Bespoke Professional Development and Training Limited

SAFEGUARDING POLICY AND PROCESS

Updated: July 2023
Next renew due: March 2024

Version Number	Last Amended	Reason for Revision	Amended By-
v1	July 2019	Standard Review	Tracey Carter
v2	July 2020	Standard Review	Tracey Carter
v3	June 2021	Standard Review	Tracey Carter
v4	Nov 2021	Policy and legislation update	Bev Harland
v5	Nov 2022	Standard review	Bev Harland
v6	March 2023	Updates required	Bev Harland
v7	July 2023	Update DSL and DDSL details	Lindsey Holland

Background

BePro is committed to safeguarding and promotion the welfare of all learners including young people and vulnerable adults or adults at risk.

A vulnerable adult or adult at risk is defined as a person whom:

- Has needs for care and support (whether or not the local authority is meeting any of those needs) and;
- Is experiencing, or at risk of abuse or neglect; and
- As a result of those care and support needs is unable to protect themselves from either the risk of or the experience of abuse or neglect.

Employers have a responsibility to the learners that they employ. We also recognise that we have a duty to help employers, staff, and learners to recognise their responsibilities, through guidance, support, and training. As the employer of a learner, it is important that you understand your responsibilities to the learner and what safeguarding means to you.

The aims of this policy are:

- To identify the expectations of staff in relation to safeguarding
- To ensure relevant and effective safeguarding practices are in place
- To ensure the right of every applicant and apprentice to learn within a safe environment
- To ensure that the fundamental rights and needs of our applicants and apprentices are observed
- To prevent abuse through the pastoral support offered to all applicants and apprentices
- To raise awareness of different types of abuse and children in need issues
- To provide guidelines for staff in handling matters relating to actual or suspected child abuse
- To ensure staff act professionally
- To reject at interview stage anyone where we have doubts about the suitability
- To prevent the rise of abuse by ensuring procedures and standards are in place

What is Safeguarding?

Safeguarding regulations have been around for a while, across a wide range of legislation:

- o Working together to safeguard Young Adults 2010
- o Working together to safeguard Children 2018
- o The Children Act 1989, followed by 2004 Children's Act
- o The Young Adults Act of 1989
- o The Adoption and Young Adults Act 2002
- o The Young adults act 2004
- o Safeguarding Vulnerable Groups Act 2006
- o Care Act 2014
- o Public Interest Disclosure Act of 1998
- o The Police Act – DBS 1997
- o Mental Health Act 1983
- o NHS and Community Care Act of 1990
- o Rehabilitation of Offenders Act 1974
- o Education and Training (Welfare of Children) Act 2021

The legislation provides definitions of children and vulnerable adults/adults at risk and sets out the legislative framework of measures to protect them from harm. The term 'safeguarding' embraces both child and vulnerable adult/adults at risk protection and preventative approaches to keep our apprentices, staff, and employers safe. Safeguarding encompasses student's health and safety, welfare, and well-being.

BePro is committed to safeguarding and promoting the welfare of children, young people and vulnerable adults/adults at risk and expects all staff and employers to share this commitment.

Definitions

BePro Safeguarding Policy and Process March 2023 Ref SP06 Review date March 2024

Safeguard - Protect from harm or damage with an appropriate measure

Vulnerable - Exposed to the possibility of being attacked or harmed, either physically or emotionally

Child - A child is under the age of 18 (as defined in the United Nations Convention on the Rights of a Child)

Vulnerable Adult/Adult at risk - Is a person aged 18 years or over who may be unable to take care of themselves or protect themselves from harm or from being exploited. This may include a person who:

- o Is elderly and frail
- o Has a mental illness including dementia
- o Has a physical or sensory disability
- o Has a learning disability
- o Has a severe physical illness
- o Is a substance misuser
- o Is homeless

Safeguarding Is the process of protecting people, whether from crime, other forms of abuse or from being drawn into terrorism-related activity

Types of Abuse

Physical abuse Is defined as the use of physical force that may result in bodily injury, physical pain, or impairment. Physical abuse may include but is not limited to such acts of violent striking, hitting, beating, pushing, shoving, shaking, kicking, pinching, and burning.

Emotional/psychological abuse A person subjecting another to behaviour that may result in psychological trauma, including anxiety, chronic depression, or post-traumatic stress disorder.

Financial abuse Tactic used by abusers to limit and restrict their victims' access to their finances. For example, a young adult having their benefits taken away from them.

Self-Neglect Is any failure of an adult to take care of themselves? It could be a result of poor health, depression, cognitive problems or being physically unable to care for themselves.

Discriminatory abuse Is when you are picked out deliberately for unfair treatment because of a protected characteristic. For example, a vulnerable adult is picked on by an employer because of their disability.

Organisational abuse Is where an institution fails to provide basic care for its residents. It is also related to gang culture where an individual is forced into committing a crime for the financial gain of gang leaders.

Why is safeguarding necessary for employed learners?

Providers of government-funded training have a duty to safeguard their learners and to take such steps that try to ensure the safety of its learners (children under 18 or vulnerable adults) at all times.

What are the responsibilities of an Employer?

- To understand what is meant by safeguarding and promoting the welfare of learners
- Be aware of your statutory duties towards the welfare of children and vulnerable adults/adults at risk
- Be familiar with our guidance, in particular, the reporting arrangements

It is the responsibility of the employer to ensure employees working alongside learners are free from convictions and of sound character and judgement and will not pose as any threat or danger to apprentices.

What to do if an apprentice discloses information

Employees working closely with learners should be alert to the possibilities of harm and they should inform only. In the case of an emergency where there is an urgent need or medical support is needed, call the appropriate emergency service.

If any member of staff has a safeguarding issue brought to their attention, they must treat it as a matter of urgency and contact the Designated Safeguarding Lead, and in their absence the Deputy Safeguarding Lead.

- o   Please see the Process below.

Monitoring IT Usage

This policy also sets out the controls and rules to be followed for those undertaking any monitoring to ensure that the privacy of all colleagues is appropriately protected and to protect the interests of staff engaged in monitoring who may discover activities amounting to misconduct so serious that they cannot reasonably be expected to ignore it.

The policy aims to set expectations for staff on the degree of privacy they can expect when using University issued IT systems and equipment. The policy does not include rules or guidance on the use of University issued IT equipment or required standards of staff conduct. For guidance on the use of University issued IT equipment staff and students should review the IT Acceptable Use Policy.

The policy also sets out the governance of filtering arrangements to ensure that those with a legitimate need to research external websites that would normally be blocked, have a mechanism to do so. The filtering that is implemented will prevent access only to those sites likely to contain harmful and/or illegal material or giving rise to a risk that vulnerable people might be drawn into illegal activity including terrorism.

This policy applies to all forms of monitoring including, but not limited to, the use of scanning software to monitor system events and user behaviour. No monitoring of staff activity on staff owned devices is permitted as these are considered entirely private. However, staff owned devices using BePro's networks may be monitored. BePro will normally co-operate with a lawful request to help law enforcement agencies investigate crime.

The Monitoring IT Usage policy is informed by the requirements of the:

• Data Protection Act (until 25 May 2018)

• UK General Data Protection Regulations (from 25 May 2018)

• Regulation of Investigatory Powers Act (2000)

Targeted monitoring

Non automated (targeted) monitoring may be undertaken if criminal activity, which BePro cannot reasonably be expected to ignore, is detected as a consequence of automated monitoring. If a student is alleged to have engaged in such activity, BePro may report them to the police who will determine the nature and scope if any subsequent investigation. Non automated (targeted) monitoring of IT facilities and systems issued to, and used by, staff members will only be undertaken to the extent permitted by or as required by law and as necessary or justifiable for the following purposes:

• Detection and prevention of infringement of these and other policies and regulations

• Investigation of alleged misconduct

• Handling email and other electronic communications during an employee's extended absence

- To find lost messages or to retrieve messages lost due to computer failure

- To comply with any legal obligation

Training and Educating Employees

Each member of delivery staff has completed a certificated Safeguarding in Further Education (FE) course or Safeguarding and Safer Recruitment in FE and undertake regular CPD events and standardisation meetings to keep updated with legislation and refresh their knowledge. Our Safeguarding Lead holds Level 3 Safeguarding qualification. Key Individuals involved in both learner recruitment and staff recruitment complete an in-house Safer Recruitment training course.

All employees undertake a Safeguarding Induction. The training received is continually reviewed to ensure the most appropriate and up to date training is given. Aligning with the mandatory duty surrounding the Government's Counterterrorism and Security Act 2015, all staff undertake Prevent training aligning with their role within BePro.

Periodic updates surrounding key safeguarding concepts are communicated monthly via e-mail. Monthly focus topics are also distributed via these internal communication channels to raise awareness and promote discussion in all areas under the wider safeguarding agenda including areas such as radicalisation, mental health issues, positive relationships, and staying safe on the internet. This will educate learners alongside giving greater knowledge to be passed onto employers.

There is reference to safeguarding in all team meetings – carried out fortnightly, with the Safeguarding Lead and Line Manager utilising the information in the monthly focus topics to steer discussions.

Additional training programmes to support dealing with unpredictable behaviour and behavioural learning difficulties will become available in the near future.

Keeping Yourself Safe

To maintain yours and the learner's safety, the following are prohibited:

- Befriending learners on personal social media sites
- Distributing personal telephone numbers
- Visit learners at home or transporting learners to and from locations (this includes travelling in a car with the learner driving)
- Do not use sarcasm, insults, or belittling comments towards learners
- Personal relationships with learners

It is also important to be mindful of the following when conducting yourself:

- Locations of one-to-one meetings with colleagues. These should take place at a neutral location.
- You will naturally build a rapport with learners through the apprenticeship contact, and the learners may see you as a confidante and support but be sure to maintain professional boundaries whenever carrying out work on BePro's behalf.
- Be respectful of all young and vulnerable people and appreciate you are in a position of trust. We have the opportunity to listen to their concerns and support them.
- Uphold confidentiality within certain remits when required by the situation but be careful not to promise to keep secrets or ask others to do so.
- Avoid spending time alone with learners in a closed environment. If this is unavoidable for example during a formal assessment/ test, ensure a member of the site staff is aware where you are and monitors this.
- Be careful when giving learner advice as this is based on your opinion. Focus support around information (facts) and guidance (signposting).
- Be mindful of any learners you acquire that by default creates a conflict of interest i.e., a partner or friend becomes a learner. Discuss appropriateness/ alternative assessor arrangements with your line manager.
- If at any point you feel unsafe in a learner's company inform the site manager, your line manager, the designated safeguarding lead and leave the premises.

Keeping Learners Safe

Learners are issued with a learner welfare card detailing both internal and external support services. This contains contact details for the police, BePro head office and other external services and will signpost to relevant support experts should they require it.

Monthly topics in relation to equality and diversity and safeguarding are discussed during each apprenticeship visit. Learning surrounding these activities is discussed and documented at each visit, along with pastoral checks.

Where BePro Development acts as a subcontract to other companies – We will commit to upholding the policies and procedures of the training provider/college which holds the funding. BePro will also attend any relevant training/ updates, adhere to monitoring requirements, be aware of and adhere to funding regulations as set out by the different funding authorities.

The legislation update in The Education and Training (Welfare of Children) Act 2021 and the application of 'Keeping children safe in education' extends to ITPs, independent special colleges and 16 to 19 academies (and not just maintained schools, FE and sixth form colleges) to the extent that if we have students or apprentices who are under the age of 18, it is appropriate that we exercise the same scrutiny as well as the statutory guidance that applies to them considering the review into sexual harassment in ITP's as well as Schools and Colleges.

Leadership and Management

The Senior Management team meet regularly providing a greater focus on safeguarding and safety of learners.

The Safeguarding Lead is also subject to Quality Assurance checks carried out by the Managing Director.

Learner Safeguarding Concerns Process Map

BePro Safeguarding Policy and Process March 2023 Ref SP06 Review date March 2024

1.
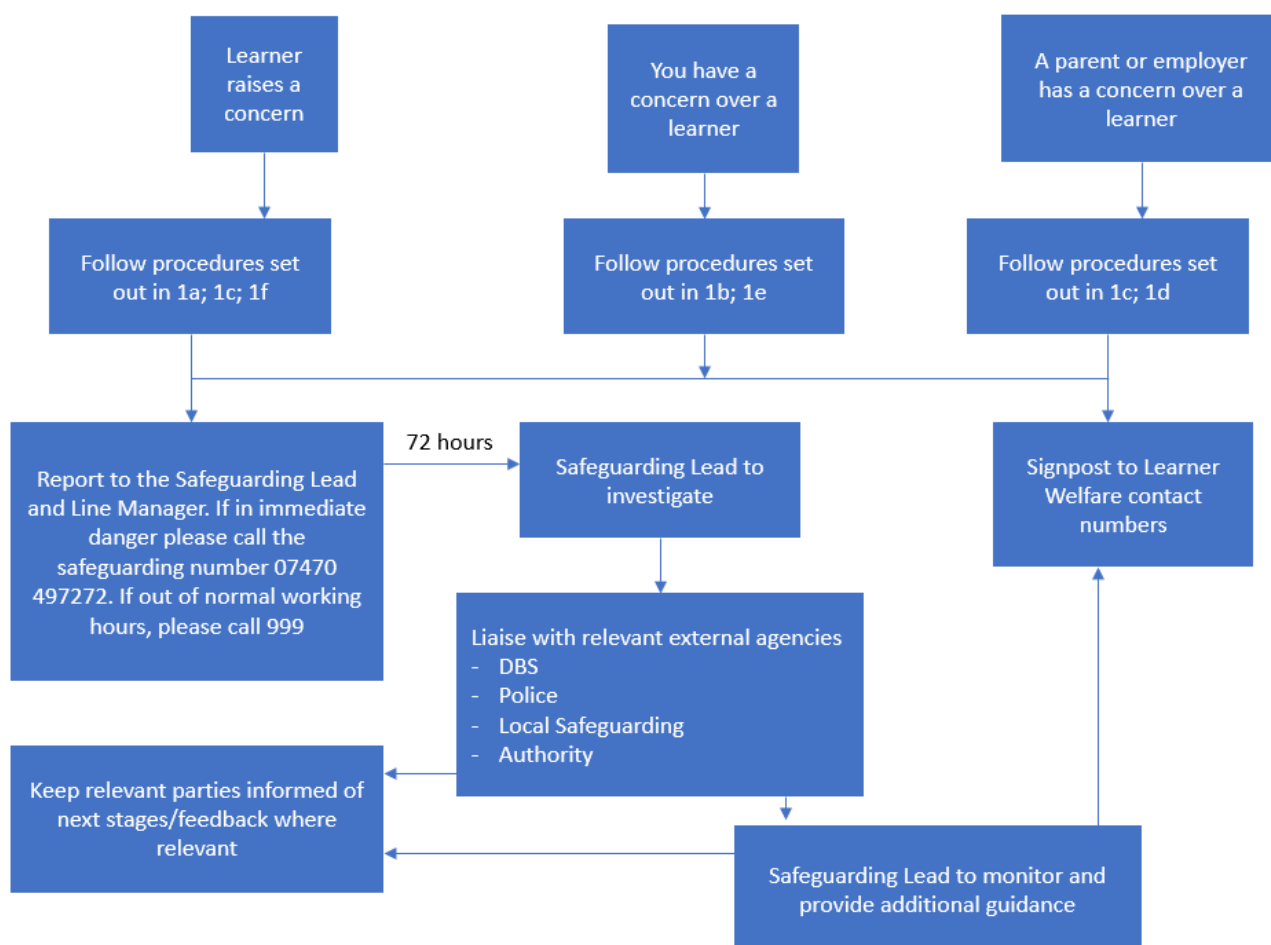
Reporting a Concern

a) If a learner raises a concern/allegation with you: If the learner has a concern over their own personal welfare and wellbeing, you are to listen to and record all information given, making no judgement or assumptions. Take any actions required to secure the immediate safety of the child or adult at risk, if deemed appropriate. This may involve staying with them until a responsible adult can be located. This will only be recorded on the *Safeguarding Record* and raised with the manager if the learner agrees. If the learner gives consent, you must report the issue to the Designated Safeguarding Lead (DSL) or Deputy Safeguarding Lead if the DSL is not available. If you feel the learner's safety and wellbeing are at risk and they do not give consent for the matter to be escalated, you should escalate only when you believe the matter would deteriorate if additional support was not sourced. You should always consider the wishes of the individual, even those under the age of 18. Advice should be sourced from the Safeguarding Lead or Deputy if you are unsure. The designated lead will then investigate the incident within 72hrs and decide the appropriate course of action. A decision will also be made as to whether a referral outside the organisation is appropriate.

b) If a Development Coach/Tutor has concerns over a learner: This might be through observation or alleged by others through discussion. Advice should be sourced from the Safeguarding Lead if you are unsure.

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c) If a learner/ parent has a concern/ allegation about a member of BePro Development staff: All learners are to be informed that if they have a concern over their own personal welfare and wellbeing and they do not feel comfortable talking to their Development Coach/Tutor that they are to contact BePro's Safeguarding Lead. Contact details for the designated person are available in this Safeguarding Process and the Safeguarding Policy. The Safeguarding Lead's contact details can also be found within the welfare card along with additional details of external sources. The Safeguarding Policy is also available on BePro's internal SharePoint.

d) If a parent contacts you to report a concern about their child. Ensure you listen and record the details as per a learner reporting a concern to you. Ensure you have contact details for the parent. You must report the issue to the Safeguarding Lead. The designated lead will then decide the appropriate course of action, and if a referral outside the organisation is appropriate. They will also liaise with the parent as appropriate. Be mindful of confidentiality as all learners aged 16 and above and of employed status are deemed to be adults, and therefore no information should be passed to parents or carers without prior consent to do so from the learner.

e) If you observe a safeguarding issue taking place within the working practices of an employer's setting. An example of this would be a practitioner using inappropriate behaviours or actions or observing inappropriate restraint techniques. Take action to stop the activity immediately and inform the individual of your concerns. You should ask them to remove themselves from the area and advise them you will inform their senior manager. Take any actions to secure the safety of the child or adult at risk. This may involve staying with them until a responsible adult can be located. Inform your designated Safeguarding Lead. Be mindful of differences between poor practice and a safeguarding issue and apply your action appropriately.

f) If a learner reports unsafe practices or safeguarding issues to you within their working environment. Advise the learner to follow in-house reporting or whistleblowing procedures. You may support the learner in speaking to the appropriate senior team members. Report the incident to your designated Safeguarding Lead who will offer additional guidance and signposting for the learner and will monitor.

Important Information

If you feel the safeguarding concern, you have reported is not being dealt with effectively by the Safeguarding Lead, please refer to the Whistleblowing Policy.

If you disagree with the outcome of a safeguarding referral outcome, please refer to the Safeguarding Lead for guidance or you may also follow the local safeguarding board escalation procedure – found on their local authority website.

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BePro's Designated Safeguarding Lead
Lindsey Holland
Email: safeguarding@beprodevelopment.co.uk

BePro's Deputy Safeguarding Lead
Steph Howarth
Email: safeguarding@beprodevelopment.co.uk

Responsibilities towards the Prevent Duty

The government Counterterrorism and Security Act 2015, places a duty upon all education providers to have regard to the need to prevent people from being drawn into terrorism. This Prevent Duty forms part of the wider governments CONTEST counter terrorism strategy:

    • Prevent terrorism – stop people becoming terrorists

    • Pursue terrorism – disrupt and stop terror attacks

    • Protect against terrorism – strengthen UK protection

    • Prepare to deal with terrorism – mitigate impact of attacks that cannot be stopped.

As a nation we continue to prioritise according to the threat posed to our national security; the allocation of resources will be proportionate to the threats we face. There has been an increase in far-right inspired terror attacks and lone acts of terror as opposed to mass organised terror activities. The government strategy now includes ways in which to identify risk of these instances. The aim of the Prevent strategy is to reduce the threat to the UK from terrorism by stopping people becoming terrorists or supporting terrorism. The Prevent strategy has three specific strategic objectives:

- Respond to the ideological challenge of terrorism and the threat we face from those who promote it
- Prevent people from being drawn into terrorism and ensure that they are given appropriate advice and support.
- Work with sectors and institutions where there are risks of radicalisation that we need to address.

Objectives

BePro as a training provider have a responsibility to ensure:

    • We have undertaken training in the Prevent Duty as identified by their leaders and managers

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• We are all aware of when it is appropriate to refer concerns about learners or colleagues to the provider's safeguarding officer

• To exemplify British values of "democracy, the rule of law, individual liberty and mutual respect and tolerance for those with different faiths and beliefs" into our practice.

Learner Safety, Engagement & Curriculum

The duty encompasses building learner resilience to the threat of radicalisation, challenging extremism and raising awareness of and demonstrating British values:

- Democracy

- Rule of Law

- Tolerance and understanding of different faiths

- Challenging discrimination

- Individual liberty

Opportunities to promote the above values are currently facilitated within the apprenticeship curriculum, including various resources. Knowledge, skills, and behaviour monitoring tools, alongside surveys are used to measure the impact of such materials.

Referral Pathway

Although incidents involving radicalisation have not occurred at BePro to date, it is important for us to be constantly vigilant and remain fully informed about the issues which affect the local area, cities, and society in which we operate.

Employees are reminded to suspend any 'professional disbelief' that instances of radicalisation 'could not happen here' and to be 'professionally inquisitive' where concerns arise, referring any concerns through the appropriate channels.

We believe that it is possible to intervene to protect people who are vulnerable. Early intervention is vital, and employees must be aware of the established processes for front line professionals to

refer concerns about individuals and/or groups. We must have the confidence to challenge, the confidence to intervene and ensure that we have strong safeguarding practices based on the most up-to-date guidance and best practice.

Everyone within BePro is trained in Safeguarding and will deal swiftly with any referrals from whatever source.

The Designated Safeguarding Lead will liaise with the Management Team to discuss the most appropriate course of action on a case-by-case basis; they will jointly decide when a referral to external agencies is needed.

If a learner has concerns about themselves, or you have concerns about a learner being at risk of radicalisation, you should refer to Appendix 1 and 2 for the process for escalating any safeguarding concerns.

Appendix 3 will support with identifying vulnerabilities and indicators of someone being at risk of radicalisation.

NB – should you feel your learner, yourself or any members of the public are in immediate danger report to the police immediately.

Once the Designated Safeguarding Lead has been informed, they will make a decision on whether the issue needs to be escalated to the local police Prevent Officer. The Designated Safeguarding team/staff member that is involved with the referral will then support the Channel process as seen fit by the local Channel panel. See Appendix 1 for the referral pathways.

It should be noted that referral to the Channel process is not a criminal intervention. It should be noted that a learner displaying one or a few of vulnerabilities and indicators does not mean the learner will necessarily be at risk of radicalisation, but it may do so. In all instances that concern you, you should report to the Designated Safeguarding Lead. The process for referral to a prevent coordinator involves risk assessing the learner's level of engagement, intent, and capability. If guidance is required, the safeguarding lead will discuss with a local FE Prevent coordinator.

Appendix 1

Referral and Channel process Prevent Duty - Reporting Procedure

Blue boxes are internal

Red boxes are external
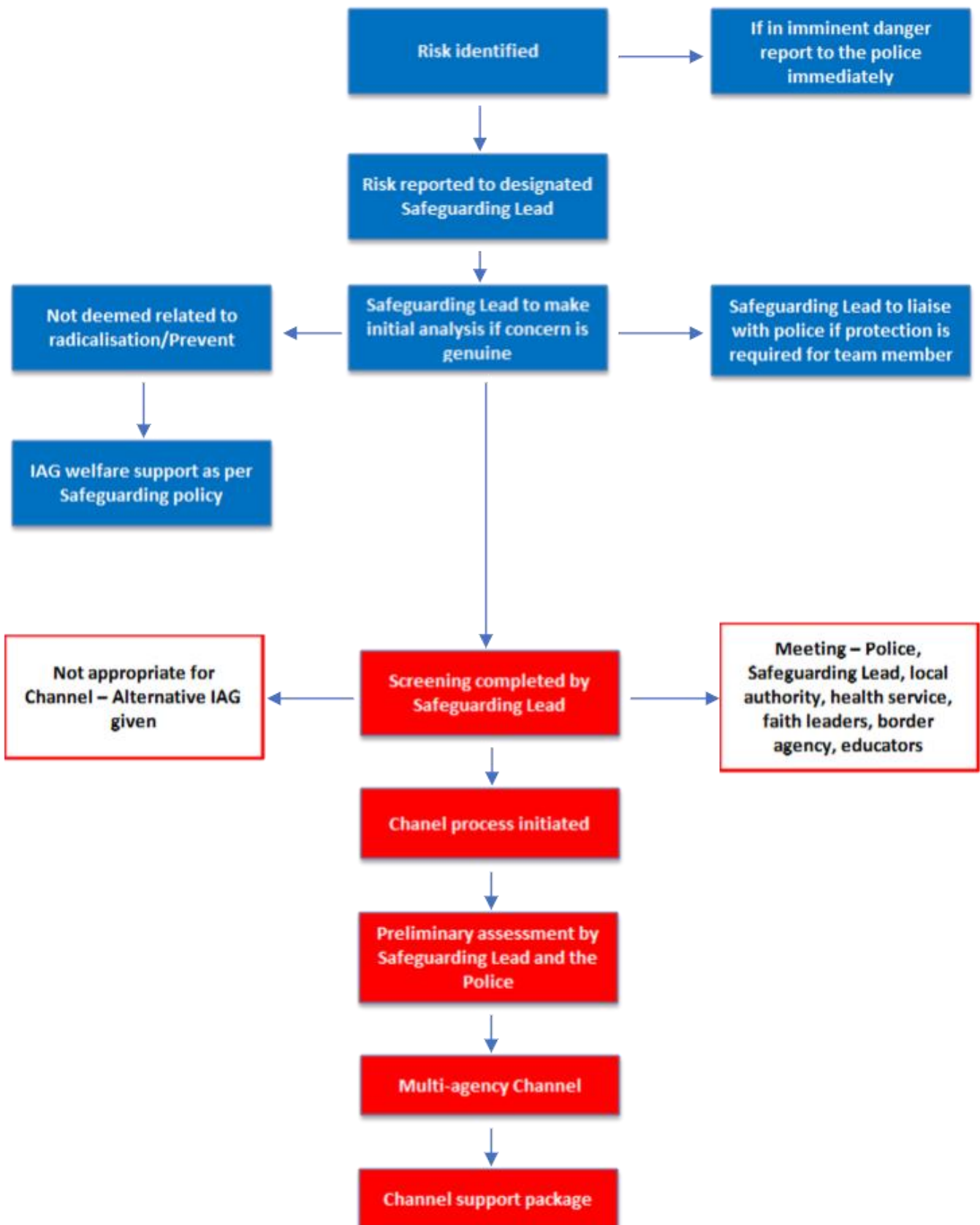
Appendix 2

Disclosure Recording Form

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Disclosure Record

Disclosure Record

This record will be used by members of BePro staff to record disclosures specifically relating to radicalisation and Prevent. The completed form should be sent to the Safeguarding Lead dealing with the allegation.

Staff Details

Name	
Position	

Learner Details

Name	
Location	
Telephone Number	
Date of Birth	

Date and time of disclosure:	Dd/mm/yyyy
Details of the disclosure:	

Action taken so far

Discussed with Learner's Line Manager Yes/No
Agreed Action:

Disclosure Record v1 June 2021

Disclosure Record

BePro — Bespoke Professional Development

Name of staff member completing the form	
Signature of staff member completing the form	
Date	

The Disclosure Record should now be passed to the Safeguarding Lead to follow up and investigate further

To be completed by Safeguarding Lead:

Action taken:

Safeguarding Lead Signature	
Date	

Disclosure Record v1 June 2021

Appendix 3

Vulnerabilities & Indicators of Radicalisation

Vulnerabilities	Indicators
Identity crisis	Withdrawn
Personal crisis	Changes in behaviour
Personal circumstances	Changes in social circle
Special educational need	Using extremist language
Experiences of criminality	Change in appearance
Isolation and social exclusion	Justifying the use of violence
Seeking acceptance	Possessing or accessing extremist material
Media influence	Accessing violent and extremist websites
A need to belong	

Review

This policy will be reviewed at intervals of 1 year to ensure it remains up to date and compliant with the law.

The policy was last updated July 2023 and is due for review March 2024.
The policy may also be reviewed if legislation changes or if monitoring information suggests that policy or practices should be altered.

Georgina Selmi
CEO