

Safeguarding Policy

Policy Date: February 2024

1. Policy Statement

Gateway Qualifications is actively committed to ensuring that the welfare of children and vulnerable adults that its employees or anyone working on behalf of Gateway Qualifications have direct contact with, in the course of their duties is safeguarded. All those employed by or working on behalf of the organisation have a duty to safeguard all children and vulnerable adults with whom they come into contact.

Under the guidance from the Disclosure and Barring Service, employees or contractors should only have a DBS check if there is regular, unsupervised contact with children and/or vulnerable adults. This guidance does not apply to the majority of employees or wider workforce associates working on behalf of Gateway Qualifications and therefore there is no requirement for a DBS check.

The exception to this statement are Independent End Point Assessors (IEPA) and Internal Quality Assurers (IQA) who may have unsupervised contact with apprentices under 18 years of age and vulnerable adults. It is difficult to predict the type of apprentices who would need an IEPA/IQA assessment and therefore the policy decision is for all IEPAs and IQAs to have a full safeguarding clearance before they carry out any assessments.

Gateway Qualifications recognises its statutory responsibilities under the **Keeping Children Safe in Education (KCSIE) (September 2023) document**.

2. Scope

This policy applies to all employees and wider workforce associates.

3. Guidelines for all employees and staff

Gateway Qualifications' employees do not carry out regulated activities¹ and do not have unsupervised contact with children or vulnerable adults.

If employees or wider workforce contractors visit centres or customers and have occasional contact with children and vulnerable adults, they will ensure that they will abide by the centre or customer's safeguarding procedure and will always be under the supervision of another adult from the responsible organisation.

As employees or wider workforce contractors are not involved in regulated activity, it is not a requirement to have a check under the Disclosure and Barring Service.

The Recruitment and Selection Policy ensures ID, right to work in the UK and references are obtained and employment history checks are verified as part of routine recruitment practices. Please refer to the Recruitment and Selection Policy for further information.

All employees and wider workforce contractors will receive training on a regular basis regarding how to deal with disclosures which is detailed below.

¹ As defined in 'Regulated activity in relation to children: scope Factual note by HM Government', Link [Department for Education \(publishing.service.gov.uk\)](https://www.publishing.service.gov.uk)

3.1 Dealing with concerns or disclosures

There can be a range of situations in which a concern might arise during assessment activities, some of which are listed here:

- student-teacher relationship
- student-other adult relationship
- abuse at home
- indications of self-harm
- behaviour between older and younger students
- behaviour of fellow examiner.

All allegations or suspicions of abuse must be taken seriously and treated in accordance with the host centre or employer's safeguarding procedures. In all cases, this will include informing the host centre or employer's Designated Safeguarding Officer (DSO).

Things to look out for as signs of a possible issue include:

- threats or accounts (direct or inferred) of self-inflicted harm.
- threats or accounts (direct or inferred) of harm to others.
- indications that the individual is being physically, sexually, or emotionally threatened or harmed by others.
- indications that the mental state of the individual may be impaired.
- indications that the individual is being bullied or taken advantage of
- use of indecent or violent images
- indications that individual(s) are being radicalised or aiming to radicalise others. (Radicalisation is the process by which a person comes to support terrorism and forms of extremism leading to terrorism).

These signs could take the form of answers to questions, other narrative on a written assessment, graphic drawings, emails, or any other form of correspondence. References to previous incidents or experiences, as well as immediate issues, should be highlighted to the host organisation's DSO.

Events that would not normally constitute a Safeguarding issue unless other signs are present are:

- a failure to answer any questions in an examination.
- isolated uses of indecent language
- generic doodles.

3.2 Concerns or disclosures arising from a telephone call

If the concern arises as the result of a telephone conversation the course of action should be as follows:

1. Stay calm and clear in your communication.
2. Write down all the details that you can, in particular, the caller's full name, his/her Centre/employer name, the time and date of the call and details of any threats or allegations made. Do not push the caller for more details, only record the information they freely provide.

3. Ask the caller for some contact details and write down whatever they are willing to give you.
4. Calmly express your concern for the caller and ask if they have a trusted person close by that they can talk to, e.g. a parent, guardian, teacher, other family member, doctor, long-time friend of the family etc. Encourage them to go and talk to this person as soon as they can after the call ends. A suitable phrase would be something like, "I am concerned about what you are telling me, and I think it would be helpful for you to talk to somebody. Do you have a parent or teacher close by that you can talk to?"
5. Ask the caller if they would like details of how they can contact somebody that can help them. Give them the following contact details if they want them:
 - Childline - 0800 1111
 - Child Exploitation & Online Protection Agency (CEOP)
 - Go to the web site thinkuknow.co.uk and use the 'Click CEOP' button to report an issue.
6. Tell the caller that because of your concerns you will be referring the case to a safeguarding officer.
7. During the call DO NOT:
 - ask the caller for details other than those which they volunteer.
 - give the caller your personal or contact details, other than your name.
 - promise to take actions that you cannot guarantee to fulfil.
 - promise to keep the issue secret.
8. Immediately following the call, contact the centre or employer to obtain their DSO's contact information and e-mail all the details to the DSO putting the words 'Safeguarding Concern' in the subject line.

3.3 Concerns or disclosures arising from inappropriate activities at centres/employer premises

Due to the nature of assessment on site with a centre or employer, it is possible that a child protection concern at a centre/employer premises may arise out of an activity that you are observing, for example, during a workplace observation or interview. If an activity you are watching gives you cause for concern, you will need to consider whether to stop the assessment prior to completion. No activity should continue that might be raising safeguarding issues or putting anyone at risk of harm or abuse.

If you are concerned about an activity, you should seek advice immediately and contact the host organisations DSO.

As soon as possible you should send a written account to the host organisations' DSO.

3.4 Concerns Arising from the Actions or Comments of a Gateway Qualifications representative

Any allegation of abuse or suspected abuse in relation to a colleague acting as a Gateway Qualifications representative must be referred to the Director of Awarding and HR Manager for discussion and guidance.

The matter will be dealt with in accordance with the Safeguarding and/or Whistleblowing and/or disciplinary procedures.

If a concern arises during a visit to a Centre where the colleague is in direct contact with children, the Centre's DSO and/or employer must be informed.

3.5 Responding to a Direct Disclosure

If you find yourself in a situation where an individual discloses information directly to you it is important to listen carefully to the information the child or vulnerable adult is giving you. When listening to a disclosure the following good practice is required:

- react calmly so as not to frighten the child/vulnerable adult.
- listen to the child/vulnerable adult.
- do not show disbelief.
- tell the child/vulnerable adult that he/she is not to blame and that he/she was right to tell.
- take what the child/vulnerable adult says seriously, recognising the difficulties inherent in interpreting what a child/vulnerable adult says, especially if they have a speech disability and/or differences in language.
- do not pre-suppose that the experience was bad or painful - it may have been neutral or even pleasurable.
- always avoid projecting your own reactions onto the child or vulnerable adult
- if you need to clarify, keep questions to the absolute minimum to ensure a clear and accurate understanding of what has been said.
- if you need to clarify or the statement is ambiguous, use open-ended, non-leading questions.
- do not introduce personal information from either your own experiences or those of other children or vulnerable adults.
- reassure the child or vulnerable adult.

When receiving a disclosure, you should avoid the following:

- probing for more information than is offered.
- speculating or making assumptions
- making negative comments about the person against whom the allegation has been made.
- approaching the individual against whom the allegation has been made.
- making promises or agreeing to keep secrets.
- giving a guarantee of confidentiality

Immediately following the disclosure, contact the centre or employer to obtain their DSO's contact information and e-mail all the details to the DSO putting the words 'Safeguarding Concern' in the subject line.

4. Additional Requirements for Independent End Point Assessors and EPA Internal Quality Assurers

Independent End Point Assessors (IEPA) may undertake assessments with individuals who may be under the age of 18 or classed as a vulnerable adult.

The assessments may involve regular contact with an individual over a period of time as stipulated in the apprenticeship standard assessment plan. This contact may be online or face-to-face and is likely to be unsupervised. Some assessment methods (e.g. Professional Discussion, Presentation, Interview, knowledge test) take place in a controlled environment, with contact between the apprentice and the IEPA being unsupervised.

We recognise that we do not wish to undertake unnecessary DBS and safeguarding checks in line with KCSIE but wish to ensure that when allocating the IEPA and IQA that the person is suitable to work with children and vulnerable adults. For this reason, all IEPAs and EPA IQAs will be required to complete safeguarding checks before being assigned to an apprentice.

The safeguarding checks are as follows:

- Identity Check confirming Right to Work in the UK
- References from 2 previous employers
- Enhanced DBS check with a barred list check for children and vulnerable adults
- Overseas DBS check if person has worked or lived overseas for 3 months or more in last 5 years.

4.1 Obtaining a DBS

If the IEPA/IQA is on the DBS update service, we will ask for confirmation of the number and check the record.

If they are not on the DBS update service, they will need to provide an enhanced DBS with a barred list check dated within the last 3 months and references need to show continuous employment.

If the IEPA/IQA does not have a DBS, the organisation will undertake the full DBS on their behalf. The EPA/IQA will be asked to reimburse Gateway Qualifications for any fees incurred.

HR will maintain a single central record to retain the safeguarding information.

4.2 Safeguarding training

All IEPAs and EPA IQAs need to undertake safeguarding training before they are allocated an apprentice. If they can show evidence of training within the last 12 months, they are exempt from undertaking the training, but will need to undertake annual refresher training.

5. Queries relating to this policy

If you have any queries about any aspect of this policy, please contact the HR Manager in the first instance.

5. Supporting information

CEOP	www.ceop.police.uk
NSPCC Helpline	0808 800 5000

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Ofqual General Conditions of Recognition
Condition: Not applicable
QAA licensing criteria
Condition: Not applicable