe recruitment procedures and ensures that all appropriate checks are carried out on staff and volunteers who work with all apprentices in a position of trust and maintain a single central register. A process will be in place to verify that agency staff have been appropriately checked prior to starting work.

A member of the Quality team - the Designated Safeguarding Lead will be responsible for dealing with all safeguarding issues and providing advice and support to other Safeguarding Leads across Pareto Law and the Board.

- All staff in Pareto Law (including casual staff, associates and volunteers) who will (or will potentially) work with young people are required to read and understand the document 'Keeping Children Safe in Education'
- [https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\\_data/file/1007260/Keeping\\_children\\_safe\\_in\\_education\\_2021.pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/1007260/Keeping_children_safe_in_education_2021.pdf)
- All staff in Pareto Law who will (or will potentially) work with young people and adults at risk are required to undertake mandatory training to equip them to carry out their responsibilities for safeguarding young people and adults at risk effectively, that is kept up to date by refresher training at two yearly intervals. A log of training will be maintained by Group HR which will be sent at defined intervals to Designated Safeguarding Leads for supportive action. Accountability to ensure compliance rests with Quality team, who must have appropriate structures in place
- The Designated Safeguarding Lead is responsible for ensuring that the modules are appropriate, current and accessible. The Apprenticeship Leadership and Management team will support this process through the safeguarding action plan.

- The Designated Safeguarding Lead and the recruiting manager (or their equivalent) ensure that permanent staff, temporary staff, associates and volunteers who work with children and adults at risk receive induction to include the Single Safeguarding Policy and are made aware of Pareto Law's Safeguarding Young People and Adults at Risk policy and the Divisional procedures for safeguarding children, young people and adults at risk, including their own responsibilities
- All staff are required to comply with the Code of Conduct
  - The Designated Safeguarding Lead, or the Deputy is nominated to be responsible for liaising with the local authority and/or partner agencies, as appropriate in the event of allegations of abuse being made against the Board or Senior Management team
  - In terms of strategic oversight, the Board discharges its statutory leadership responsibility through the Safeguarding team/board – this is due to the close proximity of the Local Board members to the Designated Leads and apprentices

### 6.0 Designated Safeguarding Lead

- Pareto Law's Apprenticeships Operations and Quality Director has overall responsibility for our Safeguarding Policy, notwithstanding all staff and volunteers' individual responsibility to ensure that this policy is strictly adhered to and is the Designated Safeguarding Lead (DSL);
- Pareto Law's Apprenticeship Quality Manager is the Deputy Safeguarding Lead who has Level 3 training with responsibility for safeguarding issues within the organisation;
- Deputy Divisional Designated Safeguarding Leads (Regional Safeguarding Officers) have been identified in each region and across the business to support the Designated Safeguarding Lead and Deputy Safeguarding Lead;
- In addition to basic safeguarding young people training and adults at risk training Pareto Law's designated managers with lead responsibility are required to undertake appropriate training determined by their operational role to standards agreed by the Local Safeguarding Children's Boards and their Local Adult Safeguarding Board, including refresher training at two yearly intervals to keep their knowledge and skills up to date. This will include the Group Designated Safeguarding Lead, The Deputy Safeguarding Lead and the Regional Safeguarding Officers. These staff should ensure ongoing CPD as and when appropriate through internal safeguarding meetings and external events. This training is also undertaken by the HR Manager or equivalent.

### 7.0 Equality Opportunities Statement

The policy is written with due regard to Pareto Law's commitment to Valuing Diversity. However, where there are concerns about a child's or adults at risks' welfare, this will take priority. An Equality Impact Assessment will be completed. This policy may be subject to review following Equality Impact Assessment by the Apprenticeship Management Team.

### 8.0 General Data Protection Regulations

Wherever possible Designated Safeguarding Leads will follow the principles of the GDPR, however this should not be a barrier to the effective and timely communication of information related to safeguarding information. This is treated as the 'special category personal data and allow for storage and sharing sensitive and personal information through secure means'.

*"Whilst, among other obligations, the Data Protection Act 1998 places duties on organisations and individuals to process personal information fairly and lawfully and to keep the information they hold safe and secure, this is not a barrier to sharing information where the failure to do so would result in a child being placed at risk of harm. Fears about sharing information cannot be allowed to stand in the way of the need to promote the welfare and protect the safety of children."* KCSIE (Sep 2018)

Further guidance is available: [Working Together to Safeguard-Children.pdf](#)



## 9.0 Online safety

### • 09.1 Monitoring I.T usage

Pareto Law Apprenticeships run Fortigate. Fortigate is a unified threat management device that protects in multiple ways such as web filtering, intrusion prevention, data loss prevention and antivirus.

The full list of categories are available in the link below and are designed to protect against malicious content in all its forms.

<https://www.fortiguard.com/webfilter/categories>

The categories are maintained by Fortinet. Best Practice is to adopt this classification. Any exceptions are reviewed and implemented by the IT Security team.

Reports are generated and accessed via the Cloud Portal. (<https://login.forticloud.com/>)

### • 09.2 Educating our apprentices

Pareto Law Apprenticeships Skills Coaches embed relevant and meaningful online safety topics and training content into our apprentices learning journey. Online safety content is delivered using internally developed content as well as credible and valid content from trusted sources such as provider networking groups, local authority websites and updates, the Fellowship of Inspection Nominees (FIN) working groups and bank of online member resources.

### • 09.3 Staff training

Pareto Law Apprenticeships staff are required to complete I.T security training modules relevant to their role within the organisation.

We will develop the safeguarding knowledge of delivery staff so that it is relevant and contextualised specific to the Business, Administration, Finance and Law sector subject area and standards within this area that we deliver. These include (but are not limited to) Sales, Leadership and Management, Customer Service and Business Administration. We ensure that continuous learning and development that is focused specifically on keeping apprentices safe and preventing them from the risk of abuse or neglect is a core element of our safeguarding professional development.

## 10.0 Minimising coronavirus (COVID-19) risks

Pareto Law continue to monitor and adhere to the most up to date government guidance and direction for minimising coronavirus (COVID-19) risks.

[Actions for FE colleges and providers during the coronavirus pandemic](#)

## 11.0 Why is safeguarding necessary for employed Apprentices?

As a provider of government funded training, Pareto Law have a duty to safeguard our Apprentices and to take such steps that try to ensure the safety of our Apprentices always. As part of that duty, we will talk to you about what you can do to ensure that Apprentices are not exposed to threats or dangers.

### 11.1 What are the responsibilities of an Employer?

- To understand what is meant by safeguarding and promote the welfare of Apprentices
- Be aware of your statutory duties towards the welfare of individuals
- Be familiar with our guidance the reporting arrangements

It is the responsibility of the employer to ensure employees working alongside Apprentices have had the relevant DBS checks and of sound character and judgement and will not pose as any threat or danger to Apprentices.





## 11.2 Staff Training

Pareto Law Apprenticeships will develop safeguarding knowledge of delivery and non-delivery staff so that it is relevant and contextualised specific to the Business, Administration, Finance and Law sector subject area and standards within this area that we deliver. These include (but are not limited to) Sales, Leadership and Management, Customer Service and Business Administration. We ensure that continuous learning and development that is focused specifically on keeping apprentices safe and preventing them from the risk of abuse or neglect is a core element of our safeguarding professional development. We pride ourselves on over twenty five years of success in the Sales Training Sector and we ensure this success is transferred to the development of our staff through our internal CPD programme and through identifying appropriate and high quality externally delivered learning and development opportunities. By delivering thorough, robust and consistent continuous professional development, we ensure our staff are committed to promoting the safeguarding of our apprenticeships and are committed to preventing the risk of abuse, neglect or harm to them.

## 12.0 Escalating an incident or concern

Safeguarding concerns and/or incidents should be reported using the incident report form and by referring to the processes detailed below.

## 12.1 What to do (Apprentices and Employer/Partners)

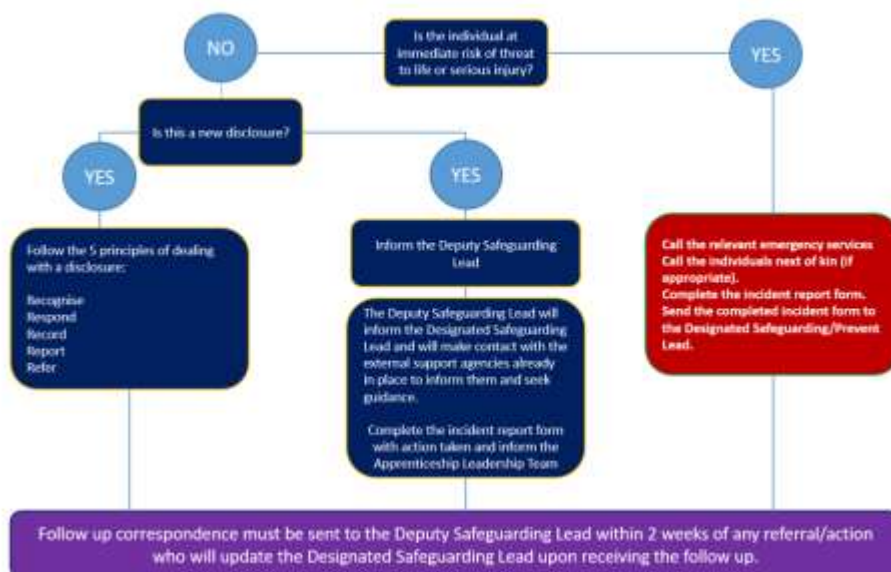
If an apprentice or employer/partner needs to raise a safeguarding concern they should speak to their Skills Coach for support and guidance in raising the concern.

If the concern requires immediate attention they should call the Deputy Safeguarding Lead on 07951111778 and email [Safeguarding@pareto.co.uk](mailto:Safeguarding@pareto.co.uk) providing as much detail as possible about the concern.

## 12.2 What to do (Pareto Apprenticeship Staff)

All staff have a responsibility to follow the 5 R's of reporting

- Recognise
- Respond
- Report
- Record
- Refer



All staff should know what to do if a child or adult at risk tells them he/she is being abused or neglected. Staff should know how to manage the requirement to maintain an appropriate level of confidentiality. This means only involving those who need to be involved, such as the designated safeguarding lead (or a deputy) and children's/adult's social care. Staff should never promise a child or adult that they will not tell anyone about a report of abuse, as this may ultimately not be in the best interests of the child /adult.

- The process for referral is to the Designated Safeguarding Lead or their Regional Safeguarding Officer.
- Where a child / adult at risk is suffering, or is likely to suffer from harm, it is important that a referral to children's / adult's social care (and if appropriate the police) is made immediately. Referrals should follow the local authority's referral process and will be made by the Designated Safeguarding Lead. In the unlikely event that the Designated Safeguarding Lead or deputy be unavailable, then staff are duty bound to refer to the local authority without delay. The staff member should call the local authority and ask to speak with the duty children and families or adult team (depending whether it is a child or adult at risk)
- In the event that the referral involves concerns raised about a Pareto Law staff member towards a child or adult at risk, HR must be informed immediately by the designated Safeguarding Lead at [safeguarding@pareto.co.uk](mailto:safeguarding@pareto.co.uk) along with the local authority designated officer (LADO). In the unlikely event that the concern is about the Designated Safeguarding Leads, then the member of staff must contact the Divisional Head who will follow the same procedure.
- In the event that the referral involves concerns raised about a Pareto Law staff member towards a child or adult at risk, an investigation will be carried out by an appropriate member of the Safeguarding Team using the following processes:
  - Planning
  - Gathering Evidence
  - Conducting Interviews
  - Providing Support
  - Maintaining Communication
- All Pareto Law staff who have a concern about a child, or adult at risk should follow the referral processes. Staff should expect to support social workers and other agencies following any referral

### 12.3 Referral to Group Services

Safeguarding Leads are required to inform the Board and the Apprenticeship Senior Management Team of the following referrals:

- Apprentice (children and adults at risk referrals to the Local Authority Designated Officer / Children and Families or Safeguarding
- Adults' Duty Team / Police whereby the apprentice is the alleged 'subject';
- Apprentice (children and adults at risk) referrals to the Local Authority Designated Officer / Children and Families or Safeguarding Adults Duty Team / Police whereby the learner is the alleged 'perpetrator'
- Staff referrals to the Local Authority Designated Officer / Children and Families or Safeguarding Adults Duty Team / Police whereby the staff member is the alleged 'perpetrator'

The Safeguarding incident report form should be completed and emailed to [safeguarding@pareto.co.uk](mailto:safeguarding@pareto.co.uk). All correspondence will be held in the strictest confidence.



## 12.4 Reporting to the ESFA – (Extract from):

### Informing ESFA about serious safeguarding incidents

Whilst the local authority and the institution have primary duties in respect of safeguarding, the Secretary of State (SoS) has a general duty to promote the wellbeing of children in England under section 7 of the Children and Young Persons Act 2008. ESFA's role therefore, is to provide assurance to the SoS, in meeting her general duty, that the right organisations are taking action to keep all learners safe.

For this reason, we want to be made aware when an institution is itself the subject of an investigation by the local authority or the police. We do not require details of all the safeguarding incidents an institution reports to the local authority or to the police, only where the institution itself, or one of its subcontractors, is subject to investigation. In such circumstances, we require the Chair or Chief Executive of the institution (or senior designated safeguarding lead) to email

[Enquiries.EFA@education.gov.uk](mailto:Enquiries.EFA@education.gov.uk)

ESFA will need to know the name of the institution, the nature of the incident and confirmation that it is, or is scheduled to be investigated by the local authority and/or the police. The relevant clause will be amended at the first opportunity to be clearer on this point, either in-year or for 2018 to 2019.

### The circumstances in which ESFA funded providers should inform ESFA of safeguarding referrals/concerns

The main issues/referrals ESFA want to be notified about, where any funded learners are concerned, are those that result in police investigations. ESFA needs to be sighted on these cases and satisfied the right action is in hand by responsible bodies.

How we expect to be informed and level of information required. Please email

[Enquiries.EFA@education.gov.uk](mailto:Enquiries.EFA@education.gov.uk)

ESFA will need to know the name of the institution, the nature of the safeguarding incident and confirmation that it is under investigation by the police. We will not ask for, or require any information that could be used to identify individuals or any information that will impact on your data protection duties.

### What we will do with the information provided

Once ESFA has been alerted that a serious safeguarding incident has taken place at an ESFA funded institution, ESFA will ensure the SoS is made aware. ESFA will then liaise with the organisations that have the primary duty. ESFA will take the action they deem necessary in accordance with the funding agreement.

### Information to be provided to ESFA about Prevent referrals to channel panels

We will not require institutions to routinely inform ESFA about Prevent referrals to channel panels. In line with the position on safeguarding more generally, we will only require institutions to inform us when an institution is itself, or one of its subcontractors, is the subject of an investigation by the local authority or the police in connection with a Prevent issue. In such circumstances, we require the Chair or Chief Executive of the Institution (or senior designated safeguarding lead) to email

[Enquiries.EFA@education.gov.uk](mailto:Enquiries.EFA@education.gov.uk)

### Information to be provided to ESFA about Disclosure and Barring Service

Institutions will only need to notify ESFA that a referral has been made, no other information is required.

### Providing ESFA with quality improvement activity in advance of an Ofsted inspection, and informing us about provisional and interim inspection grades

We have added an additional clause to enable us to request this information. We anticipate that we will only request it in very exceptional cases.

We will ask for interim and provisional inspection grades again only for exceptional cases where we reserve the right consider it necessary to take action on



### 13.0 Monitoring and Action

The Designated Safeguarding Lead will monitor and inform the Apprenticeship Leadership and Management Team. The Designated Safeguarding Lead may be required to seek further clarification or advise next steps on occasion. Correspondence will be made through [safeguarding@pareto.co.uk](mailto:safeguarding@pareto.co.uk). Pareto Law's Designated Safeguarding Lead will make arrangements to inform the Education and Skills Funding Agency of the referral.

### 14.0 Follow-up

Pareto Law's Designated Safeguarding Lead is required to provide summary follow-up information following referral. The purpose of this procedure is to provide Board with oversight and assurance that the referral is being handled with due attention by the relevant agency or service.

In some cases, the issues will be resolved within one of the milestone at which point a summary comment will be provided and the referral 'closed'. More complex cases may require ongoing monitoring. The process for this latter category will be set on a case by case basis.

### 15.0 Safeguarding and Whistleblowing (Disclosure Policy)

Every maintained school, college or training provider is required to have a whistleblowing policy that protects staff members who report colleagues they believe are doing something wrong or illegal, or who are neglecting their duties.

Where the staff member thinks that Pareto Law will - cover it up, treat them unfairly if they complained, or, if they have raised the matter before and the concern hasn't been dealt with, then they should report it to the Pareto Law Designated Safeguarding Lead.

Responsibility Signature			
<b>Name:</b>	Dan Gagg	<b>Position</b>	Quality Manager & Deputy Safeguarding Lead
<b>Signature:</b>		<b>Date:</b>	

Authority Signature			
<b>Name:</b>	Benjamin Drain	<b>Position</b>	Apprenticeship Operations and Quality Director (including Designated Safeguarding Lead)
<b>Signature:</b>		<b>Date:</b>	

**This policy will be reviewed annually (or when relevant changes to the provision require an immediate update).**



