

Safeguarding Policy Lee Marley Apprenticeship Programmes

This policy applies to all staff, volunteers, sessional workers, agency staff, students or anyone working on behalf of Lee Marley Brickwork (LMB).

Aims

LMB will not tolerate the unacceptable treatment of young people or vulnerable adults in any of its forms and is committed to safeguarding all young people and vulnerable adults from any form of harm.

It details the steps we will make to safeguard young people and vulnerable adults. We have a responsibility to promote the welfare of young people and vulnerable adults to help them feel safe and to keep them safe. If any form of abuse or neglect has been recognised or there is suspicion of being drawn into illegal activity, action will be taken.

We will ensure that decisions made will allow young people and vulnerable adults to make their own choices and will include them in any decision making. We will also ensure that safe and effective working practices are in place.

This policy is intended to support employees within Lee Marley Group to understand their role and responsibilities in safeguarding young people and vulnerable adults. All staff, volunteers, sessional workers, agency staff, students or anyone working on behalf of LMB are expected to follow this policy.

The key objectives of this policy are:

- to have an overview of safeguarding
- be clear about responsibilities to safeguard young people and vulnerable adults
- ensure the necessary actions are taken where young people or vulnerable adults are deemed to be at risk

This policy is based on the following laws and guidance

(links below or full website address available on page 9)

- [The Care Act 2014 and the Care and Support statutory guidance](#)
- [London Safeguarding Adults policy and procedures](#)
- [Data Protection Act 2018](#)
- [Human Rights Act 1998](#)
- [Sexual Offences Act 2003](#)
- [Counterterrorism and Security Act 2015](#)
- [Protection of Freedoms Act 2012](#)
- [United Convention of the Rights of the Child Sept 1990](#)
- [Mental Capacity Act 2019](#)

Under the Human Rights Act 1998, everyone has the right to live free from abuse and neglect.

LMB adheres to following the six key principles that underpin safeguarding:

- Empowerment – support vulnerable people to make their own decisions
- Prevention – take action to stop harm, neglect and abuse before it occurs
- Proportionality – respond in the least intrusive way appropriate to the risk
- Protection – support and protect vulnerable individuals from harm
- Partnership – collaborate with the relevant organisations and local communities
- Accountability – everyone is responsible for keeping other safe

LMB will not tolerate the abuse of young people or vulnerable adults, employees must ensure that their work reflects the principles above and where appropriate for those with care and support needs are involved in their decisions and informed consent is obtained. LMB must ensure that the safeguarding action agreed is the least intrusive response to the risk. Partners from the community should be involved in any safeguarding work in preventing, detecting, and reporting neglect and abuse.

LMB should be transparent and accountable in delivering safeguarding actions.

LMB will ensure that young people and vulnerable adults are involved in their safeguarding arrangements and each individual is dealt with on a case-by-case basis. As young people and vulnerable adults may have different preferences, histories and lifestyles, the same process may not work for all.

Who do safeguard duties apply to?

All young people aged under 18.

Adults who:

- have care and support needs, and
- is experiencing, or is at risk of, abuse and neglect, and
- is unable to protect themselves from either the risk of, or the experience of abuse or neglect, because of those needs.

Who do I go to if I am concerned?

The named responsible person for safeguarding duties at LMB are:

Safeguarding Lead – Caitlin Jefferies, Caitlin.Jefferies@LeeMarley.com

Safeguarding Deputy - Chantelle Horton, Chantelle.Horton@LeeMarley.com

The relevant named person above must be contacted in relation to any concerns/queries they have in regard to safeguarding young persons and adults. Record of the concern must be kept.

The named persons will be responsible to make decisions about notifying the local authority, and any other external agencies such as the Police if required and consider alternative actions, where necessary.

What should I do if I am concerned?

1. Respond

- Take emergency action if someone is at immediate risk of harm/in need of urgent medical attention.

Dial 999 for emergency services

- Get brief details about what has happened and what the young person or vulnerable adult would like done about it, but do not probe or conduct a mini-investigation

- Seek consent from the young person or vulnerable adult to take action and to report the concern.

Consider whether the young person or vulnerable adult may lack capacity to make decisions about their own and other people's safety and wellbeing. If you decide to act against their wishes or without their consent, you must record your decision and the reasons for this.

2. Report

- Name the person to whom employees need to report any potential safeguarding concerns. This will usually be the organisation's designated safeguarding lead (see above)

3. Record

- As far as possible, records should be written contemporaneously, dated and signed.

- Keep records about safeguarding concerns confidential and in a location where the alleged abuser will not have access to the record. Access should not be given to any unauthorised personnel for accessing confidential information including the sharing of passwords.

4. Refer

In making a decision whether to refer or not, the designated Safeguarding Lead should take into account:

- the young person or vulnerable adults wishes and preferred outcome

- whether the young person or vulnerable adult has mental capacity to make an informed decision about their own and others' safety

- the safety or wellbeing of children or other adults with care and support needs

- whether there is a person in a position of trust involved

- whether a crime has been committed

This should inform the decision whether to notify the concern to the following people:

- the police if a crime has been committed and/or

- Local Access & Advice Team (part of adult social services) for possible safeguarding enquiry

- relevant regulatory bodies such as Care Quality Commission, registered Training Providers, Ofsted, The Charity Commission

- service commissioning teams

The designated Safeguarding Lead must keep a record of the reasons for referring the concern or reasons for not referring.

Incidents of abuse may be one-off or multiple and may affect one person or more. Employees should look beyond single incidents to identify patterns of harm. Accurate recording of information will also assist in recognising any patterns.

See visual diagram of steps on page 8 – ‘Diagram for raising a report or concern’

Employee responsibilities

All employees at LMB are expected to report any concerns to any of the named persons for safeguarding. If the allegation is against the Safeguarding Lead, seek advice from Human Resources

The designated Safeguarding Lead for both young people and vulnerable adults should be responsible for providing acknowledgement of the referral and brief feedback to the person raising the original concern. Feedback should be given in a way that will not make the situation worse or breach the Data Protection Act. If the police are involved, they should be consulted prior to giving feedback to the referrer to ensure any criminal investigation is not affected.

The local authority will decide on who will lead on a safeguarding enquiry should it progress to that stage. The named organisation should not conduct its own safeguarding enquiry unless instructed to do so by the local authority.

Employees should ensure that the young person or vulnerable adult with care and support needs is involved at all stages of their safeguarding enquiry ensuring a person-centred approach is adopted.

Complaints procedure

LMB promotes transparency and honesty when things go wrong. All employees should apologise and be honest with service users and other relevant people when things go wrong. LMB is committed to ensuring that employees who in good faith whistle-blow in the public interest, will be protected from reprisals and victimisation.

The Mental Capacity Act 2005 is to be used when decisions on behalf of those young people or vulnerable adults who are unable to make some decisions for themselves. Refer to the [Mental Capacity Act 2005](#) (full website address available on page 9) You will need to invite an advocate if the person lacks capacity to make decisions about the safeguarding concerns.

Confidentiality and information sharing

LMB expects all Employees to maintain confidentiality at all times. In line with Data Protection law, LMB does not share information if not required.

Training, awareness raising and supervision

LMB ensures that all employees receive basic awareness training on safeguarding young people and vulnerable adults as they may come across young people and vulnerable adults with care and support needs who may be at risk of abuse. Staff will also have training on Keeping Children safe in education to support their role. Those young people and vulnerable adults may report things of concern to staff or volunteers who should be equipped with the basic knowledge around safeguarding and be confident to identify that abuse is taking place and action is required. All employees should be clear about the core values of LMB and commitment to safeguarding young people and vulnerable adults.

Female Genital Mutilation

All employees within the apprenticeship and delivery must take mandatory Female Genital Mutilation (FGM) training annually and/or when provided with relevant updates.

For more information regarding the mandatory reporting see [Mandatory reporting of female genital mutilation: procedural information - GOV.UK](#)

Prevent

Radicalisation and extremism of young people and vulnerable adults with care and support needs is a form of emotional/psychological exploitation. Radicalisation can take place through direct personal contact, or indirectly through social media.

If staff are concerned that a young person or vulnerable adult is at risk of being radicalised and drawn into terrorism, they should treat it in the same way as any other safeguarding concern.

For more information about Prevent see [Prevent duty guidance: for England and Wales.](#)

Online and E-safety

LMB are committed to ensuring that all staff and apprentices are aware of online safety and how to avoid being harmed from online activities. The company will ensure that information and communication technology is used in a safe and responsible manner.

LMB will monitor all internet usage within the training centre in a responsible and transparent way to ensure and maintain the safety of staff and apprentices. There are four key 'areas of risk categories' to be aware of:

- **Content:** Exposure to illegal, harmful, or inappropriate material, including pornography, fake news, racism, misogyny, self-harm, suicide, anti-Semitism, radicalisation, and extremism.
- **Contact:** Harmful online interactions, such as peer pressure, commercial advertisements, or adults posing as young people with the intention to groom or exploit others for sexual, criminal, financial, or other harmful purposes.
- **Conduct:** Online behaviours that increase the risk of harm, such as creating, sharing, or receiving explicit content (e.g., consensual or non-consensual sharing of nudes, pornography, or other explicit material) and online bullying.
- **Commerce:** Risks associated with online gambling, inappropriate advertisements, phishing, and financial scams. If students or staff encounter these risks, they can report them to the Anti-Phishing Working Group (<https://apwg.org/>).

Access to unacceptable content from online or network sources must be reported to the safeguarding team

Safeguarding and AI usage

AI technologies present new opportunities and new risks. Lee Marley is committed to ensuring AI is used responsibly, ethically, and safely.

Safeguarding Risks Associated with AI

Potential risks include:

- Exposure to inappropriate or harmful content generated by AI.
- AI-enabled bullying, impersonation, or harassment.
- Use of AI tools to cheat, plagiarise, or deceive.
- Sharing of personal or sensitive data with AI systems.
- Misinformation or unsafe advice generated by AI tools.

Safe Use Expectations

To minimise risk:

- Only approved AI platforms should be used for learning.
 - Employees are reminded to utilise One Advanced AI for any requests that involve personal/ identifiable data.
 - Microsoft CoPilot can be used for general questions or tasks but must ensure no personal data is included.
- All AI-generated work must be checked for accuracy, appropriateness, and relevance.
- AI must not replace critical judgement or assessment decisions by staff.
- Any harmful, inappropriate, or concerning AI-generated content must be reported immediately to the DSL.

Training and Awareness

- Staff and apprentices will receive guidance on safe and responsible AI use.
- The organisation will monitor developments in AI safety and update guidance accordingly.

In person/ online contact between apprentices and staff

- Staff should not be adding apprentices on social media channels or giving out personal numbers as a means of contact.
- Contact from staff should always be via work devices.
- Please ensure communication between staff and apprentices is kept within working hours (8am-5pm) to ensure an appropriate work-life balance as well to manage and maintain reasonable expectations.
- Please ensure sensitive information is processed through the correct channels (Apprenticeship Email) as data is not fully protected via third party applications (WhatsApp).

Safer recruitment

LMG follows a range of Safer Recruitment practices throughout the hiring process, including highlighting our commitment to safeguarding in job advertisements, conducting thorough interviews, and collecting references. We ensure that all necessary background checks are completed for new staff members who will work with or come into contact with young people and vulnerable adults, in accordance with the Disclosure and Barring Service (DBS), Teacher Regulation Agency (TRA) standards, and KCSIE guidelines. The company reserves the right to conduct online checks as part of our Safer Recruitment practices (outlined in KCSIE 2023). All hiring managers will undergo 'Safer recruitment' training and all newly hired staff will have to complete mandatory safeguarding training as part of their onboarding.

Appendix 1

What are the types of safeguarding concerns young people and vulnerable adults endure?

The Care and Support statutory guidance sets out the 10 main types of abuse:

- Physical abuse
- Neglect
- Sexual abuse
- Psychological
- Financial abuse
- Discriminatory
- Organisational
- Domestic violence
- Modern Slavery
- Self-neglect

However, you should keep an open mind about what constitutes abuse or neglect as it can take many forms and the circumstances of the individual case should always be considered.

For more information, read section 14.17 of the Care and Support Statutory Guidance.

What are the possible signs of abuse?

Abuse or neglect can be difficult to spot. You should be alert to the following possible signs of abuse or neglect:

- Depression, self-harm or suicide attempts
- Difficulty making friends
- Increase in fear or anxiety
- The person looks unkempt or is not dressed appropriately
- The person never seems to have money
- The person has an injury that is difficult to explain (such as bruises, finger marks, nonaccidental' injury, neck, shoulders, chest and arms)
- The person has mentioned difficulty sleeping
- The person seems frightened, or frightened of physical contact
- Inappropriate sexual awareness or sexually explicit behaviour
- The person is withdrawn, changes in behaviour

You should ask the person if you are unsure about their well-being as there may be other explanations to the above presentation.

Who abuses and neglects young people or vulnerable adults?

Abuse can happen anywhere, even in somebody's own home. Most often abuse takes place by others who are in a position of trust and power. It can take place whether an individual lives alone or with others. Anyone can carry out abuse or neglect, including:

- partners
- other family members
- neighbours
- friends
- acquaintances
- local residents
- people who deliberately exploit adults they perceive as vulnerable to abuse
- paid staff or professionals
- volunteers and strangers

Staff Safeguarding Process

1 – Why are you concerned?

For example: Allegation / someone shares a worry or concern.

Noticeable indicators of abuse or neglect.

Take prompt action if someone or others are in immediate danger. Dial 999 for the emergency services.

2 – Report and Document your concerns

Use the 'Report a Concern' form to report **anything** that you think seems suspicious or out of character.

If appropriate, determine what action the individual would like to see taken and carry out a brief investigation.

ENSURE to keep any additional documentation obtained confidential.

3 – Respond

Seek consent to action the concern.

Consider if the person lacks the ability to make decisions about their or others safety and wellbeing. If you decide to act against the young persons or vulnerable adults wishes, you **MUST** record your decision and reason for this.

4 – Report

All documented concerns and additional detail of relevance to the designated Safeguarding Lead or Safeguarding Deputy. If uncertain, still report to the Safeguarding Lead so the next steps can be considered dependant on the circumstances.

5 – Record

The Designated Safeguarding Lead will track all details relating to a safeguarding concern. This will be held confidentially and only be available to the Designated Safeguarding Lead. The Designated Safeguarding Lead will monitor the situation and contact the relevant individuals or request further support as necessary.

6 – Refer

The Designated Safeguarding Lead will escalate and report where necessary. For example contacting the Police or Local Authority.

Safeguarding Contacts:

Safeguarding and Prevent Lead:

Caitlin Jefferies

Caitlin.Jefferies@LeeMarley.com

Phone: 07484 415203

Deputy Safeguarding and Prevent Officer

Chantelle Horton

Chantelle.Horton@LeeMarley.com

Phone: 07385 375821

Policy web addresses:

Care Act 2014

www.legislation.gov.uk/ukpga/2014/23/contents?view=plain

London Safeguarding Adults policy and procedures

www.camden.gov.uk/documents/20142/0/London+Multi-Agency+Adult+Safeguarding+Policy+%26+Procedures.pdf/9a4727af-aa29-7842-b0e5-c706dec3d394?t=1619620436296

Data Protection Act 2018

www.legislation.gov.uk/ukpga/2018/12/contents/enacted

Human Rights Act 1998

www.legislation.gov.uk/ukpga/1998/42/contents?view=plain

Sexual Offences Act 2003

www.legislation.gov.uk/ukpga/2003/42/contents?view=plain

Counterterrorism and Security Act 2015

www.legislation.gov.uk/ukpga/2015/6/contents?view=plain

Protection of Freedoms Act 2012

www.legislation.gov.uk/ukpga/2012/9/contents?view=plain

United Conventions of the Rights of the Child

www.unicef.org/child-rights-convention

Mental Capacity Act 2019

www.legislation.gov.uk/ukpga/2019/18?view=plain

Prevent duty guidance - England

www.gov.uk/government/publications/prevent-duty-guidance/prevent-duty-guidance-for-england-and-wales-accessible

Prevent duty guidance – Scotland

www.gov.uk/government/publications/prevent-duty-guidance-england-scotland-and-wales-2015/revised-prevent-duty-guidance-for-scotland-2015

Safeguarding Policy



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Approved by:

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Chief Operating Officer
For and on behalf of Lee Marley GroupF



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