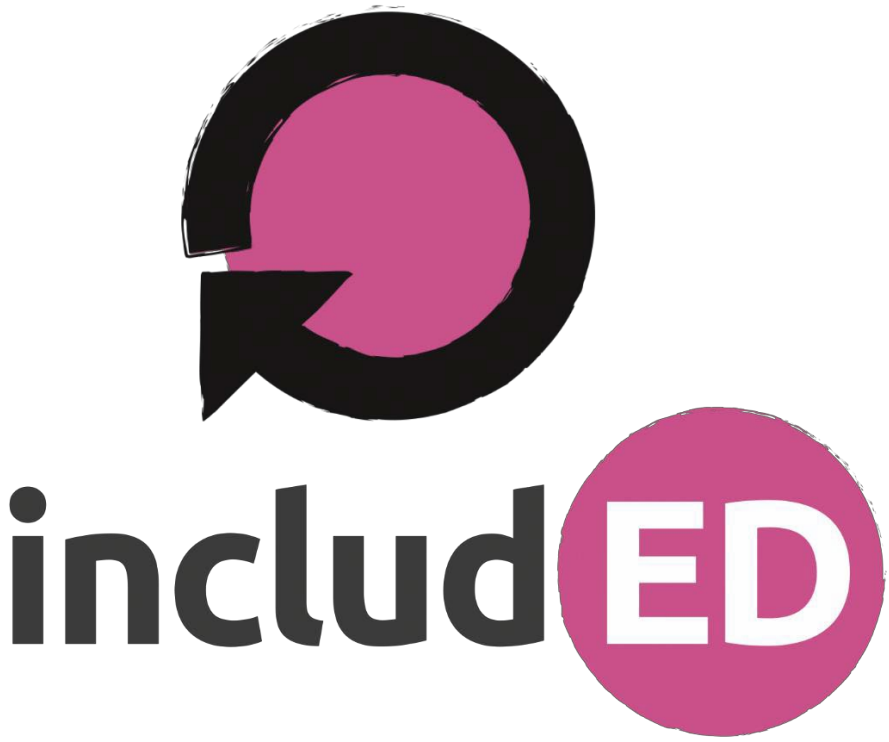
Our Guide to



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Our Guide to includED

Purpose

includED is our brand which covers and develops five areas and encompasses our four key includED areas:

Equality and inclusion

Safeguarding

Prevent

E-safety

includED brand

Through all includED activity Paragon Skills enacts its statutory and legislative responsibilities under the following key pieces of legislation:

The Rehabilitation of Offenders Act 1974

The Children Act 1989

The Equality Act 2010

Safeguarding Vulnerable Groups Act 2006

Counter-Terrorism and Security Act 2015

Working Together to Safeguard Children 2018

Scope

This guide applies to all colleagues, including senior managers and the Board, paid colleagues, volunteers and part-time workers, agency colleagues, contractors, learners or anyone working on behalf of Paragon Skills. It outlines our approach to the four includED areas and outlines the responsibilities that we all have to promote the welfare of our learners and each other. It describes what Paragon Skills will do to ensure that learners in our care are kept safe, receive an appropriate and relevant social education and how we will respond to concerns or risks of harm.

All those that act on behalf of Paragon Skills are expected to enact the principles contained within this guide. This includes our clients (employers), learners and partners.

Partners

Our partner organisations will be provided with a copy of this guide to enable them to understand how Paragon Skills approaches equality and inclusion, safeguarding, Prevent and E-safety with its learners.

It is expected that our partners are committed to our includED ethos and achieve the standards outlined within this guide when engaging with our learners. A self-study resource for managers covering all aspects of includED is available for our partner organisations.

Partners will be supported through the provision of timely includED advice and guidance and, where relevant, access to training and continuing professional development. Sub-contractors are provided with access to the includED resource bank, bi-monthly snippets, includED factsheets and safeguarding guides via Sharepoint.

Our clients (employers) will be provided with a guide to includED which is aimed at supporting their understanding of equality, inclusion and safeguarding. Specific client training in any of the includED topics may be provided on request from the Safeguarding and Welfare Manager.

Task group

Our includED brand and ethos is overseen by a task group. This task group is representative of the key areas of our business. The terms of reference and responsibilities for the includED task group can be found at Appendix 1.

Key contacts

The safeguarding team at Paragon Skills are the key contacts for all matters relating this this guide.

Safeguarding role	Name	Job role	Contact details
Designated safeguarding lead (DSL)	Andrew Johnson	Head of People	andrew.johnson@pgon.co.uk 07794 067731
Safeguarding lead (SL) Prevent lead E-Safety lead includED task group chair	Niki Husher	Safeguarding and Welfare Manager	niki.husher@pgon.co.uk 07971 306967
Safeguarding lead (SL)	Jakki Ashford	People Business Partner	jakki.ashford@pgon.co.uk 07811 052291

Associated policies and documentation

The following policies and documentation should be read alongside Our Guide to includED

Part One – Keeping Children Safe in Education 2019

Our Guide to Social Media

Our Guide to Safer Recruitment

Supporting looked after children

Colleague handbook (including whistleblowing)

Complaints policy

Monitoring and review

The safeguarding leads will review this guide at least annually to assess its implementation and effectiveness, with the support of the includED task group. This is in line with statutory requirements.

Overall responsibility for this guide and its implementation lies with the Paragon Skills Board. In order to ensure that they are able to monitor the implementation and effectiveness of this guide, a quarterly Board report will be provided to them.

Paragon Skills uses the includED brand in the following ways:

Equality and inclusion - our commitment

The Equality Act 2010 (The Act) places responsibilities upon Paragon Skills and its colleagues to promote equality. We will extend this responsibility by encompassing the Prevent Duty and Safeguarding expectations within this guide with the view to work in ways which promote community cohesion, tackle inequality and minimise the risk of harm posed to vulnerable groups and individuals.

Paragon Skills is committed to promoting equality, inclusion, dignity and respect for all through its culture and activities. We will embrace diversity by promoting and maintaining an inclusive and supportive environment where everyone can achieve their full potential. We are committed to monitoring diversity within our workforce and learner base through our includED impact measures.

Objectives

We will support our colleagues, customers and learners to recognise and meet the differing needs of people from diverse backgrounds within their day to day activities, and to embed and promote the principles of equality in all that they do. We will regularly review our progress in doing this and take swift action where gaps or inappropriate practice are identified.

Equality Act 2010 definitions

The Act covers nine 'protected characteristics':

Age

The Act protects people of all ages. However, different treatment because of age is not unlawful direct or indirect discrimination if it can be justified that we are achieving a legitimate aim.

Disability

The Act has made it easier for a person to show that they are disabled and protected from disability discrimination. Under the Act, a person is disabled if they have a physical or mental impairment which has a substantial and long-term adverse effect on their ability to carry out normal day-to-day activities.

Gender reassignment

The Act says that you must not be discriminated against because you are transsexual - that is your gender identity differs from the gender assigned to you at birth. In the Act it is known as gender reassignment. All transsexual people share the common characteristic of gender reassignment.

Race

For the purposes of the Act, race includes colour, nationality and ethnic or national origins.

Religion, belief and non-belief

In the Act, the word religion includes all religions and faiths. It also includes a lack of religion where people have no religious belief at all.

Sexual orientation

Protection by the Act is given to bisexual, gay, heterosexual, and lesbian people.

Sex

Both men and women are equally protected by the Act. Discrimination on the grounds of sex is unlawful.

Marriage or civil partnership

The Act protects those who are married or in a civil partnership against discrimination. Single people are not protected under the Act.

Pregnancy and maternity

A woman is protected against discrimination on the grounds of pregnancy and maternity during the period of her pregnancy and statutory maternity leave. During this period, any discrimination cannot be treated as sex discrimination.

Discrimination

There are a number of forms of discrimination. Paragon Skills actively challenges all forms of discrimination and will work to ensure that our learners, colleagues and partners are aware of how discrimination can be tackled effectively.

Direct discrimination

Direct discrimination occurs when someone is treated less favourably than another person because they have a protected characteristic.

Associative discrimination

Associative discrimination occurs when someone is treated less favourably because they are associated with someone who has a protected characteristic – this is a form of direct discrimination.

Perceptive discrimination

Perceptive discrimination occurs when someone is treated less favourably because someone thinks they may have a protected characteristic. It applies even if the person doesn't have a protected characteristic. This is a form of direct discrimination.

Indirect discrimination

Indirect discrimination occurs when a rule, policy, or practice that may disadvantage people who share a protected characteristic is imposed.

Harassment

Harassment is unwanted conduct relating to a protected characteristic which has a purpose of upsetting or violating a person's dignity or creating an intimidating, hostile, degrading, humiliating or offensive environment for the individual. Harassment cannot be aimed at people on the grounds of maternity, pregnancy, marriage or civil partnership. Colleagues can make a formal complaint on the grounds of harassment if they find the action offensive and it wasn't directly aimed at them personally.

Victimisation

Victimisation occurs when someone is treated badly because they have made or supported a complaint or grievance under the Equality Act 2010 or are suspected of doing so. Malicious or untrue complaints are not covered.

Discrimination, harassment and victimisation against colleagues, learners and partner colleagues will not be tolerated.

Training

Initial training on equality and inclusion will be provided to all colleagues at induction through the completion of our self-study EDucation pack which covers all elements of includED. This will then be supported through the provision of regular includED Continuing Professional Development (CPD), bi-monthly includED snippets and via formal annual refresher self-study activity. The training and CPD provided will focus on equality and inclusion related matters as well as providing information which empowers colleagues to challenge inequalities, to build the resilience of our learners and have a positive impact upon community cohesion.

Equality for all

We will value and make use of differences between colleagues to the benefit of both them and Paragon Skills and provide a working and learning environment free from bullying, discrimination and harassment.

We will thoroughly investigate and deal with any complaints raised regarding discrimination, harassment, victimisation or inequality.

Our approach to ensuring the equality of opportunity and the benefits of diversity will be understood by all colleagues.

All those involved in recruitment, selection or assessment of colleagues or job applicants will be given appropriate guidance to carry out their roles effectively – Paragon Skills is an equal opportunities employer and the recruitment or promotion of any individual will be based on individual merit, skills and abilities relevant to the requirements of the role. All recruiting managers will receive training on recruiting safely and fairly prior to leading the recruitment and selection process.

Individuals will be able to recognise their responsibility to showing respect to their colleagues, working as a team and contributing positively to an environment where everyone has the same chance to develop and progress within Paragon Skills.

We will provide learning materials which are free from cultural or other bias. Although primarily written in English, learning materials will be made available in alternative formats and in other languages where requested.

Training programmes will be designed and delivered in a flexible manner, which takes account of the diverse needs, aspirations, prior achievements and prior experience of learners.

Any learners with additional support needs will be identified at the point of entry and arrangements will be made to provide them with appropriate support. We will use CognAssist, an online neurodiversity tool which at looks at eight different brain functions, to provide support with any additional learning needs. All learners will be screened and provided with an opportunity to access this resource at the point of identified need.

We will make arrangements for learners with special assessment requirements to ensure that there are no unnecessary barriers to preventing them from achieving.

All procedures for assessment and testing will be free from cultural or other bias.

We will take positive action to ensure that minority groups are represented within our workforce and our learner community.

The equality and inclusion guide will be constantly monitored to ensure that it is working and being applied consistently across the organisation. This will include utilising Learner and Colleague Voice mechanisms.

Levels of responsibility

This guide is under Board governance and is reviewed annually by Paragon Skills and also through the Board cycle every year.

The strategic direction for equality will be managed by the Head of People with input from the includED task group.

The Executive Team will monitor and review the impact of this guide on the business based on Board report feedback provided by the includED task group through the Board reporting process.

The People Team will be responsible for advising managers on the application of the guide and for ensuring that all training and documentation in connection with monitoring, recruitment, selection, training, promotion and relevant employment procedures are administered in accordance with the guide.

Managers are provided with People Standards to assist them in meeting their responsibilities which include them ensuring that their colleagues have a clear understanding of equality and inclusion and how to enact their responsibilities.

All colleagues will:

- Challenge unlawful discrimination for all protected characteristics shown above.
- Promote equality of opportunity for all.
- Promote good relations between people of different races and cultures.
- Promote equality of opportunity between disabled people and other people.
- Challenge harassment and bullying of people that is related to their protected characteristic.
- Follow safeguarding reporting procedures to protect individuals from any potential risk of harm.

- Promote positive attitudes towards people with a protected characteristic.
- Support the development of community cohesion.
- Read all literature issued on equality, abiding by and ensuring the consistent application of this.

Personal Tutors are responsible for ensuring that the learners for whom they are responsible have an understanding of equality and are supported to have an appreciation of how this impacts them personally and of their own role in ensuring good practice. This will be done using the approved resources provided by the includED task group and will include self-study materials.

Personal Tutors will make learners aware of the procedures to be followed if they have been unfairly treated in any way whilst in learning with Paragon Skills.

Customers and partners

Customers and partners are responsible for ensuring equality within their own workplaces and for promoting equality of opportunity for their own learners and colleagues. Where an employer or partner does not understand their obligations under the Equality Act, Paragon Skills will provide information, advice and coaching to help improve that knowledge for the benefit of their business. Where appropriate, this will include support to develop their own policies to tackle inequality within their workplace and the provision of training.

Teaching and learning

We will support our learners to recognise and understand bullying, harassment and victimisation and provide them with skills to challenge this effectively with the view of developing their personal resilience and citizenship skills. We will broaden their understanding of British values and topical and relevant equality related matters through the delivery of includED teaching and learning sessions. Safe space discussions will enable them to explore equality in a personalised impactful way. All learners will be provided with an appropriate level of self-study activity focusing upon equality as an additionality to their programme.

Colleague recruitment

Paragon Skills is an equal opportunities employer and operates a People Standard on recruitment which reflects the following commitments.

Job descriptions and specifications will clearly set out the skills, experience and qualifications required for the post and will only stipulate justifiable requirements for the job. Job advertisements will not unlawfully preclude or discourage applications from specific individuals or groups.

Recruitment activity will not suggest that Paragon Skills might take into account factors that would, or might, discriminate unlawfully. It be available in alternative formats, eg via email or in large print upon request.

Selection criteria used will reflect the standard required.

Consideration will be given to flexible working arrangements such as variable working hours, part-time and term-time working, job sharing and career breaks for all that would wish to be considered for such arrangements.

Paragon Skills is a Disability Confident committed employer. Applicants with disabilities will be given full and fair consideration for employment, having regard for their particular aptitudes and abilities and any reasonable adjustments that can be made. If an existing colleague becomes disabled, the objective should be the continued provision of suitable employment, either in the same or an alternative position, with appropriate training being given where necessary. Colleagues with disabilities will be actively supported to ensure that they share in opportunities for training, career development and promotion.

Paragon Skills reserves the right to take positive action during its recruitment activity with the view to recruit a colleague that is needed to support us in our aim to provide a colleague base which reflects the ethnic makeup of the communities that it serves. Our Recruitment People Standard guides our recruiting managers, and this is supported by 'Safer Recruitment the Paragon Way' self-study for recruiting managers.

Any employment references provided for ex-colleagues will be based on fact alone and will not contain any discriminatory information.

Rehabilitation of offenders' information does not form a part of the initial process for screening candidates for interview. This information will only be consulted to ensure the suitability of a person to work in regulated activity, or for roles with frequent contact with children. Having a spent or unspent conviction does not preclude persons from working in these roles; the decision regarding the offer of employment will be based upon analysis of risk.

Sensitive data

In accordance with the General Data Protection Regulation (GDPR), Paragon Skills will collect and process information related to learners' and colleagues' gender, ethnicity and disability. This will be used to measure progress of underrepresented groups and to identify areas in which Paragon Skills needs to improve its efforts in promoting equality and diversity in the workplace or training environment. It will be reviewed against local labour market intelligence and national benchmarks. This activity will form a part of our includED impact measures (IIMs) which are overseen by the People Team and includED task group.

Data will be collected and stored with the express consent of the individual and stored and processed in line with the General Data Protection Regulation. Paragon Skills may also pass data to partner organisations such as the funding body. This is done only with the express consent of the individual providing it.

Marketing and recruitment of learners

We will provide marketing and advertising materials which reflect Paragon Skills' commitment to equality and inclusion, challenge stereotypes and raise participation of underrepresented groups. All marketing and advertising materials will be written in English and, if required, will be made available through a range of sources. Wherever requested, marketing and advertising materials can also be made available in languages other than English or other accessible formats.

Bullying and harassment – colleagues

Paragon Skills is fully committed to providing a working environment that is free from bullying, harassment and victimisation of any kind. We take seriously any allegations of bullying or harassment. Paragon Skills expects everyone to understand and enact their responsibilities for keeping the workplace free of bullying, harassment and victimisation and to actively challenge inequality.

Concerns related to bullying, harassment and victimisation may be dealt with under a number of appropriate People Standards including grievance, disciplinary or the capability procedure.

Harassment can be described as unwanted behaviour, which a person finds intimidating, upsetting, embarrassing, humiliating, or offensive. It is important to note that it is not whether the behaviour was intended to be offensive that matters, rather whether the individual was offended. Sexual harassment is a significant workplace problem and can affect men as well as women, regardless of their age. It is, however, only one of several types of harassment.

People can be subject to harassment on a variety of grounds, including:

- Race, ethnic origin, nationality and skin colour.
- Gender or sexual orientation.
- Willingness to challenge harassment (leading to victimisation).
- Membership or non-membership of a trade union.
- Disabilities or learning difficulties.
- Status as an ex-offender.
- Age.
- Aids/HIV.
- Health.
- Physical characteristics.
- Personal beliefs / religious beliefs.
- Political persuasion.

This list is not exhaustive. Harassment can range from extremes such as violence to less obvious forms like ignoring someone. Examples of behaviour that can be considered as harassment include:

- Unwanted physical contact.
- Jokes, offensive language, gossip, slander, sectarian songs.
- Posters, graffiti, obscene gestures, flags and emblems.
- Isolation or non-co-operation and exclusion from social activities.
- Intrusion by pestering, spying and stalking either in person on via the internet in chat rooms.

Bullying is any persistent behaviour, directed against an individual, which is intimidating, offensive or malicious and which undermines the confidence and self-esteem of the recipient.

Examples of bullying include:

- Verbal or physical threats and intimidation.
- Persistent negative comments.
- Humiliating someone in front of others.
- Unjustified persistent criticism.
- Offensive or abusive personal remarks.
- Constantly changing targets in order to cause someone to fail.
- Making false allegations.
- Grooming using the internet and chat rooms.
- Monitoring unnecessarily and obtrusively.
- Unwanted banter.

Legitimate, constructive, and fair criticism of a person's performance or behaviour from a manager is not bullying. Certain types of harassment and bullying are regarded as unfair discrimination and are therefore covered by the Equality Act 2010. The Human Rights Act 1998, implemented in October 2000, changed the way that Courts and Employment Tribunals deal with harassment and bullying and introduced the right not to be subjected to degrading treatment or punishment.

Safeguarding - our commitment

The learner perspective

To provide an environment where:

- The welfare of the learner is paramount.
- All learners, regardless of age, disability, gender, racial heritage, religious belief, sexual orientation or identity, have the right to equal protection from all types of harm or abuse.
- Relationships with learners, partners, clients and with other agencies are developed which promote a safe learning environment.
- Colleagues, learners, partners and clients have an understanding of safeguarding which then enables them to fulfil their statutory or moral obligations.
- We undertake to contribute towards 'Working Together to Safeguard Children' 2018. In order to enact this we adopt the principles as laid out in the statutory guidance 'Keeping Children Safe in Education' 2019.

Our safeguarding objectives

The purpose of this guide is to inform everyone connected with Paragon Skills, and with whom we partner, of our position with respect to the safeguarding of learners. It explains how we respond to our statutory obligations laid out within Keeping Children Safe in Education (2019).

We believe that it is always unacceptable for a learner to experience abuse of any kind, and recognise our responsibility to safeguard the welfare of all learners, through procedures and practices which protect and minimise potential harm.

Safeguarding is everybody's responsibility.

Definitions

Safeguarding seeks to keep children and adults safe from a range of potential harm and looks at preventative action, not just reaction. It is directed by various legislation and statutory guidance including Working Together to Safeguard Children (2018) and Keeping Children Safe in Education (2019).

It means promoting the welfare of children and vulnerable adults and having approaches and procedures in place which define how we will seek to protect our learners.

The term 'child' means anyone who has not yet attained the age of 18 and the term 'vulnerable adult' means a person, aged 18 or over, who is or may be in need of community care services by reason of disability, age or illness; and is or may be unable to take care or unable to protect themself against significant harm or exploitation.

A number of other situations may render a person 'vulnerable' such as - domestic violence, addiction, mental ill health, living in a drug-misusing family, living in areas of high crime, being likely to face racism or having caring responsibilities. With specified consent we extend our safeguarding approach to any such individual.

Safeguarding includes how we will respond to Child and Vulnerable Adult Protection concerns including the response to disclosures of maltreatment. This includes abuse, neglect, criminal or sexual exploitation, radicalisation, domestic abuse, or victimisation, peer on peer abuse, homelessness, bullying, female genital mutilation, honour based violence, sexual violence, sexual harassment or risk of harm where the perpetrator is a member of the learner's family, the wider community, another learner or colleague.

Colleagues should be particularly alert to the potential need for Early Help for a child who:

- Is disabled and has specific additional needs.
- Has special educational needs (whether or not they have a statutory education, health and care plan).
- Is a young carer.
- Is showing signs of being drawn into anti-social or criminal behaviour; including gang involvement and association with organised crime groups.
- Is frequently missing/goes missing from care or from home.
- Has had a change in friendship groups and is in relationships with older people.
- Is showing a significant dip in performance.
- Is self-harming.
- Has unexplained gifts or possessions, outside of what would be considered to be their financial means.
- Has two mobile phones, or regularly appears to change their mobile phone.
- Is misusing drugs or alcohol.
- Is at risk of modern slavery, trafficking or criminal exploitation.
- Is in a family circumstance presenting challenges for the child, such as substance abuse, adult mental health problems or domestic abuse.
- Has returned home from care to their family.
- Is demonstrating vulnerabilities to honour based violence.
- Is showing early signs of abuse and/or neglect.
- Is at risk of being radicalised or exploited.
- Is a privately fostered child (where they are under 16).
- Is within the court system.
- Has a family member in prison.
- Has a diagnosed mental health condition.
- Is experiencing low mental wellbeing.
- Is a looked after child.

Colleagues, clients, partners and learners who have a safeguarding concern about a learner should follow the '5 Rs' detailed in Appendix 2.

Safeguarding reporting procedures

We will use the 5 Rs - Recognition, Response, Reporting, Recording and Referral when approaching safeguarding matters and require all colleagues to operate in line with this process. These have been developed with reference to 'What to do if you are worried a child is being abused – Advice for practitioners' 2015 and can be found at Appendix 2.

All concerns about learner welfare must be logged, by the colleague identifying it, using the safeguarding concern and incident report form after discussion with the relevant Operations Manager (OM) who is the safeguarding manager. This will enable a picture regarding any risks to be built and is used for 'stacking up' purposes ready to inform any requirement for Early Help for the learner. The report form can be found here.

Assessments regarding levels of risk undertaken by the safeguarding team will take into consideration the social circumstances of a learner alongside the educational context when considering the need to make a referral to children's or adults' services.

Where an allegation of harm or abuse of a learner is aimed at a colleague at Paragon Skills, this must be reported immediately to the Head of People, designated safeguarding lead, by phone on 07794 067731. This will be investigated by the Chief Executive Officer with the Head of People's support.

Vulnerable and at risk learners

In recognition of the additional vulnerabilities faced by looked after children, Paragon Skills has a Looked After Children's Policy. This is aimed at supporting the achievement of this disadvantaged group and provides guidance for colleagues on supporting the needs of this priority group.

At risk learners can be identified at any point during their programme. These are learners that require additional support and intervention to keep them safe. By flagging these individuals, further enhanced monitoring will be enacted to ensure that welfare concerns are stacked up and 'Early Help' is provided, in partnership with local agencies, where required. Flagging of at risk learners is the responsibility of the safeguarding leads.

Wider safeguarding

Paragon Skills is committed to providing welfare support to all learners. This includes responding to a learner (of any age) via either direct intervention, advice and guidance or signposting where an issue exists within their day to day life (including the workplace) which could impact upon their ability to achieve. For learners under 18 this includes providing Early Help and working with external agencies and responding to claims of bullying, victimisation or harassment.

To support the development of our learners' personal understanding of risk they will all be provided with an appropriate level of self-study activity focusing upon safeguarding and resilience as an additionality to their programme.

Confidentiality

We will work to the following Privacy Statement with our learners:

"It is important that you feel safe and confident to discuss any issues that you may have with a member of the Paragon Skills team. For this reason any information that you share will only be discussed with those who can directly help and support you, unless you tell us that either you or others are at risk of harm. In such cases we may have to share this information with external agencies such as social services or the Police. This will only be passed on with your knowledge."

We will introduce this to learners at induction and refer to it throughout the learning process.

Paragon Skills takes its responsibilities to report crime seriously and as a result we will not afford confidentiality in the following situations:

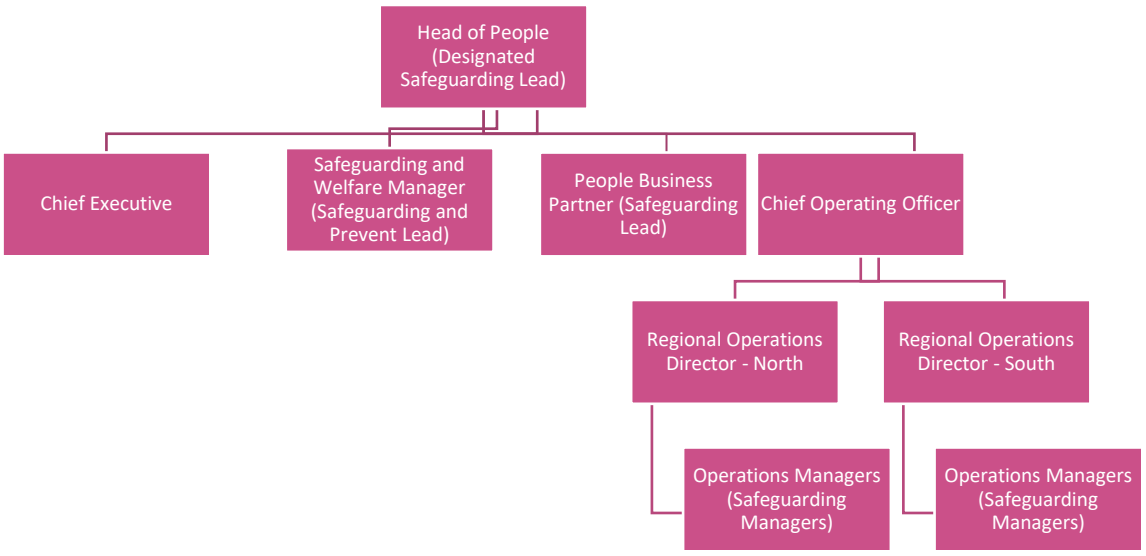
- Where it is identified that a child or vulnerable adult is at risk of harm.
- Where we are told that a serious crime has been committed or is about to be committed.
- Where information regarding terrorism or drug trafficking is disclosed.
- Where we are instructed to disclose something by a court.

Where a learner is identified as being involved in criminal exploitation this will be addressed as a safeguarding matter.

Levels of responsibility

This guide is under Board governance and is reviewed annually by Paragon Skills and also through the Board cycle every year.

Everyone has a responsibility to keep children and the vulnerable safe from harm and to educate them in the risks posed to them. The level of accountability for this will differ dependent on the role held and is laid out in Annex A with the structure of safeguarding responsibility being outlined within the following structure chart.



Whistleblowing

Paragon Skills operates a whistleblowing procedure. This procedure should be used by any colleague, client, partner or learner where it is felt that we have failed to act to prevent harm from occurring to an individual. Details of this are contained within the colleague handbook.

Training

In line with Keeping Children Safe in Education (2019) we are committed to providing colleagues with training and awareness raising activity around safeguarding specific to their roles and at a level and frequency as defined within legislation (Annex A). We will record all colleagues' training using our HR software.

All colleagues in learner facing roles are required to read Part one of Keeping Children Safe in Education. Colleagues sign to confirm adherence to this requirement.

Colleague training and continuing professional development (CPD) will cover the elements defined within the statutory guidance. The content of training will be reviewed on a regular basis by the safeguarding leads to ensure its appropriateness and relevance. Initial training will be provided to all colleagues at induction during a face to face session. This will be supplemented by the completion of our self-study EDucation pack which covers all elements of includED. All learner facing colleagues are provided with a Safeguarding Field Guide which acts as a day to day safeguarding aide-memoire.

We will provide frequent directed includED CPD to our Personal Tutors and Tutors through resources such as bi-monthly snippets, Safeguarding Guides and 20:20 Vision delivered by safeguarding managers. This will ensure that they are kept up to date and given the confidence to address and respond to issues highlighted by our learners. The back catalogue of these CPD resources will be freely accessible to all colleagues, including those who work within partner agencies, and will be shared with new colleagues as they commence with Paragon Skills. In addition to CPD resources, colleagues have access to a variety of factsheets which provide information and signposting on a range of matters including mental health.

As the person responsible for day to day safeguarding matters, the Safeguarding and Welfare Manager will attend externally provided safeguarding training on an annual basis. This will be cascaded to the designated safeguarding lead, safeguarding leads and safeguarding managers. Safeguarding leads and managers will receive regular updates from the Safeguarding and Welfare Manager about a range of wider safeguarding matters.

Formal annual refresher self-study activity will be provided to all colleagues as a part of wider includED refresher training activity.

In recognition of the impact of mental health and wellbeing upon safeguarding, all our colleagues will be provided with Mental Health Awareness training. For our line managers and our safeguarding managers this will include mental health first aid. Our safeguarding leads and People Team will hold a level three in Supervising Mental Health First Aid. This training is available for partners on request.

Teaching and learning

We will provide learners with opportunities to explore safeguarding in a safe environment and in a way that is relevant to their learning programme with the aim of improving their knowledge, confidence and awareness of safeguarding. This will be done using the approved resources provided by the includED task group, through safe space discussions and through the provision of includED self-study resources.

Safer recruitment

We will operate safer recruitment processes which aim to recruit safely and fairly in line with the Disclosure and Barring Service code of practice, the Rehabilitation of Offenders Act (1974), the Safeguarding Vulnerable Groups Act (2006), and Keeping Children Safe in Education (2019).

We are committed to offering learners a safe, happy and healthy environment and will recruit colleagues who share in the belief that the welfare of the learner is paramount and promote this through all that they do.

All recruiting managers will undertake 'Safer Recruitment the Paragon Way' training. All recruitment panels will include at least one colleague that has completed this self-study and this will be refreshed bi-annually. This training is regularly reviewed to ensure it adheres to recognised good practice.

DBS checks will be undertaken on all colleagues in regulated activity, those with frequent and unsupervised access to children, those that manage colleagues for whom a DBS is relevant and Senior Leadership Team members; these colleagues are defined as being in positions of trust. DBS checks are re-requested on a three yearly basis with the details of these checks being recorded on a single central record. In addition to DBS checks, we undertake overseas checks where an applicant has lived outside of the UK in the last five years, right to work checks and probe gaps in employment.

Where DBS checks are not in place or not required, colleagues will work to appropriate risk mitigations.

We will undertake annual self-declarations to inform individuals' suitability for all those in positions of trust within Paragon Skills. We define positions of trust as all roles with frequent learner contact.

Full details of our approach to safer recruitment are laid out in Our Guide to Safer Recruitment.

Clients and partners

We will support clients with whom we engage to recognise their own safeguarding obligations to learners aged under 18. We will do this by providing timely information, advice and guidance.

Paragon Skills delivers a range of qualifications within the child and health and social care sectors meaning that our colleagues will come into incidental contact with children and vulnerable adults within these settings. We will therefore ensure that our learners follow their own employer's procedures for the management of safeguarding. Where this is not possible or appropriate, the learner should be guided towards their employer's whistleblowing procedures in line with statutory guidance.

Managing and responding to risk

We recognise that it is necessary to undertake safeguarding risk assessments and that safeguarding should be considered alongside other standard assessment of risk processes.

We will undertake generic risk assessments (eg residential stays, classroom based delivery, lone working, contractors working on site, transporting learners) and ensure that these are stored centrally for access and use by all colleagues.

At times it will be appropriate to risk assess individual or specific groups of learners or activities. Such circumstances should be discussed with the Safeguarding and Welfare Manager, in advance of the learner/s commencing or as soon as a risk is highlighted.

Social media

There are notable benefits to using social media as communication and promotional tools as well as potential negative effects in terms of reputation and safeguarding. In order to use social media such as social networking sites and blogs in a safe and professional way we operate a social media guide; Our Guide to Social Media.

Owing to the safeguarding implications surrounding the misuse of social media formats, any activities undertaken outside the boundaries of the guide will be dealt with in line with the Disciplinary People Standard.

Extremism and radicalisation

The Prevent Duty identifies that young people pose a risk and as a result we recognise that our learners may be at risk of radicalisation. Colleagues have a responsibility to recognise this potential risk and to identify learners that may be at risk of harm from radicalisation with the view to support them to access the support which Channel can offer.

Furthermore, we recognise that our colleagues pose a risk and may be at risk of radicalisation and provide support and supervision to colleagues which will seek to identify vulnerable individuals to support them to access Channel support.

We have a Prevent guide in line with the requirements placed upon us under the Counter-Terrorism and Security Act (2015). This forms a part of this guide.

Our designated Prevent officer is the Safeguarding and Welfare Manager with the safeguarding leads deputising.

Local priorities

As a training provider which operates nationally, we recognise that each learner is an individual. Safeguarding priorities will differ across the country meaning that our safeguarding managers will take an interest in supporting their direct reports to understand the safeguarding priorities for the localities in which they engage with learners. These are defined by local authorities and partnerships meaning that our safeguarding managers will build links within their areas which enable them to understand and respond to the needs of the community in which they operate.

Record keeping

All records regarding a learner's welfare will be clear, use straightforward language, be concise, accurate in fact and stored confidentially and securely in line with GDPR. Any judgements, interventions or decisions made will be carefully recorded to facilitate further professional judgements to be made should this be necessary.

GDPR is not a barrier to sharing information for the purposes of safeguarding the individual. Any information shared will be shared in line with the Information Sharing: Practitioners' guide (HM Government, March 2015) document.

Records of safeguarding issues will be kept centrally by the safeguarding team. These will be chronological, factual and kept in accordance with data protection regulations and only accessible by the safeguarding team and Chief Executive. Where relevant, a reference to the record will be logged on (but not stored on) the learner's file. Records will be destroyed after three years.

All records are kept to facilitate 'stacking up'. In line with statutory guidance a safeguarding lead will pass on child protection records to educational establishments to which a learner progresses.

CCTV and content filtering monitoring software

We will use CCTV and content filtering software throughout our buildings to enhance the measures taken to safeguard learners and colleagues.

We will not use CCTV in toilets, showers or changing facilities.

We will use CCTV and content filtering software to monitor the behaviour of colleagues and learners with the view to actively safeguard individuals and respond to any identified risks. This will be done in accordance with the GDPR.

Prevent - our commitment

The purpose of this guide is to provide everyone connected to Paragon Skills with a clear outline of our position with respect to the safeguarding of learners and colleagues under the Prevent Duty.

Prevent is a strand of the Government's counter terrorism strategy CONTEST. Paragon Skills is, via its levels of engagement with learners of all ages and from a variety of cultural and ethnic backgrounds, able to contribute towards the aim of preventing individuals from being drawn into terrorism or extreme violence.

As an education and training provider, Paragon Skills has a statutory duty to prevent people being drawn into terrorism under the Counter-Terrorism and Security Act (2015). We meet these obligations through considering radicalisation and extremism as a safeguarding matter. We provide training to our colleagues and support partners to recognise where learners or peers may be at risk of being drawn into radical or extreme behaviour as part of our overall approach to safeguarding.

Objectives

As part of Paragon Skills' approach to equality and inclusion, safeguarding and the promotion of fundamental British values, we will:

- Promote fundamental British values by ensuring that there is a culture of equality and inclusion within our delivery.
- Provide the opportunity for learners to explore what British values mean to them.
- Challenge segregation, radicalisation and discrimination and promote cohesion and build learner resilience with the aim of our learners and colleagues contributing actively to an inclusive society.
- Operate a clear and consistent anti-bullying approach which challenges harassment and discrimination and enables learners and colleagues to feel safe and supported.
- Provide support, advice and guidance for learners and colleagues who may be at risk of radicalisation. This may include referral to safeguarding hubs or Channel, the process by which multi-agency support is provided to individuals who are at risk of being drawn into terrorism. This forms part of our safeguarding arrangements.
- Ensure that colleagues, learners, partners and clients are aware of their roles and responsibilities in preventing radicalisation and extremism.
- Have a leadership team which actively promotes the core values of shared responsibility and well-being for learners and colleagues by ensuring that these are at the heart of everything that we do.
- Facilitate safe space discussions which enable our learners to develop their own knowledge and understanding of British values.
- Operate a Prevent risk assessment which informs a Prevent action plan. This will be reviewed and updated quarterly with updates being provided to the Board. This risk assessment will be overseen by the safeguarding leads with the includED task group, the Senior Leadership Team and Colleague Voice taking an active role in its review.

Levels of responsibility

This guide is under Board governance and is reviewed annually by Paragon Skills and also through the Board cycle every year.

Paragon Skills' Safeguarding and Welfare Manager is the company's Prevent officer. Safeguarding leads will deputise as required.

Safeguarding managers are responsible for understanding the Prevent priorities in the areas in which their teams operate and appraising their team of this information through quarterly updates. They will build their own understanding and local knowledge through their attendance at local network meetings as defined below:

Safeguarding Manager	Region Covered	Prevent network
Andrew Johnson	North Yorkshire	York/Durham
Jakki Ashford	South and East Yorkshire	Sheffield
Niki Husher	Dorset, Devon and Cornwall	Bournemouth/Poole/Gloucester
Eleanor Ash	West Midlands	Birmingham/Telford
Gary Carney	North West	Manchester/Liverpool
Operations Manager (Bournemouth and Fareham)	Dorset and Hampshire	Fareham/Dorset
Kerry Berry	Somerset and Gloucestershire	Bristol/Portsmouth
James Phillips-Hicks	South and London	Bedford/Luton/South London
Jan Newbould	Wiltshire and Oxfordshire	Swindon/Oxford
Michelle Anstee	Leicestershire	Leicester/Nottingham
Kevin Bridgwood	North West	Preston/Blackburn
Lisa Hampshire	East Midlands	Peterborough/Stoke-on-Trent/Stafford
Kellie Cope	South East	Brighton/Ashford

The Prevent officer and safeguarding leads are responsible for making all decisions regarding referrals to local authority safeguarding hubs for consideration under Channel panels. Channel focuses on providing support at an early stage to people who are identified as being vulnerable to being drawn into terrorism. The programme uses a multi-agency approach to protect vulnerable people. Panels are held at local authority level. The panel is made up of statutory partners who decide the best route for supporting the individual who has been referred to them as being vulnerable to extremism.

The includED task group will be responsible for driving the development of teaching and learning activities and self-study resources.

- All colleagues should be vigilant to extremist behaviour as a wider part of their safeguarding duties and report their concerns to the safeguarding team in line with our wider safeguarding reporting procedures (see the 5 Rs).
- Learner facing colleagues will deliver learning and assessment which reflects fundamental British values.
- We will seek to actively safeguard all learners and provide welfare support at the point of need for learners identified to be at risk of harm as defined within Keeping Children Safe in Education (2019).
- We will implement anti-bullying strategies and challenge discriminatory behaviour. We will challenge banter and recognise this as the potential to be peer on peer abuse.
- We will respond to identified community needs.
- We will actively narrow the achievement gap between different groups of learners.
- We will promote a culture of vigilance and operate a whistleblowing procedure which includes reference to the Prevent agenda.

Teaching and learning

Paragon Skills provides a curriculum that promotes fundamental British values with the view to encourage learners to participate in their local communities and use their voice to make positive changes. This will be done using the approved resources provided by the includED task group.

We will take every available opportunity to match our curriculum to both local and national priorities whilst offering learners the opportunity to develop critical thinking skills.

We will use topical and relevant examples to stimulate thinking and actively tackle discrimination and radicalisation.

Learners will be encouraged to explore fundamental British values in a safe and supportive environment, without fear of discrimination via safe space discussions. All learners will be provided with an appropriate level of self-study activity focusing upon the risk posed by radicalisation and extremism as an additionality to their programme.

Use and monitoring of information and communication technology (ICT)

ICT equipment provided to both colleagues and learners is subject to monitoring to enable us to enact our safeguarding responsibilities. In addition to monitoring, filters are applied to Paragon Skills systems which will restrict access to harmful content. A log will be kept and reviewed to enable patterns of inappropriate access to be identified and challenged. This log will be overseen by the Head of IT and areas of concern raised with the safeguarding team.

Colleagues identifying inappropriate use will report this to a safeguarding manager to enable this to be investigated for safeguarding purposes.

Paragon Skills operates an E-safety guide which reflects the requirements placed upon us by the Prevent Duty, this forms a part of this guide.

Managing and responding to risk

We will ensure that there is a shared understanding amongst colleagues and learners as to the risks posed within the training environment by extremist behaviour. We will raise awareness through formal induction training for all colleagues as a part of wider includED self-study activity, annual refresher self-study activity and through quarterly Prevent focused Safeguarding Guides.

Steps will be taken to mitigate the risk posed to colleagues/learners by individuals vulnerable to radicalisation on a case by case basis through the risk assessment process.

Referrals to Channel will be made on a case by case basis and with consideration being made to the need for a multi-agency approach in advance of any referrals. The relevant local authority safeguarding team will be consulted, along with the DfE Prevent Coordinator in advance of any referrals to Channel.

We will operate a critical incident management plan in dealing with terrorist related incidents. This will form part of our Disaster Recovery Plan and ensure that there are plans in place which respond to any direct threats within our buildings. Key colleagues will be trained in ACT (Action Counters Terrorism).

Risk assessments will be undertaken on any external speakers and clear guidance will be issued as to levels of acceptable behaviour whilst on site. Where available, scripts will be approved before delivery to ensure that the content is consistent with fundamental British values and our approach to safeguarding.

We have zero tolerance to racism, discrimination, religious or cultural intolerance and indifference and will treat these as safeguarding matters.

Relevant display materials, including externally produced leaflets and posters, will promote fundamental British values and have due consideration to the Equality Act. We will promote this ethos with our clients and partners.

Paragon Skills will only promote its services within organisations that share its values for the need to safeguard, promote equality and prevent extremist behaviour. Where required, risk assessments will be undertaken to consider the appropriateness of venues before agreements are made to provide training to individuals within that organisation. We will risk assess all external speakers and sub-contractors to ensure that they are compliant with this guide.

The culture of vigilance extends to our external relationships. Where customers with whom Paragon Skills is engaged are found to be either in breach of the Equality Act or advocating extremist views or behaviour, this will be addressed as a safeguarding issue by a safeguarding manager with support from a safeguarding lead.

Training

The safeguarding leads will complete Home Office on-line and Channel Awareness training. Directed CPD will be provided to safeguarding managers by the Safeguarding and Welfare Manager and formal annual refresher self-study activity will be provided to all colleagues.

New colleagues will undertake Home Office Prevent on-line training as part of their EDucation pack when they commence with Paragon Skills. This will be refreshed annually and supported by directed CPD delivered by safeguarding managers at team meetings through resources such as includED bi-monthly snippets and our quarterly dedicated Prevent focused Safeguarding Guides which are accompanied by interactive knowledge consolidation activities.

Mandatory safeguarding training will equip colleagues with the ability to recognise signs that a learner or colleague might be on the path to becoming radicalised and outline the process by which concerns should be raised. This will be delivered face to face as part of the Corporate Induction day.

All training will be refreshed annually or as required by legislation.

Paragon Skills will actively promote our Prevent Duty to colleagues and learners alike and ensure that a wide range of colleagues are involved in Prevent risk assessment.

Customers and partners

The Safeguarding and Welfare Manager will link with the DfE Prevent Coordinators in the areas in which we operate.

Safeguarding managers will work with local Prevent Partnerships to ensure that they are aware of the Prevent priorities for the area in which they operate. They will attend at least one network per year in their area of operation.

Where Paragon Skills operates within a Prevent priority area, information sharing relationships will be developed with Prevent partners; this will include where possible accessing Counter Terrorism Local Profile information.

Multi-agency support will be sought as part of our approach to Early Help for any individual felt to be at risk from or vulnerable to extremism.

E-safety - our commitment

Paragon Skills recognises the benefits and opportunities which new technologies offer to teaching, learning and business execution. We provide ICT and internet access to learners and colleagues and encourage the use of technologies in order to enhance skills, promote achievement and enable lifelong learning.

Objectives

This guide explains our approach to E-safety and how colleagues and learners should behave when using systems and equipment provided to them by Paragon Skills.

Scope

The accessibility and global nature of the internet and different technologies available mean that we are aware of potential risks and challenges associated with internet use.

Our approach is to implement appropriate safeguards within the Academies and wider operation, whilst supporting colleagues and learners to identify and manage risks independently and with confidence.

Furthermore, we expect our partner organisations to demonstrate practices and culture which meet with the standards laid out within this guide. We believe this can be achieved through a combination of security measures, training, guidance and implementation of our wider policies.

Use of ICT

Paragon Skills is committed to achieving the principles of the GDPR. Information Communication Technology (ICT) and Information Technology (IT) systems will be provided which contribute towards these aims. Further information on the steps enacted by Paragon Skills to protect the data provided to us by data subjects can be found in our Data Protection policy.

Colleagues and learners are not permitted to use software or any other method of interfering with any of the company's computer equipment.

Colleagues and learners are not permitted to download software or install any software onto the company's computer system except on advice from a member of the IT department.

Much of the material on the internet is protected by copyright laws and therefore the company, the colleague and the learner could be liable under civil and criminal law for any unauthorised copying. It is expected therefore that individuals are mindful of copyright when undertaking to use the internet.

Paragon Skills has the right to review all files and records and the right to periodically monitor, audit or review network, workstation, internet and e-mail use on the company network. This extends to both colleagues and learners and will be notified to users via a privacy statement.

Use of the internet

Where appropriate, the use of the internet is encouraged as part of official, professional and learning activities. It is recognised as a source of up-to-date information and provides guidance on a number of business and vocational related matters. Internet access is provided for business and learning purposes only, not personal use.

The IT department will review internet activity and analyse usage patterns, and may choose to perform detailed analysis of the data to assure that the network and internet access are devoted to maintaining the highest levels of productivity and security.

Paragon Skills prohibits the use of unauthorised sites. If colleagues find the network accidentally connected to a site that contains sexually explicit, radical, extremist or offensive material, they must disconnect from that site immediately, regardless of whether that site has previously been deemed acceptable by any screening or rating program. All such circumstances must be reported to a line manager.

Use of the internet and ILT (instructor led training) by our learners is encouraged. Paragon Skills provides internet access to learners within the Academies and access to web based learning management systems to further their learning and development through the provision of learner networks and bring your own device (BYOD) approaches. We will provide appropriate education to ensure that our learners have the tools to protect themselves from potential risks of harm during such activities. Furthermore, learners will access the learner network using personalised log ons. Monitoring of the usage of the learner network will allow for at risk learners to be identified based upon their internet access.

Virus protection procedures seek to prevent the introduction of virus contamination into the Paragon Skills network. Unauthorised software including public domain software, magazine cover discs/CDs, USB memory sticks, external hard drives, or internet/world wide web downloads must not be used.

Levels of responsibility

This guide is under Board governance and is reviewed annually by Paragon Skills and also through the Board cycle every year.

All colleagues are responsible for ensuring the safety of learners and should report any general concerns about their E-safety in line with our Safeguarding Guide to a safeguarding manager.

The E-safety officer is the company's designated safeguarding lead (DSL). The E-safety officer is responsible for keeping up to date with new technologies and their use, as well as attending relevant training. They will coordinate colleague development and training, record incidents, report any developments and incidents to the Board and liaise with the local authority and external agencies as required in line with Safeguarding and Prevent Guides.

The includED task group will be responsible for driving the development of includED teaching and learning activities.

Managing and responding to risk

Colleagues should be particularly mindful that technology is used by young people that are at risk of harm or engaging in criminal or risk taking behaviours. This includes viewing sexualised imagery of children, county lines activity, viewing or engaging in extremist narrative and grooming behaviour.

Use of personal social networking

Personal social networking should be used by colleagues with due diligence.

Information once published, eg photographs, blog posts, is impossible to control and may be manipulated without consent, used in different contexts, or further distributed.

Colleagues should ensure appropriate security settings are applied so access to their profile is limited to those explicitly given access to do so.

Colleagues should also refer to Our Guide to Social Media.

Inappropriate use

Unauthorised or inappropriate use of the ICT systems may result in disciplinary action which could lead to dismissal.

Violations of this guide may subject the individual to disciplinary and/or legal action as may be deemed necessary.

Teaching and learning

Learners must act safely and responsibly at all times when using the ICT and ILT provided to them by Paragon Skills. We will provide them with an education which develops their ability to meet this requirement.

Alongside this, learners using BYOD or the learner network will be issued with a privacy statement and acceptable usage guidance on internet use with which they are expected to comply. They will be made aware that their usage is being monitored for safeguarding purposes.

We operate safe surfing and monitor and restrict access to harmful sites within our Academies. Academy based learners will be introduced to such E–safety mechanisms as a part of their induction. This will include a privacy statement outlining how personal data will be used for the purposes of safeguarding.

Learners are responsible for participating in E-safety education as part of the curriculum. This will be delivered using the approved resources provided by the includED task group. All learners will be provided with an appropriate level of self-study activity focusing upon E-safety as an additionality to their programme.

Learners will be briefed on safeguarding reporting procedures and encouraged to report any concerns that they may have about themselves or another learner in relation to E-safety.

All learners must know what to do if they have E-safety concerns and who to talk to. In most cases, this will be their Personal Tutor or Tutor.

Training

To support colleagues to safeguard the learner and in addressing E-safety matters with learners as part of includED, they will be provided with training and directed Continuing Professional Development in E-safety matters. This will be embedded into includED induction training for new colleagues and into the formal includED annual refresher self-study activity. Colleagues will also receive regular includED CPD and learning consolidation activities on E-Safety matters through bi-monthly snippets and Safeguarding Guides delivered by safeguarding managers at team meetings.

Annex A - Safeguarding training and accountabilities

Position	Accountabilities	Training provided
Directors and Board members	To ensure that robust policies and procedures are in place which seek to minimise the risk of harm posed to our learners.	Introductory briefing Annual update
Chief Executive Officer	To ensure that the policies and procedures are implemented and followed and that sufficient time and resources are allocated to these. Responsible for leading any investigation into disclosures, supported by the Head of People, where these are related to harm posed to learners by any member of Paragon Skills. Vigilance.	Introductory briefing Annual update self-study activity
Regional Operations Directors (RODs)	To ensure sufficient time is allocated within the operation to implement safeguarding procedures. To report any allegation of abuse by a Paragon Skills colleague to the CEO. Vigilance.	Introductory briefing EDucation pack Level Three Annual update self-study activity
Head of People (designated safeguarding lead)	To undertake the strategic responsibilities as laid out in annex A of Keeping Children Safe in Education (2019) at Senior Leadership Team level. To brief the Board. To receive disclosures of abuse or risks of harm or to a learner's welfare and to seek to mitigate these risks through a process of investigation and risk management. To report any allegation of abuse by a Paragon Skills colleague to the CEO. To lead the internal investigation into any allegations of abuse by a Paragon Skills colleague. To mentor safeguarding managers.	Introductory briefing EDucation pack Level Three Annual Refresher
Safeguarding and Welfare Manager (safeguarding lead)	To undertake the day to day responsibilities laid out in annex A of Keeping Children Safe in Education (2019). To receive disclosures of abuse or risks of harm or to a learner's welfare and to seek to mitigate these risks through a process of investigation and risk management. To report any allegation of abuse by a Paragon Skills colleague to the CEO and the Head of People. To support the internal investigation into any allegations of abuse by a Paragon Skills colleague. To report to the Board any safeguarding incidents or risks to learners or the company. To write and deliver safeguarding training, CPD and support to colleagues at all levels across the business.	Introductory briefing EDucation pack Level Three Annual refresher self-study activity Monthly CPD

	To mentor safeguarding managers. To act as the company's Prevent and E-safety officer. Vigilance.	
Safeguarding leads	To provide colleagues with information, advice and guidance related to safeguarding matters and concerns. To make decisions regarding the requirement to seek Early Help for vulnerable learners. To make decisions regarding the need to action a local authority safeguarding referral. To mentor safeguarding managers. To make decisions regarding the need to action referrals to Channel.	Introductory briefing EDucation pack Level Three Annual refresher self-study activity Monthly CPD
Operational Managers (OM) (safeguarding managers)	To support their direct reports to undertake mandatory safeguarding training. To facilitate the delivery of monthly safeguarding CPD to their reports. To signpost their reports to a safeguarding lead where a learner is felt to be at risk or harm or in need of welfare advice and guidance. To operate in line with safer recruitment practices. To report any allegation of abuse by a Paragon Skills colleague to the CEO. To report all disclosures of abuse or risks of harm to a learner to a safeguarding lead. To complete mandatory safeguarding training to level three. Vigilance.	Introductory briefing EDucation pack Level Three Annual refresher self-study activity Monthly CPD
Personal Tutors and Tutors	To check on the learner's welfare at each visit/point of contact. To provide safeguarding teaching and learning opportunities to learners. To facilitate safe space discussions based on includED topics. To raise any concerns regarding the learner's welfare to the safeguarding manager. To report all disclosures of abuse or risks of harm to a learner to a safeguarding manager. To report any allegation of abuse by a Paragon Skills colleague to the CEO. To complete all mandatory safeguarding training and to participate in monthly CPD as provided by their OM. Vigilance.	Introductory briefing EDucation pack Annual refresher self-study activity Regular CPD

Support functions/ all other colleagues	To be mindful of safeguarding and the potential for our learners to be at risk of harm. To raise any concerns that they may have regarding the welfare or risk of harm posed to a learner to a safeguarding lead. To report any allegation of abuse by a Paragon Skills colleague to the CEO. To complete all mandatory safeguarding training. Vigilance.	Introductory briefing Annual CPD
Contractors and temporary colleagues (regulated activity)	To provide safeguarding teaching and learning opportunities to learners. To raise any concerns regarding the learner's welfare to the OM. To report all disclosures of abuse or risks of harm to a learner to a safeguarding lead. To report any allegation of abuse by a Paragon Skills colleague to the CEO.	Safeguarding process briefing delivered by the manager

Appendix 1 - Terms of reference for includED task group

Purpose

The primary purpose of the task group is to:

- Lead and drive the delivery of the equality and inclusion, safeguarding, Prevent and e-safety strategies.
- Analyse, challenge and shape the includED culture of Paragon Skills and its partners with the support of regional colleagues and Senior Leadership Team.
- Identify and contribute to the design of continuing professional development materials on includED for colleagues.
- Lead task and finish groups on behalf of the Senior Leadership Team which improve includED outcomes for learners; with a particular focus on impacting the learner and their personal behaviour and making a positive contribution to the community.
- Support the development of includED resources.
- Monitor and challenge recruitment, progression and success rates of under-represented groups of both colleagues and learners through the analysis of includED impact measures (IIMs).

The group is accountable to Executive Team via the chair. It works on behalf of the Senior Leadership Team, with delegated authority to shape, drive and implement agreed actions and provide appropriate challenge. The group will meet tri-annually.

Priorities are business driven, set at a corporate level by the group, who work to continuously and positively impact the experience of learners.

Key priorities are to ensure all colleagues:

- Understand the includED strategies and how their role contributes to them.
- Have the knowledge and skills to operate effectively and in a way that has a positive impact upon the learners' experience.
- Understand the behaviours required of them, in line with organisational culture and values.

Membership

Members are accountable for owning and delivering includED strategies (via the Senior Leadership Team) and within their own department/team, implementing agreed actions.

Membership includes representatives from the following key business areas:

- Operations
- Quality
- People Team

Chairperson

The chair of the Group is Niki Husher. In Niki's absence, the deputy chair of the group is Jakki Ashford. The chair is accountable to the Executive Team for the success of the group, including its measurable outputs.

Key responsibilities

The responsibilities of the Group focus on owning and delivering the includED strategies, on behalf of the Executive Team. The strategies will focus on the following key areas:

- Positively impacting the personal development, behaviour and welfare of the learner.
- Meeting legislative requirements of safeguarding, Prevent and equality and measuring impact of includED.
- Developing a confident and competent team of people that are committed to and demonstrate a positive includED culture.
- Monitoring of marketing and communication tools to ensure reflection of inclusive values.

Outputs

- Recommendations and challenges to the Executive Team and Senior Leadership Team.
- Resources for delivery including bi-monthly snippets and customer awareness tools.
- Performance reporting of under-represented groups through IIMs.
- The production of training and CPD for colleagues.

Arrangements

- Meetings will be held on a tri-annual basis.
- If urgent advice or decisions are required, these may be approved by email outside of the formal meeting.
- Effective representation is required from each division; if members are not available any input should be agreed with another member or the chair in advance.
- If items are deemed to be confidential this will be communicated to the group in advance or at the end of the meeting and adherence to this will be expected.

Appendix 2 - Safeguarding reporting procedure – The 5 Rs

Recognition

Recognition covers both disclosures of abuse and your personal concerns about a learner's welfare.

- A disclosure of abuse is likely to be direct.
- A wider safeguarding concern for a learner may arise from either a conversation or a change in a learner's behaviour which causes you to become concerned for their welfare or well-being.

Response

When faced with a disclosure:

- Do not interview - just **listen and clarify** if necessary. Remain calm and professional.
- **Inform** the person that the concerns raised must be recorded and passed on to the safeguarding team.
- **Reassure** the person that they have done the right thing in reporting their concerns and that you will do everything you possibly can to help.
- Do not make unrealistic promises around confidentiality.

When faced with a wider safeguarding or welfare issue:

- Approach your safeguarding manager and discuss the next steps with them – this may include monitoring the situation or seeking further advice and guidance from the Safeguarding and Welfare Manager or a safeguarding lead.
- Consider the need for intervention or Early Help. Your safeguarding manager will advise you on this.
- Use the premise of 'stacking up' to inform next steps in conjunction with your safeguarding manager.

Reporting

All disclosures of abuse or risk of immediate harm must be urgently reported to a Safeguarding lead, by phone. DO NOT DISCUSS DISCLOSURES OF ABUSE WITH ANYONE ELSE.

With the safeguarding manager's agreement report any welfare concerns as soon as practicably possible, but before the end of the working day by submitting the reporting form.

Record

Using the safeguarding concern and incident report form record precisely what has been alleged/happened - use the words of the learner and record factual information only.

Referral

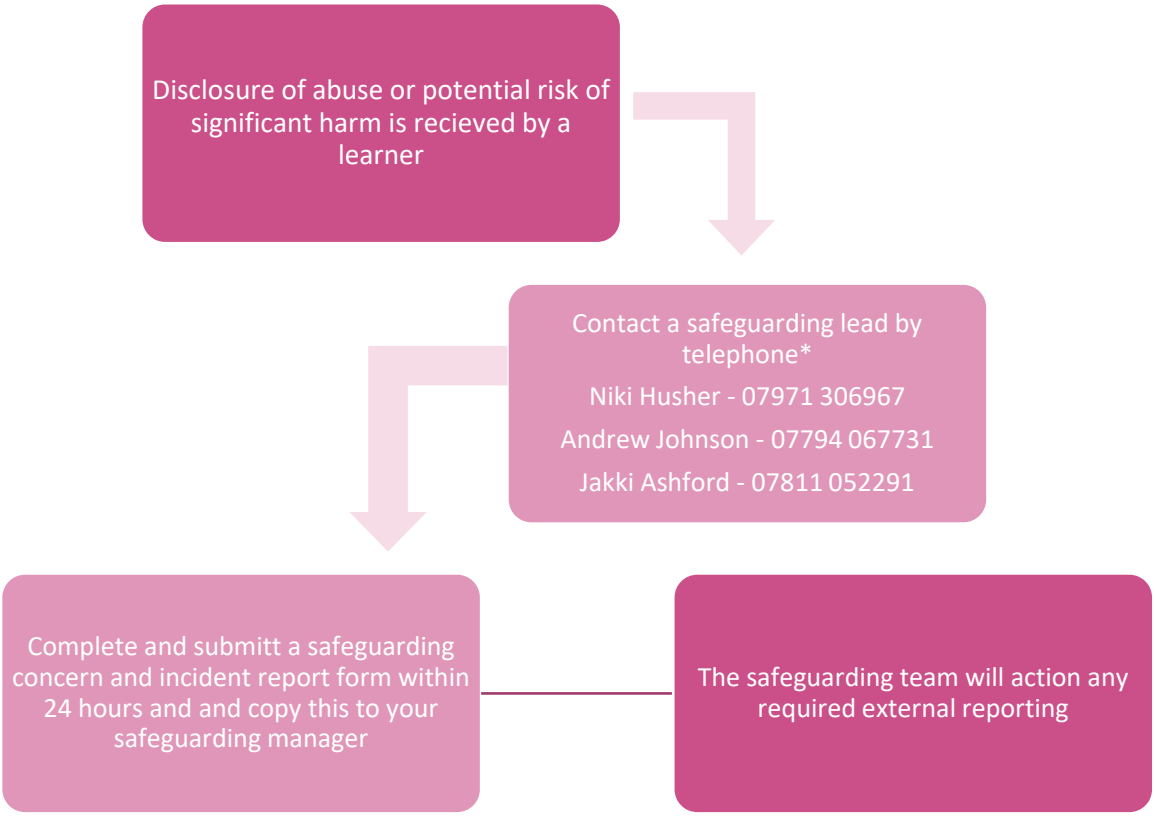
Anyone is able to make a referral to Social Care or the Police, where there is a significant and immediate risk to the learner. This should, however, be notified to the safeguarding team for the purposes of stacking up. Any intention of referral must be notified to the individual concerned and, unless it would jeopardise the safety of the child, to their parent/carer.

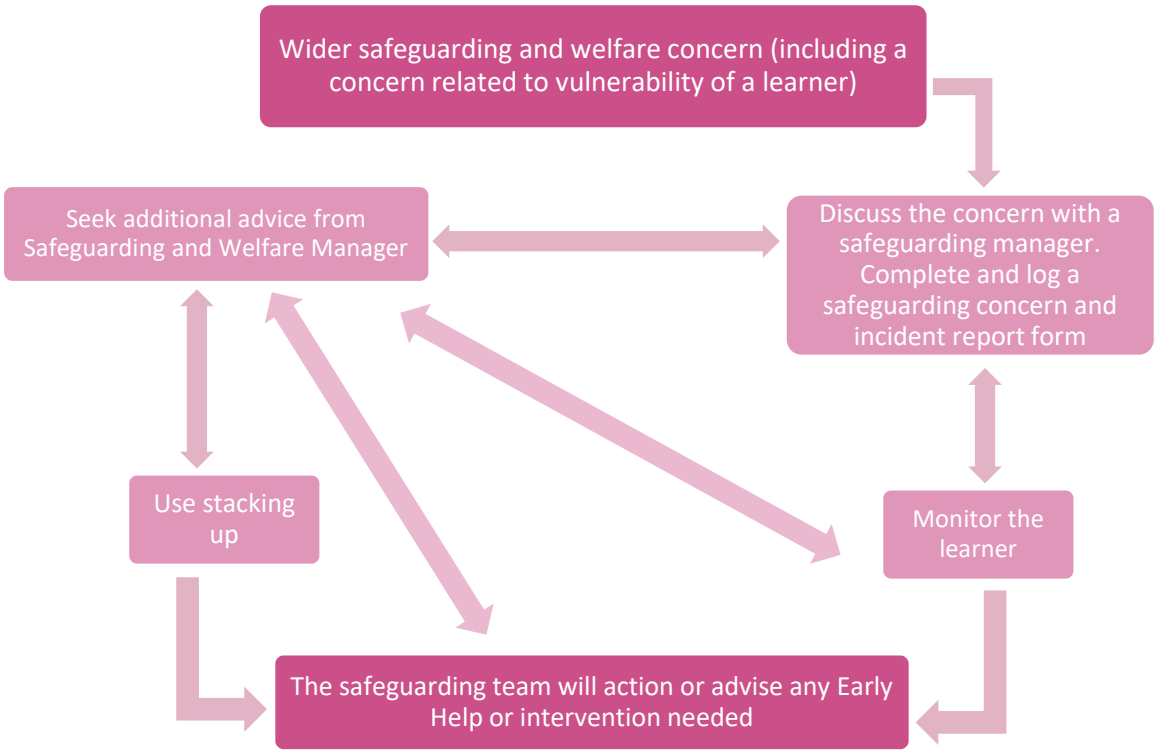
No one at Paragon Skills is in a position to decide whether abuse has taken place.

Responding to an immediate risk of harm

* let the learner know that you will be passing on the concern and reassure them that they have done the right thing by telling you.

Responding to disclosures



* let the learner know that you will be passing on the concern and reassure them that they have done the right thing by telling you.

Responding to a wider safeguarding concern or a welfare issue