



Safeguarding Policy and Procedure

Policy Title:	Safeguarding Policy and Procedure
Version:	6
Responsibility:	Dan Gagg – National Quality Manager and Designated Safeguarding Lead
Last Update:	09/05/2025
Effective From:	09/05/2025
Next Update:	09/05/2026
Authority:	James Knight - Vice President of Performance Consultancy and Apprenticeships



Contents

What to do (Apprentices and Employer/Partners)	3
Scope and Purpose	3
Policy Statement	4
Definitions	5
Safeguarding	5
Abuse	5
Neglect	6
Child	6
Vulnerable Adult /Adult at Risk	6
Sexual Harassment	6
For a comprehensive list of definitions and key terminology, please refer to the Appendix section at the end of this policy.	6
Safeguarding Young People	6
Safeguarding Adults at Risk	7
The Types and forms of Abuse	8
Sexual Harassment	9
Wellbeing	10
Designated Safeguarding Lead	10
Equality of Opportunities Statement	11
General Data Protection Regulations	11
Online safety	11
Monitoring I.T usage	11
Educating our apprentices	12
Online Safety - Staff training	12
Why is safeguarding necessary for employed Apprentices?	12
What are the responsibilities of an Employer?	12
Pareto Staff Training	13
Escalating an incident or concern	13
What to do (Apprentices and Employer/Partners)	13
What to do (Pareto Apprenticeship Staff)	13
Referral to Group Services	15
Reporting to the DfE and Ofsted	16
Monitoring and Action	16
Follow-up	17
Safeguarding and Whistleblowing (Disclosure Policy)	17
Appendices	18
Definitions	18

[Link to Pareto Safeguarding and Prevent reporting form](#)

<https://forms.gle/Lx6Sw6y76CmUBR7C8>

email: safeguarding@pareto.co.uk

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

Pareto is committed to promoting and ensuring adherence to this policy and procedure. We will actively promote and reinforce this commitment during staff induction processes. Additionally, continuous training will be provided to our employees to ensure proper implementation of the policy and procedure.

To maintain its effectiveness and relevance, this policy and procedure will be reviewed at least once annually. The purpose of these regular reviews is to assess its suitability, identify any areas for improvement, and make necessary updates as required.

For the purposes of this policy, the terms "us", "our" and "we" refer to Pareto.

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 helpline on **01625 810643** and email Safeguarding@pareto.co.uk providing as much detail as possible about the concern.

Scope and Purpose

Pareto 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 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 subcontracting 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

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 Apprenticeships 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" (2025) and "[Safer Practice, Safer Learning](#)"(2007), the following arrangements apply to Pareto Apprenticeships:

All relevant documents relating to this policy will be read as part of the staff induction process and made available for ongoing access.

Pareto Apprenticeships Single Safeguarding policy is made available to parents/carers, apprentices and customers via the apprenticeship website and 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 (2025) and Safer Practice, Safer Learning (2007)
- 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 Apprenticeships operates safer 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.

The Deputy Designated Safeguarding Lead will be responsible for dealing with all safeguarding issues and providing advice and support to other Safeguarding Leads across Pareto Apprenticeships and the Board.

- All staff in Pareto Apprenticeships (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 (2025)' completion of this is logged on our Single Central Record.

https://assets.publishing.service.gov.uk/media/68add931969253904d155860/Keeping_children_safe_in_education_from_1_September_2025.pdf

- All staff in Pareto Apprenticeships 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 one yearly intervals. A log of training will be maintained by the Deputy Designated Safeguarding Lead. Accountability to ensure compliance rests with Quality team, who must have appropriate structures in place
- The Deputy Designated Safeguarding Lead is responsible for ensuring that all training content is appropriate, current and accessible. The Apprenticeship Leadership and Management team will support this process.
- 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 Safeguarding Policy and are made aware of the procedures for safeguarding children, young people and adults at risk, including their own responsibilities
- All staff are required to comply with the business principles (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.

Definitions

Safeguarding

Safeguarding is a set of practices and procedures designed to protect individuals, particularly children and vulnerable adults, from harm, abuse, neglect, and exploitation. It encompasses a range of actions taken to ensure their safety, well-being, and development.

Abuse

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





Neglect

Neglect occurs when a person deliberately withholds, or fails to provide, suitable and adequate care and support needed by another adult or child.

Child

Pareto Apprenticeships follow the Children Act (2022) which 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 for whom additional procedures apply.

Vulnerable Adult /Adult at Risk

Where we determine that an adult is under our supervision, Pareto Apprenticeships follows The Care Act (2014) Section 14.2 where it states: The safeguarding duties apply in relation to any person who is aged 18 or over and at risk of abuse or neglect because of their needs for care and support.

Sexual Harassment

Sexual harassment is a form of harassment that involves unwelcome sexual advances, requests for sexual favors, and other verbal or physical harassment of a sexual nature. It is a violation of an individual's rights and can create a hostile or offensive work or learning environment.

For a comprehensive list of definitions and key terminology, please refer to the Appendix section at the end of this policy.

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 2025 (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 (2024) defines safeguarding and promoting the welfare of children as:

- Providing help and support to meet the needs of children as soon as problems emerge
- Protecting children from maltreatment;
- Preventing impairment of children's mental and physical 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 2024. The Children Act (2022) 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 for whom additional procedures apply.

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 - A whole-organisation approach to safeguarding vulnerable adults for the learning and skills sector ” (2007). The guidance applies to all education providers of post-16 learning and skills.

Where we determine that an adult is under our supervision, Pareto Apprenticeships follows The Care Act (2014) Section 14.2 where it states: The safeguarding duties apply in relation to any person who is aged 18 or over and at risk of abuse or neglect because of their needs for care and support. Where someone is over 18 but still receiving children’s services and a safeguarding issue is raised, the matter should be dealt with as a matter of course by the adult safeguarding team. Where appropriate, they should involve the local authority’s children’s safeguarding colleagues as well as any relevant partners (e.g. police or NHS) or other persons relevant to the case. The level of needs is not relevant, and the adult does not need to have eligible needs for care and support, or be receiving any particular service from the local authority, in order for the safeguarding duties to apply.

An adult is an apprentice aged 19* or above at the point of enrolment.

**Pareto Apprenticeships follow KCSIE 2025 guidance on children’s age, i.e. a learner who is under 18 years old is classed as a child. For DfE (non-safeguarding) reporting purposes, 18 year olds are reported in the same category as under 18s.*

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)—

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

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.





“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:

- assume a person has the capacity to make a decision themselves, unless it's proved otherwise
- wherever possible, help people to make their own decisions
- do not treat a person as lacking the capacity to make a decision just because they make an unwise decision
- if you make a decision for someone who does not have capacity, it must be in their best interests
- treatment and care provided to someone who lacks capacity should be the least restrictive of their basic rights and freedoms

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.

KCSIE 2024 contains important additional information about specific forms of abuse and safeguarding issues.

Child abduction and community safety incidents	Homelessness
Child Criminal Exploitation (CCE) and Child Sexual Exploitation (CSE)	Mental health
County lines	Modern Slavery
Children and the court system	Radicalisation
Children missing from education	Extremism



Children with family members in prison	Sexual violence and sexual harassment between children in schools and colleges
Cybercrime	Serious Violence
Domestic abuse	So-called 'honour'-based abuse (including Female Genital Mutilation and Forced Marriage)

Sexual Harassment

Pareto Apprenticeships staff are requested to be vigilant around issues associated with sexual violence and sexual harassment towards apprentices.

The Education and Training (Welfare of Children) Act 2021 applies expectations to other further education and skills providers.

The Worker Protection (Amendment of Equality Act 2010) Act 2023 that came into effect on 26 October 2024, introduced a legal duty for employers to proactively take reasonable steps to prevent sexual harassment. Pareto Apprenticeships, will of course, protect any 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 Apprenticeships. Any incident can have an impact on people's lives. Below are some examples:

Unwelcome: The behaviour is not desired or solicited by the recipient.

Creates a Hostile Environment: The behaviour interferes with the recipient's ability to work, learn, or participate in an activity. It creates a hostile or offensive environment that is intimidating, humiliating, or abusive.

Sexual in Nature: The behaviour is related to sex or sexuality, and it can include a variety of actions, including:

Verbal Harassment: Unwanted sexual comments, jokes, propositions, or threats.

Physical Harassment: Unwanted touching, groping, or assault.

Visual Harassment: Displaying sexually suggestive materials or images.

Non-Verbal Harassment: Unwanted gestures, staring, or following.

Pareto Apprenticeships deliver Safeguarding CPD to new staff at induction as well as an ongoing programme for existing staff that includes sexual harassment. We will ensure staff understand how to handle reports of harmful sexual behaviour between apprentices both on and outside our premises.

Pareto 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 ensure every apprentice will experience embedded delivery of Sexual Consent & Harassment as part of their whole learning journey through effective, meaningful and relevant embedded learning content starting with the 'Safeguarding Essential' modules.





Pareto Apprenticeship will educate apprentices 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.

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.

Designated Safeguarding Lead

- Pareto Apprenticeships National Quality Manager is the Designated Safeguarding Lead who has Level 3 training with responsibility for safeguarding issues within the organisation;
- Deputy Divisional Designated Safeguarding Leads have been identified appropriately across the provision to support the Designated Safeguarding Lead and Deputy Safeguarding Lead. The DSL has overall responsibility for our Safeguarding Policy, notwithstanding all staff and volunteers' individual responsibility to ensure that this policy is strictly adhered to.
- Pareto Apprenticeships designated managers with lead responsibility are required to undertake appropriate training determined by their operational role, including refresher training at two yearly intervals to keep their knowledge and skills up to date. This will include the Designated Safeguarding Lead, The Deputy Safeguarding Lead and the Regional Delivery Managers. These staff should ensure ongoing CPD as and when appropriate through internal safeguarding meetings and external events and through the Annual Safeguarding Training Plan.
- The Deputy Designated Safeguarding Lead is responsible for safeguarding CPD to all operational staff.

Equality of Opportunities Statement

The policy is written with due regard to Pareto Apprenticeships commitment to Valuing Diversity. However, where there are concerns about a child's or adults at risks' welfare, this will take priority.

In line with the Equality Act 2010, Pareto Apprenticeships will take positive action, where it can be shown that it is proportionate, to deal with particular disadvantages affecting apprentices with certain protected characteristics in order to meet their specific need. Pareto Apprenticeships will make reasonable adjustments for disabled children, young people and adults.

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 allows for storage and sharing of sensitive and personal information through secure means'.

The Data Protection Act 2018 and General Data Protection Regulations (GDPR) do not prevent 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

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

Online safety

Monitoring I.T usage

Pareto Apprenticeships utilise a number of technologies as a defence in depth approach to monitor and secure I.T. usage, including but not limited to:

- ZScaler Web filtering, filtering of web content based on categorisation and risk, includes filtering of traffic from non browser applications and logs of activity.
- Data Loss Prevention and monitoring via Google Workspace Enterprise
- Anti-virus and behavioural analytics via CrowdStrike Falcon

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

<https://help.zscaler.com/zia/about-url-categories>

Pareto Apprenticeships has increased our expectations and responsibilities regarding the filtering and monitoring systems for IT. This is in response to the published standards for filtering and monitoring, which can be found here.

Pareto will and do:

- Identify and assign roles and responsibilities to manage filtering and monitoring systems
- Review filtering and monitoring provision at least annually
- Block harmful and inappropriate content without unreasonably impacting teaching and learning
- Have effective monitoring strategies in place that meet their safeguarding needs

Educating our apprentices

Pareto 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.

Online Safety - Staff training

Pareto Apprenticeships staff are required to complete I.T security training modules relevant to their role within the organisation (accessible through the Pareto/Randstad LMS).

We will develop the safeguarding knowledge of delivery staff so that it is relevant and contextualised specific to the Business, Administration, Finance and Law, Information and Communication Technology and Education and early years sector subject area and standards within this area that we deliver. These include (but are not limited to) Business, Administration, Finance and Law, Information and Communication Technology and Education and early years. 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. Training Includes an understanding of the expectations, applicable roles, and responsibilities in relation to filtering and monitoring

Why is safeguarding necessary for employed Apprentices?

As a provider of government funded training, Pareto Apprenticeships 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.

What are the responsibilities of an Employer?

To understand what is meant by safeguarding and to 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 aged 16-18 have had the relevant enhanced DBS checks and of sound character and judgement and will not pose as any threat or danger to Apprentices.

Pareto Staff Training

Pareto 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 and Information and Communication Technology sector subject area and standards within this area that we deliver. These include (but are not limited to) Business, Administration, Finance and Law, Information and Communication Technology and Education and early years. 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.

Escalating an incident or concern

Safeguarding concerns and/or incidents should be reported using the incident report form: <https://forms.gle/AvDxjeeBcztigxM88> or emailing safeguarding@pareto.co.uk and referring to the processes detailed below.

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 Safeguarding Helpline on **01625 810643** and email Safeguarding@pareto.co.uk providing as much detail as possible about the concern.

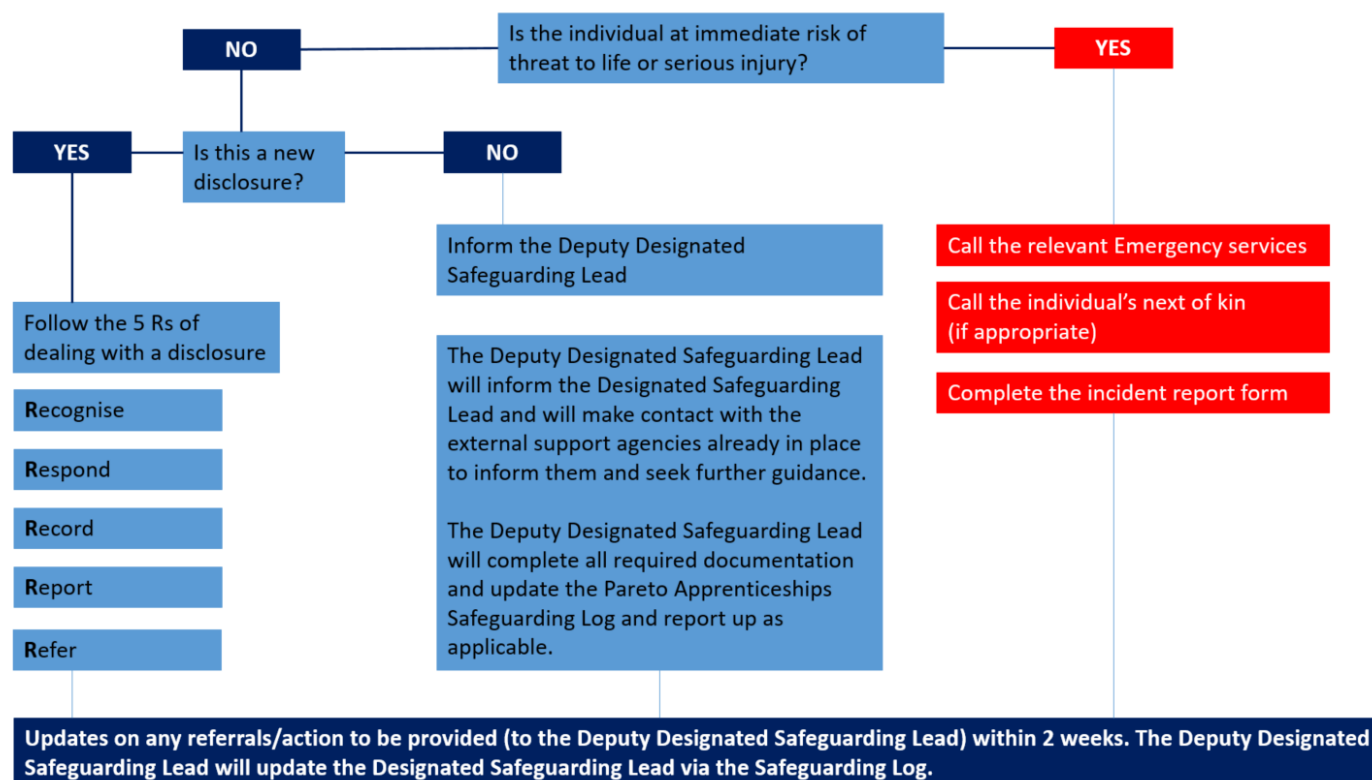
What to do (Pareto Apprenticeship Staff)

Safeguarding concerns and/or incidents should be reported using the incident report form: <https://forms.gle/AvDxjeeBcztigxM88> or emailing safeguarding@pareto.co.uk and by referring to the processes detailed below.

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



✓ RECOGNISE	➔	The signs and indicators of abuse, neglect and radicalisation.
✓ RESPOND	➔	To what you see (concern) or to what is said (report or disclosure). Listen deeply and ask factual questions
✓ RECORD	➔	What you have seen or been told. Focus on the facts and use the words of the disclosure.
✓ REPORT	➔	To a Designated or Deputy Designated Safeguarding Lead without Delay.
✓ REFER	➔	To an appropriate organisation – (in almost all cases this is the responsibility of the Designated Safeguarding Lead)



All staff should know what to do if a child or adult at risk tells them they are 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 Deputy Designated Safeguarding Lead.
- 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 is unavailable, then staff are duty bound to refer to the local authority (Identified via <https://www.localgov.co.uk/council-directory>) 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 Apprenticeships staff member towards a child or adult at risk, HR must be informed immediately by the Designated Safeguarding Lead at 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 appropriate Divisional Head (Head of Curriculum & Quality, Head of Apprenticeship Operations and Transformation) who will follow the same procedure.
- In the event that the referral involves concerns raised about a Pareto Apprenticeships 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 Apprenticeships 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.

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 Reporting Form** <https://forms.gle/3RqJqHUSvBAdeF577> should be completed.

All correspondence will be held in the strictest confidence.





Reporting to the DfE and Ofsted

Pareto Apprenticeships' Designated Safeguarding Lead will make arrangements to inform the Department for Education and Ofsted of the referral.

(Within this section the Contractor is Pareto Apprenticeships)

The Contractor will ensure it notifies both Ofsted and the DfE via the Contact Form: General Enquiries at the Department for Education - GOV.UK (www.gov.uk) where a referral has been made by the Contractor or one of the Contractor Related Parties in either of the following circumstances (such notification must include the name of the institution, a high level summary of the nature of the incident (without sharing personal information about victims or alleged perpetrators) and confirmation of whether it is, or is scheduled to be, investigated by the Local Authority and/or the police):

A safeguarding concern related to sexual violence to Local Authority children's social care/adult social care and/or the police,

Or

An allegation of abuse made against a teacher, lecturer or other member of staff to the designated officer(s) (at the local authority).

The Contractor will ensure it notifies Ofsted and the Department via the Contact Form: General Enquiries at Department for Education - GOV.UK (www.gov.uk) of incident(s) and/or where a referral has been made, where the Contractor or one of the Contractor Related Parties:

Is aware of an incident, or pattern of incidents, which undermines the promotion of British fundamental values or the ability of the Contractor or the Contractor Related Parties to comply with the Prevent duty, or makes a referral of an individual member of Contractor Personnel for the purposes of determining whether that member of Contractor Personnel should be referred to a panel for the carrying out of an assessment under section 36 of the Counterterrorism and Security Act 2015 of the extent to which that individual is vulnerable to being drawn into terrorism.

Where it applies:

The Contractor must comply with the Modern Slavery Act 2015 and must have in place throughout the Contract Period policies and procedures to ensure full compliance.

The Contractor must ensure that all Sub-Contracts that it enters into include an obligation for the Sub-Contractor to comply with the Modern Slavery Act 2015 with special emphasis on express anti-slavery and anti-human trafficking provisions.

The Contractor shall implement due diligence procedures to ensure that there is no slavery or human trafficking in any part of its supply chain.

The Contractor will, in circumstances where it Sub-Contracts the management and/or delivery of the Services under this Contract, ensure that all the provisions in respect of learner welfare are included in the Sub-Contract with each Sub-Contractor.

Monitoring and Action

The Designated Safeguarding Lead will monitor and inform the Apprenticeship Senior Leadership and Management Team. The Designated Safeguarding Lead may be required to seek further clarification or advise next steps on occasion.



Follow-up

Pareto Apprenticeships Designated Safeguarding Lead is required to provide summary follow-up information following referral. The purpose of this procedure is to provide the 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 milestones 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.

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 Apprenticeships 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 Apprenticeships Designated Safeguarding Lead. Pareto Apprenticeships refer to the whistleblowing policy of our parent organisation Randstad. The policy can be found [here](#).

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