



BLUE LION
TRAINING ACADEMY

Group Policy & Procedure

SAFEGUARDING and PREVENT
GP04

Document History

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SAFEGUARDING and PREVENT POLICY

1. Introduction

Blue Lion Training Academy (BLTA) has a statutory and moral duty to ensure that we function with a view to safeguarding and promoting the welfare of children, young people and vulnerable adults receiving education and training. Throughout these policies and procedures, reference is made to 'children and young people'. This term is used to mean 'those under the age of 18'. The governing body recognises that some adults are also vulnerable to abuse and, accordingly, these procedures may be applied (with appropriate adaptations) to allegations of abuse and the protection of vulnerable adults. Vulnerable adults have the same rights, in law, to special measures as children.

The company is committed to ensuring that we:

- Provides a safe environment for children and young people to learn in.
- Identifies children and young people who are suffering, or likely to suffer and significant harm.
- Takes appropriate action to see that such children and young people are kept safe, both at home and whilst attending we. In pursuit of these aims, the Corporation will approve and annually review policies and procedures with the aim of:
 - Raising awareness of issues relating to the welfare of children and young people and the promotion of a safe environment for the children and young people learning.
 - Aiding the identification of children and young people at risk of significant harm and providing procedures for reporting concerns.
 - Establishing procedures for reporting and dealing with allegations of abuse against members of staff. The safe recruitment of staff and on-going training. In developing the policies and procedures, the governing body will consult with, and take account of, guidance issued by the Department for Education (DCSF), National Institute of Adult and Continuing Education (NIACE) and other relevant bodies and groups.
 - Promoting physical, mental and general health and well-being to all staff and apprentices.

The procedures have been developed in cooperation with the Directors, senior managers and consultants. In recent years there has been increasing concern about the safety and welfare of children, young adults and vulnerable adults throughout the UK. FE settings have traditionally considered the welfare of under 18s as part of their Duty of Care obligations. Whilst there is currently no specific directive relating to FE settings, legal opinion is now that there are a number of statutory and other provisions relating to child safeguarding that could be applied to all FE and HE settings and which, therefore,



BLTA would be expected to take into account, including:

- The Protection of Freedoms Act 2012.
- The Education Act (2002) Section 175.
- The Children Act (1989 and amendments).
- The Children Act 2004.
- Working Together to Safeguard C2006.
- Safeguarding of the Vulnerable Adult guidance 2006.
- Safeguarding of Vulnerable Adult Schemes.
- 'Aim safer: A Framework for Safeguarding Children & Young People in Higher Education Institutions'.

The Children Act 1989 states the legal definition of a child is “a person under the age of 18”.

Section 115(4) of the Police Act 1997 states that a person can be considered to be vulnerable if they are: “substantially dependent upon others in performing basic physical functions, or ability to communicate with those providing services, or to communicate with others, is severely impaired, and, as a result, would be incapable of protecting himself from assault or other physical abuse, or there is a potential danger that his will or moral well-being may be subverted or overpowered”

We have nominated a director with special responsibility for child protection issues. The director can be contacted via the office. All staff working with children, young adults and vulnerable adults will receive training adequate to familiarise themselves with child protection issues and the professional responsibilities, roles and duties to follow which are outlined within we policy and procedures. Update training will be required within a three-year period, or earlier as need is identified and judged appropriate.

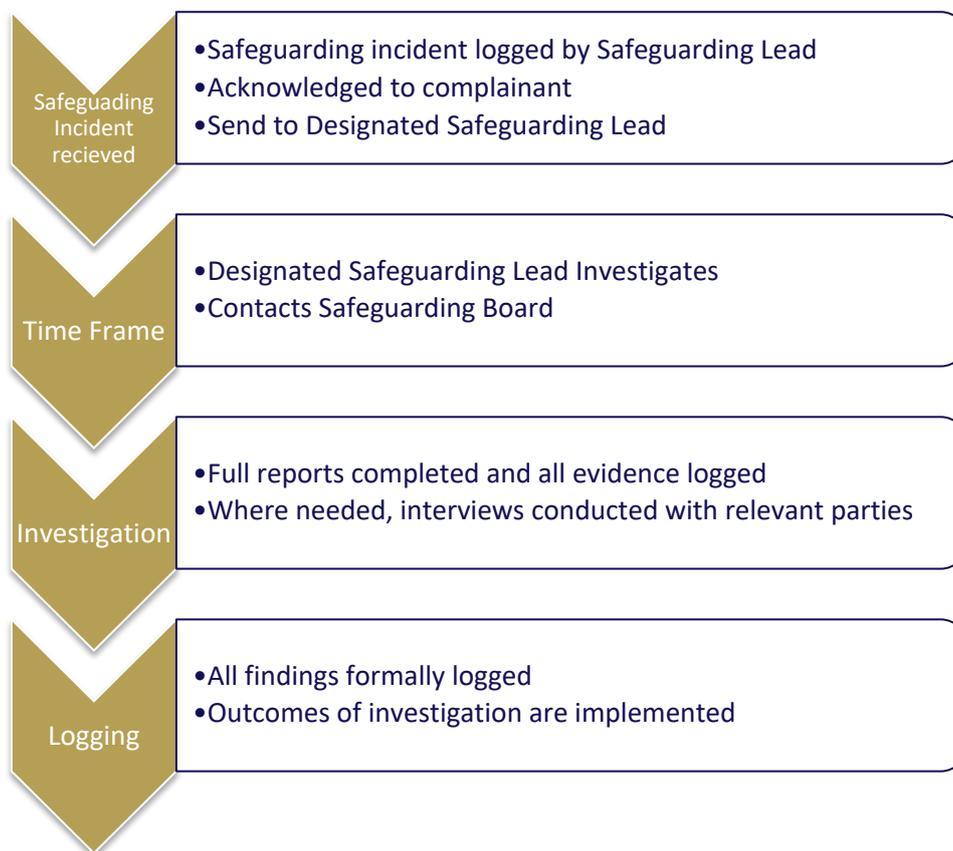
A senior member Management team will hold overall responsibility for child protection with support from other members of staff with specific safeguarding responsibility. BLTA have staff who are designated safeguarding officers and can operate to the required standard.



2. Our Procedure for investigating reported incidences are as follows: -

If staff have any safeguarding or prevent concerns they should complete a Safeguarding incident form and immediately pass it to the safeguarding lead. If the safeguarding lead is not available for any reason it should be raised to the Director responsible for safeguarding or deputy safeguarding lead.

If a concern or allegation is received then please follow procedures as laid out in the “Staff reporting guide handout” at the end of this document.



3. Safeguarding Principles

BLTA believes that children/young people have rights as individuals and should be treated with dignity and respect.

We will strive to provide a safe environment for all learners in its care while they are on site studying, off site visiting or participating in wider Business activities.

This policy and the procedures are based on the following principles: The welfare of children, young people and vulnerable adults is of primary concern.

All children, young people and vulnerable adults, whatever their age, culture, disability, gender, language, racial origin, socio-economic status, religious belief and/or sexual identify have the right to safeguarding from abuse.



It is everyone's responsibility to report any concerns about abuse to one of the nominated safeguarding contacts identified within this document, and the responsibility of the Social Services Department and the Police to conduct, where appropriate a joint investigation.

All incidents of alleged poor practice, misconduct and abuse will be taken seriously and responded to swiftly and appropriately.

All personal data will be processed in accordance with the requirements of General Data Protection Regulation (GDPR)

Education is powerful and can help equip individuals with knowledge, skills and critical thinking. BLTA also value the ability for learners to challenge any radical thinking and encourage apprenticeship support tutors to facilitate healthy debate and will embed throughout teaching and delivery. BLTA want to encourage learners to be aware of the risks under the Prevent Strategy for themselves and to be able to identify signs and possible risks. Online training is available to learners from induction throughout their stay on programme.

4. Responsibility

All staff and learners are required to take shared responsibility for the safeguarding and safety of any children, young people and vulnerable adults on or off campus.

They must be aware of and abide by our Code of Good Practice. All Business staff are in a position of trust, in particular staff who teach, support, guide or in any way interact with learners, young people and vulnerable adults visiting.

The Centre Manager has responsibility for overseeing our Safeguarding Children, Young People and Vulnerable Adults Policy with delegated responsibility to relevant members of staff.

The Directors have nominated the Centre Manager as the senior member of staff responsible for child and vulnerable adult safeguarding issues within we (the Child and Vulnerable Adult Safeguarding Officer (CVAO)) and they will liaise directly with the Training Coordinator as deemed necessary.

Additionally, the Centre Manager will ensure that arrangements are in place for the following specific areas:

- Liaising with employers and training organisations that receive children, vulnerable adults or young people on placements to ensure that appropriate safeguards are put in place whilst off site on work experience/placements in the workplace.
- Liaising with other organisations and designated individuals that are involved with the learners outside.

BLTA have other named individuals whom staff may contact if they have any concerns relating to any learner. Responsibilities on the part of the staff are in a position of trust, in particular those staff who teach, support, guide or in any way interact with learners, children and vulnerable adults.



It is incumbent upon all staff to be aware of this and to act accordingly at all times. We already have processes in place to check the suitability of staff and learners working directly with children and young people and vulnerable adults.

BLTA is committed to ensuring that staff have satisfactory Disclosure & Barring Service (DBS) enhanced checks undertaken by us before allowing them to work with learners. A satisfactory check is defined as having no criminal convictions (including cautions, reprimands and final warnings) relevant to the post. Should convictions be returned by the process a member of the Senior Management Team with appropriate DSP (Designated Senior Person safeguarding) training will assess the level of risk associated with the appointment and determine if the applicant is suitable for appointment.

All staff or apprenticeship support tutors employed to look after children must report any subsequent criminal convictions to a company Director. Failure to do so will result in disciplinary action being taken. Where we are operating in partnerships, perhaps offsite, and partner employees come into contact with BLTA learners we will seek assurance that their employees will have been through the same pre-employment checks expected of BLTA staff.

5. Vulnerable Adults

We will adhere to the policy and procedures that County Council and ESFA have in place. Where possible BLTA will identify vulnerable adults and ensure that there are appropriate support measures in place. Any member of staff across BLTA with concerns regarding an adult learner whom they believe or know to be vulnerable must contact one of the Safeguarding contacts. The role of a Designated Safeguarding Contact is:

- To receive and record information from any staff, volunteers, children, parents or carers who have child safeguarding concerns.
- Assess the information promptly and carefully, clarifying and obtaining more information about the matter as appropriate
- Make a formal referral to Customer First or the police
- To record statements from any member of staff who feels that a young person has indulged in inappropriate behaviour or made sexually suggestive comments or approaches.

6. Reporting and Monitoring Procedures

All members of staff working closely with children, or vulnerable adults, need to be alert to possibilities of abuse and any concerns about the behaviour of any adult with respect to that child should be reported to one of the Safeguarding contacts who will decide what further action to take. If staff, in the course of their work at BLTA, have a safeguarding issue brought to their notice, this must be treated as a priority over all other work. An oral, and then written report should be provided to the safeguarding contact dealing with the matter who will keep a confidential record of any such incidents.



Apprenticeship Support Tutors will report absences of apprentices as follows:

- Failing to attend session and/or work – apprenticeship support tutor will record on the appropriate review report and collaborate with the employer
- Apprentices ongoing absences from sessions/ work – the apprenticeship support tutor will ascertain with the apprentice any reasons for absences and record on appropriate form. The apprenticeship support tutor will support the apprentice to follow employer policy and procedure for managing absences.
- Raise any concerns at the earliest point to BLTA Centre Manager and/ or Safeguarding Officer.

7. Allegations of Abuse or Inappropriate behaviour Involving Staff

Allegations involving a member of staff and a person under 18 or a vulnerable adult should be reported to the responsible director and the senior manager designated for safeguarding matters.

Consideration will be given as to whether the situation falls within the definition of abuse.

8. Training

BLTA will ensure that this policy will be promoted to all staff, associates, consultants or contractors and they will receive appropriate training as follows:

Designation	Training required	Frequency
Directors	Standard Online safeguarding and prevent training modules	Annual
	Safer recruitment	Annual
Senior Managers	Standard Online safeguarding and prevent training modules	Annual
	Safer recruitment	Annual
Safeguarding Lead	Level 3 Designated Safeguarding Lead	Two years
	Prevent – 2 day	Three years
	Enhanced Online safeguarding and prevent training modules	Annual



Designation	Training required	Frequency
Delivery and admin staff	Standard Online safeguarding and prevent training modules	Annual
	CPD – internal and external	Quarterly
Learners	Safeguarding & Prevent	On going throughout programme
	H&S/Risk assessment	Annual
Employers	Legal requirements	In line with legislation

Implementation of the policy will be monitored via our Internal HR systems, which compliments other procedures such as standardisation meetings, team meetings, briefings and updates. These strategies will enable employees to implement the policy by using examples, scenarios and external training to ensure all staff members are aware of how to implement.

9. Welfare, Health and Safety

All users of BLTA services must be made aware of the welfare, health and safety requirements and be prepared to abide by them. Please refer to our full Health and Safety Policy.

10. Code of Conduct for Staff

All staff must be familiar with BLTA's Professional Code of Conduct for Staff, which is provided to all staff on appointment and is available.

11. Prevent

The Counter Terrorism and Security places a duty on us to have “due regard to the need to prevent people from being drawn into terrorism”. Guidance is issued under Section 29 of the Act, which we follow. We ensure staff have undertaken training in the Prevent Duty as identified by management and are aware of when it is appropriate to refer concerns about learners to the Prevent officer. We ensure all staff exemplifies 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. All are staff are trained in their responsibilities within Prevent and we follow a strict internal process of referrals as and when appropriate. If we / one of our learners/ employers believe that someone is vulnerable to being exploited or radicalised, please use the established safeguarding or duty of care procedures within our organisation / your organisation to escalate



your concerns to the appropriate leads, who can raise concerns to Channel if appropriate.

British values are defined as democracy, rule of law, individual liberty and mutual respect and tolerance of different faiths and beliefs. The Prevent duty also reminds providers of the need to promote the Equality duty to learners. This gives tutors a chance to explore how the British values apply to learners' lives and work. This might relate to how we achieve change in British society through democracy; employment and health and safety laws which protect us all at work; the extent of our liberty in this country and the need to respect others' faith or atheism.

Compliance with the Prevent duty is a requirement for all providers but full engagement with the Duty gives us an opportunity to explore important issues with learners and to give them a chance to consider how British values are relevant to their lives.

There are FIVE British Values, which are:

- Democracy
- Rule of Law
- Individual Liberty
- Mutual respect for and tolerance of those with different faiths and beliefs

12. Teaching

BLTA strives to deliver good teaching that embeds safeguarding and prevent to build resilience. Our key approaches are:

- A learner centred approach promoting a connection through good teaching
- Equip learners with skills, knowledge and understanding
- Facilitate safe environments for dialogue and critical thinking

BLTA delivery staff will embed safeguarding, prevent, British values, radicalisation and extremism throughout the learner's programme. Learners have access to online learning that will stretch, challenge and encourage critical thinking skills, and ultimately, have relevance.



13. Learners

BLTA provide Safeguarding and Prevent at Induction and will make the learners aware of the Safeguarding Lead within BLTA. Learners will be made aware of:

- Employer Safeguarding and Prevent Policy and Procedure
- How to report
- Risks under Prevent to themselves and others
- Spot the signs of potential risks
- Healthy debate and critical thinking
- Understand and respect different opinions
- British Values
- Understand the dangers of radicalisation and extremism

Following induction, all learners will participate in regular Safeguarding/prevent activities that are embedded into their programme.

Learners responsibility:

- Attend work and training as agreed
- Advise the employer of sickness or absence and their apprenticeship support tutor when appropriate
- Agree annual leave with their employer and advise their apprenticeship support tutor
- Contact apprenticeship support tutor immediately if employment ceases or changes
- Learners need to provide evidence for absence to be authorised
- If off sick for longer than 7 days, fit to return to work evidence is required

14. Employers

BLTA aim to collaborate with its employers to encourage employers to promote and highlight safeguarding and prevent to all its employees. We aim to:

- Review policy and procedures to ensure that it encompasses how the employer will manage young apprentices. For example, a mentor, buddy system etc.
- Review training to all staff, especially consideration with young apprentices to ensure that training is fit for purpose and taking into consideration lack of experience, potential awareness of their awareness of risk
- Risk assessments to take into account young apprentices and to put in place any support required such as a buddy / mentor/ training etc
- Supervision arrangements for young apprentices to ensure that employers had adequate provision for young apprentices
- Promote up to date training either with BLTA through e-learning / workshops or signposting employers to other alternative providers / e-learning opportunities



- Safeguarding champions / buddies
- Signposting to help lines / charities etc.
- HSE guidance on young people/apprentices at work

<http://www.hse.gov.uk/youngpeople/law/index.htm>

http://m.acas.org.uk/media/pdf/0/i/Employing_younger_workers_Nov.pdf

If, at any time, a BLTA Employer is not engaging or following current Health and Safety / legal requirements when employing an apprentice, BLTA will take appropriate action by liaising first with the employer and agreeing an action plan.

Failure to comply will result in BLTA reporting the Employer to the appropriate government departments.



BLTA – Staff reporting guide hand-out

This procedure must be followed whenever any member of staff or related partner / employer hears an allegation from a child or adult at risk, that abuse has, or may have, occurred or where there is a significant concern that a child or adult at risk, may be abused/radicalised:

RECEIVE - What is said

- Accept what you are told
- You do not need to decide whether or not it is true.
- Listen without displaying shock or disbelief.

REASSURE - The learner

- Acknowledge their courage in telling.
- Do not promise confidentiality
- Remind them they are not to blame – avoid criticising the alleged perpetrator.
- Do not promise that “everything will be alright now” (it might not be)

REACT - Respond to the learner

- Do not interrogate
- Avoid leading questions but ask open ended ones
- Clarify anything you do not understand
- Explain what you will do next, i.e. inform a Designated Safeguarding Person.

RECORD - Make notes as soon as possible

- During the interview if you can.
- Include: time, date, place, the learner’s own words – do not assume – ask, e.g. “Please tell me what xxxxx means”.
- Describe observable behaviour and appearance
- Cross out mistakes – do not use Tippex.
- Do not destroy your original notes – they may be needed later on and must be given to the Designated Person.

SUPPORT - Consider what support is needed for the learner

- You may need to give them a lot of your time to ensure they feel reassured and supported.
- Ensure you are supported – such interviews can be extremely stressful and time consuming
- Once reported to them, the Designated Person will take responsibility for the matter and will take the necessary actions. However, if you have questions or need additional support then do ask.



Definitions

The following definitions apply throughout the Safeguarding policy and associated procedures Child or Children: The Children Act 2004 defines a child as a person under eighteen for most purposes.

Vulnerable Adult or Adults: The Office of the Public Guardian (OPG 2013) defines a vulnerable adult as a person aged 18 or over who has a condition of the following type:

- a substantial learning or physical disability
- a physical or mental illness or mental disorder, chronic or otherwise, including addiction to alcohol or drugs
- a significant reduction in physical or mental capacity.

Types of abuse and neglect

Abuse:

A form of maltreatment of a child or vulnerable adult. Somebody may abuse or neglect a child or vulnerable adult by inflicting harm, or by failing to act to prevent harm. They may be abused by an adult or adults or child or children.

Physical Abuse:

Physical abuse may take many forms e.g. hitting, shaking, throwing, poisoning, burning or scalding, drowning or suffocating. It may also be caused when a parent or carer feigns the symptoms of, or deliberately causes, ill health to a child or vulnerable adult. This unusual and potentially dangerous form of abuse is now described as fabricated or induced illness.

Emotional Abuse:

Emotional abuse is persistent emotional ill treatment causing severe and persistent effects on the child or vulnerable adult's emotional development and may involve:

- Conveying the message that they are worthless or unloved, inadequate, or valued only in so far as they meet the needs of another person
- Not giving the child or vulnerable adult opportunities to express their views
- Deliberately silencing them or 'making fun' of what they say or how they communicate
- Interactions that are beyond a child or vulnerable adults developmental capability as well as overprotection and limitation of exploration and learning, or preventing from participating in normal social interaction
- Seeing or hearing the ill-treatment of another
- Serious bullying (including cyber bullying), causing children or vulnerable adults to feel frightened or in danger
- Exploitation or corruption of children or vulnerable adults



- Some level of emotional abuse is involved in most types of ill treatment, although emotional abuse may occur alone.

Sexual Abuse:

Sexual abuse involves forcing or enticing a child or vulnerable adult to take part in sexual activities, not necessarily involving a high level of violence, whether or not they are aware of what is happening. These activities may involve physical contact, including assault by penetration (for example rape or oral sex) and non-penetrative acts such as masturbation, kissing, rubbing and touching outside of clothing. This may also include non-contact activities, such as involving children or vulnerable adults in looking at, or being involved in the production of sexual images, watching sexual activities, encouraging children to behave in sexually inappropriate ways or grooming a child in preparation for abuse (including via the internet). Sexual abuse is not solely perpetrated by adult males. Women can also commit acts of sexual abuse, as can other children.

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. Neglect may occur during pregnancy as a result of maternal substance abuse. Once a child is born, neglect may involve a parent or carer failing to; provide adequate food, clothing and shelter (including exclusion from home or abandonment); protect from physical and emotional harm or danger; ensure adequate supervision (including the use of inadequate care-givers); or ensure access to appropriate medical care or treatment. It may also include neglect of, or unresponsiveness to, a child or vulnerable adults emotional needs.

There are also specific issues, which we expect our staff to be aware of, these include:

- Child sexual exploitation
- Forced marriage
- Domestic violence
- Female genital mutilation
- Radicalisation
- Self harm
- Bullying/cyber bullying
- Drugs
- Faith abuse
- Gangs and youth violence
- Violence against women and girls
- Sexting
- Honour Based Violence
- Trafficking

BLTA recognises that Online Safety is a safeguarding issue not an ICT issue. The purpose of internet use in the academy is to help raise educational standards, promote candidate achievement, and support the



professional work of staff as well as enhance the school's management information and business administration.

The internet is an essential element in 21st century life for education, business and social interaction and we have a duty to provide everyone quality access as part of their learning experience.

It is our duty to ensure that everyone in our care is safe and this applies equally to the 'virtual' or digital world.

We will ensure that appropriate filtering methods are in place to ensure that pupils are safe from all types of inappropriate and unacceptable materials, including terrorist and extremist material. This will be in line with the 'Prevent Duty'.

