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Child Protection and Safeguarding Children, Young People and Vulnerable Adults Policy

1. POLICY AIM AND OBJECTIVES

BPIF Training is committed to the safeguarding and well-being of all of our learners and fully recognise the responsibilities for protecting vulnerable groups. This policy applies to all staff, learners, visitors and volunteers working on behalf, or in conjunction with BPIF

There are six main elements to our policy

1. Ensuring that we operate safer recruitment practices in accordance with the legislative document – Safer Recruitments and Safeguarding Children in Education (2007)
2. Raising awareness of safeguarding throughout the organization, achieving commitment to safeguarding vulnerable groups and ensuring that staff are well equipped with the appropriate knowledge and skills to support learners effectively and help keep them safe.
3. Raising awareness of safeguarding to all of our learners and ensuring that learners who are the most vulnerable are equipped with the skills and knowledge to keep themselves safe
4. Developing and implementing procedures for raising, recording and investigating any cases or suspected cases of abuse
5. Identifying procedures for accessing additional support and guidance
6. Demonstrating how IT usage is monitored

BPIF Training recognise that because of our day-to-day contact with learners, our staff are well placed to observe the outward signs of abuse and therefore BPIF Training will

- Establish and maintain an environment where learners feel secure, are encouraged to talk and are listened to
- Ensure that learners know that there are designated staff within BPIF whom they can approach if they are concerned or worried
- Include opportunities within our ongoing teaching, learning and assessment for learners to develop the skills they need to recognise and stay safe from abuse

We recognise and adhere to the statutory requirements within the following relevant pieces of safeguarding legislation;

- Working together to Safeguard Children (2015, 2018)
- Children's' Act (1989, 2004)
- Safeguarding and Safer Recruitment in Education (2007)
- Safeguarding Vulnerable groups Act (2006 amended 2012)
- Protection of Freedoms Act (2012)
- Disclosure and Barring Services Code of Practice (2012, 2015)
- Sexual Offences Act (2003)
- Every Child Matters (2004)
- Equality Act (2010)
- Sexual Violence and Sexual Harassment Between Children in Schools and Colleges (2021)

To support our commitment to the safeguarding and wellbeing of all of our learners with regard to the above legislation we will:

- Ensure that we have a Designated Person for Safeguarding who has received appropriate training and support for this role

The Designated Person for Safeguarding is **Andrew Bracey** (Apprenticeship Quality and Performance Manager). Other staff members with specific responsibilities for safeguarding are **Karly Lattimore** (Managing Director) and **Ben Johnstone** (Apprenticeship Quality and Performance Manager) as deputy safeguarding offers, and **Robin Sumner** who is BPIF Training safeguarding representative on the board.

- Ensure that all staff are aware and understand their responsibilities in relation to safeguarding and in being alert to the signs and indicators of abuse and for referring any concerns directly to the Designated Person for Safeguarding.
- Ensure that effective safeguarding procedures are developed, implemented and monitored to ensure their effectiveness. These procedures are based in the 5Rs approach of Recognition, Response, Record, Report and Refer.
- Ensure that we develop effective links with relevant external agencies, local safeguarding boards and cooperate with any requirements with any safeguarding referral matters
- Ensure that we keep written records of any safeguarding concerns, even when there is no need to refer the matter to the relevant agencies.
- Ensure all records are stored securely and in accordance with the Data Protection Act

BPIF Training recognise its responsibility with regard to safeguarding of young and vulnerable learners from abuse and inappropriate and inadequate care and is committed to responding in all cases where there is concern. Due to the nature of our work, BPIF Training may be in the front line of work with some children, young learners, vulnerable learners, and vulnerable adults. This may mean that we are the first to know that a child, young or vulnerable learner or adult is being or has been abused and that we are concerned about a persons' wellbeing. Everyone has an equal responsibility to ensure that individual needs and welfare of the person are put first and to safeguard any person with whom we may come into contact. This responsibility not only rests with the Board, Directors, Senior Management Team and Designated Persons but also with every individual member of staff employed or volunteering with our organisation which are work, at an employee's premises or at home.

2. UNDERSTANDING SAFEGUARDING

Safeguarding is a proactive process of protecting and ensuring the safety and wellbeing of young and vulnerable learners. It may involve instances in which a young or vulnerable learner is suffering or likely to suffer from harm. Safeguarding involves safer recruitment practices to assist in identifying persons who are unsuitable to work with children and vulnerable adults.

The benefits of safeguarding include:

- Learners are appropriately protected, and all issues are dealt with effectively
- Staff are clear about individual responsibilities, roles, and boundaries
- Staff are protected from malicious and misplaced allegations
- Learners can rely on those in a position of trust.

How do we define Children, young people and vulnerable Adults?

Young learners are defined as any learner who has not yet reached their 18th birthday (Children's Act 1989, 2004)

The Safeguarding and Vulnerable Groups SVGA (2006) no longer labels adults as 'vulnerable' because of the setting in which an activity is received, nor because of the personal characteristics of the adult receiving these activities.

The definition of regulated activity as explained within the Protection of Freedoms Act 2012 identifies those activities provided to any adult which, if any adult requires them, will mean that the adult will be considered 'vulnerable' at the time.

An adult is a person aged 18 years and over. There are six categories within the new definition of regulated activity.

- Health care
- Personal Care
- Providing social work
- Assistance with general household matters
- Assistance with the conduct of a persons' own affairs
- Conveying

BPIF Training recognise that, in the context of safeguarding learners, any adult can be subject to abuse and they do not have to be 'vulnerable' as defined by the Act in order for BPIF Trainings safeguarding procedure to be implemented.

Definitions and Types of Abuse or Neglect

Child abuse and neglect is a generic term encompassing all ill treatment of young and vulnerable learners, including serious physical and sexual assaults as well as cases where the standard of care does not adequately support the persons' health or development.

Abuse and neglect are forms of maltreatment of a young and vulnerable learner. Somebody may abuse a young or vulnerable learner by inflicting harm, or by failing to prevent harm.

Young or vulnerable learners may be abused in the family or an institution or community setting by those known to them or, more rarely, by a stranger. An adult or adults or another child or children may abuse them.

Working together to Safeguard Children (2010) sets out definition and examples of the four broad categories of abuse:

Physical Abuse may involve hitting, shaking, throwing, poisoning, burning or scalding, drowning, suffocating or otherwise causing physical harm. Physical harm may also be caused when a parent or carer fabricates the symptoms of, or deliberately includes illness.

Emotional Abuse is the persistent emotional ill treatments of a person such as to cause severe and persistent adverse effects on his or her emotional development. It may involve conveying to a child or a person that they are worthless or unloved, inadequate or valued only in so far as they meet the needs of another person. It may feature age or developmentally inappropriate expectations being imposed on a child or person concerned. It may involve causing that child or person to feel frightened or in danger, or exploitation or corruption Emotional or other forms of abuse may occur as a result of domestic violence. Some level of emotional abuse is involved in all types of ill treatment or abuse, though it may occur alone.

Sexual Abuse involves forcing or enticing a child or vulnerable adult to take part in sexual activities, whether or not they are aware it is happening. The activities may involve physical contact, including penetrative or non-penetrative acts. They may include non-contact activity such as involving children or vulnerable adults in looking at, or encouraging them to behave in inappropriate ways. Sexual abuse may also take place through the inappropriate use of cameras and images.

Neglect is the persistent failure to meet a child or vulnerable adults' basic and/or psychological needs, likely to result in the serious impairment of his or her health or development. It may involve a parent or carer failing to provide adequate medical care or treatment. It may also involve the neglect of basic emotional needs.

In respect to vulnerable adults, the local County Council identify seven forms of abuse. In addition to the four above they also identify:

Financial Abuse which is defined by the misappropriation of money or assets; transactions to which the person could not consent or which were invalidated by intimidation or deception; or the misuse of assets. Examples include misuse of benefits, denying access to money, not spending allowances on the individual, and any unreasonable restriction on a person's right to control over their lives to the best of their ability.

Discriminatory Abuse which is defined as any form of abuse based on discrimination because of a person's race, culture, belief, gender, age, disability, sexual orientation or marital status

Institutional Abuse which is defined as repeated incidents of poor professional practice or neglect, and inflexible services based on the needs of providers rather than the persons acquiring the service

The grooming of children and young people for the purposes of involving them in extremist activity is child abuse and child protection procedures should be followed when there are concerns that a child or young person is at risk of additional types of abuse and unsafe activities which we recognise and have become more prevalent in recent times are:

- Bullying and harassment
- Discriminatory abuse
- Financial abuse
- Domestic abuse
- Alcohol and drugs
- Crime and knife crime
- Cyber crime

Signs and Indicators of Possible Abuse

When considering whether there is enough information and evidence to suggest a child, young person or vulnerable adult has been abused there are a number of possible indicators. However, there may also be a perfectly reasonable explanation, so it is important to remain vigilant but not overzealous or jump to conclusions. There may also be no signs or indicators of abuse, however this does not mean that a report of abuse is false. Suggested signs of abuse are detailed in Appendix 1 to this document.

PREVENT AND SAFEGUARDING

The grooming of Children, Young People and Vulnerable Adults for the purposes of involving them in extremist activity is child abuse and child protection procedures should be followed where there are concerns that a child or young person is at risk of radicalisation or has already been radicalised.

The government defines extremism as 'vocal or active opposition to Fundamental British Values including democracy, respect and tolerance of different faiths and beliefs. Also included in the definition

of extremism is calling for the death of a family member of the armed forces.

Radicalisation is the process by which people come to support terrorism and violent extremism and, in some cases, then participate in terrorist groups. There is no obvious profile of a person likely to become involved in extremism, or a single indicator of when a person might adopt violence in support of extremist ideas. Possible indicators that a person is at risk or has been radicalised can be found in Appendix A.

Children, young people and vulnerable adults can be exposed to harmful, extremist ideology in the immediate family through the impact of extreme beliefs held by family members including parents and carers or family and friends who live outside the family home but have an influence over the child's life. Older children or young people might be radicalised over the internet.

The Government's strategy to reduce the risk from terrorism identifies the need not only to stop terrorist attacks but also prevent people from becoming terrorists. The Government's strategy for countering terrorism is CONTEST and the Prevent Strategy forms part of this.

CONTEST has four key strategies

- Pursue: to stop terrorist attacks
- Prevent: to stop people becoming terrorists or supporting terrorism
- Protect: to strengthen our protection against a terrorist attack
- Prepare: to mitigate the impact of a terrorist attack.

Prevent addresses all forms of terrorism and nonviolent extremism which can create an atmosphere conducive to terrorism and can popularise views which terrorists then exploit. The Prevent Strategy makes clear that preventing people becoming terrorists or supporting terrorism requires challenge to extremist ideas where they are used to legitimate terrorism and are shared by terrorist groups.

Work to safeguarding children, young people and adults, including the provision of early intervention to protect and divert people away from being drawn into terrorist activity is central to the Prevent Strategy.

Staff who observe any behavior or who hear or are told anything significant by a child, young person or others, must report their concerns to the designated named safeguarding person.

If BPIF Training has any significant concerns about a learner, or others beginning to support terrorism and / or violent extremism, it is a requirement that it is discussed with the local police so that they can be part of further work to address the issue. BPIF work to the Prevent element of the Government's Counter Terrorism Strategy, and where deemed appropriate seeks external support through referrals to the Channel Programme

Channel provides a mechanism for assessing and supporting people who may be targeted by violent extremists or drawn into violent extremism. Channel uses existing collaboration between local authorities, the police, statutory partners and the local community to:

- Identify individuals at risk of being drawn into violent extremism
- Assess the nature and extent of the risk
- Develop the most appropriate support for the individual concerned

CHILDREN MISSING IN EDUCATION

The London Child Protection Procedures define a child as missing if their whereabouts are unknown, whatever the circumstances of their disappearance. Sometimes children stay out longer than agreed as boundary testing activity. These children have taken unauthorised absence and would not usually

come with the definition of missing.

According to police figures, around 360000 children/young people run away each year, although the real number is likely to be more, as not all cases are recorded. Children looked after are three times more likely to run away than other children.

The child/young person may be missing from care of home because they are suffering physical, sexual or emotional abuse and/or neglect. Children and young people who go missing may be victims of sexual exploitation and trafficking. In addition, young people who are missing may be feeling forced marriage or honour-based violence.

Many of these young people stay with friends or family members, but some do not have access to support and could be at risk of significant harm through physical or sexual abuse. They may end up in potentially harmful situations including sleeping rough.

BPIF has drawn up this policy to deal with children or young people who miss training in this circumstance, particularly on repeat occasions and for these children and young people who leave their training programme without clear indication of where they will be continuing their education.

BPIF have taken information from the DfE guidance including Keeping Children Safe in Education: Statutory Guidance for Schools and Colleges 2021.

BPIF recognises that the high majority of all training takes place on site at an employer's premises, and it is recognised that there may be occasion when a child or young person will need to cancel an appointment. This policy covers those instances of absence where:

- There is a repeated pattern of absence
- The reason for absence is unclear or unexplained
- A member of staff has raised concerns about the nature of the child or young person's absence

In these instances, BPIF's safeguarding lead or deputy should be consulted. Where a child or young person is deemed to be at risk, BPIF's procedure for reporting suspected abuse to children, young people and vulnerable adults is followed.

SEXTING

Sexting among children and young people can be a common occurrence where they often describe incidents as 'mundane'. Children and young people involved in sexting incidents will be dealt with (by the Police) as victims as opposed to perpetrators (unless there are aggravating circumstances).

If there is a report, or a suspicion of a sexting incident, it must be remembered that intimate images are typically considered to be illegal images which is why incidents need very careful management for all those involved.

BPIF's policy is for all members of staff to report any suspected cases, or cases of sexting to BPIF's safeguarding lead.

BPIF's safeguarding lead will record all incidents of sexting. This includes actions taken and actions that are not taken, together with justifications.

CHILD CRIMINAL AND SEXUAL EXPLOITATION

Child sexual exploitation is a form of child sexual abuse. It occurs where an individual or group takes advantage of an imbalance of power to coerce, manipulate or deceive a young person under the age

of 18 into sexual activity in exchange for something the victim needs or wants, and/or for the financial advantage or increased status of the perpetrator or facilitator. Child sexual exploitation does not always involve physical contact; it can also occur through the use of technology.

Child criminal and sexual exploitation:

- Can affect any child or young person, male or female, under the age of 18 years, including 16- and 17-year-olds who can legally consent to sexual intercourse
- Can still be abuse even if the sexual activity appears consensual
- Can include both contact and non-contact sexual activity
- Can take place in person or via technology, or a combination of both
- Can involve force or enticement-based methods of compliance and may, or may not, be accompanied by violence or threats of violence.
- May occur without the child or young person's immediate knowledge (through others copying videos or images that they have created and put on social media, for example)
- Can be perpetrated by individuals or groups, males or females, and children or adults. The abuse may be a one-off occurrence or a series of incidents over time, and range from opportunistic to complex organised abuse
- Is typified by some form of power imbalance in favour of those perpetrating abuse

Should there be an incident, or suspected incident of child sexual exploitation then BPIF's procedure for safeguarding children, young people and vulnerable adults is followed. All staff will reassure victims that they are being taken seriously and that they will be supported.

PEER ON PEER ABUSE

BPIF Training is committed to protecting children young people and vulnerable adults from peer-on-peer abuse. Peer-on-peer abuse includes:

- Young people aged 16 and 17 who experience physical, emotional, sexual and/or financial abuse and coercive control in their intimate relationships.
- Young people aged under 18 who are sexually abused in the context of exploitive relationships, contexts and situations of a person of any age, including another young person.
- Any young person under the age of 18, who demonstrated behaviour outside of their normal parameters of development
- Serious youth violence including murder, rape and GBH between young people under the age of 18.

BPIF Training's policy is for all members of staff to report any suspected cases, or cases of peer-on-peer abuse to BPIF Training's safeguarding lead. All staff will reassure victims that they are being taken seriously and that they will be supported.

HONOUR BASED VIOLENCE

Honour based violence is a violent crime or incident which may have been committed to protect or defend the honour of the family or community.

It is often linked with family members or acquaintances who mistakenly believe someone has brought shame to their family or community by doing something that is not in keeping with the traditional beliefs of their culture. For example, honour-based violence might be committed against people who:

- Become involved with a boyfriend or girlfriend from a different culture or religion
- Want to get out of an arranged marriage
- Want to get out of a forced marriage
- Wear clothes or take part in activities that might not be considered traditional within a particular culture

Crimes of 'honour' do not always include violence. Crimes committed in the name of 'honour' might include:

- Domestic abuse
- Threats of violence
- Sexual or psychological abuse
- Forced marriage
- Being held against your will or taken somewhere you don't want to go
- Assault

BPIFs policy is for all members of staff to report any suspected cases, or cases of honour based violence to BPIFs safeguarding lead.

FEMALE GENITAL MUTILATION (FGM)

Female Genital Mutilation (FGM) is a form of child abuse and as such is dealt with under BPIFs child protection and safeguarding children, young people and vulnerable adult's policy. At BPIF, the Board and Management Team expect safeguarding to be everybody's responsibility and expect all staff to following this policy.

The World Health Organisation (WHO) defines FGM as the following:

'Female Genital Mutilation comprises of all procedures involving partial or total removal of the external female genitalia or other injury to the female genital organs whether for cultural or non-therapeutic reasons.'

BPIF have taken information from several documents including the Governments Home Office guidelines and the Ofsted Guidelines for Inspecting Safeguarding. The UK Government has written advice and guidance on FGM that states that:

"FGM is considered child abuse in the UK and a grave violation of the human rights of girls and women. In all circumstances where FGM is practiced on a child it is a violation to right of life, their right to their bodily integrity, as well as their right to health. The UK government has signed a number of international human rights laws against FGM, including the Convention on the Rights of a Child"

"UK communities that are most at risk of FGM includes Kenyans, Somalis, Sundanese, Sierra Leoneans, Egyptians and Eritreans. However, women from non-African communities that are at risk of FGM include Yemeni, Kurdish, Indonesian and Pakistani women."

Indications that a child or young people is at risk of FGM include:

- The family come from a community that is known to practice FGM
- In conversation a child or young person may talk about FGM
- The child or young person may express anxiety about a special ceremony
- The child or young person may talk or have anxieties about forthcoming holidays to their country

of origin.

Where BPIF have any concerns that a child or young person is at risk of FGM then we refer to individual's local safeguarding board for advice.

Where a child or young person discloses that they are victims, or may be victims of FGM, BPIFs procedures for reporting suspected abuse to children, young peoples and vulnerable adults is followed.

FORCED MARRIAGE

A person may be at risk of forced marriage if their family belongs to a community which practices arranged marriage – but this does not mean any marriage will necessarily be forced.

Indicators may be that their family makes preparations for a holiday, they talk about going abroad and/or a ceremony taking place with a sense of reluctance, they say goodbye to friends with a sense of this being permanent or they seem distressed or tearful

BPIFs policy is for all members of staff to report any suspected cases, or cases of forced marriage to BPIFs safeguarding lead.

KNIFE CRIME

Knife crime is a term used commonly in the media to refer primarily to street-based knife assaults and knife carrying. However, there are many different criminal offences relating to knives. For example:

- it is an offence to threaten or cause harm to a person with a bladed weapon
- some bladed weapons are prohibited from being sold or purchased, including to anyone under the age of 18
- Offences such as robbery or assault can be aggravated if a knife is involved
- It is also an offence to carry a knife in a public place without good reason.

According to Ofsted paper: Safeguarding Children and Young People in Education from Knife crime, in the last 12 months since September 2018, knife crime had increased by 68.4% across England and Wales compared with 12 months up to September 2014 and 55% across the Metropolitan Police Service area of London over the same period. Public perception of knife crime being a problem in London has increased and 26% of respondents to the London Public Attitude Survey 2018 felt that knife crime was a problem compared with 20% a year earlier.

It is clear that knife crime is an increasing safeguarding risk to children and young people, both at school and in their local communities. Whilst there is no clear answer to the question of the cause of knife crime.

Where a child or young person discloses that they may be at risk or BPIF suspect that there may be caused to be suspicious that a young person is at risk or involved in knife crime then all cases are to be reported to BPIFs safeguarding lead.

HUMAN TRAFFICKING

Human Trafficking involves men, women and children being brought into a situation of exploitation through the use of violence, deception or coercion and forced to work against their will. People can be trafficked for many different forms of exploitation such as forced prostitution, forced labour, forced begging and forced criminality, domestic servitude, forced marriage, forced organ removal. When children are trafficked, no violence, deception or coercion needs to be involved: simply bringing them into exploitative conditions constitutes trafficking.

People trafficking and people smuggling are often confused. People smuggling is the illegal movement

of people across international borders for a fee and upon arrival in the country of destination the smuggled person is free. The trafficking of people is fundamentally different as the trafficker is facilitating the movement of that person for the purpose of exploitation. There is no need for an international border to be crossed in cases of trafficking, it also occurs nationally, even within one community.

BPIF Trainings policy is for all members of staff to report any suspected cases, or cases of human trafficking to BPIF Trainings safeguarding lead.

MODERN SLAVERY

Modern Slavery refers to the illegal exploitation of people for personal/ commercial gain. Victims trapped in servitude they were deceived or coerced into. Modern Slavery may include:

- *Criminal Exploitation* - pick pocketing, shoplifting, drug trafficking.
- *Domestic Servitude* - forced to work in private houses with restricted freedoms, long hours, and no pay.
- *Forced labour* - long hours, no pay, and poor conditions, verbal and physical threats.
- *Sexual Exploitation prostitution and child abuse*
- *Other forms* - Organ removal, forced begging, forced marriage and illegal adoption

Possible indicators that an individual is being subject to modern slavery is where an individual may:

- Look malnourished or unkempt
- Be withdrawn, anxious and unwilling to interact
- Appear under the control and influence of others
- Live in cramped, dirty, overcrowded accommodation
- Have no access or control of their passport or identity documents or use false or forged documents
- Appear scared, avoid eye contact, and be untrusting
- Show signs of abuse and/or have health issues
- Show old/untreated injuries, or delay seeking medical care with vague/inconsistent explanation for injuries
- Appear to wear the same or unsuitable clothes, with few personal possessions
- Fear authorities and in fear of removal or consequences for family
- Be in debt to others or a situation of dependence

BPIFs policy is for all members of staff to report any suspected cases, or cases of modern slavery to BPIFs safeguarding lead

MENTAL HEALTH

It is recognised by BPIF Training that Mental Ill-Health is an ongoing issue. That it can be a sign of neglect, abuse, exploitation, or other potentially traumatic experience. That a mental health issue is a safeguarding issue if the individual is not receiving professional help/support.

BPIF have trained staff as Mental Health First Aiders – they provide support to both staff and learners alike. Whilst they are not trained professionals able to make formal diagnosis, they are able to sign-post individuals to support services/networks.

ONLINE AND E-SAEFTY

BPIF Training recognises that technology and the use of ICT equipment is part of everyday life and that it is an essential part of learning and employment.

ICT systems are one of the fastest and most effective ways of finding information, sharing ideas and working with other people but, while effective, there is also the opportunity for risks to occur.

As part of our safeguarding responsibility, we aim to protect all staff and learners against risks associated with the internet and other technology aids such as mobile phones. This will be known as e-safety.

The risks to users can include data that is inaccurate, dangerous, illegal and offensive.

The risks associated with technology can be categorised under the following headings:

Physical: Including poor posture, effected by poor seating and furniture set-up, and eye strain due to the length of time a person is exposed to the screen. BPIF has a written Home Working with VDU's in place which is available to all staff and learners.

Contact: Social networking sites and chat rooms allow you to meet new friends but unfortunately not everyone is who they claim to be. Never give personal information out as this could make you vulnerable to exploitation, bullying or sexual aggression.

Conduct: This behaviour can be by, or towards, individuals and can include cyberbullying and cyberstalking. Behaviours can also include racism and piracy. When using equipment provided by BPIF Training and your employer, you have a right to be protected and a duty to behave honestly and responsibly. Never do anything that makes you vulnerable to malicious software or charges of bad behaviour. Incorrect use of equipment, including downloading or passing on illegal or inappropriate content, can result in the user committing a criminal offence.

Content: This includes downloading information, some of which may be illegal, dishonest or inappropriate. This presents risks to the learner/staff member and your employer/ training provider if using their equipment. Posting personal information can also pose risks as previously mentioned in the "contact" category.

Commerce: This includes the risk of financial abuse when making a purchase online through an unsecure source. Always check that a site belongs to the company it says it does – if in doubt, look for a real-world postal address or phone number.

3. SAFEGUARDING STRUCTURE AND RESPONSIBILITIES

BPIF Training has in place an organization structure for safeguarding children, young people and vulnerable adults. Key senior staff with designated responsibilities include:

- Designated Safeguarding Officer (Intermediate and Advanced Apprenticeship Manager) who is a member of BPIF's training management team
- Deputy Safeguarding Officer (Managing Director of Training)
- Board Safeguarding representative who is a non-executive director of BPIF's main board of directors

The designated safeguarding officer is a senior member of BPIF Trainings Leadership Team. They have a key duty to take a lead responsibility for raising awareness within the staff of issues relating to welfare of children and young people and the promotion of a safe environment for children, young people and vulnerable adults. This includes:

- Overseeing the referral of cases of suspected abuse, radicalisation or allegations to the County Councils Department of Children and Young Peoples services or other agencies such as the Police of Channel as appropriate.

- Providing advice and support to other staff on issues relating to child/vulnerable adult protection
- Maintain a proper record of any child/vulnerable adult protection referral, complain or concern, even when the concern does not lead to a referral
- Ensuring that all staff receive basic training in child/vulnerable adult issues and are aware of BPIFs Child Protection and Safeguarding Children, Young People and Vulnerable Adults Policy

BPIF Training take the view that all staff and learners are required to take shared responsibility for the protection and safety of children, young people and vulnerable adults of site and at the employers' site. They must be aware of and abide by BPIFs Codes of Good Practice.

Processes are in place to check the suitability of staff working directly with children and young people. Some staff and learners across the company will be in regular or significant contact with children, young people or vulnerable adults in the course of their teaching or other work. There is a commitment that such staff have a satisfactory Disclose and Barring Service (DBS) enhanced check in place.

BPIF Training has processes in place to ensure that external speakers/trainers on site are checked.

4. THE OPERATION OF THE DESIGNATED SAFEGUARDING TEAM

When a member of staff refers a case of suspected abuse to a member of the designated safeguarding team, he or she decides whether or not the situation should be referred to the Local Authority, the Police or Channel, or whether some other course of action is more appropriate. In coming to a decision about what action to take the member of the Designated Safeguarding Team may take advice from the providers contact at the local authority. If they consider that abuse or radicalisation has taken place, or that a child, young person or vulnerable adult is at risk of abuse, they will formally notify the Local Authority, the Police or Channel about this.

At this point the Local Authority will take over responsibility for the issue. If they decide that there are serious concerns, they will initiate a formal assessment and, where circumstances warrant it, involve the police.

Involvement in cases of suspected abuse/radicalisation can be personally disturbing and distressing. Although the individuals involved in taking the disclosure may feel a need to talk about it with someone (a colleague, a friend or partner) they should avoid this in order to respect the confidentiality of the child, young person or vulnerable adult concerned. If a member of staff feels that they need to talk to someone, they should contact the Human Resources Department.

Disclosure of, or being the subject of abuse is obviously a very difficult and distressing time for the child, young person or vulnerable adult, who needs to be offered continued support by BPIF. The child, young person or vulnerable adult should be made aware of the support available to them and helped to initiate contact with this support if so desired.

A confidential record will be kept of all cases referred to the designated safeguarding team, including details of cases referred to the Local Authority, the Police, Channel or other services. These written records will be kept securely, with any paper information held securely by the designated safeguarding team

5. SAFER RECRUITMENT

BPIF Training has written recruitment and selection procedures which can be found on BPIF Training's intranet. The policy and procedures are designed with the aim of safely recruiting staff and providing a safe environment for children, young people and vulnerable adults to learn in. key aspects of the procedure are as follows:

- Job descriptions are available for all roles. All jobs contain explicit responsibility for safeguarding

and promoting the welfare of learners having due regard for BPIF Training's Child Protection and Safeguarding Children, Young People and Vulnerable Adults Policy

- A person specification setting out the key criteria is available for all roles. The person specification includes demonstrating commitment to safeguarding policies and the suitability to work with children, young people and vulnerable adults.
- Advertising of posts externally as appropriate
- A requirement for those appointed to produce documentary evidence of academic/vocational qualifications
- Standard interview questions for tutor appointments and other key staff who work with children, young people and vulnerable adults exploring their suitability with respect. Interviewers are advised to follow up on any gaps or discrepancies in the employment history of applicant.
- Two satisfactory references are obtained for each successful applicant as a condition of their employment. The first reference should be from the applicants existing or most recent employer. The second reference should also be from an employer. Character references are only used where an applicant has little or no work experience.
- A policy on obtaining a satisfactory DBS and 'barred list' check for appropriate positions as a condition of employment at the provider.

BPIF Training reserves the right to deny employment to individuals where permitted criminal record checks suggest they may pose a danger to the learning community.

BPIF Training also reserved the right to suspend and/or dismiss staff members, in accordance with its employment procedures, from employment or undertaking a specific role with respect to that employment. This may apply if information was withheld, when requested about their criminal record at the point of employment, or a criminal record acquired during employment.

All members of staff working closely with children, young people or vulnerable adults have to be alert to the possibilities of abuse, radicalisation and any concerns about the behaviour of any adult with respect to that child, young person or vulnerable adult should be reported in accordance with procedures. This will be supported by relevant training, skills development and updated to ensure recognition, response, reporting, recording and referral are all to the required standard.

Any staff member who considers themselves to be a vulnerable adult can seek support from BPIF Training's Human Resources Department who will as required support with appropriate occupational health screening or counselling.

DBS disclosures will be obtained for all staff and volunteers working in 'regulated positions' (as defined by the Criminal Justice and Court Services Act 2000) with children, young people or vulnerable adults as per IAS guidelines. BPIF Training where appropriate evaluate information to determine individuals' appropriateness to work in such activity.

Where staff are not engaged in regulated positions, but are involved in activities that may involve children, young people or vulnerable adults, a risk management approach is taken to the delivery of learning and teaching, and activities involving the wider public.

6. MONITORING IT USAGE

BPIF Training is committed to ensuring that IT is monitored for appropriate use.

BPIF Training's IT Department is responsible for

- Identifying and installing suitable content filtering and audit software where internet access is provided in addition to any filtering service offered by the Internet Service Provider (ISP).
- Putting systems in place for monitoring responsible ICT use both at their premises and remote locations.

- Reporting improper use of IT equipment to the Designated Safeguarding Officer
- Having a system for immediate access when dealing with improper use of ICT equipment as part of this policy.

All persons using BPIF IT equipment must

- Never hold in their possession illegal materials/images in electronic or other formats.
- Never download or access illegal images or sites at any time or in any place through BPIF facilities both on and away from BPIF premises.
- Ensure they are fully aware of the e-safety policy and guidelines and adhere to them.
- Ensure all communication with is solely for the purpose of learning, teaching and assessment and carried out in a professional manner using only an official BPIF email address and telephone/mobile phone number.
- Never engage with any learners via contact/webcam sites (for example chat rooms, message boards and newsgroups) for any purpose other than teaching and learning and always record the content of this delivery method and purpose for its use.
- Never engage in communication with individuals under 18 or are deemed to be vulnerable via contact/webcam sites (for example chat rooms, message boards and newsgroups) for any purpose.

Where learners use their own, or employers' equipment they must adhere to the e-safety policy. If a member of staff suspects improper use, then this will be reported under this policy.

7. TRAINING

All new staff recruited into the business are taken through a comprehensive induction period including training on Safeguarding and Prevent. All staff members are also given the staff handbook which includes detail relating the equality, diversity, and inclusion practices within BPIF Training.

All staff are trained to level 2 (regulated) in safeguarding children, young people and vulnerable adults.

BPIF Training will provide training in safeguarding and prevent to managers and others likely to be involved in recruitment or other decision making where safeguarding concerns are likely to arise.

BPIF Training's Quality Assurance of Learning and Learning Outcomes Procedures include mechanisms to monitor safeguarding practices and identify further training needs.

All board meetings, as well as training management meetings and standardisation meetings have a standing agenda item for safeguarding which provides an opportunity to not only share good practice but identify additional training needs which will then form part of BPIF Training's Quality Improvement Plan and also individual staff development plans

8. COMMUNICATION, AWARENESS AND PROMOTION

BPIF Training will use several different ways to communicate and promote our policy so that all our staff, learners, employers, contractors, and others

- understand our commitment to safeguarding
- understand their roles and responsibilities
- know where to seek advice and guidance

During the apprenticeship programme we will ensure that equality and diversity is communicated at key stages throughout the learning journey

- Sign up and induction processes for new learners, and new employers: during the initial induction we will discuss safeguarding and prevent and the learners' rights and responsibilities and reporting mechanisms
- Teaching, learning and assessment visits: At each learner visit (including remote visits) we will discuss safeguarding to raise awareness of any current issues and to test the learners' knowledge
- Formal Progress Reviews: We will discuss safeguarding at each formal progress review, testing the learners' understanding and giving the opportunity to ask questions relating to safeguarding
- Learner and Employer Newsletters, Briefing and Topics of the Month: Each month learners and employers are issued with Topics of the Month including a key theme around safeguarding and prevent to stimulate understanding and discussion
- Surveys: Routinely during the learning programme surveys will be conducted with learners and employers to help BPIF Training identify any issues and allow us to continuously improve

9. RESPONSIBILITIES

Every employee is required to assist BPIF Training to meet its commitment to safeguard children, young people and vulnerable adults.

BPIF Training will:

- Ensure recruitment and selection and training of appropriate staff
- Ensure staff are risk assessed until an appropriate DBS certificate is held.
- Engage learners and employers in planning the learning programme to ensure that individual needs are being met.
- Ensure that learning takes place in an environment free harassment and abuse
- Ensure that participants are aware that they have a formal duty to play their part in this policy.
- Ensure that all reports of safeguarding concerns are dealt with properly, appropriately and with dignity and respect.

Learners are required to:

- Engage in conversations which raise their awareness of safeguarding definitions and current issues
- Report any concerns regarding safeguarding to the Designated Safeguarding Officer

Employers are required to:

- Engage in conversations which raise their awareness of safeguarding definitions and current issues
- Report any concerns regarding safeguarding to the Designated Safeguarding Officer

10. MANAGING ALLEGATIONS

Allegations made against or concerns in relation to staff working with children/adults take two forms:

- Allegations that meet the harms level
- Allegations that do not meet the harms threshold – referred to as low-level concerns

Harms Threshold can be defined as:

- behaved in a way that has harmed a child, or may have harmed a child

- possibly committed a criminal offence against or related to a child
- behaved towards a child or children in a way that indicates he or she may pose a risk of harm to children
- behaved or may have behaved in a way that indicates they may not be suitable to work with children.

Low level concerns can be defined as:

- being over friendly with children
- having favourites
- taking photographs of children on their mobile phone
- engaging with a child on a one-to-one basis in a secluded area or behind a closed door
- using inappropriate sexualised, intimidating, or offensive language.

Where a concern is raised at either level an internal investigation will take place that may lead to the individual being suspended and if required will following due process go through BPIF Training disciplinary process, (please refer to BPIF Training Disciplinary and Grievance Procedure).

If there is cause to believe that actual harm has been made to a child or vulnerable adult then the Police and Social services will be informed. A case Manager will be appointed this will be the DSL or their Deputy.

If the allegation meets the threshold, then the individual will be suspended in accordance with BPIF Training Disciplinary Policy. If a low-level concern the situation will be reviewed, and appropriate support will be put in place and could be that the individual is monitored whilst working with children or vulnerable adults.

11. APPENDICES

The appendix of this policy contains important reference materials relating to reporting a safeguarding incident as well as additional measures in place to further safeguard children, young people and vulnerable adults during the ongoing Covid-19 Pandemic.

Appendices 1 – Procedures for reporting cases of suspected abuse involving children, young people and vulnerable adults.

Appendices 2 – Designated People Responsible for Safeguarding

Appendices 3 – Safeguarding Incident Report

Appendices 4 – Keeping Children Safe Online

Appendices 5 – Domestic Abuse

Appendices 6 – Support for Victims of Domestic Abuse

12. REVIEW

The Child Protection and Safeguarding Children, Young People and Vulnerable Adults Policy was updated on 5th September 2021. The policy is to be reviewed bi-annually, as a minimum with the next review date being no later than 5th March 2022.

Signed:



Name: Charles Jarrold
 Job Title: Chief Executive Officer
 Date: 5th September 2021

APPENDICES

Appendix 1 – Procedures for reporting cases of suspected abuse involving children, young people and vulnerable adults

The duty to report

BPIF and all its members of staff have a legal duty to report cases of suspected abuse. If you, as a member of staff, have concerns that a child, young person or vulnerable adult has been mistreated or abused, you **MUST** report this.

What to do if you notice abuse

You may become aware of potential abuse in two main ways.

- You may observe signs in a learner that lead you suspect that they have become physically, emotionally or sexually abused or suffered severe neglect or are becoming radicalised, or in addition in the case of a vulnerable adult, that they may be experiencing financial, discriminatory or institutional abuse.
- The learners themselves may disclose to you that they have been abused.

The tables below gives examples that may indicate that an individual is being abused. In addition to these, a person may be being abused by virtue of their age, gender, race, disability, sexual orientation or marital status which would indicate discriminatory abuse. Similarly, any examples listed may be an indication of institutional abuse if the individual is in receipt of organised care

Possible Signs of Physical Abuse include may include

Unexplained injuries or burns, particularly if they are recurrent	Over compliant behaviour or a 'watchful' attitude
Refusal to discuss injuries	Fear of medical help
Improbable explanations to injuries	Running way
Untreated injuries or lingering illnesses not attended to	Significant changes in behaviour without explanation
Admission of punishment which appears excessive	Unexplained patterns of absence which may service to hide injury
Shrinking from physical contact	Deterioration of work
Fear of undressing	Fear of returning home or of parents being contacted

Possible Signs of Psychological/Emotional Abuse may include

Continual self-depreciation	Neurotic behaviour
Fear of new situations	Air of detachment
Inappropriate emotional responses to painful situations	Social isolation
Self-harming or mutilation	Eating problems – including overeating or lack of appetite
Compulsive stealing/scrounging	Depression/withdrawal
Drug/solvent abuse	

Possible Signs of Sexual Abuse may include

Bruises, scratches, burns or bite marks on the body	Promiscuity, prostitution, provocative sexual behaviour
Self-injury, self-destructive behaviour, suicide attempts	Sexual awareness inappropriate to the persons age
Pregnancy – particularly in the case of a young person	Frequent public masturbation

Recoiling from physical contact
Eating disorders

Tiredness, lethargy, listlessness
Genital discharge, irritation
Unexplained gifts of money

Attempts to teach other about sexual activity
Refusal to stay with certain people or go to certain places

Withdrawal from friends
Aggressiveness, anger, anxiety, tearfulness

Possible Signs of Neglect may include

Constant hunger
Poor personal hygiene
Inappropriate clothing
Frequent lateness or non-attendance for teaching sessions
Untreated medical problems
Drug/solvent abuse

Low self esteem
Poor social relationships
Compulsive stealing or scrounging
Constant tiredness

Depression/withdrawal

Possible Signs of Financial Abuse may include

Loss of jewellery and personal property
A bill not paid when money is entrusted to a third person
Unexplained withdrawal of cash
Over protection of money or property
Loss of money from a wallet or purse

Lack of money to purchase basic items
Misuse of benefits
Inadequate clothing
Theft of property

Possible Signs of Radicalisation include

The individual's views become increasingly extreme regarding another section of society or government policy
The individual becomes increasingly tolerant of more moderate views

The individual expresses a desire/intent to take part in or support extremist activity

Over protection of money or property

The individual is observed downloading, viewing or sharing extremist propaganda from the web
The individual becomes withdrawn and focussed on one ideology

The individual may change their appearance, their health may suffer and they may become isolated from family, friends, peers or social groups,
Theft of property

If an individual discloses to you that they (or indeed another child, young person or vulnerable adult) have been, or are being abused, or feel at risk of being abused:

DO

- Listen very carefully to what they tell you
- If you can, write brief notes of what they are telling you while they are speaking (these may help later if you have to remember exactly what was said) – and keep your original notes, however rough. It's what you wrote at the time that may be important later – not a tidier and improved version you wrote up afterwards. If you don't have the means to write at the time, make notes of what was said as soon as possible afterwards.
- Take what is said seriously and accept what you are told
- Stay calm and reassure the individual that they have done the right thing by talking to you
- Write down as soon as you can exactly what you have been told
- Tell them that you must pass this information on but only to those that need to be told

- Tell them to whom you will report then matter

DO NOT

- Panic
- Promise to keep things secret. You have a duty to refer a child, young person or vulnerable adult who is at risk
- Lie or say that everything will be fine now that they have told you
- Criticise the abuser, especially if this is a parent or carer
- Ask a lot of detailed questions. Instead ask questions such as 'anything else to tell me?'
- Press for answers that the individual is unwilling to give.
- Attempt to carry out an investigation of suspected or alleged abuse by interviewing people etc.
 - BPIFs designated safeguarding team, Social Services and Police staff are the people trained to do this – you could cause more damage and spoil possible criminal proceedings.

It is important that the person to whom the disclosure is made does not investigate or question the person concerned except to clarify what they have heard. This is particularly important in cases of sexual abuse

It is very important, as accurately as possible, to record what was said to you when you have received the disclosure of abuse. All written records should be handled confidentially.

If a child, young person or vulnerable adult discloses to you that they or another have been abused, or if you suspect from what you observe that they are being abused **YOU MUST REPORT THIS** to the designated safeguarding officer or in their absence the deputy safeguarding officer.

If for any reason you are unable to contact a member of the designated safeguarding team and the matter is urgent, then contact the Local Authority or the Police directly and report the matter to the designated safeguarding officer or deputy at the next available opportunity.

In all cases, if you are concerned, the rule is to pass this on quickly and to seek help and further support rather than to worry alone or do nothing.

Appendix 2 – Designated Persons Responsible for Safeguarding: Contacts

Responsibility	Designated Person	Telephone	Email
Designated Lead	Andrew Bracey	07801 981312	Andrew.bracey@bpif.org.uk
Deputy Lead	Karly Lattimore	07384 214536	Karly.lattimore@bpif.org.uk
Board Representative	Robin Sumner		rsumner@romax.co.uk
Regional Prevent Lead for FE and H education (West Midlands)	Mrs Hifsa Haroon-Iqbal		Hifsa.Haroon-Iqbal@EDUCATION.gov.uk
Regional Prevent Lead for FE and H education (London)	Chris Rowell		Chris.ROWELL@education.gov.uk

OTHER SAFEGUARDING CONTACTS

- The Police – 999
- NSPCC - 0808 800 5000
- Men's advice line – 0808 801 0327
- Galop for members of the LGBT+ Community 0800 999 5428
- Childline 0800 1111
- National Domestic Abuse Helpline 0808 2000 247
- Women's Aid <https://www.womensaid.org.uk/information-support/>

Source: <https://www.gov.uk/government/publications/coronavirus-covid-19-and-domestic-abuse/coronavirus-covid-19-support-for-victims-of-domestic-abuse>

Appendix 3 – Safeguarding Incident Record

Please use this form to record incidents or concerns regarding a safeguarding incident. It is important that we maintain records of incidents to staff to pass to local safeguarding agencies or the Police. These records will also be used to produce an annual report on Safeguarding for BPIF Training

Name of staff member. Full contact details if possible.
Concern or incident
Date, time and location
Action taken
Follow up from Designated Safeguarding Officer

Name (print):

Signature:

Date:

Appendix 4 – Keeping Children Safe Online

The purpose of this document is to provide guidance and support to those who work with or have children.

Whilst there are huge benefits to being online in order to stay connected to family and friends during this period, the government recognises many parents may feel concerned about the activities and content their children are accessing. This guidance outlines resources to help keep children safe from different risks online and where to go to receive support and advice.

Keep your child safe online

It is important to have regular conversations about staying safe online and to encourage children to speak to you if they come across something worrying online.

These resources provide guidance for parents and carers to keep children safe online. They will, amongst other things, support you to talk to your child about a range of online safety issues, set up home filtering in a child-friendly way and set up age-appropriate parental controls on digital devices:

- [Thinkuknow](#) by National Crime Agency-CEOP (Child Exploitation and Online Protection) provides resources for parents and carers and children of all ages to help keep children safe online
- [Childnet](#) has developed [guidance for parents and carers](#) to begin a conversation about online safety, as well as [guidance on keeping under-fives safe online](#)
- [Parent Info](#) is a collaboration between Parent Zone and NCA-CEOP, providing support and guidance for parents and carers related to the digital world from leading experts and organisations
- NSPCC has [guidance for parents and carers](#) to help keep children safe online
- [UK Safer Internet Centre](#) provides tips and advice for parents and carers to keep children safe online - you can also [report any harmful content found online through the UK Safer Internet Centre](#)

What harms might my child experience online?

You may have concerns about specific harms which children can experience online. There are more resources to help you understand and protect your child from different harms online, including:

- child sexual abuse – [a definition](#)
- exposure to radicalising content
- youth-produced sexual imagery ('sexting')
- cyberbullying
- exposure to age-inappropriate content, such as pornography
- exposure to harmful content, such as suicide content

Appendix 5 – Support for Victims of Domestic Abuse

The purpose of this document is to provide guidance and support to those who may be suffering from domestic or abuse or for those who know somebody who may be suffering from domestic abuse.

Measures announced over recent weeks to tackle coronavirus (COVID-19) have seen people's day-to-day lives drastically altered. These changes are essential to beat coronavirus and protect our NHS.

The government acknowledges that the order to stay at home can cause anxiety for those who are experiencing or feel at risk of domestic abuse. There is never an excuse for domestic abuse, no matter what the circumstances are.

For anyone who feels they are at risk of abuse, it is important to remember that there is help and support available to you, including police response, online support, helplines, refuges and other services. You are not alone.

The household isolation instruction as a result of coronavirus does not apply if you need to leave your home to escape domestic abuse.

Friends, family, neighbours and community members can be a vital lifeline to those living with domestic abuse. If you are worried that someone you know may be a victim of domestic abuse, reassure them that the police and support services are still there to help and direct them to sources of support.

The government supports and funds several charities who can provide advice and guidance and we are in regular contact with the charity sector and the police to ensure that these support services remain open during this challenging time.

What is domestic abuse?

Domestic abuse is not always physical violence. It can also include, but is not limited to:

- coercive control and 'gaslighting'
- economic abuse
- online abuse
- verbal abuse
- emotional abuse
- sexual abuse

What signs to look for

If you believe that you or someone else could be a victim of domestic abuse, there are signs that you can look out for including:

- being withdrawn
- having bruises
- controlling finances
- not being allowed to leave the house
- monitoring technology use such as social media platforms

Where to get help

If you believe you are being abused, or worried you may commit domestic abuse, please use the services on this page.

If you suspect that your neighbours or those in your community are victims of domestic abuse, we encourage you to report it to the police.

Call 999

If you are in immediate danger, call 999 and ask for the police - the police will continue to respond to emergency calls.

Appendix 6 – Learners Sent Home From Work Due to Closure or in Isolation

The purpose of this document is to provide guidance to BPIF Training Staff in light of the evolving progress of Covid-19 within the sector.

All Training Coordinators to:

- Check you have up-to-date contact details and addresses for all apprentices.
- Flag any concerns about apprentice safety during self-isolation or company closure with the Safeguarding Lead.

Match each apprentice to a level of risk you think they're exposed to at home, as best you can. This will help you focus your attention on the most-in-need apprentices and develop a proportionate contact plan.

- **Red:** apprentices who are at most risk of harm or neglect and have the fewest protective factors (e.g. those with an Educational Health Care plan).
- **Amber:** apprentices who are at a moderate risk of harm, with some protective factors (e.g. apprentices identified as a 'child in need', and those with a social worker).
- **Blue:** you have some concerns, or the apprentice has previously been at 'red' or 'amber' and still needs to be monitored.

Training Coordinator to main contact with each apprentice in isolation.

This contact to be at least once a week.

Training Coordinator to maintain record of contact with apprentice and their needs. Report weekly to the Safeguarding Lead on status of apprentice and agree decision on what to do next.

Do not make home visit without explicit permission from the Safe Guarding Lead if a home visit is deemed appropriate then follow this process:

Home visits:

- Make sure to see and speak to apprentices
- Speak to them on the doorstep, or see them through a window if they're self-isolating
- Avoid close contact with them ([closer than 2 metres for more than 15 minutes](#)), in line with [government advice on social distancing](#)
- Avoid staff going to apprentices' homes alone. Have 2 members of staff go, ideally including someone with a good relationship with the family