

Pareto

Safeguarding and Prevent Policy

Policy Version: 1.1

Approved By: Governance Board

Last Reviewed: February 2026

Next Review Date: January 2027

Policy Owner: Designated Safeguarding Lead

Policy Authority: VP Apprenticeships

Safeguarding and Prevent Policy

Pareto Safeguarding and Prevent Policy	1
1. Policy Statement and Introduction	3
2. Core Safeguarding Principles	4
3. Scope	4
4. Key Safeguarding Contacts at Pareto	4
4.1 How to Report a Concern:	5
5. Roles and Responsibilities	5
6. The Prevent Duty	6
7. Recognising Signs of Abuse and Neglect	6
Categories of Abuse include:	6
Other Safeguarding Risks include:	7
8. Reporting Procedures: The 5 Rs	7
9. Online Safety	8
10. Safer Recruitment, Screening and Staff Training	8
10.1 Safer Recruitment	8
10.2 Continuous Screening	8
11. Data Protection and Confidentiality	9
12. Allegations Against Staff	9
13. Whistleblowing	9
14. Management of External Speakers and Events	9
15. Reporting Serious Incidents to External Bodies	9
16. Policy Review	10

Safeguarding and Prevent Policy

1. Policy Statement and Introduction

Pareto is fully committed to its responsibility to safeguard and promote the welfare and well-being of all our learners. We recognise that all learners have a fundamental right to be protected from harm, abuse, and neglect. This policy provides a clear framework for a safe, supportive, and inclusive learning environment, as detailed in our EDI policy, for everyone engaged in our apprenticeship programmes.

Our approach is learner-centred. We will always act proportionately and in the best interests of the learner. This policy applies to all learners, with a particular focus on the specific needs of our 16-18 year old cohort and any adults who may be at risk.

We have written this policy in line with the most current legislation and statutory guidance, including:

- Keeping Children Safe in Education (KCSIE) 2025
- The Prevent Duty (Counter-Terrorism and Security Act 2015)
- The Care Act 2014
- Working Together to Safeguard Children 2023
- Information sharing: advice for practitioners (2024)

2. Core Safeguarding Principles

Our safeguarding practice is underpinned by the six key principles of the Care Act 2014:

- **Empowerment:** Supporting people to make their own decisions and give informed consent.
- **Prevention:** Taking action before harm occurs.
- **Proportionality:** Providing the least intrusive response appropriate to the risk presented.
- **Protection:** Support and representation for those in greatest need.
- **Partnership:** Working with local services and communities to provide a collective response.
- **Accountability:** Transparency and accountability in delivering safeguarding.

3. Scope

This policy applies to all Pareto staff (including employees, contractors, and associates), senior leaders, and any visitors involved in our services. It also provides essential guidance for our learners and their employers, who are key partners in our safeguarding commitment.

4. Key Safeguarding Contacts at Pareto

Anyone with a safeguarding concern should report it immediately to the Designated Safeguarding Team.

- **Designated Safeguarding Lead (DSL), Level 4 Trained:** Dan Gagg
dgagg@pareto.co.uk
- **Deputy Designated Safeguarding Lead (DDSL), Level 3 Trained:** Lyn Kennerson
lkennerson@pareto.co.uk

4.1 How to Report a Concern:

- **Urgent Safeguarding Phone Line: 01625 810643**
- **Email: safeguarding@pareto.co.uk** (monitored during office hours)
- **Online Reporting Form: [\[Link to Online Form\]](#)**

If you believe a learner is in immediate danger of harm, you must call 999 immediately, then report the incident to the Pareto DSL as soon as it is safe to do so.

5. Roles and Responsibilities

- **Senior Leadership Team:** Has overall responsibility for ensuring that Pareto's safeguarding policies and procedures are effective, implemented consistently, and compliant with statutory requirements.
- **Designated Safeguarding Lead (DSL):** Is the primary contact for all safeguarding concerns. The DSL supports staff, liaises with external agencies (like the Local Authority Designated Officer (LADO), social services, and the police), and maintains accurate, confidential records.
- **Deputy DSL, Safeguarding Committee & Senior Leadership Representative:** Support the DSL in their duties and act as a point of contact in their absence.
- **Regional Safeguarding Champions:** Act as a local contact to support Skills Coaches and Trainers. They share key safeguarding messages, updates, and resources relevant to local risks, ensuring learners and employers are well-informed.
- **All Staff (Skills Coaches, Trainers etc.):** Have a duty to be vigilant, identify potential signs of concern, and report them immediately and appropriately. All staff must complete mandatory safeguarding training.
- **Learners:** Are encouraged to look after their own well-being and that of others, and to report any concerns they have about themselves or another learner without delay.
- **Employers:** Are crucial partners in safeguarding. We work with employers to ensure they understand their responsibilities in providing a safe working environment for the apprentice, including relevant DBS checks for staff working with apprentices aged 16-18.

6. The Prevent Duty

Pareto is committed to its duty under the Counter-Terrorism and Security Act 2015 to prevent people from being drawn into terrorism. This sits within the UK's wider counter-terrorism strategy, CONTEST. Our aim is not to prevent learners from having political or religious views, but to protect them from extremist narratives.

- **Radicalisation** is the process by which a person comes to support terrorism and extremist ideologies.
- **Extremism** is vocal or active opposition to fundamental British Values.
- **British Values** are defined as: Democracy, The Rule of Law, Individual Liberty, and Mutual Respect and Tolerance for those with different faiths and beliefs.

We support the Prevent agenda by:

- Promoting British Values throughout our curriculum and interactions.
- Providing a safe environment for learners to discuss controversial issues and challenge extremist narratives.
- Ensuring our staff are trained to recognise the signs of radicalisation and know how to raise a concern.

Any concern related to Prevent should be reported to the DSL, who will assess the concern and, where appropriate, make a referral to the Channel programme.

7. Recognising Signs of Abuse and Neglect

All staff should be aware of the different types of abuse and neglect. Concerns can arise from observations, disclosures from a learner, or information from a third party.

Categories of Abuse include:

- **Physical Abuse:** Hitting, shaking, scalding, or any use of force.
- **Emotional Abuse:** Persistent criticism, threats, bullying, humiliation, or lack of love and affection.
- **Sexual Abuse:** Forcing or enticing a person to take part in sexual activities.
- **Neglect:** The persistent failure to meet a person's basic physical and/or psychological needs.

Other Safeguarding Risks include:

- **Online Safety & Cyberbullying:** Including inappropriate online content, grooming, and sexting.
- **Mental Health & Wellbeing Concerns:** Such as anxiety, depression, self-harm, and suicidal thoughts.
- **Domestic Abuse:** Controlling, coercive, threatening, or violent behaviour.
- **Financial Abuse:** Misuse, theft, or control of someone's money or property.
- **Modern Slavery & Human Trafficking:** Including forced labour and county lines exploitation.
- **'Honour-Based' Violence, Forced Marriage & Female Genital Mutilation (FGM):**
- **Discrimination and Bullying:** Based on any protected characteristic.
- We aim to actively challenge discriminatory language or behaviour that could create a safeguarding risk (e.g., hate-related bullying/harassment).

This is not an exhaustive list. If you have any concern about a learner's welfare, you must report it.

8. Reporting Procedures: The 5 Rs

Do not investigate concerns yourself. It is your responsibility to report, and the DSL's responsibility to investigate and take action. All staff must follow the 5 Rs framework.

1. **RECOGNISE:** The signs and indicators of abuse, neglect, or radicalisation.
2. **RESPOND:** To what you see or what is said. Listen carefully to any disclosure. Do not ask leading questions. Reassure the learner they did the right thing by telling you. Do not promise to keep secrets.
3. **RECORD:** Your concern immediately. Note what you saw or were told, using the learner's own words where possible. Include dates, times, locations, and names. Be factual and objective.
4. **REPORT:** Your concern without delay to the DSL or Deputy DSL using an official channel (phone, email, or online form).
5. **REFER:** The DSL is responsible for referring the concern to the appropriate external organisation (e.g., social services, police, Channel panel).

If a learner is in immediate danger, call 999 first, then report to the DSL.

9. Online Safety

Given that most of our delivery is online, we take online safety extremely seriously. We do this by:

- Using secure, approved platforms for all online delivery.
- Establishing clear codes of conduct for online sessions.
- Educating learners and staff on how to stay safe online, identify risks, and report inappropriate behaviour or content.
- Utilising filtering technologies to protect against malicious content.

10. Safer Recruitment, Screening and Staff Training

10.1 Safer Recruitment

Pareto follows safer recruitment procedures for all new staff, including carrying out DBS checks for eligible roles. All staff receive comprehensive, role-specific safeguarding training upon induction. This is refreshed through mandatory e-learning from the Education and Training Foundation (ETF) as per the ETF refresh frequency. Specialist training is provided for all members of the Safeguarding Team.

10.2 Continuous Screening

Pareto staff are strongly encouraged to register with the DBS Update Service within the strict 30-day window following the issue of their Enhanced Certificate. To support this, Pareto will reimburse the annual subscription fee for all active staff.

Staff on the Update Service: By registering, staff consent to Pareto carrying out periodic status checks. These checks will be conducted and logged on our Single Central Record on an annual basis.

Staff NOT on the Update Service: Where a staff member has chosen not to register, or their subscription has lapsed, Pareto will carry out a new Enhanced DBS check every two years (or sooner if concerns arise). The cost of these subsequent checks may be passed on to the employee.

11. Data Protection and Confidentiality

Pareto is committed to the principles of [UK General Data Protection Regulation \(UK GDPR\)](#) and the [Data Protection Act 2018](#). However, concerns about data protection must never prevent the sharing of information when it is necessary to keep learners safe. Information will be shared securely and only with those who need to know.

12. Allegations Against Staff

Any allegation made against a member of Pareto staff will be taken seriously and handled immediately by the Senior Leadership Team in line with statutory guidance. The LADO will be consulted where the allegation meets the required threshold.

13. Whistleblowing

Pareto has a whistleblowing policy to protect staff who report colleagues they believe are doing something wrong, illegal, or neglecting their duties. Staff can report concerns to the DSL or follow the procedure outlined in the policy from our parent organisation, Randstad.

14. Management of External Speakers and Events

To comply with the Prevent Duty, Pareto has procedures to assess and manage risks associated with external speakers or events on our premises or affiliated with our brand. We will not provide a platform for extremist views. If an event with potential risks proceeds, we will ensure it is managed carefully and that any challenging views are balanced with opposing perspectives.

15. Reporting Serious Incidents to External Bodies

The DSL will notify Ofsted and the Department for Education (DfE) of any serious safeguarding incidents, including allegations of abuse against staff, in line with statutory requirements.

16. Policy Review

This policy will be reviewed annually, or sooner if there are changes to legislation or statutory guidance.

Policy Owner:

Dan Gagg

Dan Gagg

Dan Gagg (Feb 4, 2026, 5:56pm)

04 Feb 2026

Policy Authority:

James Knight

James Knight

James Knight (Feb 5, 2026, 1:39pm)

05 Feb 2026

Safeguarding and Prevent Policy

10

Company number: 03119895

Registered office address: 450 Capability Green, Luton, Bedfordshire, United Kingdom, LU1 3LU

London Contact Number: 0333 355 6762



Issuer Pareto Law Ltd

Document generated Wed, 4th Feb 2026 17:55:15 GMT

Document fingerprint 2d6374e36b39f85c467a2613670c6c54

Parties involved with this document

Document processed	Party + Fingerprint
Wed, 4th Feb 2026 17:56:41 GMT	Dan Gagg - Signer (0aea90810587a985dec72a12a5f711da)
Thu, 5th Feb 2026 13:39:47 GMT	James Knight - Signer (31a817cd2c4d2a6f9a6e68d04e28946d)

Audit history log

Date	Action
Wed, 4th Feb 2026 17:55:15 GMT	Envelope generated by Dan Gagg (2.122.132.129)
Wed, 4th Feb 2026 17:55:15 GMT	Document generated with fingerprint 2d6374e36b39f85c467a2613670c6c54 (2.122.132.129)
Wed, 4th Feb 2026 17:56:09 GMT	Sent the envelope to Dan Gagg (dgagg@pareto.co.uk) for signing (2.122.132.129)
Wed, 4th Feb 2026 17:56:09 GMT	Document emailed to dgagg@pareto.co.uk
Wed, 4th Feb 2026 17:56:15 GMT	Dan Gagg opened the document email. (66.249.93.67)
Wed, 4th Feb 2026 17:56:18 GMT	Dan Gagg opened the document email. (66.249.93.66)
Wed, 4th Feb 2026 17:56:19 GMT	Dan Gagg viewed the envelope (2.122.132.129)
Wed, 4th Feb 2026 17:56:41 GMT	Dan Gagg signed the envelope (2.122.132.129)
Wed, 4th Feb 2026 17:56:42 GMT	Sent the envelope to James Knight (jknight1@pareto.co.uk) for signing (2.122.132.129)
Wed, 4th Feb 2026 17:56:42 GMT	Document emailed to jknight1@pareto.co.uk
Wed, 4th Feb 2026 19:14:38 GMT	James Knight opened the document email. (146.75.185.38)
Thu, 5th Feb 2026 12:52:56 GMT	Sent James Knight a reminder to sign the document. (2.122.132.129)
Thu, 5th Feb 2026 12:52:57 GMT	Document emailed to jknight1@pareto.co.uk
Thu, 5th Feb 2026 13:39:13 GMT	James Knight opened the document email. (66.249.93.66)
Thu, 5th Feb 2026 13:39:20 GMT	James Knight viewed the envelope (90.194.235.24)
Thu, 5th Feb 2026 13:39:47 GMT	James Knight signed the envelope (90.194.235.24)
Thu, 5th Feb 2026 13:39:47 GMT	This envelope has been signed by all parties (90.194.235.24)
Thu, 5th Feb 2026 13:39:47 GMT	Signed document confirmation emailed to dgagg@pareto.co.uk (90.194.235.24)

Thu, 5th Feb 2026 13:39:47 GMT

Signed document confirmation emailed to jknight1@pareto.co.uk
(90.194.235.24)

Thu, 5th Feb 2026 13:39:47 GMT

Signed document confirmation emails have been sent to all parties.

Document URL:

<https://api.signable.app/shareable/envelope?t=0e012de7-925a-457d-b754-99368989f12a> (90.194.235.24)