

# Safeguarding Policy

## **Mission, Vision and Values**

### **Mission**

To develop world class professionals with the knowledge, skills and commitment to deliver exceptional care.

### **Vision**

To be the first choice provider for skills and training in the sectors we serve.

### **Values**

Quality

Care

Service

Value

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## Introduction

Busy Bees Education and Training's history goes back over 35 years, when three couples, all involved in care and education, decided to take matters into their own hands after they were left frustrated by the lack of quality childcare available for their children.

The result was, since the first Busy Bees nursery was opened in 1983, Busy Bees has grown to become the leading provider of childcare in the UK thanks to its dedicated team of childcare professionals, many of whom have developed their knowledge and passion through the Busy Bees Training programmes. We have been delivering apprenticeships since 2003 and, due to the success we achieved through our in-house offering with Busy Bees, in 2013 we launched Busy Bees Education and Training, in order to offer apprenticeships and short courses to employers and care professionals throughout the UK.

Today, we deliver over 70 apprenticeships, accredited courses and CPD programmes to over 2500 learners across the country. We work with over 500 employers from within childcare, catering, residential care, clinical care and management and have helped them to upskill 4000 employees so far.

This policy is to be adhered to by all employees, all learners, employers, and members of the public.

The Safeguarding and Prevent Policy for Busy Bees Education and Training reflects the importance of our responsibility to safeguard and promote the welfare of all our apprentices and staff by protecting them from physical, sexual or emotional abuse, neglect and bullying. We are committed to providing a caring, friendly and safe environment for all our apprentices so that they can learn in a relaxed and secure atmosphere. We believe every apprentice should be able to participate in all learning and social activities in an enjoyable and safe environment and be protected from harm.

### **Applies to:**

All staff, learners and stakeholders of Busy Bees Education and Training.

## Policy

This policy has been agreed by the Busy Bees Education and Training SMT and Board and was last updated July 2021.

### Busy Bees Education and Training Executive and Senior Management

Name	Role
Anthony Bromirski	Chief Operating Officer – Overall accountability for Safeguarding and Prevent.
James Horne	Designated Safeguarding Lead Quality Director

### Busy Bees Education and Training Designated Safeguarding Lead

Name	Role	Location	Contact Details
James Horne	Designated Safeguarding Lead	Quality Director - Remote	079717 572215

### BBE&T's Deputy Designated Safeguarding Leads

Name	Role	Location	Contact Details
Kelly Holder	Development Coach	Remote -South	07854000817
Dawn Richards	Assessment Team Leader	Remote - North	07866 100517
Gemma Green	Assessment Team Leader	Remote - Midlands	07779 457451

If you have any concerns, contact the Designated Safeguarding Lead or use the email below. Learners should be made aware of this email address.

**BBE&T Safeguarding E-mail address: [BBT.Safeguarding@bbtraining.com](mailto:BBT.Safeguarding@bbtraining.com)**

It is Busy Bees Education and Training's responsibility to ensure all learners are kept safe and are given the resources to understand safeguarding, to know what to do in the instance of disclosing abuse or they are put at risk. All delivery staff are trained on how to keep all Learners safe, within their duty of care to their learners, including the Prevent Duty detailing why and how to keep learners safe from extremism and radicalisation.

So that we can accomplish this we will:

- Provide Lead Safeguarding roles
- Ensure all staff are trained in safeguarding
- Explain Learners' rights and responsibilities, including what to do if they feel their own or others' safety is at risk.
- Explain Learner's rights , where relevant
- Ensure all staff are trained in Domestic Abuse Awareness
- Ensure appropriate actions are taken to aid the safeguarding of all our Learners
- Ensure all staff are fully trained in and follow the Departments Prevent Strategy
- Ensure all Staff are following the Prevent Duty Risk Assessment and Action Plan.

**It is BBE&T's intention to:**

- Ensure that all stakeholders are protected from abuse, regardless of sex, race, disability, age, sexual orientation, religion or belief, gender reassignment, maternity, or because someone is married or in a civil partnership.
- Ensure that staff are appropriately trained in safeguarding and to understand the risk of radicalisation, challenging extremism, their role in implementing the Prevent Duty and the impact this has on their job role, and how to refer an individual who they feel is at risk.
- Ensure that appropriate supervision is given, where required.
- Take the necessary steps to inform all stakeholders of relevant policies and procedures and Code of Conduct
- Regularly review and monitor BBE&T's policies and procedures to ensure our legal, moral and social responsibilities are met.
- Take all suspicions and allegations of abuse and risks of radicalisation extremely seriously and to respond to concerns with due speed and consideration.
- Work in Partnership and in accordance with organisations' procedures, where required, including Designated Person in Local Authority, Safeguarding Partners, Safeguarding Adults Boards and the Channel multi-agency panel.
- To comply with and maintain knowledge of all relevant legislation, codes of practice and appropriate guidance and any amendments
- Have Designated Safeguarding Leads in place to advise on and manage any concerns and referrals made.
- Ensure that relevant employment and security checks are undertaken, as required. Ensure that all personal information is confidential and should only be shared with the permission of the individual concerned (and/or those with parental responsibility), unless the disclosure of confidential information is necessary in order to protect a child or adult at risk from serious harm or to promote their welfare. In circumstances, information must be confined to those people directly involved in the professional work of each individual child or adult at risk and on a strict "need to know" basis.

## Working together to safeguard children

The links below have been taken from the Working Together to Safeguarding Children 2015 guidance document.

### For Children and Young People

Childline	0800 11 11
Child Exploitation and Online Protection Centre (CEOP)	<a href="http://www.thinkuknow.co.uk/">http://www.thinkuknow.co.uk/</a> 0870 000 3344
NSPCC Helpline	<a href="https://www.nspcc.org.uk">https://www.nspcc.org.uk</a> 0800 800 5000
NSPCC Whistleblowing Helpline	<a href="mailto:help@nspcc.org.uk">help@nspcc.org.uk</a> 0800 028 0285
Internet Watch Foundation	<a href="https://www.iwf.org.uk/">https://www.iwf.org.uk/</a>
Social Care Link for Safeguarding Concerns	<a href="https://www.gov.uk/report-child-abuse-to-local-council">https://www.gov.uk/report-child-abuse-to-local-council</a>
NHS commissioned website for young people - 'Kooth'	<a href="http://www.kooth.com">www.kooth.com</a>

### For further useful links turn to

The need to refer allegations or concerns about possible risk posed by staff, volunteers, SPCs or contractors to the Designated Local Authority Person (formerly LADO) is a requirement, as detailed in the government guidance Working Together to Safeguard Children (2018)

*Note: =If you suspect child trafficking is taking place, the Designated Safeguarding Lead must be informed immediately,*

BBE&T must inform ESFA if we are subject of an investigation by the local authority or the police relating to funded learners, in such circumstances the Managing Director of BBE&T (or designated safeguarding lead) to email [enquiries.EFA@education.gov.uk](mailto:enquiries.EFA@education.gov.uk)

ESFA will need to know the name of the institution, the nature of the incident and confirmation that it is, or is scheduled to be, investigated by the local authority and/or the police. If a referral has been made to the Disclosure and Barring Service, BBE&T are required to inform the ESFA.

## Definitions

Definitions and Indicators of Abuse:

Abuse is a violation of an individual's human or civil rights by another person and may consist of a single act or multiple acts. As well as physical and psychological abuse, acts of neglect or an omission to act may amount to abuse. Abuse may also occur when a child or vulnerable adult is persuaded to enter into a financial or sexual transaction to which he or she has not consented or cannot consent.

**Physical abuse** – causes harm to a person. It may involve hitting, shaking, throwing, poisoning, burning, scalding, drowning or suffocating. It may be done deliberately or recklessly or be a deliberate failure to prevent injury.

**Neglect** – is the persistent or severe failure to meet a physical and/or psychological need.

**Sexual abuse** – involves a child, young or vulnerable person being forced or coerced into participating in or watching sexual activity. It is not necessary for the child to be aware that the activity is sexual, and the consent of the child is irrelevant.

**Emotional abuse** – occurs where there is persistent emotional ill treatment or rejection. It causes severe and adverse effects on the child, young or vulnerable person's behaviour and emotional development, resulting in low self-worth.

**Financial abuse** – may include being overcharged for services, being tricked into receiving goods or services that they do not want or need, Inappropriate use, exploitation, or misappropriation or property and/or utilities, theft, deception, fraud or explanation or pressure in connection with wills.

**Institutional abuse** - Service users required to fit in excessively to the routine of the service, more than one individual is being neglected, everyone is treated in the same way, other forms of an abuse on an institutional scale.

### Children and Young Persons/Vulnerable Adults

'Children and young people' in terms of this policy mean those under the age of 18. Vulnerable adults are aged 18 years or over who may be unable to take care of themselves or protect themselves from harm or being exploited.



## **Sexual Exploitation and Grooming**

Grooming is when someone builds an emotional connection with a child to gain their trust for the purpose of sexual abuse or exploitation. Children and young people can be groomed online or in the real world, by a stranger or by someone they know – for example, a family member, friend or professional. Groomers may be male or female. They could be any age.

Child sex exploitation (CSE) is a type of sexual abuse in which children are sexually exploited for money, power or status. Children or young people may be tricked into believing they're in a loving, consensual relationship. They may be also groomed online. Some children and young people are trafficked into or within the UK for the purpose of sexual exploitation. Sexual exploitation can also happen to young people in gangs.

## **Child on Child Sexual Violence and Sexual Harassment**

This exists in many forms, from calling someone sexualised names, flicking bra straps, lifting up skirts, grabbing bottoms, genitalia etc.

## **Mate Crime**

Mate crime happens when people with learning difficulties are befriended by someone who uses the relationship to exploit or abuse them. For more information – [www.safernet.org.uk](http://www.safernet.org.uk)

## **Online Safety and Social Media**

All staff, learners and contractors, if relevant, are trained in and receive regular updates in e-safety and recognising and reporting concerns. Our policies recognise that Internet Safety is a whole team/organisation responsibility which includes learners and their parents and carers.

Children, young people and adults at risk may expose themselves to danger, whether knowingly or unknowingly, when using the Internet and other technologies. Additionally, some children, young people and adults at risk may find themselves involved in activities which are inappropriate or possibly illegal.

BBE&T therefore recognises our responsibility to educate our learners, teaching them the appropriate behaviours and critical thinking skills to enable them to remain both safe and legal when using the Internet and related technologies. These issues are addressed within the learner journey, within relevant policies and procedures and with parents and carers.

BBE&T will ensure filters are in place to prevent access to unsuitable sites and we will monitor and report monthly on the use of the network and internet to ensure that any staff member or contractor attempting to access inappropriate, harmful or indecent images are found, then the police will be informed immediately and BBE&T will fully support their investigation, If involving a staff member, immediate suspension, in line with the disciplinary process, will immediately take effect and the managing safeguarding and prevent allegations procedure may need to be instigated by the Designated Safeguarding Lead. BBE&T will take the police advice when learners are involved as to whether the relevant commissioner should be informed.

The welfare and protection of our children and adults at risk is paramount and consideration should always be given as to whether the use of photography will place them at risk. Images may be used to harm children or adults at risk, for example as a preliminary to grooming or by displaying them inappropriately on the internet, particularly social networking sites. For this reason, consent must be sought from those with parental responsibilities (this may include the Local Authority in the case of looked after children).

We are aware of the Safeguarding Partners escalation procedures for raising concerns in respect of poor practice and recognise our responsibility to utilise these as and when necessary, in the interest of safeguarding and promoting the welfare of children and vulnerable adults.

Online safety also involves being aware of the risks to young people, our staff/volunteers and adults at risk when communicating via the Internet, digital and mobile devices and using social media. Social media includes blogs, Wikis, online communities, and social networking sites such as Facebook and Instagram.

As an organisation working with young people, BBE&T acknowledges the impact and involvement that social networking sites such as Facebook and Instagram have on the lives of young people, and their role in the ways which they interact with each other. At the same time, we recognise the dangers and potential risks that these sites can pose to both young people and BBE&T staff, and that they have the potential to be abused as a means of interacting with young people.

There is a wide range of ways to communicate with young people and this is a rapidly changing environment as new technologies, applications and social media sites merge. No Code of Conduct for e-safety can cover all of these separately. However, there are broad principles that we expect all staff to adhere to in order to safeguard young people and themselves in respect of using all these forms of media, devices, apps and social networking sites.

## **Sexting**

Sexting means sending sexually explicit messages and/or suggestive images, such as nudes. While the name suggests that this is only done via text message, these types of messages can be via any messaging service, including emails and social media.

This also means that sexts can be sent or received via a number of electronic devices, such as smart phones, computers and tablets.

If a child is under the age of 18, it is illegal for them to take a nude photo of themselves or a friend, as well as distributing them. Even though the age of sexual content is 16, the Protection of Children Act means it is against the law for a child to share a sexual image, even if it is with someone who is also under the age of 18.

Images covered under the law include, but are not limited to, naked pictures, topless photos of girls, any sex acts and sexual images in underwear. If it is found that a child under the age of 18 is in possession of any of these, has been sending them or taking these types of photos, the police can record it as a crime.

## Modern Slavery

Modern Slavery examples include forced labour, debt bondage, sexual or criminal exploitation, domestic servitude and trafficking.

Under the Modern Slavery Act 2015, we are required to ensure we do not have any aspect of modern slavery within our own organisation and within our supply chain, as such, we have to Issue a statement, published on our website, which clearly reflects the actions we have taken to prevent and ensure this. All of our staff undertake regular updated training on this subject.

Modern Slavery (s.1 of the Act) comprises of the following:

1. Slavery, servitude and forced or compulsory labour
2. Human Trafficking (s.2) – this is the movement of a person for the purposes of being exploited. There is no minimum distance (i.e. it can be from one room to another). Exploitation can include (in addition to above):
  - Sexual exploitation (regardless of age of the individual being exploited)
  - Removal of organs
  - Securing services by force, threats or deception (in particular, if the individual being exploited is a child or an adult at risk).

Child Trafficking is child abuse; children are recruited, moved or transported and then exploited, forced to work or sold. They are often subject to multiple forms of exploitation.

## Suicide and Mental Health Matters

Mental health and mental ill health can be defined in very different ways. Mental health influences how we think and feel about ourselves and other and how we interpret life events. Whereas mental ill health is a term that is used for a person whose thinking, emotions and behaviours negatively affect their ability to go about day to day activities such as work, and home life and it disrupts their abilities. There are several different types of mental illnesses including:

1. Depression
2. Anxiety disorders
3. Self-harm
4. Suicide

Suicide is a major public health issue in England. Suicide and suicidal thoughts need to be given the highest priority when dealing with an individual presenting these feelings. That said, not all people expressing suicidal thoughts want to die, they often don't want to feel the way they currently are which results in the thoughts turning to suicidal. The most important action to take when speaking to a person showing signs of suicide is to ask them directly 'are you having thoughts of suicide?' This will be able to guide the best possible action depending upon the answer you receive.

## Eating Disorders

Characterised by an abnormal attitude towards food that causes someone to change their eating habits and behaviour ([www.nhs.co.uk/eating-disorders](http://www.nhs.co.uk/eating-disorders)). Anorexia nervosa; when a person tries to keep their weight as low as possible e.g. by starving themselves or exercising excessively. Bulimia: when a person goes through periods of binge eating and is then deliberately sick or uses laxatives to try to control their weight. Binge eating disorder: When a person feels compelled to overeat large amounts of food in a short period of time.

## Self Harm

The idea of self-harm is tied up in stereotypical actions. It is a behaviour not an illness, people self-harm to cope with emotional distress or to communicate that they are distressed. It can present itself in many different ways, for example:

1. Cutting, scratching the skin with sharp objects such as knives or razor blades
2. Burning oneself with heated wax or cigarettes
3. Hitting or banging arms, legs or head on walls or other objects
4. Compulsory action of pulling hair out of the head
5. Abusing drugs and alcohol for risk rather than enjoyment
6. Eating Disorders

It is generally seen as a physical reaction to emotional pain and can be extremely addictive. This means that it is often more productive to focus on why an individual feels compelled to harm themselves, rather than the means by which they are doing so. Self-harm should not be misunderstood for being suicidal.

## Violence

### Gun and Knife Crime

Gun and knife crime is not as common as some people think, but it does happen. Guns and knives can affect everyone, not just people in gangs. Gun and knife crime include stabbing or shooting someone. But it's also illegal to:

- Carry a knife
- Threaten someone with a knife or gun
- Commit a crime with the use of a weapon - like a robbery
- Commit a crime by pretending you have a real knife or gun

Some people carry weapons like knives and guns to feel protected, because of peer pressure or to feel powerful. If a person has a weapon they might not always plan to use it - whether it is used as a weapon or not, it is still illegal.

Police have the power to stop and search if they think someone has a weapon. This could result with an arrest or the person going to prison for carrying, buying or selling a weapon.

Situations involving weapons can get out of control very easily and there might not have time to think about actions.

If carrying a weapon, a person is more likely to:

- Be attacked or threatened by other gangs who use weapons
- Be arrested by the police
- Kill or injure yourself badly with your weapon
- Hurt or kill others with your weapon
- Hurt innocent people if a fight happens
- Be charged with murder through joint enterprise if you're at a place where someone is killed, even if you weren't carrying the weapon.

## Gangs

Being in a gang can make a person feel part of something or that they belong but being part of a gang like this can be dangerous. Sometimes a person can be forced to commit a crime or do things that are unsafe. If a gang carries knives or other weapons, they might get them out to show off or intimidate people. This can be very scary for other people, especially if they think the gang will use them.

### Why do people join Gangs?

Young people join gangs for lots of different reasons. Some of these include:

- Fitting in with friends and other gang members
- Having the same interests as other people, like sports or music
- Feeling respected and important
- To be protected from bullying or from other gangs
- Making money from crime or drugs
- Gaining status and feeling powerful.

Being in a gang is not against the law but being involved with illegal activities (that some gangs do) could be an offence. A person could go to prison or end up with a criminal record if involved with:

- Gun and knife crime
- Violence or harassment
- Turf wars or postcode wars
- Carrying, using or selling drugs
- Theft or other illegal activities
- Rape and sexual assault.

If a learner has a criminal record you might not be:

- Accepted into a university, college or higher education
- Able to get a job, internship or do work experience
- Allowed to travel to some countries, like the USA.

## What is County Lines?

There is currently no legal definition, but County Lines is basically a form of exploitation, including child exploitation. County Line gangs use children and other vulnerable people to move drugs and money to and across areas using traditional gang culture as well as targeted and specific grooming of individuals including children. Once caught up in county lines, both adults and children are at risk of extreme physical and/or sexual violence, gang recriminations and trafficking. Families and individuals including children are being taken advantage of due to their naivety, inexperience and desire to belong or earn money and can easily be groomed into selling and transporting drugs. How are children being exploited? Criminals are deliberately targeting vulnerable children.

Gangs groom children into trafficking their drugs for them with promises of money, phones, friendship and belonging. In reality, children are then controlled using threats, violence and sexual abuse. The effects of this are that they live in fear and continue being exploited as they feel that they have no way to leave and live a different life – so they must keep doing what the gang wants. They, themselves are then considered criminals, when in fact they have been groomed and exploited to carry out such criminal behaviour when they do not have the age or understanding that they have been exploited.

Cuckooing is a form of crime, termed by the police, in which drug dealers take over the home of a vulnerable person in order to use it as a base for county lines drug trafficking.

- What are the signs of criminal exploitation and county lines?
- Returning home late, staying out all night or going missing
- Being found in areas away from home
- Increasing drug use, or being found to have large amounts of drugs on them.

## **Domestic Violence Abuse**

Domestic abuse, or domestic violence, is defined across Government as any incident of controlling, coercive or threatening behaviour, violence or abuse between those aged 16 or over who are or personally connected. The definition of people who are 'personally connected' as: intimate partners, ex-partners, family members or individuals who share parental responsibility for a child. There is no requirement for the victim and perpetrator to live in the same household. Domestic abuse is not just physical or sexual violence, but can also be emotional, coercive or controlling, and economic abuse.

## **Identifying cases of Female Genital Mutilation (FGM) and Forced Marriage**

There are many different types of abuse but there are some that staff may be less aware of. Female Genital Mutilation (FGM) and Forced Marriage fall into this category. Any indications that children or adults at risk may be subject to FGM or Forced Marriage, or that this may have already taken place, will be dealt with under the procedures outlined in this policy. In support of this provision, BBE&T will do everything that it can to ensure that:

- The DSLs are aware of the issues surrounding FGM, Forced Marriage and current legislation.
- Advice and signposts are available for accessing additional support, e.g. the NSPCC's helpline, ChildLine services, Forced Marriage Unit
- Awareness raising about FGM and Forced Marriage is incorporated in BBE&T's safeguarding training

Where there are concerns about FGM or Forced Marriage, a referral must be made as a matter of urgency. It is also extremely important that if a child or adult at risk has disclosed that they are at risk of FGM or Forced Marriage, the case is referred to Social Care, even if it is against that person's wishes. BBE&T staff must NOT consult or discuss these concerns with the child or vulnerable adult's parents or family, or others within the community, if there is an imminent risk, e.g. the child or adult at risk being taken out of the country, police must be informed (999) and the safety of the child or adult at risk must be the prime consideration whilst awaiting the police response. It was made a legal requirement in October 2015 to report known cases to FGM in under 18's.

## **Prevent Duty**

Prevent is about safeguarding and supporting those vulnerable to radicalisation. Prevent is 1 of the 4 elements of CONTEST, the Government's counter-terrorism strategy. It aims to stop people becoming terrorists or supporting terrorism

What does PREVENT do?

- Responds to the ideological challenge we face from terrorism and aspects of extremism, and the threat we face from those who promote these views.
- Provides practical help to prevent people from being drawn into terrorism and ensure they are given appropriate advice and support.
- Works with a wide range of sectors (including education, criminal justice, faith, charities, online and health) where there are risks of radicalisation that we need to deal with.

The main aim of Prevent is to stop people from becoming terrorists or supporting terrorism

At the heart of Prevent is safeguarding children and adults and providing early intervention to protect and divert people away from being drawn into terrorist activity.

Prevent addresses all forms of terrorism but continues to ensure resources and effort are allocated on the basis of threats to our national security.

The Counter Terrorism and Security Act 2015 places a duty on certain bodies to have 'due regard to the need to prevent people from being drawn into terrorism'.

## **What is Extremism**

The Government has defined extremism as "vocal or active opposition to fundamental British values, including democracy, the rule of law, individual liberty and mutual respect and tolerance of different faiths and beliefs". This also includes calls for the death of members of the British armed forces.

## **What is Terrorism?**

An action that endangers or causes serious violence to a person/people, causes serious damage to property or seriously interferes or disrupts an electronic system. The use of threat must be designed to influence the Government or to intimidate the public and is made for the purpose of advancing a political, religious or ideological cause.

The Prevent Team will, in partnership with other professionals including those involved in Safeguarding, investigate further to assess the nature and extent of the risk. The relevant local police prevent teams will complete an initial assessment, which will be used to inform the decision as to whether an individual should be referred to Channel.

## **What is Radicalisation?**

Radicalisation is the process in which a person comes to support terrorism and extremist ideology associated with terrorist groups.



## **Duties**

### **Role of the designated Safeguarding Lead and Deputies:**

The Designated Safeguarding lead will take responsibility for safeguarding learners under 18 and vulnerable adults and extending that duty to all other learners.

They have the responsibility to liaise with local statutory children's services agencies and with the local safeguarding partners.

They will provide support, advice and guidance to the SMT, Board Members and staff on an on-going basis and on any specified safeguarding issue as required.

### **The role includes:**

- Ensuring BBE&T is meeting its legal and statutory requirements including the Prevent Duty
- Undertaking Prevent awareness training and leading on this
- Referring cases to the Channel programme where there is a radicalisation concern, as required.
- Supporting staff who make referrals to the Channel programme
- Undertaking an annual review and if needed updating safeguarding policies and procedures
- Making sure safeguarding policies and procedures are fully implemented and followed by staff and learners
- Providing support, supervision and advice for any staff member or learner with a safeguarding concern
- Keeping own training up to date
- Providing safeguarding induction for new staff and learners
- Ensuring that all staff are trained and a register is kept of staff who have completed safeguarding training
- Keeping all staff and learners informed of good practice and new legislation and guidance
- Having an understanding of the referral procedures and know how to contact and establish links with local authority or police.
- Liaising with and making referrals to appropriate agencies about learners where there are safeguarding concerns, including the Local Authority Designated Officer (LADO)
- Submitting regular safeguarding reports to the board
- Dealing with allegations against staff



## Procedure

### Responding to concerns

Employees must remain vigilant at all times of the risk to clients of abusive behaviour from different sources including members of their family, other clients and employees.

Any suspicion, allegation or incident of abuse employees must be referred to a line manager (or another manager if appropriate) for full investigation.

If the alleged perpetrator of abuse is another employee, the circumstances will be investigated fully under the Company's Disciplinary Procedure.

If it is agreed to be a safeguarding matter a written record of the date and time of the report will be made including the name of the person to whom the matter is reported and sent to the Designated Safeguarding Lead within 24 hours.

If necessary, the Company will refer details of the circumstances to the Independent Safeguarding Authority.

#### Dealing with suspicious or allegations of abuse

- Concerns for the safety and well-being of children, young persons or vulnerable adults could arise in a variety of ways and in a range of different settings. For example a child may report or display signs of abuse, someone may hint that a child is at risk or that a colleague is an abuser, an individual may witness or hear about abuse in another organisation. It is essential to act quickly and professionally in all cases of suspected abuse.
- Any allegation by a child, young person or vulnerable adult against a member of staff, another student or volunteer should be reported immediately to the (Safeguarding Lead) relevant individual who has responsibility under this policy. In dealing with such allegations Busy Bees Education and Training has a duty of care to the individual and staff member, student or volunteer against whom the allegation has been made.

### Responding to disclosure

- Abused children, young people and vulnerable adults are more likely to disclose details of abuse to someone they trust and whom they feel safe with. By listening and taking seriously what the child, young people or vulnerable adult is saying you are already helping the situation. The following points are a guide to help you respond appropriately.

#### Actions to be taken by the person being disclosed to:-

- React calmly so as not to frighten them
- Avoid asking direct questions other than those seeking to clarify your understanding of what the person has said, they may be formally interviewed by the correct authority and they should not have to repeat their account on several occasions. Inappropriate and excessive questioning at an early stage may also impede the conduct of a criminal investigation.
- Take what the person is saying seriously, recognising the difficulties inherent in interpreting what is being said by a person who has a speech impairment or differences in language.
- Tell them they were not to blame, and they were right to tell someone.

- Reassure the child, young person or vulnerable adult but do not make promises of confidentiality which will not be feasible in the light of the developments. Explain to them that you will have to share your concerns with the Designated Safeguarding Lead who has the authority to act.
- Record in writing on the Safeguarding Report Form all the details that you are aware of and what was said using the child, young person or vulnerable adults own words immediately.

## **Actions to avoid**

### **The person receiving the disclosure should not:**

- Dismiss the concern
- Panic
- Allow their shock or distaste to show
- Speculate or make assumptions
- Probe for more information that is comfortably offered
- Make promises or agree to keep secrets
- Make negative comments about the alleged abuser
- Should not suggest any actions or consequences that may be undertaken in response to the disclosure.

## **Responding to Suspicions**

All suspicions, concerns and disclosures have to be reported immediately to the appropriate member of staff. They have the responsibility to:

- Ensure that arrangements are made to identify staff that require training in child, young person and vulnerable adult protection issues
- Ensure that reports forms and copies of policies and procedures are made available to staff
- Receive information from staff, volunteers, children, young person and vulnerable adults who have

## Confidentiality

Every effort should be made to ensure that confidentiality is maintained for all concerned in the safe guarding of children, young person and vulnerable adults. Information should be handled and disseminated on a need to know basis only. This includes the following people:

- Designated safeguarding lead
- The parents or carers of the person who is alleged to have been abused
- Police/Social Care Services
- Senior Management where appropriate
- The person making the allegation
- The alleged abuser (and parents or carers if the abuser is a child or young person)

## Allegations against Staff

All allegations of abuse made against members of staff will be managed in line with BBE&T's Safeguarding and employment policies and procedures.

These procedures apply to a wide range of allegations, including those that indicate a person may be unsuitable to work with children or adults at risk in their present position or in any capacity. It is essential that any concerns for the welfare of a child or adult at risk arising from abuse or harassment by a member of staff should be reported Immediately to the DSL, who will contact the Designated Local Authority Person (formerly known as LADO).

Where you have concerns about a colleague you should report these concerns to the DSL immediately, detailing your concerns on the BBE&T Safeguarding and Prevent referral form, and they will manage the allegations in line with agreed policy.

The DSL will discuss allegations against staff with the Designated Local Authority Person. The purpose of this discussion is to consider the nature, content and context of the allegation and to agree what further action, if any, is necessary. They will notify parents/carers that the person the allegation has been made against will be suspended, partly to protect them during any investigation. They will also consider risks to other children and communication with relevant organisations / bodies and will support the person the allegation has been made against, ensuring they are treated fairly and with impartially as detailed in BBE&T's disciplinary policy and procedures. They will include any support from the other agencies involved and manage possible media interest. Disciplinary or Capability procedures will not be initiated until the investigation by police or social care has been concluded. BBE&T will take the lead from these bodies at all stages of the process and involve the relevant DSL, Senior Managers and HR personnel. These may include:

- Child Protection or Adult at risk Safeguarding Investigation – this will assess whether the child / adult is in need of protection or in need of services – led by social care
- Criminal investigation – led by the relevant police force
- A Disciplinary Investigation – in line with BBE&T's disciplinary procedures

In the first two instances, social care and / or the police will lead on investigations. BBE&T's DSL will notify the Disclosure and Barring Service (DBS) where:

- BBE&T have permanently removed a member of staff from regulated activity.

For most cases, the DBS only has the power to bar a person who is, has been, or might in the future engage in regulated activity.

BBE&T's MD will act as BBE&T's named senior Manager to provide high level support to the HR Manager/DSL in handling allegations of abuse made against a member of staff in line with current BBE&T policy.

Where the allegation is found to be of a malicious nature, unfounded and with no further action to be taken, the individual the allegation was made against will be supported back into work and their team environment by the HR Manager, with an agreed support plan put in place.

## **Support for the Referrer**

BBE&T will fully support and protect staff, who, in good faith (without malicious intent), make a referral about a colleague who may be abusing a child or adult at risk and reports his or her concern about a colleague's practice. This support can be offered through the employee assistance programme.

They will also receive appropriate senior management support and the DSL will continue to provide support and guidance as required/appropriate.

## **Legislation and Guidance**

- The Children Act 1989 and 2004
- UN Convention on the Rights of the Child 1991
- Data Protection Act 2018 and General Data Protection Regulations (GDPR)
- Sexual Offences Act 2003
- Protection of Freedoms Act 2012
- Education Act 2005
- Human Right Act 1998
- Health and Social Care Act 2008
- Domestic Violence, Crime and Victims Act 2021
- Statutory guidance Working Together to Safeguard Children 2018 (previous versions: 1999, 2006, 2010, 2013, 2014 and 2015)
- Keeping Children Safe in Education 2019 (this replaces previous versions: 2014, 2015, 2018 and the Safeguarding Children and Safer Recruitment in Education 2006)
- Information Sharing Advice for Practitioners Providing Safeguarding Services to Children, Young People, Parents and Carers 2018.
- The Care Standards Act 2014
- The Mental Capacity Act 2005
- The "No Secrets" guidance, which sets out a code of practice for the protection of vulnerable adults
- Work based learners and Prevent Statutory Duty guidance for providers 2018. Equality Act 2010
- Revised Guidance (England and Wales)
- What to do if you're worried a child is being abused 2015?
- Mandatory reporting of FGM (Nov 16)
- Prevent Duty 2015

## How does Channel work?

Channel works in a similar way to existing safeguarding partnerships aimed at protecting vulnerable people.

Channel is designed to work with individuals of any age, is shaped around the circumstance of each individual and can provide support for any form of radicalisation or personal vulnerabilities.

Each Channel panel is chaired by a local authority and brings together a range of multi-agency partners to collectively assess the risk and decide whether a support package is needed. The group may include statutory and non-statutory partners, as well as lead safeguarding professionals. If the group feels the person would be suitable for Channel, it will look to develop a package of support that is bespoke to the person. The partnership approach ensures that those with specific knowledge and expertise around the vulnerabilities of those at risk are able to work together to provide the best support. Useful links are below for more information:

<https://www.gov.uk/government/organisations/national-counter-terrorism-security-office> [www.counterterrorism.police.uk](http://www.counterterrorism.police.uk)

## What does Channel support look like?

Channel Interventions are delivered through local partners and specialist agencies. The support may focus on a person's vulnerabilities around health, education, employment or housing, as well as specialist mentoring or faith guidance and broader diversionary activities such as sport. Each support package is tailored to the person and their particular circumstances.

A person will always be informed first if it is felt that they would benefit from Channel support. The process is voluntary, and their consent would be needed before taking part in the process. This process is managed carefully by the Channel Panel.

## Who can make a referral?

Anyone can make a referral. Referrals come from a wide range of partners, including education, health, youth offending teams, police and social services.

## What happens with the referral?

Referrals are first screened for suitability through a preliminary assessment by the Channel Coordinator and the local authority. If suitable, the case is then discussed at a Channel panel of relevant partners to decide if support is necessary.

## Raising concern

If you believe that someone is vulnerable to being exploited or radicalised, please use the established safeguarding procedures to escalate your concerns to the DSL, who can raise concerns to Channel if appropriate.

## Learner Recruitment

The Training Representative works in collaboration with the setting Manager to ensure a vigorous recruitment procedure is completed, in accordance with the Learner Process recruitment procedure and the company Employment Guidelines Manual

The safety of all of our learners is paramount and where a learner wishes to join a course and has disclosed behaviours that may be as a concern a risk assessment will be complete to assess course suitability and if the required support plan can be put in place prior to a course offer.

## Channel Risk Assessment

Risk is a theme that runs through the entire Channel process, i.e. risk to the individual, risk to the public and risk to partners or organisations providing support to the individual, including any intervention providers. The panel is responsible for managing the risk in relation to the vulnerable individual. BBE&T completed a Prevent Risk Assessment, and this can be viewed on request.

BBE&T will:

- Undertake risk assessments to address the physical management of the institution's estate, including policies and procedures for events held by staff, learners or visitors, and relationships with external bodies and community groups who may use premises, and/or work in partnerships with the institution.
- Have clear and visible policies and procedures for managing whistleblowing and complaints
- Have procedures in place to assess Trainers/DCs delivering courses to ensure that this does not lead to inadvertently funding extremist organisations
- Consider notifying the Prevent coordinator and others as necessary and develop a Prevent action plan, if a risk is identified.

## Safer Recruitment and Training for Staff

When recruiting new members of staff, BBE&T follows the government guidance "Safeguarding Children: Safer Recruitment in Education" and Safer Recruitment principles and pays due regard to the Safeguarding Vulnerable Groups Act 2006 and the Protection of Freedom Act 2012.

The company also complies fully with the Code of Practice and aims to treat all applicants for positions fairly. DBS checks are undertaken in line with government guidance and current legislation, alongside appropriate references being obtained and ensuring qualifications are verified. Safer Recruitment training has been undertaken by senior members of staff who conduct recruitment activities in accordance with statutory guidance.

Newly appointed staff will have an induction in line with the BBE&T Probation policy over a 3-month period. A robust induction into the safeguarding of children, young people and adults at risk procedures is provided when they join the company, this includes mandatory VLA activity for reading of policies and procedures, as well as e-learning. Probation is a period of both professional development and review. It provides a fair opportunity for an employee to understand the company, the standard of performance required and to be given the guidance and support needed to be effective in his or her new role.

Probation allows the manager of the newly appointed employee to assess objectively whether the new recruit is suitable for the role, taking into account the individual's overall capability, skills, performance and general conduct in relation to the job in question.

### **Keeping Children Safe in Education 2019 Part 1 - all staff must be aware**

[https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\\_data/file/836144/Keeping\\_children\\_safe\\_in\\_education\\_part\\_1\\_2019.pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/836144/Keeping_children_safe_in_education_part_1_2019.pdf)

[https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\\_data/file/836144/Keeping\\_children\\_safe\\_in\\_education\\_part\\_1\\_2019.pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/836144/Keeping_children_safe_in_education_part_1_2019.pdf)

### **Working Together to Safeguard Children 2018**

[https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\\_data/file/779401/Working\\_Together\\_to\\_Safeguard-Children.pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/779401/Working_Together_to_Safeguard-Children.pdf)

Workbase learners and Prevent Statutory Duty 2018 - recommend reading for Apprenticeship trainers and Traineeship tutors

[https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\\_data/file/744673/Work\\_Based\\_Learners\\_Guidance.pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/744673/Work_Based_Learners_Guidance.pdf)

### **The Red Folder**

Where a member of delivery staff is in a position where they feel they are in danger whilst carrying out the requirements of their role they can call one of the DSL's or their Line Manager and ask for the Red Folder. This then alerts the DSL or Line Manager to a potential safety issue. In this instance the Line Manager will ask questions of the staff member that require yes or no answers, they will consult the staff member's calendar to determine where they are and then alert the relevant authorities (If required) to send help'.

# Appendix One



# Safeguarding and Prevent Cause for Concern Report Form

This form is to be completed for any safeguarding concern that would suggest a learner may be in need of safeguarding support services, and/or their family members may be in need of care and support. This form is also used for allegations against members of staff, Inc. bullying and in cases of physical intervention, prevent, FGM or domestic abuse.

Learner

DOB

Learner's  
programmeDate and time of incident  
occurring/concern identifiedName of person  
raising concern

Others involved

Details of incident/concern

Details of possible risk arising from incident/concern

Immediate action taken/needed

Completed by (print name)  Date

Signature

Date passed to the DSL (please note name of person informed)

### **Injury details (if applicable)**

Details of injury

Time and date of injury arising

### **To be completed by the DSL/Deputy DSL**

Analysis of concern (what are the short term/long term implications to the person of this concern?)

Action to be taken as a result of concern (to include immediate actions)

### **Follow up action**

No identified risks relating to this learner's health, safety, well-being or susceptibility to undue influence (e.g. radicalisation)

Monitoring (commence or continue significant event chronology)

Safeguarding referral (see below)

Refer to Prevent officer

Refer to Channel

Refer to LEA

Early Help Assessment (EHA) required

Other (provide details)

Feedback given to person raising the concern within 3 working days      Yes      No

If not, why not and when will this happen

A copy of this form should always be kept in the Safeguarding folder on SharePoint (this is password protected).

Signature of DSL/ Deputy DSL	<div></div>	Name	<div></div>
Date	<div></div>	Time	<div></div>

## Safeguarding Referral

To be completed **only** if a referral has been made to Social Care Department.

Date of referral

Time of referral

Social care department office  
(include address and  
telephone number:

Name of Designated Officer  
in Social Care department  
who took the referral

Summary of outcome of referral. If no outcome has been agreed with social care department within 3 working days of the referral re-contact them. (include below what has been agreed in respect of action, contacting parents, involvement of the learner, timescales)

Has the referral been followed up in writing (this must be within 48 hours)    Yes      No

If no, please give reasons

Have all appropriate staff been informed of the referral and its implications    Yes      No

If yes, indicate who has been informed:

If no, please give reasons

Signature of person making this statement:

Name

Date

Time