

Metadata Safeguarding Policy

Metadata Training

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1. Purpose

- I. The purpose of this policy is to ensure that all staff at Metadata Training are working together to safeguard and promote the welfare of our apprentices.
- II. This policy describes the procedures we put in place to create and maintain a safe learning environment for all our candidates and staff members.
- III. The safeguarding policy pays attention to:
 - The conduct of staff or personnel associated with Metadata Training.
 - The design, management and implementation of Metadata Training's apprenticeship and training programmes.
- IV. The policy lays out the commitments made by Metadata and informs staff and associated personnel of their responsibilities in relation to safeguarding.
- V. This policy does not cover:
 - Sexual harassment in the workplace – this is dealt with under Metadata's Anti Bullying and Harassment Policy.
 - Safeguarding concerns in the wider community not perpetrated by Metadata Training or associated personnel.

2. What is safeguarding?

- I. In the UK, safeguarding means protecting peoples' health, wellbeing and human rights, and enabling them to live free from harm, abuse and neglect
- II. In our company, we understand it to mean protecting apprentices and our employees from harm that arises from contact with our staff or programmes.
- III. Further definitions relating to safeguarding are provided in the glossary below.

3. Scope

- All staff contracted by Metadata Training.
- Associated personnel whilst engaged with work or visits related to Metadata Training, including but not limited to the following: consultants; volunteers; contractors; programme visitors including journalists, celebrities and politicians.

4. Policy Statement

- Metadata Training believes that everyone we are in contact with, regardless of age, gender identity, disability, sexual orientation or ethnic origin has the right to be protected from all forms of harm, abuse, neglect and exploitation. Metadata Training will not tolerate abuse and exploitation by staff or associated personnel.
- This policy will address the following areas of safeguarding: child safeguarding, adult safeguarding, and protection from sexual exploitation and abuse.
- Metadata Training commits to addressing safeguarding throughout its work, through the three pillars of prevention, reporting and response.

5. Prevention

5.1 Metadata responsibilities

- Metadata Training will:
 - I. Ensure all staff have access to, are familiar with, and know their responsibilities regarding the safeguarding policy - a review is done once every 2 years for all staff by the Apprenticeship Operation Manager and this activity is closely monitored by Mike Goodland, the MD, responsible of making sure that all staff and personnel employed to provide work and training know and respect the safeguarding policy.
 - II. Ensure apprentices and the companies we work with are informed about the safeguarding policies and how to report issues to the right person. This is done during the induction session. The policy is also available in our online learning portal for apprentice to access at any time during their training with us.
 - III. Any new staff will be inducted into the Safeguard Policy by the Apprenticeship Operations Manager.
 - IV. Design and undertake all its apprenticeship programmes and activities in a way that protects apprentices from any risk of harm that may arise from their contact with Metadata. This includes the way in which information about individuals in our programmes is gathered, stored and communicated.
 - V. Implement stringent safeguarding procedures when recruiting, managing and assigning staff and associated personnel.
 - VI. Ensure all staff receive training on safeguarding at a level commensurate with their role in the organization.
 - VII. Follow up on reports of safeguarding concerns promptly and according to due process.

5.2 Staff responsibilities

5.2.1. Child safeguarding

- Metadata staff and associated personnel must not:
 - I. Engage in sexual activity with anyone under the age of 18.
 - II. Sexually abuse or exploit children.
 - III. Subject a child to physical, emotional or psychological abuse, or neglect.
 - IV. Engage in any commercially exploitative activities with children including child labour or trafficking.

5.2.2. Adult safeguarding

- Metadata Training staff and associated personnel must not:
 - I. Sexually abuse or exploit at risk adults.
 - II. Subject an at-risk adult to physical, emotional or psychological abuse, or neglect.

5.2.3. Protection from sexual exploitation and abuse

- I. Metadata Training staff and associated personnel must not:
 - Exchange money, employment, goods or services for sexual activity. This includes any exchange of assistance that is due to beneficiaries of assistance.
 - Engage in any sexual relationships with beneficiaries of assistance, since they are based on inherently unequal power dynamics.
- II. Additionally, Metadata Training staff and associated personnel are obliged to:
 - Contribute to creating and maintaining an environment that prevents safeguarding violations and promotes the implementation of the Safeguarding Policy.
 - Report any concerns or suspicions regarding safeguarding violations by a Metadata Training staff member or associated personnel to the appropriate staff member.

6. Enabling reports

Metadata Training will ensure that safe, appropriate, accessible means of reporting safeguarding concerns are made available to staff, to the apprentices and to the employers that we work with.

Any staff reporting concerns or complaints through formal whistleblowing channels (or if they request it) will be protected by Metadata Training's Disclosure of Malpractice in the Workplace (Whistleblowing) Policy.

Metadata will also accept complaints from external sources such as members of the public, partners and official bodies.

6.1 How to report a safeguarding concern

- Apprentices or staff members who have a complaint or concern relating to safeguarding should report it immediately to their Safeguarding Focal Point or line manager.
- Apprentice who want to report a concern or complaint should inform one or all the following persons:
 - Mike Goodland – mike.goodland@metadatatraining.co.uk
 - Mak Puiwah - mak.puiwah@metadatatraining.co.uk
 - Loredana Toader - lori.toader@metadatatraining.co.uk
- I. If the staff member does not feel comfortable reporting to their Safeguarding Focal Point or line manager (for example if they feel that the report will not be taken seriously, or if that person is implicated in the concern) they may report to any other appropriate staff member.
- II. Once the concern or complaint has been received the person who is being investigated will be suspended from service until the matter is investigated further. We will arrange separate confidential discussions with their line managers, with the apprentice and their HR department. The staff member who is investigated would also be interviewed. A report will be provided, and actions will be devised by Mike Goodland, the safeguarding focal point of contact. If we feel we can't satisfactorily solve this issue, or it is delicate we would request third party help.
- III. Based on the findings after the concern has been raised, we will decide if the staff member is going to be dismissed or allowed to continue in the role.
- IV. All the persons involved in the investigation will be asked to sign a confidentiality agreement to protect both the person accused and the apprentice who has suffered the abuse.
- V. The Managing Director, Mike Goodland or, in his absence, the authorised members of senior staff (Loredana Toader - lori.toader@metadatatraining.co.uk or MakPuiwah - mak.puiwah@metadatatraining.co.uk), have the ultimate responsibility for safeguarding and promoting the welfare of children and young people.

6.2 Safeguarding Focal Point contact details:

- Mike Goodland – mike.goodland@metadatatraining.co.uk Tel 07887 644572

7. Response

- I. Metadata will follow up safeguarding reports and concerns according to policy and procedure, and legal and statutory obligations.
- II. Metadata will apply appropriate disciplinary measures to staff found in breach of policy.

- III. Metadata Training will offer support to survivors of harm or abuse caused by staff or associated personnel, regardless of whether a formal internal response is carried out (such as an internal investigation). Decisions regarding support will be led by the survivor.

8. Confidentiality

It is essential that confidentiality is maintained at all stages of the process when dealing with safeguarding concerns. Information relating to the concern and subsequent case management should be shared on a need to know basis only and should always be kept secure.

9. Glossary of Terms

9.1 Beneficiary of Assistance

- Someone who directly receives training and apprenticeship services as part of the Metadata Training's apprenticeship programme. It includes exploitation by giving the perception of being in a position of power.

9.2 Child

- A person below the age of 18.

9.3 Harm

- Psychological, physical and any other infringement of an individual's rights.

9.4 Psychological harm

- Emotional or psychological abuse, including (but not limited to) humiliating and degrading treatment such as bad name calling, constant criticism, belittling, persistent shaming, solitary confinement and isolation.

9.5 Neglect

Neglect involves the persistent failure to meet basic physical and/or psychological needs, likely to result in serious impairment of the child or vulnerable adult's health and development.

9.6 Safeguarding

In the UK, safeguarding means protecting peoples' health, wellbeing and human rights, and enabling them to live free from harm, abuse and neglect.

In our sector, we understand it to mean protecting people, including children and at-risk adults, from harm that arises from coming into contact with our staff or apprenticeship programmes. We aim to respond appropriately when harm does occur.

We commit to protect our apprentices from any potential, actual or attempted abuse of power, trust, or vulnerability, especially for sexual purposes.

Safeguarding applies consistently and without exception across our apprenticeship programmes, partners and staff. It requires proactively identifying, preventing and guarding against all risks of harm, exploitation and abuse and having mature, accountable and transparent systems for response, reporting and learning when risks materialise. Those systems must be survivor-centered and protect those accused until proven guilty.

9.7 Sexual abuse

The term 'sexual abuse' means the actual or threatened physical intrusion of a sexual nature, whether by force or under unequal or coercive conditions.

9.8 Sexual exploitation

The term 'sexual exploitation' means any actual or attempted abuse of a position of vulnerability, differential power, or trust, for sexual purposes, including, but not limited to, profiting monetarily, socially or politically from the sexual exploitation of another. This definition includes human trafficking and modern slavery.

9.9 Survivor

The person who has been abused or exploited. The term 'survivor' is often used in preference to 'victim' as it implies strength, resilience and the capacity to survive, however it is the individual's choice how they wish to identify themselves.

9.10 At risk adult

Sometimes also referred to as vulnerable adult. A person who is or may be in need of care by reason of mental or other disability, age or illness; and who is or may be unable to take care of him or herself, or unable to protect him or herself against significant harm or exploitation.