

**Safeguarding Policy and Procedure**

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**DOCUMENT CONTROL**

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0.1	Alison Dann	First edition (Review of current safeguarding policy and procedure conducted and separated both documents)	19/04/21
0.1	Alison Dann	To take into account Ofsted's Review into Sexual Abuse in schools and colleges.	01/07/2021
0.3	Alison Dann	To take into account KCSiE September 2021 and post 16 education and Training (Welfare of Children) Act 2021	01/09/2021

## **Safeguarding Policy and Procedure**

### **Statement**

B2W Group recognises our moral and statutory responsibility to safeguard and protect young people and adults at risk of harm in our care whether from crime, other forms of abuse or from being drawn into terrorism related activity. It applies to all aspects of our work and to everyone working for B2W, including governors, employees, contractors, freelance staff etc. It is essential that everybody working at B2W understands their safeguarding responsibilities. Hereinafter referred to as colleagues.

### **Relevant Legislation and Related Policies**

This policy has been developed in accordance with the principles and guidance including:

- Education and Training (Welfare of Children) Act 2021
- The Children's Acts 1989 and 2004
- Education and Skills Act 2008
- Mental Capacity Act 2005
- The Care Act 2014
- Education and Skills Act 2008
- Counterterrorism and Security Act 2015
- Keeping Children Safe in Education 2020
- Working Together to Safeguard Children 2018
- Prevent Duty Guidance 2015
- Special Educational Needs and Disability Code of Practice 2015
- Safeguarding Disabled Children: Practice Guide 2009
- Voyeurism (Offences) Act 2019
- Safeguarding Vulnerable Groups Act 2006
- Guidance for safer working practice for those working in education settings 2015
- Manchester Safeguarding Children Board and MSCB Child Protection Procedures
- Manchester Adult Safeguarding Board

**Legal Definitions** -For the purpose of this policy:

### **Children or young person**

Applies to a person who is less than 18 years of age. For B2W this relates to our Apprenticeship learners that are aged between 16-18.

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### **Adults at risk**

Includes those who, because of mental health difficulties and/or physical health conditions and/or personal circumstances, may be vulnerable to abuse, exploitation, or significant harm. For B2W this relates to any learner who meets the criteria above on either our Apprenticeship programmes, Traineeships and/or Adult provision (Unemployed and employed learning)

### **Safeguarding**

Is the process of protecting vulnerable people, whether from crime, other forms of abuse or from being drawn in terrorism-related activity. This definition for safeguarding is further strengthened in Keeping Children Safe in Education (KCSIE 2021) to explicitly state that safeguarding includes "**preventing impairment to children's mental and physical health or development**". This is recognition of the impact of the Covid pandemic on a child's mental health and wellbeing. If staff have a mental health concern about a child that is also a safeguarding concern, immediate action should be taken by following the reporting process outline in this procedure. Governing bodies and proprietors should ensure they facilitate a whole group approach to safeguarding.

### **Radicalisation**

Is the process by which a person comes to support terrorism and extremist ideologies. A vulnerable learner or colleague may be more susceptible to being drawn towards or being targeted by those involved in extremist ideology

### **Policy Aims**

- To demonstrate the B2W Group commitment with regard to safeguarding to learners, parents and colleagues.
- To provide an environment in which learners feel safe, secure, valued, respected and feel confident to, and know how to, approach colleagues
- if they are experiencing difficulties, believing they will be effectively listened to.
- To raise the awareness of all colleagues of the need to safeguard learners, and of their responsibilities in identifying and reporting possible cases of abuse.
- To provide a structured framework and procedure which will be followed by all

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colleagues in cases of suspected abuse ensuring consistent good practice across the B2W Group.

- To provide a systematic means of monitoring learners known, or thought to be at risk of harm, and ensure we, the B2W Group, contribute to assessments of need and support packages for those learners.
- To develop and promote effective working relationships with other agencies.
- To ensure that all colleagues working within the B2W Group, have been checked for their suitability, including, verification of their identity and qualifications, a satisfactory DBS check and a single central record is kept for audit.
- Using our Safeguarding procedures to share concerns and relevant information with agencies who need to know and involving learners and their parents and carers appropriately.
- Using procedures to manage any allegations against colleagues or employers appropriately.
- Creating and maintaining an anti-bullying environment and ensuring that we have a policy and procedure to help us deal effectively with any bullying that does arise.
- Ensuring that we have effective complaints and whistleblowing measures in place.
- Ensuring that we provide a safe physical environment for our learners and colleagues, by applying health and safety measures in accordance with the law and regulatory guidance.
- Regularly review the policy, procedures and recording forms.

### **Prevention/Protection**

We recognise that the B2W Group plays a significant role in the prevention of harm to learners by providing good lines of communication and an ethos of protection. The B2W Group community will therefore:

- Create a culture where sexual harassment and online sexual abuse are not tolerated, identify issues, and intervene early to better protect children and adults. All staff should be able to reassure victims that they are being taken seriously and that they will be supported and kept safe. A victim should never be given the impression that they are creating a problem by reporting abuse, sexual violence, or sexual harassment. Nor should a victim ever be made to feel ashamed for making a report.
- Work to establish and maintain an ethos where learners feel secure, are encouraged to talk and are always listened to.
- Include regular consultation with learners e.g., through learner surveys and learner voice.
- Ensure that learners and colleagues know that there is a member of staff/s in the B2W

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Group whom they can approach if they are worried or in difficulty.

- Include safeguarding across the induction process and opportunities which equip learners and colleagues with the skills they need to stay safe and know who to turn to for help.

### **Roles and Responsibilities**

#### **Colleagues**

- Understand that it everyone's responsibility to safeguard and promote the welfare of learners and that they have a role to play in identifying concerns, sharing information and taking prompt action.
- To ensure the effective implementation of the Safeguarding procedure and Prevent Policy, all colleagues must work in partnership to protect all young people and vulnerable adults engaged in B2Ws recruitment, training, and support services.
- It is the responsibility of each colleague to ensure they are aware of, and adhere to, this policy and the rules and procedures relevant to them.
- Will refer any safeguarding concern to the Safeguarding Team or if necessary, where there is immediate risk to the learner, to the police or Social Services.
- Have a responsibility to provide a safe environment in which learners can learn
- Have read Keeping Children safe in education part one and the B2W Group Safeguarding Policy and Procedures.

### **Safeguarding Terms**

The following should be considered when working with learners:

- Sexual abuse or inappropriate relationships- Peer on peer sexual abuse and harmful sexual behaviour.
- Physical and emotional abuse or neglect, including Female Genital Mutilation
- Exploitation, including financial, sexual, forced marriage or gang related activity
- Neglect
- Grooming behaviour
- Domestic violence
- Bullying, including cyber bullying, bullying in the training centre or the workplace
- Victimisation
- Self harm

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- Inappropriate taking of and/or sharing of unsolicited photographs (sharing of nude/ semi-nude images and Up-skirting)
- Unsafe activities or environments
- Crime, including knife crime and gang related activity
- Trafficking

### **Identifying Harm**

Through our work with learners and employers, B2W colleagues are well placed to notice changes in behaviour and appearance which may be due to harm. These could include:

- The learner discloses that they are being harmed or are at risk of harm.
- Absence from training or work.
- Behavioural problems.
- Change in dress or physical appearance.
- Rewards, including unaccounted for money, expensive clothing or footwear or devices such as mobile phones.
- Contact with risky adults or environments.
- Reduced contact with, or becoming withdrawn from, friends or family.
- Substance abuse.

### **Identifying Radicalisation**

Colleagues should also be vigilant to the signs of radicalisation. Radicalisation can be difficult to spot, but signs that may indicate that a learner or colleague is being radicalised include:

- Not adhering to/upholding the British Values of; Democracy, Rule of Law, Individual Liberty and Respect, Tolerance of different faiths and beliefs, and those with none,
- isolating themselves from family and friends and learning groups
- talking as if from a scripted speech
- unwillingness or inability to discuss their views
- a sudden disrespectful attitude towards others
- increased levels of anger

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- increased secretiveness, especially around internet use.

### Designated staff with responsibility for Safeguarding:

- The Designated Safeguarding Lead (DSL) is a senior member of staff from the B2W Group Board and takes lead responsibility for safeguarding.
- The B2W Group has two Deputy Designated Safeguarding Leads (DDSL's) who are trained to the same standard as the DSL. The DSL and DDSL's carries out those functions necessary to ensure the ongoing safety and protection of learners by ensuring that:
- They will be available (during B2W Group hours) for staff, learners and parents to discuss safeguarding concerns. Out of hours (10pm-6am) the safeguarding mailbox can be accessed and has an automatic reply set up with emergency details provided.

### The safeguarding Team

<b>Designated Safeguarding Lead</b>	Alison Dann Director of Quality and Performance	Telephone Number 0161 474 7603
<b>Deputy Designated Safeguarding Officer</b>	Gayle Dawkes HR Team Leader	Telephone Number 07917 721094
<b>Deputy Designated Safeguarding Officer</b>	Ben Waite Head of HR	Telephone Number 07970 756 220
<b>24 hour Safeguarding email- <a href="mailto:safeguarding@b2wgroup.com">safeguarding@b2wgroup.com</a></b>		
<b>Report all concerns via email immediately</b>		

The B2W group Board oversees the implementation of this policy and the Prevent strategy/ action plans.

### The Designated Safeguarding Lead has overall responsibility for Safeguarding and Prevent, including the following activities:

1. Ensuring that the policy and reporting procedure are monitored and reviewed in accordance with changes in related legislation and guidance.
2. Communicating the policy and reporting procedure to all colleagues and ensuring that they are provided with information, advice, and training on the protection of young people and vulnerable adults.
3. Acting as the main contact for the protection of young people and vulnerable adults.
4. Establishing and maintaining contacts with Local Authorities and the Police.
5. Maintaining confidential records of reported cases and the action taken.

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6. Maintaining up to date knowledge on Safeguarding and Prevent issues.
7. Managing the Safeguarding and Prevent Action Plan.

### **Multi-agency working**

B2W Group will work in line with statutory guidance Working Together to Safeguard Children by working with social care, police, health and other services to promote the welfare of learners and protect them from harm. This includes providing a coordinated offer of early help, contributing to inter-agency plans and providing additional help to children subject to child protection plans. The B2W Group will allow access to social care workers from the local authority, where appropriate.

### **Information sharing, GDPR and data protection**

- GDPR/Data protection Act places duties on organisations and individuals to process information, fairly and lawfully, and to keep the information they hold safe and secure. However, this is not a barrier to sharing information, where to not do so, would result in a learner being placed at risk of harm.
- Information sharing is vital in identifying and tackling all forms of abuse.
- All colleagues must be aware that they cannot promise to keep a learner's secrets which might compromise their safety or well-being.
- Fears about sharing information cannot be allowed to stand in the way of promoting the welfare and protecting the safety of learners.
- The B2W Group recognises that matters relating to safeguarding are personal and will respect confidentiality.
- The Safeguarding Team will only disclose information about a learner to other members of staff on a need-to-know basis.

### **Use and Monitoring of IT**

IT equipment provided to both colleagues and learners is subject to monitoring of its use. Filters will be applied to restrict access to harmful context and prevent people from being drawn into extremist behaviour. Inappropriate use of IT will be reported to a Safeguarding Officer.

### **Logging of Safeguarding Cause for Concerns**

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All cause for concerns received by the Safeguarding team will be recorded internally both on an individual tracking form in line with our internal process, as well as a Safeguarding Log. This is managed by the Designated Safeguarding Lead for audit and reporting purposes.

In accordance with GDPR, information contained within this log and within individual cause for concern forms will only be accessible to those individuals actively involved with the Safeguarding Team operations, or with Governance over Safeguarding. However, this data is also handled with "Keeping Children Safe in Education 2020" guidance which stipulates that "Fears about sharing information **must not** be allowed to stand in the way of the need to promote the welfare and protect the safety of children". Therefore, should we be required to do so, the data contained within said documentation will be shared with relevant parties such as LADO (Local Authority Designated Safeguarding Officer), Prevent Channel, the Police and any other organisations/parties that we are duty bound to report to in light of Safeguarding and Prevent.

The Local Authority Designated Officer (LADO) has responsibility for coordinating the process of investigations, providing advice and guidance to the employer, to ensure that cases are dealt with as quickly as possible and consistently with a fair and thorough process. The Director of Quality and Performance, or in their absence/where the allegation relates to them, the Directors, should consult the LADO directly. Manchester's LADO can be contacted by calling 0161 234 1214. Or by Email: [quality.assurance@manchester.gcsx.gov.uk](mailto:quality.assurance@manchester.gcsx.gov.uk)

**The LADO will** determine:

- whether it is an allegation or a complaint,
- if there is a need to undertake preliminary enquiries and, if so, how the enquiries should be conducted or,
- if the allegation meets the threshold for a Strategy Meeting to be convened
- whether immediate action to protect a child is required.

In the instance of a safeguarding allegation against the Directors, the Designated safeguarding leads **must** liaise directly with the **LADO**.

Preliminary enquiries should be made by the Designated safeguarding lead, after consultation with the **LADO**.

- Any initial enquiries should be minimal to establish the facts of the allegation if these were not established or were unclear at the time the original concern was raised, i.e. date, time, place of any alleged incident, any witnesses and other relevant factors.

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- In-depth questioning of children or professionals/professional carers should not take place.
- Careful records should be made regarding any concerns or allegations and actions taken in response to these.
- When an allegation is made a number of inter-related elements will exist (Safeguarding, Criminal Investigation, Disciplinary, Complaints).
- Where a person has been dismissed as a result of the allegations, B2W is making a decision that they are unsuitable to continue in their role with the organisation.
- B2W must refer the person to the Disclosure and Barring
- Service. A copy of the referral will be forwarded to the LADO for their records and the confirmation letter issued by the DBS will also be shared with the LADO.
- Where the person resigns prior to the conclusion of the investigation, the LADO process will continue and a referral to the DBS will be made where appropriate by the B2W.
- The Local Authority, on behalf of the Local Safeguarding Children Board, will, therefore, have the key role in co-ordinating the relevant elements and ensuring that all subsequent stages of the Safeguarding Procedures are followed.

If any individual is unhappy that their concerns are not being taken seriously within B2W, they should raise their concerns with the Designated Safeguarding Lead and consultation with the LADO must take place.

### **Escalation of Cause for Concerns logged**

In the event that a cause for concern is logged which indicates that an individual may be at serious risk of harming themselves or others, this will be immediately reported to the Managing Director and the Board. In the event this occurs, the following actions will take place:

- DSL to inform the Managing Director and Governing Safeguarding Lead.
- Designated Safeguarding Lead to facilitate a conference call to discuss the matter in full and steps to be taken (if required) to be agreed.
- Accountable Designated Safeguarding Officer to document all actions and co-ordinate.

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- Accountable Designated Safeguarding Officer/ Lead to update Managing Director on actions appropriately until matter is closed.

### Allegations against the DSL

- If a member of staff has an allegation against the DSL with regards to a safeguarding concern, the external safeguarding governor will investigate this fully, following the processes outlined above. The governor in charge of safeguarding is Michael Hunt and can be contacted confidentially via email at [Michael@eta-gms.com](mailto:Michael@eta-gms.com)

### Code of Conduct for Colleagues

Colleagues are expected to take the following steps to ensure that they do not put themselves in a position where an allegation of abuse can be made against them. Such steps include, but are not limited to:

- Avoiding any unnecessary physical contact with learners.
- Avoiding unaccompanied journeys with learners.
- Avoiding inappropriate familiarity with learners.
- Always acting upon and recording allegations or reports made by learners.
- Always reporting potential concerns.
- Not inviting learners to socialise with them or visit them at home.
- Not engaging with learners on social media.
- Recognising that it is a criminal offence to engage in sexual activity with a person under the age of 18 when in a position of power.

In appropriate cases and in accordance with the law, B2W has the right to report to the appropriate authorities any concerns it has that a colleague or learner ought to be included in a list of people who should be restricted from working with children and vulnerable adults.

### How to Respond and Report

If you are made aware of any concerns or allegations, the following process should be followed:

- Remain calm and reassure the person that they have done the right thing in speaking up.
- Listen carefully and give the person time to speak.
- Do not voice an opinion.
- Do not ignore the concern or be judgmental or dismissive

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- Explain that only professionals that need to know will be informed, but never promise confidentiality.
- Act immediately and don't try to address the issue yourself.
- Report the concern – alert a Safeguarding Officer to the concern directly in person/by telephone and then formally report the concern by email to [safeguarding@b2wgroup.co.uk](mailto:safeguarding@b2wgroup.co.uk)
- Write a statement giving as much detail as possible, including date and time, what was said, any names or parties mentioned and how you responded.
- Do not make assumptions, consult with persons not directly involved in the situation or make promises.
- The Designated Safeguarding Lead will ensure that the relevant procedures are followed and will inform HR about any allegations
- The Designated Safeguarding Lead will inform the Local Authority Designated Officer in the first instance to determine if there is a genuine case for concern and a need for further action.
- In matters relating to radicalisation the Designated Safeguarding Lead will refer the matter (or seek advice from) the Prevent Lead, who in turn, may seek advice from the Local Authority's Channel Panel Chair or Police Prevent Lead.
- If the report is passed to authorities such as the Police for investigation, the Designated Safeguarding Lead will act as the main liaison officer and will ensure that relevant colleagues are kept informed, including the Managing Director, and HR where a colleague is concerned.
- In the case of allegations against an B2W colleague, these must be reported to HR. B2W Training is required to report instances of misconduct or unsuitability to work with children or vulnerable adults to the Disclosure and Barring Service (DBS). This would generally apply when the colleague has been permanently suspended for reasons of misconduct or unsuitability to work with children or vulnerable adults.

### **Learners who are particularly Vulnerable**

To ensure that all of our learners receive equal protection the safeguarding team will offer additional support and will give special consideration to those who are:

- Looked after children and previously looked after children
- On Child Protection Plans (For B2W, learners 16-18)
- Asylum seekers
- Young Carers
- Living away from home/private fostering
- Children in the court systems/YOT/ pending police investigations

If colleagues become aware of learners within these specific group, this information should be

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referred to the safeguarding team.

### **B2W Relevant Policies and Procedures**

- Safeguarding Procedure
- Prevent Strategy
- Equality and Diversity Policy
- Health and Safety Policy
- Whistleblowing Policy
- Grievance Policy
- Anti-Bullying Policy
- Staff behaviour Policy
- Safer Recruitment Policy
- Learner Disciplinary Policy
- E-Safety Policy
- Staff Disciplinary Policy

## **Safeguarding Procedure**

- The aim of this procedure is to provide a robust framework, to ensure that all colleagues take appropriate action when they are worried about a young person, adult at risk or colleague is at risk of abuse. It is the responsibility of all colleagues working within the B2W Group, to record and refer safeguarding concerns, even if they are just suspicions or overheard rumours, they should not be discussed this with anyone other than a member of the Safeguarding Team.

### **How to make a referral to the Safeguarding Team?**

- Use the dedicated email service: **safeguarding@B2Wgroup.com** which will automatically be sent to the Safeguarding Team outlining in the message the key points that a safeguarding concern has been raised.

### **What should be referred to the Safeguarding Team**

#### **Safeguarding Flowchart**

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Disclose / suspicion of abuse	Concern for safety / welfare
<p>Ensure any discussions take place in a 'suitable' place.</p> <p>Do not promise to keep the matter confidential and adhere to the steps covered in the safeguarding policy.</p> <p style="text-align: center;">↓</p> <p>Contact the Designated Safeguarding Lead Protection or available member of the Safeguarding Team either by telephone or <a href="mailto:safeguarding@b2wgroup.com">safeguarding@b2wgroup.com</a></p> <p style="text-align: center;">↓</p> <p>A safeguarding form should be completed and processed. SG team will provide this form.</p> <p style="text-align: center;">↓</p> <p>The Designated Safeguarding Lead will take any necessary action.</p>	<p>Ensure any discussions take place in a 'suitable' place.</p> <p>Do not promise to keep the matter confidential and adhere to the steps covered in the safeguarding policy.</p> <p style="text-align: center;">↓</p> <p>Where abuse is suspected the concern becomes a disclosure</p> <p style="text-align: center;">↓</p> <p>Where abuse is not evident but concerns remain, contact the Safeguarding Team for further advice via email/ telephone. Or follow wider Safeguarding issues guidance in Safeguarding Policy/ Procedure</p> <p style="text-align: center;">↓</p> <p>You will be directed to the appropriate procedure to follow. This may include;                      completing a Cause for Concern form which will be sent to the Safeguarding Team.                      you may be referred to your line- manager, e.g. behavioural issues.                      or to the disciplinary procedure.</p>

### Pre-course Disclosures

- Any disclosures by potential learners relating to probation, spent or unspent convictions should be reported to the safeguarding team using the Priority Action form found in the Safeguarding section of SharePoint, located within the HR area of SharePoint.
- All colleagues must be alert to, and aware of the signs of abuse, these may include

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changes in behaviour or a failure to perform or develop as expected. However, recognising abuse may be difficult and colleagues need to take notice not only of major incidents but also other signs which may cause concerns.

### Specified Safeguarding Issues include: (Appendix 1)

Child sexual exploitation (CSE)	Breast Ironing	Bullying/ Cyberbullying	Contextual Safeguarding
Child Criminal Exploitation: County Lines	Drugs	Domestic Violence	Upskirting
Fabricated or induced illness	Faith abuse	Female genital mutilation (FGM)	Peer on Peer
Forced marriage	Gender based violence	Honour based violence	Sexual Violence
Homelessness	Initiation/ hazing type violence and rituals	Mental health	
Private fostering	Radicalisation	Sexting	
Teenage relationship abuse: peer on peer	Modern slavery and trafficking	Children with family members in prison	

- Safeguarding Procedures **must be followed** whenever an allegation of abuse is made, or concern is expressed regarding the behaviour towards a child adult at risk or a colleague. It is important to note that under the Sexual Offences Act 2003 it is a criminal offence for a person over the age of 18 in a position of trust to enter into a sexual relationship with any learner under 18 years of age, even if the relationship is consensual, or in the case of a learner over 18 years where the learner is vulnerable.

### Wider safeguarding Concerns:

- \*Colleagues should note that wider safeguarding concerns follow a different referral pathway and ensure they have read the related policies and procedures \*

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Individual need	Related Policy	Procedure/ who to contact
<b>Bullying &amp; Harassment</b>	Anti-Bullying Policy	<p>Refer to Head of Department (HoD), who will ensure that incidents are dealt with in a consistent manner.</p> <p>If behaviour is extreme HoD will report to safeguarding team for advice about whether external agencies need to be involved. Behaviour – negatively effecting the learning and wellbeing of others</p>
<b>Behaviour – negatively effecting</b>	Disciplinary Policy	Will be dealt with by HOD under the B2W Group disciplinary policy
<b>the learning and wellbeing of others</b>		If behaviour is extreme HOD will report to safeguarding team for advice about whether external agencies need to be involved
<b>First Aid</b>	Health and Safety Policy	Named first aid representatives are available in the policy if intervention is available-Advice and guidance can be provided by HR.
<b>Mental Health</b>	HR Policies <a href="https://www.guidelines.co.uk/summaries/mental-health">https://www.guidelines.co.uk/summaries/mental- health</a>	If there is a safeguarding concern, colleagues are to follow safeguarding procedure
<b>Pregnancy</b>	Pregnancy Procedures	HOD to complete risk assessment with learner and submit to Head of HR, Ben Waite
<b>Violence/Aggressive Behaviour</b>  <b>Illegal/Dangerous Items. (e.g. drugs, including 'legal highs') or something dangerous (e.g. knife).</b>	Disciplinary Policy Learner code of conduct Colleagues behaviour policy	HOD to invoke disciplinary and suspend learner if necessary