

Safeguarding & Prevent Policy

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General Policy Statement

We want all our employees to be safe and feel protected; in accordance with our values, we will 'do the right thing'.

Bishop Fleming is committed to safeguarding, the Prevent strategy and promoting the wellbeing of all employees, in line with the firm's values and other key People policies. All our employees have a responsibility to recognise, identify and respond to any safeguarding concerns, including those associated with our responsibility to prevent people from being drawn into terrorism.

As Bishop Fleming is an apprenticeships Employer-Provider, throughout this policy any reference to 'employees' includes all apprentices employed at Bishop Fleming.

Introduction

The policy applies to all employees (including agency workers) working for Bishop Fleming in all locations where education and training is delivered to young people and vulnerable adults. It applies in any situation where learners are in studying for an apprenticeship at another location. The policy also covers collaborative provision and employees employed directly by contractors supplying services on behalf of Bishop Fleming.

We are guided by our values, and by the principles that all our employees have a right to be, and to feel safe and we will ensure that this applies, wherever they are working and whoever they are working with.

The purpose of this policy is to provide clear direction to all employees and contractors to ensure Safeguarding concerns, referrals and actions are handled sensitively, professionally and in ways that promote the welfare of our employees and support their needs.

Safeguarding encompasses issues such as health and safety, bullying, medical needs, provision of first aid, personal security, and use of information technology. This policy is supported by other relevant People Policies.

As a provider of apprenticeships Bishop Fleming has a statutory duty to create a safe learning environment for all. It is the intention of this policy, and supporting procedures, to ensure that appropriate action is taken to discharge these duties.

Definitions

Safeguarding is about protecting our employees from deliberate harm, neglect, failure and from being drawn into terrorism. It also relates to broader aspects such as:

- Young people and vulnerable adult's own health and safety, and physical and emotional and well-being
- providing first aid

- educational visits
- online safety and associated issues
- appropriate arrangements to ensure a secure and safe working environment

As per the Health and Social Care Act (2012) Regulation 13, an adult is considered 'vulnerable' if they receive a health, personal or social care service from a professional. Personal services would include, for example, help with financial matters, feeding, washing or dressing.

Our commitment to promoting this policy

Our commitment is to promote and implement this policy in four key areas:

Provision of a safe and inclusive workplace

- We will create an environment where our employees feel safe, secure, valued and respected, and feel confident and know what to do if they have a concern, about themselves or others.
- We will help our apprentices to develop the confidence and resilience to respond appropriately to the risks of extremism, by integrating specific industry-related examples within our apprenticeship curriculum, to help them to understand the risks in context.
- Employees should refer to the Diversity and Equality policy, and the Whistleblowing Policy for more information.

Protection of employees

- We will identify and support employees who are known or thought to be at risk of harm.
- We will ensure a healthy and safe working environment. Employees should refer to the Health and Safety policy for more information.
- We will ensure employees who work alone or at home are provided with emergency contact details for their manager or a senior colleague.
- We will work with other agencies if required to support the wellbeing and safety of employees

Safer recruitment and training

- All employees who have access to children, young people and vulnerable adults will be vetted through our recruitment and onboarding process
- We maintain and review a single central record of DBS checks
- We comply with the duty of employers to inform the DBS of any individual (including employees or learners on work placements) who poses a threat to children or vulnerable adults
- All People Managers receive training in responding and reporting safeguarding issues

Recording and monitoring

- We have a Safeguarding Operational Team, who have overall responsibility for the Safeguarding and Prevent Strategy, and for ensuring that the policy is well publicised and that all employees are committed to its implementation.
- Any records kept on our employees are held according to our GDPR Policy – eg information will be shared with the safeguarding team (see [Appendix 3](#))

Where we have any concerns about a young person we employ, we will work with the relevant Local Authority and take guidance from them in our procedures.

How we will implement the policy

People Managers are given ongoing support and training in the supervision and management of their teams. Our policy is to enable and empower People Managers to manage their teams and identify concerns early, and to provide them with support to do this in the most effective way possible.

We also commit to:

- Review and monitor employment practices and procedures, including those covering training and apprenticeships;
- Review this policy annually, initiated by our Designated Safeguarding Officer (DSO).
- Make the policy available for all employees on Frank.

For apprentices: in addition to the points above, we incorporate safeguarding and Prevent into the apprenticeship curriculum, and discuss industry-specific safeguarding and prevent issues with apprentices.

Procedure for raising a safeguarding concern

Safeguarding is everyone's responsibility and all our employees should make sure that they stay alert to the signs and indications that might suggest a safeguarding issue.

You should not let other considerations, like the fear of damaging relationships with colleagues, prevent you from reporting concerns about the wellbeing or safety of another employee.

1. If you have a concern, you have a duty and responsibility to contact the Designated Safeguarding Officer as soon as possible. See [Appendix 3](#). You can raise an anonymous concern (details of how coming soon).
2. Record details of your concerns/disclosure or event as accurately as possible, sticking to the facts. See [Appendix 4](#) for examples and signs to look out for.
3. The Designated Safeguarding Officer will take the appropriate next steps (which may include further investigation, seeking further guidance, or referral to an external body, the Local Authority or the police, and follow up and support the employee).
4. If an allegation is made against a colleague, the People Director must be informed immediately.

If someone discloses a safeguarding or Prevent issue to you, please note the following:

- Do not promise confidentiality
- Listen carefully to what they say and how they say it, and record the details as accurately as possible, sticking to the facts
- Do not make any judgements or communicate your personal views
- Report the disclosure to a member of the Safeguarding Team as soon as possible, as outlined above, remembering that this issue should not be discussed with anyone else outside the Safeguarding Team

If you have any concerns about the professional behaviour of a colleague please refer to the Whistleblowing Policy. You should refer to the Grievance Policy for any concerns related to your own personal circumstances.

The Prevent Strategy

This policy is also intended to incorporate the Government's strategy 'Prevent' which forms part of the overall national counter-terrorism strategy, CONTEST.

Prevent is the Government's anti-extremism strategy. The aim of the strategy published in 2011, is to reduce the threat to the UK from terrorism by stopping people becoming terrorists or supporting terrorism and it has three specific strategic objectives:

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

Prevent works within the non-criminal space, using early engagement to encourage individuals and communities to challenge violent extremist ideologies and behaviours, and prevent people becoming involved in extremism. Bishop Fleming has a legal responsibility to fulfil the Prevent duty statement.

Bishop Fleming is not an investigating agency. Any allegation or suspicion of abuse or significant harm will normally be carried out by local Social Care Services or other agencies with statutory powers, such as the appropriate Local Authority or police force. Specifically we will:

- educate and inform our apprentices of the risks associated with being drawn into terrorism and ensure that they are given appropriate advice and support throughout their apprenticeship, and are protected from extreme narratives.
- ensure that apprentices and managers know what to do, and who to talk to if they have a concern, by providing information and guidance at the beginning of each new apprenticeship, and through [signposting on the intranet](#).
- Help apprentices develop resilience to extreme narratives and influences.

Radicalisation is the process by which individuals come to support terrorism or violent extremism. There is no typical profile for a person likely to become involved in extremism, or when they move to adopt violence in support of their particular ideology. People Managers and any employees with concerns should contact a member of the Safeguarding Team if they have any concerns.

Policy Review Date: June 2023

Next Review Date: July 2024

Reviewed by: Anna Averis, People Director

Reviewer Signature:



Appendix 1 – Safeguarding in relation to children and young people

- Bishop Fleming does not employ or deliver training to any individuals under 16. We do, however, hold events within schools and careers events that may place us in contact with under 16-year olds.
- A member of the Safeguarding team will liaise with the school as appropriate, ensuring that any concerns are reported to the appropriate investigating agency, either by us or by the school. A written record of any discussions/referrals will be made.

Appendix 2 - Training sub-contractors

Subcontractors must be aware of the Prevent duty and if we ever enter sub-contracting agreements, we will through our due diligence process ensure that any subcontractors engaged to support delivery in any way have an appropriate safeguarding policy in place, and comply fully with Prevent duty.

Appendix 3 –Safeguarding Team

The Bishop Fleming Safeguarding Team meets twice a year, and more frequently where operational requirements dictate.

- Anna Averis (Lead Designated Safeguarding Officer)
- Ria Burridge
- Jon Sparkes
- Sheree Bell (Deputy Designated Safeguarding Officer)
- Hannah Powlesland
- Toria Kendrick

The Safeguarding Team will:

- Ensure our Policy for Safeguarding and Prevent and associated procedures are in place and implemented.
- Be responsible for receiving allegations against employees and passing them on as appropriate.
- Action any policy or procedures changes immediately they are notified, and ensure the policy is reviewed and amended as appropriate.
- If requested by the Local Authority, be a named point of contact for communication with regards to an individual Safeguarding matter or allegation against an employee.
- Record details of all allegations against employees and consult with the Local Authority, as appropriate, in order to ensure that allegations are dealt with in an objective and transparent way.
- Carry out any agreed actions with the Local Authority and report on outcomes, including where required any contact and reporting to the Discloser and Barring Service.
- Collate and report on all training undertaken by any employees working with young people, together with the number of learners for whom we have Safeguarding concerns

- Ensure that detailed and accurate written records are kept, even where that concern does not lead to a referral, and ensure that all such records are kept confidentially and securely.
- Maintain a centralised record of all Safeguarding activity.
- Complete Safeguarding and Prevent online training, provided by the Education and Training Foundation, and refresh this every 3 years.

If further guidance is required, a member of the Safeguarding Team will consult the relevant Local Authority in the first instance. The LDSO will be the main point of contact for external bodies. Bishop Fleming is not an investigating agency. Any allegation or suspicion of extremist behaviour will be referred to appropriate agencies, including the police.

We welcome inter-agency working to support the welfare of our learners and we note that Data Protection Act and human rights law are not barriers to justified information sharing. We will share information with informed consent where appropriate but recognise that we may still share information without consent if, in our considered judgement of safety and well-being of the individual and others, there is good reason to do so.

Appendix 4: Examples of potential Safeguarding or Prevent concerns

Some young people and adults may be vulnerable to radicalisation for the purpose of violent extremism. Concerns regarding radicalisation should be referred using the same procedure as for Safeguarding.

Neglect, including self neglect
Evidence or suspicion of grooming
Physical, sexual, emotional or psychological abuse
Bullying, including on-line and prejudice-based bullying
Racist, disability and homophobic or transphobic abuse
Gender-based violence/violence against women and girls
Substance misuse
Issues that may be specific to a local area or population
Domestic violence
Female genital mutilation (FGM)
Forced marriage

Signs to look out for in young people

Managers must stay alert to any unusual or changed behaviour amongst apprentices, such as those listed below.

*It is important to note that these signs are not automatic indicators of risk

Drop in attendance; please refer to the Sickness Policy.
Troubling or changes in behaviour
Excessively withdrawn, fearful or anxious
Evidence of self-harm
Dismissive of colleague concerns
A reluctance to go home
Misuse of drugs and alcohol