

# CMI EPA SAFEGUARDING POLICY

March 2023

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<b>EPA Safeguarding Policy</b>	
<b>Applies to</b>	Employers, Training Providers, CMI Apprentices, CMI Staff and Associated Third Parties
<b>Effective from and replaces all previous versions prior to</b>	16 March 2023
<b>Owned by</b>	Awarding Body Team
<b>Reviewed and monitored by</b>	Senior Quality Manager (EPA) & Head of Awarding Body and Compliance
<b>Document Location</b>	Website & IAA Resource Area
<b>Review Frequency</b>	Annually

## Version Control

This is version 3 of the Chartered Management Institute (CMI) EPA Safeguarding Policy. This version replaces all previous ones, and it is each training provider/employer's responsibility to ensure that all employees involved in the provision of CMI apprenticeships familiarise themselves with this version of the document.

This document is subject to revision and is maintained electronically. Electronic copies are version controlled. Printed copies are not subject to this control.

<b>History</b>			
<b>Page No.</b>	<b>Chapter Title</b>	<b>Amendments Made</b>	<b>Date Amended</b>
Whole Policy	Whole document	Thorough review and update	10/03/2021
Whole Policy	Whole document	Annual Review - minor amendments to legislation and terminology	1/2/23

## 1. Introduction

### 1.1 Scope of Policy

This document sets out CMI responsibilities for staff and representatives with regards to safeguarding children and vulnerable adults. It is for both internal and external use.

It relates to all situations where, in the course of Apprenticeship End Point Assessment activities, the CMI comes into contact with children and vulnerable adults.

### 1.2 Commitment

CMI is strongly committed to practices that protect children, young people and vulnerable adults from abuse, neglect or significant harm. Employees recognise and accept their responsibilities to develop the awareness of the risk and issues involved in safeguarding.

CMI recognises its responsibility to safeguard the welfare of all apprentices undertaking EPA, by commitment to practise that protects them and looks to minimise potential harm. CMI is committed to safeguarding and promoting the welfare of apprentices undertaking EPA and expects all CMI employees and our partners involved in EPA to share this commitment.

## 2. Safeguarding Purpose

Safeguarding is intended to keep children safe from a range of potential harm and looks at preventative action, not just reaction. It is protecting children from maltreatment; preventing impairment of children's health and development; ensuring that children grow up in circumstances consistent with the provision of safe and effective care; and taking action to enable all children to have the best outcomes. (Keeping Children Safe in Education 2022). CMI's EPA service extends its responsibilities to vulnerable adults.

Safeguarding defines how we will respond to:

- Child and Vulnerable Adult Protection.
- Protection from maltreatment (abuse, neglect, exploitation or victimisation) or risk of harm where the perpetrator is a member of the apprentice's family, the wider community, another apprentice or an individual engaged by CMI.
- Welfare support needs.
- Responding to an apprentice (of any age) via either direct intervention, advice and guidance or sign posting where an issue exists within their day to day lives (including the workplace) which could impact upon their ability to complete the EPA.
- For apprentices under 18 this includes providing early help.

## 3. Who We Safeguard - Definition

**Child** - The term 'child' means anyone who has not yet attained the age of 18.

**Vulnerable Adult** - The term 'A vulnerable adult' is defined as a person who is aged 18 years or over to whom a 'regulated activity' relates to vulnerable adults (as set out in the Safeguarding of Vulnerable Groups Act 2006).

### What is 'regulated activity'<sup>1</sup>?

'Regulated activity' is a broad term which applies differently to children and to vulnerable adults. It is likely to include:

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<sup>1</sup> JCQ - Principles for safeguarding children and vulnerable adults – Revised – Autumn 2017

- Specified activities relating to children and vulnerable adults (e.g. teaching, training, instruction, care or supervision) which are carried out on a frequent (as a general rule at least once a week), or intensive (more than three days in any 30 day period) basis, or overnight (between 2am and 6am where the activity gives the person the opportunity to have face-to-face contact with children or vulnerable adults);
- Certain work in a specified place which provides the opportunity for frequent contact with children or vulnerable adults (e.g. a school);
- Advice or guidance, which is provided wholly or mainly for children and which relates to their physical, emotional or educational well-being;
- Certain specified positions (e.g. a school governor) and functions (e.g. early years child minding).
- An activity is unlikely to be a 'regulated activity' if it is supervised.

#### **4. What We Are Safeguarding From**

In line with Working Together to Safeguard Children 2015, safeguarding is defined as:

- Protecting children from maltreatment
- Preventing impairment of a child's health or development
- Ensuring that children are growing up in circumstances consistent with the provision of safe and effective care.

The following should therefore be considered when delivering EPA to apprentices:

- Sexual abuse or inappropriate relationships
- Physical and emotional abuse or neglect
- Exploitation e.g. financial, sexual, forced marriage
- Neglect
- Grooming behaviour
- Domestic violence
- Bullying including cyber bullying, bullying in the workplace
- Victimisation (race, sexuality, gender, disability etc.)
- Accidents (road, home, in the workplace)
- Self-harm
- Unsafe activities and environments
- Crime
- Unsuitable housing/homelessness
- Extremism

CMI is mindful that a number of other situations may render a person 'vulnerable', such as victims of domestic violence, migrants, living in a drug-misusing family, living in areas of high crime, being likely to face racism or having caring responsibilities.

#### **5. Levels of Responsibility**

Working Together to Safeguard Children 2018 states that 'everyone who works with children has a responsibility for keeping them safe'. CMI is committed to supporting all employees to understand the requirements placed upon them and the various pieces of safeguarding legislation. This is done through a variety of ways including information, advice and guidance, training and the provision of support resources. CMI employees and our partners have responsibility for safeguarding in the provision of EPA services, and have a duty to act to ensure that the welfare of the apprentice is paramount.

#### **6. Information and Support for Apprentices**

All apprentices will have access to this Safeguarding Policy when using our EPA services. Apprentices can expect that they will be treated sensitively and with dignity should a safeguarding incidence/concern occur or an allegation of abuse be made. CMI requires staff / representatives to treat such matters confidentially, notifying colleagues only on a 'need to know' basis under the direct guidance of the owner.

## 7. Confidentiality

Whilst respecting privacy and data protection, CMI End Point Assessment Service cannot guarantee confidentiality in all circumstances. If we discover anything that we believe parents/carers, social services or the police should be informed of, we will do so believing it is in the best interests of the individual involved.

CMI's end point assessment service takes its responsibilities to report crime seriously and as a result 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.

## 8. Disclosure Procedures for Recruitment of CMI Staff / Representatives

This section applies to CMI Staff / Representatives only.

As part of the CMI recruitment process CMI Staff / Representatives are required to declare/disclose any criminal convictions, cautions etc (including the penalty or penalties imposed) which are not spent (for the purposes of the Rehabilitation of Offenders Act).

The information received will be treated with the utmost confidentiality and will be used by CMI to reach a conclusion as to whether a contract should be offered to the applicant.

Disclosure of offences will not in itself mean that a contract of services will not be issued. CMI shall make a decision after careful consideration of the individual circumstances and with due regard to any safeguarding risks. The CMI undertakes not to unlawfully discriminate against any individual on the basis of information revealed in the disclosure. Any action taken on the basis of such information will depend on the nature of the role and the circumstances and background of the offence.

## 9. Reporting Policy and Procedures

### 9.1 CMI Staff / Representative responding to Safeguarding concerns

Any representative of CMI who suspects that a child or vulnerable adult is at risk of harm or abuse, takes personal responsibility to report their concerns following the correct procedure. Not reporting concerns may put children and vulnerable adults at further risk of harm. It is not CMI's responsibility to investigate a child or adult safeguarding concern but to review the information provided and, where necessary, escalate and inform the relevant authorities.

Staff and CMI representatives must inform CMI's Designated Safeguarding Lead via email [epa.absupport@managers.org.uk](mailto:epa.absupport@managers.org.uk). CMI Representatives should also inform their main managing contact at CMI.

CMI has a Designated Safeguarding Lead (DSL) and disclosures will be given to this person for review.

The information provided must record as much information as possible about the situation. This information should be passed immediately within one working day and should have the **time & date the record was made and signed**. This should include:

- Who is taking the record and their role/relationship with the individual
- Where and when it happened
- Who was involved
- Any contact details - name, address, telephone number and date of birth of the person involved

- What action, if any, has so far been taken

Staff and CMI representatives must pass on what information they have, even if the informant has only divulged a little or will not give their details. All information should be treated as strictly confidential and staff and CMI representatives must not talk about any information with anyone other than the agreed CMI Designated Safeguarding Lead.

## **9.2 Allegation of safeguarding concern is being made against CMI Staff / Representative**

In all instances, CMI representatives must inform CMI's Designated Safeguarding Lead via email [epa.absupport@managers.org.uk](mailto:epa.absupport@managers.org.uk). CMI Representatives should also inform their main managing contact at CMI.

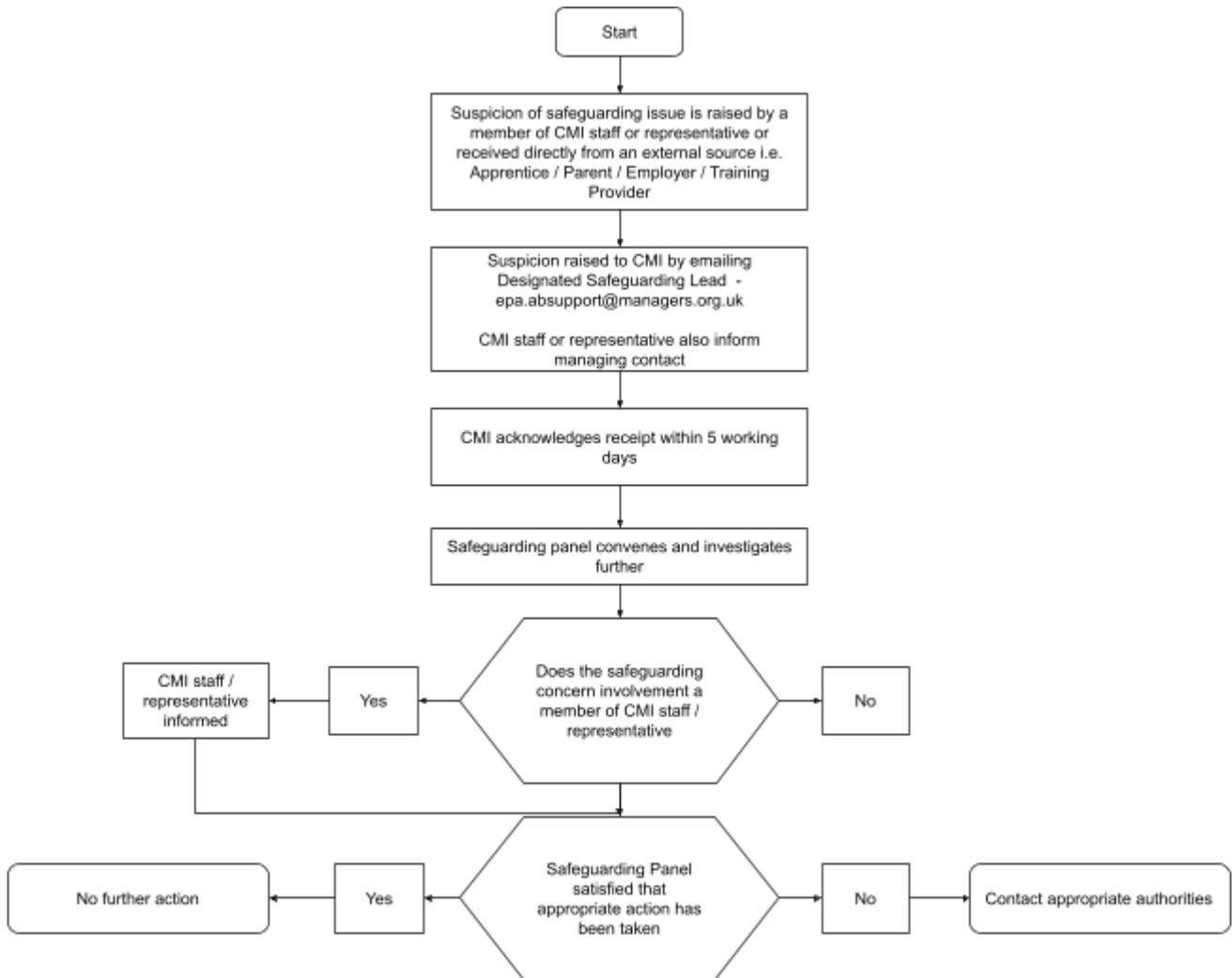
If the CMI receives an allegation against a member of CMI staff or representative, from an external source (e.g. apprentices, parents, employers or training provider staff), they will inform the representative in question not giving any more information than could lead to further safeguarding or compromise any investigation. CMI may suspend them from their contractual duties while the matter is investigated. Any allegation will be scrupulously investigated, having regard to confidentiality.

## **10. Safeguarding Panel**

The Safeguarding Panel's responsibilities are to review any safeguarding concerns that are reported to CMI either by CMI staff, representatives or external sources. The Safeguarding Panel will make a judgement about what action, if necessary, should be taken in relation to any reported concern.

The Safeguarding Panel will have three representatives consisting of the Designated Safeguarding Lead and a Quality Manager. The third member will be nominated by the Designated Safeguarding Lead and does not necessarily need to be involved in End-Point Assessments.

## 11. CMI Safeguarding Disclosure Process



## 12. CMI Codes of behaviour

CMI has in place Codes of Conduct that set out acceptable standards of behaviour and good practice for staff and representatives.

- Listen to, value and respect everyone as an individual
- Actively contribute to an organisational culture where inappropriate behaviour is not tolerated
- Provide an example of the good conduct you wish others to follow
- Where possible you should not give out personal information, or share email addresses, mobile phone numbers etc with any child, young person or vulnerable adult
- Report all allegations/suspensions of abuse by seeking further support and guidance, including any allegation made against yourself or other staff
- Ensure that any concerns about inappropriate behaviour are quickly and appropriately reported on to CMI
- Be aware that some children and vulnerable adults may behave inappropriately.
- Should have no physical contact.
- Should not make or permit suggestive or discriminating remarks to/or about children or vulnerable adults.

- Should not meet children or vulnerable adults outside of organised/formal interaction.

### **13. Implementation**

In order to achieve the successful implementation of this safeguarding policy, CMI will, give clear guidance to its staff and representatives on how the safeguarding policy will be adapted and applied

CMI will provide access to this Safeguarding policy to all its representatives, EPA customers and partner organisations to ensure that it should be available on request to apprentices and other interested parties.

CMI will provide development activities/updates appropriate to the needs of CMI staff / representatives when required.

CMI will ensure that:

- Issues concerning welfare, safety and confidentiality are addressed as an integral part of EPA assessment development, review and assessment guidance
- Require that all CMI staff / representatives have completed and signed a Disclosure Declaration covering offences, cautions, reprimands, warnings etc.
- Require that all CMI staff / representatives complete a new Disclosure Declaration should their circumstances change

### **14. Policy Review Arrangements**

We will review this policy annually as part of our self-evaluation arrangements and revise it in line with any feedback from customers, learners, regulatory authorities or external agencies, or changes in our practices.

### **15. Contact Us**

If you have any queries about the contents of the policy, please contact our Awarding Body Team via email at [epa.absupport@managers.org.uk](mailto:epa.absupport@managers.org.uk) or via post to:

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Management House  
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