

## ELA TRAINING SERVICES

# Safeguarding Policy

### Key Elements

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This document sets out the responsibilities and expectations for all employees of The ELA Group in relation to and promoting the health, safety, wellbeing, ethical and professional conduct and safeguarding of all stakeholders of the ELA Group.

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Implementation is monitored by the Managing Director and supported by the board of Directors.

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**Agreed by:**  
Inderjot Singh,  
Managing Director,  
ELA Group

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**Directors' statement of commitment to an unbiased, non-partisan, non-discriminatory and ethical workplace.**

The Directors of the ELA Group wish to make it clear that the propagation of extremist religious views, partisan political views and discriminatory practices by employees and stakeholders will not be tolerated.

All employees are expected to offer a balanced presentation of views and opinions to learners while carrying out their duties and taking part in extra-curricular activities that are provided or organised by or on behalf of the ELA Group, including through the distribution of promotional materials. Extremist religious views, partisan political views and discriminatory practices by employees and stakeholders **MUST** be reported and dealt with robustly.

We take our commitment to providing an unbiased, non-partisan, non-discriminatory and ethical workplace seriously. Failure to observe the above could lead to disciplinary action (including summary dismissal) and referral to government, regulatory organisations and education authorities.

ELA Training Services is committed to protecting the health, safety and welfare of our stakeholders. It is our policy to ensure, as far as is reasonably practicable, that all required tasks and activities are carried out with the minimum of risk to all of our stakeholders.

Taking advice from policies like Keeping Children safe in Education (Sept 2018) and No Secrets guidance (2015), we have including all relevant polices into our Safeguarding Policy so as to make this document as comprehensive as possible.

## 1. Introduction

We define **stakeholders** as everyone who is, or is perceived to be affected by the operations of ELA Training Services. This especially includes and is not restricted to **employees, vulnerable people, children and young people** with whom our work brings us into contact. We define vulnerable people as people who are or may be for any reason unable to take care of themselves, or unable to protect themselves against significant harm or exploitation. **We make it clear that although most of the procedures and guidelines are designed to be used by ELA Training Services staff to safeguard ELA Training Services learners, the procedures and guidelines are also intended to be used with reasonable discretion by stakeholders to protect other stakeholders.**

In the context of child protection, **children and young people** refers to anyone under 18 years of age. It is the responsibility of everyone at ELA Training Services to promote the protection of all stakeholders, especially vulnerable people, children and young people.

We define **Safeguarding** as the action we take to promote the welfare of stakeholders and protect them from harm. It means caring for learners appropriately and protecting them from that which is not in their best interests. It includes the health and safety, protection and pastoral care of children and vulnerable people. Connected to safeguarding is the phrase '**Duty of Care**'; there is a legal responsibility that all employees who work with stakeholders have a duty to look after them properly; children and vulnerable people especially depend on adults for their safety and well-being.

ELA Training Services acknowledges the duty of care to safeguard and promote the welfare of children and young people, and is committed to ensuring that our safeguarding practice reflects our statutory responsibilities and government guidance, and complies with best practice and regulatory requirements. This policy recognises that the welfare and interests of children and young people are paramount in all circumstances. It aims to ensure that regardless of age, gender, religion or beliefs, ethnicity, disability, sexual orientation or socio-economic background, all people are equally regarded, and their right to protection from harm or abuse is consistently upheld.

ELA Training Services is committed to safeguarding the welfare of ELA Training Services stakeholders and has developed this Safeguarding Protection Policy and Procedure to support all stakeholders in putting into practice this commitment.

This policy establishes the roles and responsibilities of everyone who works for ELA Training Services in relation to the protection of all stakeholders, especially vulnerable people, children and young people with whom their work brings them into contact.

In following this policy, staff are always expected to maintain a sense of proportion, apply common sense to situations and protect the child's welfare as priority. This policy is based on, and reflects, the principles of both UK legislation and guidance and other relevant ELA Training Services policies and procedures. The approach has been developed in such a way as to be consistent with 'Best Practice' within the field of safeguarding.

It is also the duty of ELA Training Services to ensure that persons are not placed in situations where abuse might be alleged. It is not intended that the policy should restrict staff from normal ways of working, but Trainers/assessors and Members of Staff always need to consider how an action or activity may be perceived as opposed to how it is intended.

ELA Training Services promote well-being by applying principles of good practice by undertaking to:

- Treat stakeholders with care, respect and dignity
- Recognise that those working for ELA Training Services will be perceived by stakeholders and young people as trusted representatives of ELA Training Services
- Ensure communication with stakeholders is open and clear
- Assess the risks to stakeholders of its activities

ELA Training Services will fulfil our local and national responsibilities as laid out in the following documents:

1. The Procedures of the Borough of Hounslow's Safeguarding Boards(Jan 2018)
2. Keeping Children Safe in Education: Statutory guidance for schools and colleges (DfE Sept 2018)
3. The Data Protection Act (2018)
4. The General Data Protection Regulation (GDPR) (Regulation (EU) 2018)
5. No Secrets (2015)
6. The Prevent Duty (March 2016) as part of the Counter-Terrorism and Security Act (2015)
7. Working Together to Safeguard Children (DfE 2015)
8. Mental Health and Behaviour in Schools: Departmental Advice (DfE 2014)
9. The Education Act 2002 s175 / s157

## 2. Application of this Policy

This policy and procedures are widely promoted and are mandatory for everyone involved in ELA Training Services: for ELA Training Services staff and trainers/assessors and stakeholders.

**ELA Training Services is committed to safeguarding the welfare of every Guardianship child in its care and all adults associated with our organisation will be expected to share our ethos and actively engage in looking after children and young people safely.**

**The ELA Training Services Safeguarding Policy and Guidance is known to all trainers/assessors.**

Failure to comply with the policy and procedures will be addressed without delay and may ultimately result in dismissal/exclusion from the organisation.

## 3. Policy Aims

- To provide protection for the stakeholders and young people who receive ELA Training Services' services, including the stakeholders of our trainers/assessors via the learner code of conduct.
- To provide ELA Training Services staff, trainers/assessors and their families with guidance on procedures they should adopt in the event that they suspect a child or young person may be experiencing, or be at risk of harm.

## 4. ELA Training Services Safeguarding Principles

**We will seek to safeguard stakeholders and learners by:**

- valuing, listening to and respecting them;
- adopting safeguarding guidelines through procedures and a code of conduct for staff, trainers/assessors and stakeholder;
- promoting and prioritising the safety and wellbeing of stakeholders, children and young people;
- recruiting staff and trainers/assessors safely, ensuring all necessary checks are made, preventing the employment/deployment of unsuitable individuals;

- sharing information about safeguarding and good practice with ELA Training Services Guardianship stakeholders, employers, staff, trainers/assessors and their families;
- sharing information about concerns with agencies who need to know, and involving employers and stakeholders appropriately;
- providing effective management for ELA Training Services staff and trainers/assessors through supervision, support and training;
- providing a safe and secure environment for all stakeholders;
- ensuring all stakeholders are safe and secure and protected from harm;
- ensuring that all ELA Training Services Guardianship stakeholders know who to turn to for help, advice or support, and have access to 24-hour support;
- appointing a Designated Safeguarding Lead (**DSL**) who has overall responsibility for the safeguarding and welfare of all ELA Training Services Guardianship stakeholders;
- ensuring that everyone understands their roles and responsibilities in respect of safeguarding and is provided with appropriate training to recognise, identify and respond to signs of abuse, neglect and other safeguarding concerns relating to stakeholders and young people;
- ensuring that all staff and trainers/assessors follow ELA Training Services policies and procedures relating to safeguarding and welfare and are aware of who in ELA Training Services is responsible for safeguarding;
- ensuring that the relevant persons are aware of the special needs or particular vulnerabilities of individual ELA Training Services stakeholders;
- ensuring appropriate action is taken in the event of incidents/concerns of abuse and support provided to the individual/s who raise or disclose the concern;
- ensuring that confidential, detailed and accurate records of all safeguarding concerns are maintained and securely stored.



## 5. ELA Training Services staff roles and responsibilities

**At ELA Training Services safeguarding is everyone's responsibility.** Within ELA Training Services, the Directors oversee the day to day welfare and safeguarding matters, placement of ELA Training Services learners with assessors/trainers, induction and recording systems.

Chris Kistan (Director) is the Designated Safeguarding Lead (**DSL**) and has responsibility for implementing the ELA Training Services Safeguarding Policy. Chris Kistan is trained to Level 3 in Safeguarding. The (**DSL**) is responsible for reporting any allegations of abuse and concerns that occur to the relevant authorities.

## 6. Implementing ELA Training Services' Safeguarding Policy

- ELA Training Services considers it the duty of Trainers/assessors and Members of Staff to protect stakeholders, children and young people from abuse. This is the fundamental element of our safeguarding policy.
- All trainers/assessors and adults in the training environment must understand their responsibilities in being alert to the signs of abuse, and their responsibility for referring any concerns to the **DSL**.
- All trainers/assessors and adults in the training environment must understand the responsibility placed on ELA Training Services for child protection.
- Not all concerns about stakeholders, children or young people relate to abuse, there may well be other explanations. It is important that all concerns are considered in the context of safeguarding.
- It is not a staff member's responsibility to investigate a concern. The responsibility is to act on concerns and take appropriate action according to company procedures.

## 7. Confidentiality and Appropriate Disclosure of Information

Records of Concern and Incident Reports must be used as detailed in their protocols. Confidentiality is crucial to all our relationships, but the welfare of the stakeholder, child or young person is paramount. Confidentiality cannot be maintained if the withholding of information will prejudice the welfare of the child.

All information that has been collected on any child will be kept locked and secure and access will be strictly limited to the **DSL**. The **DSL** will be responsible for sharing information with the appropriate authorities.

Following advice from organisations and professionals in the field of safeguarding, the **DSL** will make staff particularly aware of any current areas of concern.

## 8. What to do if a person makes a disclosure

**Follow the ELA Training Services' Reporting Protocol on Page \*\*.**

ELA Training Services is committed to ensuring that it meets its responsibilities in respect of safeguarding by treating any allegation seriously and sensitively. Records of Concern and Incident Reports must be used as detailed in their individual protocols.

The Safeguarding Step Response to Disclosure Procedure for ELA Training Services staff is as follows:

- Stay calm.
- Listen to what the stakeholder/child/young person is actually saying.
- Reassure them that they have done the right thing by disclosing.
- Do not promise total confidentiality, as subsequent disclosure could then lead to the stakeholder/child/young person feeling betrayed.
- Explain that you are obliged to inform the **DSL** who may need to involve other authorities.
- Reassure the child that the people who will be informed will be sensitive to their needs and will be looking to help protect them. Inform them that it is not in their interests to keep the disclosure confidential and it will have to be passed on to the appropriate agencies.

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- Make a note of any conversations with the child as soon as possible after the conversation has taken place, giving as much detail as possible, including when and where the conversations took place, and using the **actual words** used by the child.
- Draw a diagram, if appropriate, to show the position of any bruises or marks the child or young person shows you, trying to indicate the size, shape and colour.
- Keep all records factual. Be aware of not making assumptions or interpretations of what the child/young person is telling you. Store all records securely.
- **Do not interrogate** the child, or push for more information. Ensure that any questions asked are open, not leading or closed questions.
- Discuss your concerns with the **DSL** who will report this information to an appropriate agency (the Designated Officer previously called the Local Authority Designated Officer-LADO).
- The person to whom the disclosure was made should ensure that the stakeholder/child/young person who has disclosed the information is informed about what will happen next, so they can be reassured about what to expect.
- You may report your concerns directly to you local Designated Officer if you are not satisfied with the response from ELA Training Services. You will find contact details for your local Social Care Referral and Assessment Team online. The details will be on your Local Council website.

### Allegations against under 18s

Due to the nature of ELA Training Services' business practice, some stakeholders, children and young persons may need additional support, as it is possible that their employers, guardians or parents will be overseas.

## ELA Training Services' Safer Recruitment Policy and Procedures for Staff

Adoption Date	Updated	Review Date	Director
10/2018	03/2020	03/2021	Chris Kistan

### Introduction

ELA Training Services is committed to recruitment procedures and practices which aim to prevent the appointment of people who may pose a risk to children. The robust screening of applicants is proven to act as a deterrent for offenders seeking employment with access to vulnerable people in order to harm them.

### DBS (Disclosure and Barring Service)

The work of ELA Training Services is classified by the government as regulated activity. This is the term most commonly used to describe roles where a suitability/criminal records check is required – roles involving responsibility for or substantial access to under 18s. In broad terms, regulated activity is any position that has direct contact with children. Any person that is engaged in 'regulated activity' as defined by the Safeguarding Vulnerable Group Act 2006 (England&Wales) and parallel laws in Scotland and Northern Ireland requires an enhanced disclosure check.

ELA Training Services ensures that every person working within ELA Training Services and having access to information about children have a current, clear and valid Enhanced DBS check, registering annually for the update service.

### Recruitment

- Job descriptions include reference to ELA Training Services' commitment to safeguarding the welfare of every child and young person in its care, and all adults associated with our organisation will be expected to share our ethos and actively engage in looking after our stakeholders, children and young people safely.
- Two references are requested. References will be followed up and referees will be asked whether there is any reason not to engage the applicant where they have substantial access to under 18s. Follow up phone calls are made to verify the references.
- ELA Training Services will seek a full employment history for prospective staff and reserves the right to approach any previous employer. All gaps in CVs must be explained.

- Proof of identity and qualifications are required (original documents will be checked at interview).
- Interview questions will explore a candidate's attitude to working with under 18s.
- Interview questions about disability and health will be asked in order to establish whether there may be any physical or mental obstacles to trainers/assessors fulfilling their specific role that cannot be overcome.
- The interview panel will always include a staff member who has completed the current DfE Safer Recruitment in Education e-learning module.

### Induction

- ELA Training Services is responsible for ensuring that all staff understand their safeguarding responsibilities and are skilled and confident in managing these responsibilities.
- Staff induction includes a detailed description of our policies, procedures, practices and provisions in relation to the safeguarding and welfare of our stakeholders, children and young people.
- Staff are familiarized with relevant reporting lines and communication channels within ELA Training Services to enable them to effectively raise concerns or issues.
- Staff are informed about and expectations for their own conduct.
- Evidence that all induction procedures have been conducted is retained in staff files.

### Safeguarding training

- All ELA Training Services staff have undertake Level 2 safeguarding training.
- The Safeguarding Officer trained to at least Level 3 will keep other staff regularly updated and trained with current safeguarding practices.

### Recruitment of ex-offenders

ELA Training Services will not unfairly discriminate against any applicant for employment on the basis of conviction or other details revealed. ELA Training Services makes appointment decisions on the basis of merit and ability, if an applicant has a criminal record this will not automatically bar him/her from employment with ELA Training Services.

In view of the fact that all positions within ELA Training Services will amount to “regulated positions” within the meaning of the Protection of Children Act 1999 (as amended by the Criminal Justice and Courts Services Act 2000), they are exempt from the Rehabilitation of Offenders Act 1974.

All convictions, cautions, reprimands or final warnings that are not “protected” as defined by the Rehabilitation of Offenders Act 1974 (Exceptions) Order 1975 (as amended in 2013) must be declared when applying for a position at ELA Training Services. Failure to disclose a previous conviction may lead to:

- an application being rejected or, if the failure is discovered after employment has started, may lead to summary dismissal on the grounds of gross misconduct; a failure to disclose a previous conviction may also amount to a criminal offence
- under the relevant legislation, it is unlawful for ELA Training Services to employ anyone who is included on the barred lists maintained by the DBS of individuals who are considered unsuitable to work with children or vulnerable adults

It is a criminal offence for any person who is disqualified from working with children to attempt to apply for a position within ELA Training Services. ELA Training Services will report the matter to the Police and the DBS if:

- ELA Training Services receives an application from a disqualified person
- ELA Training Services is provided with false information in, or in support of an application
- ELA Training Services has serious concerns about an applicant’s suitability to work with children and vulnerable people

## ELA Training Services' Whistleblowing Policy

Adoption Date	Updated	Review Date	Director
10/2018	03/2020	03/2021	Chris Kistan

ELA Learning Services will support Whistle Blowers if disclosed wrong doing is in the public interest.

### Complaints that count as whistleblowing

Reports of the following issues are protected by law:

- A criminal offence, e.g. fraud
- someone's health and safety is in danger
- risk or actual damage to the environment
- a miscarriage of justice
- the company is breaking the law
- wrongdoing is being covered up

### Complaints that don't count as whistleblowing

Personal grievances (e.g. bullying, harassment, discrimination) aren't covered by whistleblowing law, unless the particular issue is in the public interest.

ELA Training Services will act upon any information received via "whistle-blowing" or via other external bodies.

ELA Training Services or the prescribed body will receive the concern and decide if any action is needed. Further information may be required and requests for anonymity will be respected. ELA Training Services or the prescribed body may inform the whistleblower about the action they've taken, depending on the circumstances.



## ELA TRAINING SERVICES's Anti-Bullying Policy and Procedure

Adoption Date	Updated	Review Date	Director
10/2018	03/2020	03/2021	Chris Kistan

***ELA Training Services does not tolerate the bullying of other people in any form whatsoever and all incidents of bullying reported to ELA Training Services will be fully investigated.***

**ELA Training Services learners and stakeholders are encouraged to:**

- respect other people, their space and their belongings
- demonstrate kindness
- not walk away if we see someone being bullied
- report incidents of bullying

**ELA Training Services learners and stakeholders are given the following advice about bullying:**

- Talk to or contact someone you trust, such as your friend or even contact Childline on 08001111 or Samaritans on 116123 to talk to someone you don't know, safely.
- Be persistent. If the first person you talk to doesn't help, don't give up. Speak to someone else.
- If you can, write down everything that has been said or done to hurt you. Try to write down how you feel. When you have found someone you can trust, discuss what you have written.
- Ask the person you talk to not to do anything without telling you about it first. You have a right to know what is being done on your behalf and to say whether you think it is a good idea or not. If you find it difficult to talk to an adult ask some one to talk to an adult on your behalf.
- Telephone Child Line (Freephone08001111) or Samaritans on 116123. Their helpers provide a confidential helpline for people
- Email ELA Training Services at [incident@ela-group.co.uk](mailto:incident@ela-group.co.uk)
- Most importantly, do something. Sometimes bullying stops quickly, but doing nothing means it may continue until someone is seriously upset or hurt.



## ELA TRAINING SERVICES' E-Safety Policy

Adoption Date	Updated	Review Date	Director
10/2018	03/2020	03/2021	Chris Kistan

### Purpose

This policy applies to all members of the ELA Training Services community (including staff, children, employers/carers and visitors). It is a statement of the aims, principles, strategies and procedures for e-safety throughout ELA Training Services. The E-Safety Policy should be read in conjunction with our Data Protection and Information Sharing Policy and Safeguarding Policy.

**We have a responsibility to the learners in our care to know what they are doing online during their stay with us.**

### What is E-Safety?

E-Safety refers to safeguarding and safeguarding of both children and adults in the digital world. It is about learning to understand and use technologies in a safe, positive way, also about supporting children and adults to develop safe online behaviours.

Risks to children who use the internet include:

- Exposure to inappropriate materials, for example, pornographic pictures and videos
- physical danger and sexual abuse, for example, through 'grooming' by paedophiles
- cyber bullying – persistent bullying through the digital medium
- losing control over pictures and videos
- obsessive use of the internet and ICT, for example, addiction to videogames
- damage to online reputation
- inappropriate or illegal behaviour, for example, exposure to hate mail or offensive images
- viruses, hacking and security
- exposure to extremist material and the possibility of radicalisation
- copyright infringement, for example, the illegal sharing of music, pictures, video or documents

E-Safety is largely concerned with internet communications. The internet is accessible from computers, laptops, tablets, mobile phones, games consoles and other devices like the iPod Touch and internet connected TV. Other communication technologies such as texting and phone calls are also covered by the term 'E-Safety'.

### Why provide internet access?

The internet is an essential for education, business and social interaction. ELA Training Services encourage the provision of quality internet access to enable learning.

**ELA Training Services have content filtering and monitoring software in operation on their routers.**

### Internet

- ELA Training Services learners will be encouraged to tell their trainer/assessor immediately if they encounter any material that makes them feel uncomfortable.
- Internet access will be filtered appropriate to the age of the learner.

### Email

- All emails sent must be professional in tone and content.
- ELA Training Services learners must immediately tell the trainer/assessor if they receive offensive email in an ELA led training session.
- ELA Training Services learners must not reveal personal details of themselves or others in email communication (such as address or telephone number).
- ELA Training Services learners should be made aware that the writer of an email (or the author of a web page) may not be the person claimed.

## Social Networking

### ELA Training Services trainers/assessors shall:

- Behave responsibly and professionally at all times in connection with the use of social networking sites and keep up to date with privacy policies of the sites they use
- Ensure that all communication with ELA Training Services learners (including on-line communication) takes place within clear and explicit professional boundaries
- Use their professional judgment and, where no specific guidance exists, take the most prudent action possible and consult with the Director of ELA Training Services if they are unsure
- co-operate with ELA Training Services in ensuring the implementation of this policy

### ELA Training Services Website:

- Website photographs that include ELA Training Services learners will be selected carefully and will only be published with permission.
- ELA Training Services learners' full names will not be used anywhere on the website, particularly in association with photographs.

## Cyberbullying

Cyberbullying is the use of the internet and related technologies to harm other people, in a deliberate, repeated, and hostile manner. When learners are the target of bullying via mobile phones, gaming or the internet, they can often feel very alone and, a once previously safe and enjoyable environment or activity, can become threatening, harmful and a source of anxiety. Cyberbullying (along with all forms of bullying ) will not be tolerated. All incidents reported will be recorded and investigated.

### ELA Training Services Trainer/Assessor Data Security

- ELA Training Services trainers/assessors must not share their user account details and must not leave their computers unlocked and accessible to learners.

### ELA Training Services Learners

- All ELA Training Services learners must sign the Code of Conduct and Learner Agreement.
- E-Safety rules will be given to learners in their learner handbook.
- Any breaches of the Code of Conduct with reference to ICT will be referred directly to ELA Training Services and internet access may be denied.
- ELA Training Services Guardianship Children will be informed that network and internet use on a home stay host's computer will be monitored.

### Employers' Support

- Employers' attention will be drawn to ELA Training Services' E-Safety Policy in the parent handbook.
- Employers will be asked to read through the ELA Training Services Guardianship Learner Code of Conduct with their learner and for the learner to sign the agreement.

### Policy Implementation

All new ELA Training Services trainers/assessors receive e-safety advice and guidance as part of their induction programme to ensure they understand their responsibilities, as detailed in this policy.

## ELA Training Services' Photography Policy and Procedure

Adoption Date	Updated	Review Date	Director
10/2018	03/2020	03/2021	Chris Kistan

### Using images of learners: photographs, videos, websites and social media

We live in an age in which digital technology has vastly increased the use, and potential misuse of photography. Photographs for ELA Training Services, learner and trainer/assessor uses and those that appear in the media and ELA Training Services social media, are a source of pleasure, pride and celebration of learner achievement.

However, learners are often abused by someone they know. The risk of a learner being directly targeted for abuse through being identified by a stranger is very small. Providing reasonable steps are taken to ensure an appropriate photograph, and to protect the full name and contact details, photography by ELA Training Services staff and the media is allowed, within safe practice guidelines.

### Issues of Consent

The Data Protection Act 2018 affects our use of photography. This is because an image of a learner is personal data for the purpose of the Act, and it is a requirement that consent is obtained from the parent of a young person under the age of 18 years for any photographs or video recordings. It is also important to ascertain the views of the child.

Consent may be sought on the Learner Application form for images to be used by ELA Training Services.

Trainers/assessors and other stakeholders may not use images of ELA Training Services or learners online without the express consent, in writing of ELA Training Services.

Employers retain the right to withdraw consent at any stage, but they need to do so in writing.

### ELA Training Services will:

- Never use a learner's full name online to accompany a photograph
- Use the minimum information necessary to accompany a photograph
- Only use images of learners in suitable dress (not children in swimming costumes, for example)
- Store photographs securely for authorised ELA Training Services use only
- Only use images of under 18s where permission has been granted

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## ELA Training Services' Health, Safety and Welfare Policy

Adoption Date	Updated	Review Date	Director
10/2018	03/2020	03/2021	Chris Kistan

### Health and safety

- ELA Training Services recognises its responsibility under the Health & Safety at Work, etc. Act 1974 to provide for the health, safety and welfare of its employees, children, members of the public and any others whom may be affected by ELA Training Services' activities.
- To this end ELA Training Services will, so far as is reasonably practicable, fully comply with the requirements of the said Act, and such of its attendant Regulations as may apply, by making suitable and sufficient arrangements.

### Within the ELA Training Services Office

#### ELA Training Services will:

- Develop and maintain safe systems of work
- Give sufficient information, instruction, training and supervision to ensure the health, safety and welfare of all its staff, vulnerable people and others working within ELA Training Services premises, and during activities and excursions
- Protect the health, safety and welfare of visitors to ELA Training Services
- Provide equipment that is fit for purpose and maintained in accordance with the necessary requirements
- Maintain a safe and healthy place of work, with safe access to that place of work
- Provide induction training which will include but not be limited to the Health & Safety Policy, First Aid arrangements and Fire Precautions/Procedures
- Positively consider the environmental impact to all ELA Training Services activities; and, formally consult with employees on all matters having effect on their health, safety and welfare at work
- Update staff on latest developments in health and safety
- Further, detailed information is provided in the ELA Training Services Staff Handbook.

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## Guidance for Trainers/Assessors

### ELA Training Services will:

- provide competent, professional guidance, training and support as required
- where applicable, issue detailed safety policy, instructions and guidelines to trainers/assessors relating to their activities, and ensure trainers/assessors are conversant with them

### Trainers/assessors will:

- follow all health and safety advice and guidance from ELA Training Services
- initiate first aid in the event of an accident, and ensure that the accident is recorded and reported to ELA Training Services
- inform ELA Training Services or any changes to their personal circumstance that would affect their ability to keep themselves and learners safe and healthy.
- Carry out a learning environment risk assessment and message this to the ELA Training Services

**It is the duty of all members of ELA Training Services staff, trainers/assessors and learners to take reasonable care for the health and safety of themselves, and of any others who may be affected by their acts or omissions.**

### Well-being, Welfare, Health and Safety.

**ELA Training Services contributes to learner' wider well-being by:**

- Helping each learner achieve the best possible educational outcomes
- Dealing with bullying and discrimination and keeping children safe
- Dealing with bullying in accordance with the ELA Training Services' anti-bullying policy
- Encouraging learners to behave responsibly

### ELA Training Services has policies to:

- Prevent unsuitable people working with under 18s
- Promote safe practice and challenge poor and unsafe practice
- Identify instances where there are grounds for concern about a stakeholders' welfare
- Take appropriate action to keep stakeholders safe

### Missing learner procedure

A learner may be identified as missing if their whereabouts cannot be confirmed visually, from information provided by the learner or other trustworthy people with regard to their movements or telephone contact with them or their employer.

**If a trainer/assessor thinks a learner is missing, they must:**

- Attempt to ascertain whereabouts from the last people in contact with the learner
- Attempt to contact the learner on his/her mobile phone
- Check all places in the locality where the learner was last seen (within reason)
- 

**If a learner is still missing, the trainer/assessor should contact the employers and ELA Training Services Director by telephone.**



#### ELA Training Services will:

- Contact their employers/guardians (with due regard for time zones).
- Request assistance as appropriate.

On completion of this and any subsequent searches made, the Director and employers/guardians will continue to be informed of progress.

The Director (or in his/her absence, the person on duty), will arrange for the Police to be informed.

#### **If the learner is found, or the incident is otherwise resolved:**

- The Director will be directly informed directly by the Trainer/Assessor
- The Police will be informed if they have been involved.
- The Director will initiate a full inquiry, and provide a written report
- This report and the incident log will be kept securely on the ELA Training Services Server

#### After the incident:

- the trainer/assessor or Guardianship manager will sensitively discuss the incident with the learner
- the Director will sensitively discuss the incident with the employers/guardian

## ELA TRAINING SERVICES's Prevent Policy

Adoption Date	Updated	Review Date	Director
10/2018	03/2020	03/2021	Chris Kistan

### What is Prevent

The national Prevent strategy is designed to reduce the number of serious incidents and to catch anyone especially vulnerable people before they enter the criminal justice system.

### Meeting our Prevent Duties and Tackling Extremism

ELA Training Services understands its responsibilities under the Counter Terrorism & Security Act 2015 to prevent people of all ages being radicalized or drawn into terrorism and seeks to meet its obligations in the ways shown below.

### Context

- ELA Training Services trains learners of ages 16 and above, all year from around the world.
- ELA Training Services promotes a multi-cultural environment where respect for and tolerance of other beliefs is required.
- ELA Training Services's head office is located in one of the boroughs of a multi-cultural city and places trainers/assessors with learners and employers in cities, towns and villages all over the UK.

### Prevent Lead

**Responsibility for ensuring Prevent Duty lies with Chris Kistan, Director and Designated Safeguarding Lead for the Prevent Strategy.**

### Risk Assessment and Procedures

- A risk assessment has been produced by the ELA Training Services Lead Contact for the Prevent Strategy and held in the ELA Training Services; it will be reviewed and updated annually.
- The ELA Training Services Lead Contact for the Prevent Strategy has received training in Prevent policy and risk.
- All members of the ELA Training Services team at head office will undertake Prevent online training.

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- All trainers/assessors will receive Prevent guidance from ELA Training Services and will undertake online Prevent training.
- ELA Training Services will make and maintain contact with the local police/local authority Prevent coordinator in all areas where we have children to understand their role, the support available, (e.g. via the Channel process) and a list of contacts for referrals.

#### ELA Training Services will counteract risks by:

- Promoting a safe and supportive environment via clear expectations of accepted behaviours and those including radicalization and extremism, not being tolerated.
- Promoting the core British values:
  - I. Democracy
  - II. The rule of law
  - III. Individual liberty
  - IV. Respectful and Tolerance of different faiths or beliefs,

through documents given to learners (learner handbook), via information on enrolment on British culture and traditions.

- Where possible, developing critical awareness and thought to counter accepting extremism without question, especially of online material.
- Challenging radical or extremist views in any context (formal or informal) via stated procedures. In most situations this would require an immediate response re the tolerance expected then reporting concerns.
- Being ready to react when world or local events (e.g. Westminster, London Bridge, Paris attacks) cause upset and the likelihood of conflicting feelings being expressed. Prevent lead to take initiative in these situations.
- Asking trainers/assessors to have strong filters on the Internet and clear rules on accessing extremist/terrorist websites/uses of social networks to exchange extremist/terrorist views.
- Trainers/assessors getting to know learners and their circumstances making it easier to spot changes in behaviour.
- ELA Training Services staff and trainers/assessors being observant and vigilant in noticing any signs of radical or extremist behaviour.
- ELA Training Services staff and trainers/assessors supporting any children identified as vulnerable.
- ELA Training Services staff and trainers/assessors themselves not supporting or funding and extremist organisations.

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- ELA Training Services staff and trainers/assessors exemplifying the core British values by:
- 1. Ensuring an unbiased, non-partisan, non-discriminatory and ethical learning environment
  2. Being democratic and creating opportunities for democratic processes,
  3. Following the rule of law and compliance bodies advice
  4. Creating opportunities for learner voice and opinion to be communicated
  5. Exemplifying respect and tolerance for all faiths and beliefs

### Understanding the risk of extremism

- Staff, learners, children and trainers/assessors may come into contact with ELA Training Services already holding extremist views. They may be influenced by a range of factors: global events, peer pressure, media family views, extremist materials (hard copy or online), inspirational speakers, friends or relatives being harmed, social networks, and more.
- People who are vulnerable are more likely to be influenced.
- Their vulnerability could stem from a range of causes including: loss of identity or sense of belonging, isolation, exclusion, mental health problems, sense of injustice, personal crises, victim of hate crime or discrimination and bereavement.

### What is the ELA Group doing to prevent radicalisation?

Prevent Duty training is delivered on induction. A certificate is issued on successful completion of the course which is assessed by a test.

### ELA Group trainers and assessors engage the following resources:

- **Digital Disruption**– This organisation provides chargeable and free resources targeted especially at increasing digital literacy – at how young people use the internet, and critique and challenge information they find on it.
- **Learning Together To Be Safe**– Prepared by the Department for Children, Schools and Families (now Department for Education), this 2008 toolkit to help schools contribute to the prevention of violent extremism was brought out after the first iteration of the Prevent agenda. Although the policy it refers to has been updated, some of its content may still be of use to schools.

- **My Country My Vote**– This project does not seek to tackle issues of extremism directly. However, research has shown that one effective long-term approach to preventing extremism is to engage young people in participatory democracy. This project aims to do just that, and may therefore be a useful model to follow.
- **Prevent Duty Guidance**: for England and Wales – Produced by the UK Government, this is the official guidance document.
- **Prevent for Schools**– This resource was set up following demand from schools in Lancashire, UK. It has been updated to reflect the latest duties (2015), and has links to resources and tools for schools (both primary and secondary).
- **RE-silience**– This project is run by the Religious Education Council of England and Wales, and aims to help RE teachers who want to develop their confidence and competence in dealing with contentious issues in the classroom, particularly those linked to violent extremism.
- **Rewind**– The Rewind project has tackled racism in an area of the West Midlands with a long history of support for far-right views. It has courses available for interested schools. A now-dated review of their services can be found on the Institute for Race Relations website.
- **Safeguarding in Schools**– This consultancy is run by a former headteacher who specialises in providing courses and resources on safeguarding to school staff and headteachers, including on tackling extremism.
- **Think Project**– Running for three years up to March 2015, the Think Project worked with disengaged young white people in Wales. It is unusual in having evaluation built in from the start. The results of this evaluation were discussed in this peer-reviewed article.
- **Victvs**– This consultancy provides training and resources for staff as well as parents on understanding the new Prevent duties as well as the risks from extremism and radicalisation

**Follow the ELA Training Services' Reporting Protocol on Page 34 if you have any concerns about Radicalisation, Extremism or Terrorism relating to any stakeholders.**

## ELA Training Services' Records of Concern Reporting Protocol

### 1.0 Disclosures and Records of Concern Reporting Protocol

- This protocol is used in conjunction with the “5 Steps to Handling Disclosures and Records of Concern V 2.0 Update March 2018” poster that is included in your pack. **Contact your line manager immediately if you do not have access to this. Do not engage in any ELA Education Group work until you are confident in this procedure.**
- Within **1 hour or immediately (if possible)** of any Disclosure and/or Concern, email a short message about the Disclosure and/or Concern to [safe@ela-group.co.uk](mailto:safe@ela-group.co.uk). An investigating officer should respond within an hour. If not, contact Chris Kistan, the Principal of ELA Group at +44 (0) 7731105035.
- Within **24 (working) hours** of any Disclosure and/or Concern, those involved must complete the correct form (ELA Record of Concern Form v2.0 November 2018) and email it to [safe@ela-group.co.uk](mailto:safe@ela-group.co.uk). An investigating officer should respond within 24 hours. If not, contact Chris Kistan, the Designated Safeguarding Lead at +44 (0) 7731105035.
- Be clear as to the persons involved. These reports must be understood by neutral external stakeholders. Therefore, you should list the full names of persons and their role of everyone at the beginning of the incident report and assign initials to them. For example, Fred Bloggs, staff (FBI), John Smith, pupil (JSm) etc. You can then use their initials in the body of the incident report. Initials allow us to impart a degree of confidentiality.
- Save a copy of the report securely for your professional records.

**If any form of Restraint or Physical Intervention is used during the accident, incident or near miss then staff must clearly state the manner and duration of the restraint and the training/rationale that they had to apply the restraint.**

#### NOTES:

- Do not use emotive language eg: “stormed out of a room”. It is more professional and unprejudiced to say “left the room running and slammed the door after them”.
- Do not use any opinion – stick to the facts of the event.

**If any First Aid is administered, details of this must be included in the form.**

## 2.0 Follow our Safeguarding Policy Guidelines (What to do if a person makes a disclosure)

- ELA Group is committed to ensuring that it meets its responsibilities in respect of child protection by treating any allegation seriously and sensitively. Records of Concern and Incident Reports must be used as detailed in their protocols.
- Follow the Safeguarding 5 Step Flowchart to support your response.
- Stay calm.
- Listen to what the child/young person is actually saying.
- Reassure them that they have done the right thing by telling you.
- Do not promise the child that this can be kept secret, as subsequent disclosure could then lead to the child feeling betrayed. Explain that you are obliged to inform other people.
- Reassure the child that the people who will be informed will be sensitive to their needs and will be looking to help protect them. Inform them that it is not in their interests to keep the disclosure confidential and it will have to be passed on to the appropriate agencies.
- Make a note of any conversations with the child, trying to make these as detailed as possible, including when and where the conversations took place. Draw a diagram, if appropriate, to show the position of any bruises or marks the child or young person shows you, trying to indicate the size, shape and colour.
- Record as soon as possible and use the actual words used by the child.
- Keep all records factual. Be aware of not making assumptions or interpretations of what the child/young person is telling you. Store all records securely.
- Do not interrogate the child, or push for more information. Ensure that any questions asked are open, not leading closed questions. Do not ask the child/young person to repeat what they have told you, for another person. Record accurately.
- Discuss your concerns with the ELA Group **DSL**
- Who will report this information to an appropriate agency (the Designated Officer previously called the Local Authority Designated Officer-LADO).



- The person to whom the disclosure was made should ensure that the child who has disclosed the information is informed about what will happen next, so they can be reassured about what to expect.
- You may report your concerns directly to your local LADO if you are not satisfied with the response from ELA Group. You will find contact details for your local Social Care Referral and Assessment Team online. The details will be on your Local Council website.

**3.0 Do not engage in any ELA Education Group work until you are confident in this procedure.**



## ELA Training Services' Incident, Near Miss Accident Reporting Protocol

### 1.0 Incident, Near Miss or Accident Reporting Protocol

- Within **1 hour or immediately (if possible)** of any accident, incident or near miss, an email a short message about the must be emailed to [incident@ela-group.co.uk](mailto:incident@ela-group.co.uk). An investigating officer should respond within an hour. If not, contact Chris Kistan, the Designated Safeguarding Lead Director at ELA Group at +44 (0) 7731105035.
- Within **24 (working) hours** of any accident, incident or near miss, those involved must complete the correct form (RT Incident Near Miss Accident Form v1.0 Jan 2018) and email it to [incident@ela-group.co.uk](mailto:incident@ela-group.co.uk). An investigating officer should respond within 24 hours. If not, contact Chris Kistan, the Designated Safeguarding Lead Director at ELA Group at +44 (0) 7731105035.
- Be clear as to the persons involved. These reports must be understood by neutral external stakeholders. Therefore, you should list the full names of persons and their role of everyone at the beginning of the incident report and assign initials to them. For example, Fred Bloggs, staff (FBI), John Smith, pupil (JSm) etc. You can then use their initials in the body of the incident report. Initials allow us to impart a degree of confidentiality.
- Save a copy of the report securely for your professional records.

**If any form of Restraint or Physical Intervention is used during the accident, incident or near miss then staff must clearly state the manner and duration of the restraint and the training/rationale that they had to apply the restraint.**

**NOTES:**

- Do not use emotive language eg: “stormed out of a room”. It is more professional and unprejudiced to say “left the room running and slammed the door after them”.
- Do not use any opinion – stick to the facts of the event.

**If any First Aid is administered, details of this must be included in the form.**

**2.0 If this incident includes a disclosure or cause for concern, follow our Safeguarding Policy Guidelines or the “5 Steps to Handling Disclosures and Records of Concern V 2.0 Update March 2018” poster that is included in your pack. Contact your line manager immediately if you do not have access to this.**

**3.0 Do not engage in any ELA Education Group work until you are confident in this procedure.**

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## Acceptable Behaviour promotes Safeguarding

Our objective is to create a workplace which is free from harassment and bullying and to ensure that all employees are treated with dignity and respect.

Everyone is responsible for promoting this objective and complying with this procedure. It is important to recognise that conduct which one person may find acceptable, another may find totally unacceptable. This includes when you are at work on training courses or on Company social events.

Managers have particular responsibility for creating and respecting a considerate culture within their area (both in the workplace or at work-related events outside of the workplace) and for utilising the support available to ensure that informal and formal complaints are dealt with sensitively, appropriately and in line with the procedures set out in this policy.

## The Company's Position on Bullying and Harassment

All employees have a duty not to bully or harass each other nor to help anyone else to do so.

We will not tolerate bullying or harassment in our workplace or at work-related events outside of the workplace, whatever the seniority of the perpetrator and whether the conduct is a one-off act or repeated course of conduct, and whether done purposefully or not. Neither will we tolerate retaliation against, or victimisation of, any person involved in the bringing of a complaint of harassment or bullying. You should also be aware that if a court or tribunal finds that you have bullied or harassed someone you could be liable to compensate the victim. In some circumstances the treatment may amount to a crime punishable by a fine or imprisonment.

We will take appropriate action if any of our employees are bullied or harassed by our customers or suppliers.

**Allegations of bullying and harassment will be treated seriously. Investigations will be carried out promptly, sensitively and, as far as possible, confidentially.**

## 4.0 FURTHER INFORMATION

If you require further information contact the **DSL**

Adoption Date	Updated	Review Date	Director
10/2018	03/2020	03/2021	Chris Kistan