



Safeguarding Policy & Procedure

Distribution	All Staff		
Reference Number		Version	4.0
Author	Alison Dann, Designated Safeguarding Lead		
Reviewed by	Vicki Parker Deputy Designated Safeguarding Lead		
Authorised by	Luke Muscat, Group CEO		
Issue date	1 st September 2023		
Review date	1 st September 2024		

DOCUMENT CONTROL

Version	Name	Comment	Date
1.0	Alison Dann	First edition (Review of current safeguarding policy and procedure conducted and separated both documents)	19/04/2021
1.1	Alison Dann	To take into account Ofsted's Review into Sexual Abuse in schools and colleges.	01/07/2021
1.2	Alison Dann	To take into account KCSiE September 2021 and post 16 education and Training (Welfare of Children) Act 2021	01/09/2021
2.0	Alison Dann	To further take into account key publications of sexual harassment and abuse. To update safeguarding officer contact details. To update reporting process for subcontractors.	05/04/2022
3.0	Alison Dann	To reflect updates to KCSiE 2022 Advice on sexual violence and sexual harassment The DfE's advice on Sexual violence and sexual harassment between children in schools and colleges (DfE, 2021) has been merged into Keeping children safe in education 2022. As part of	07/09/2022

		<p>this merger, the term “child-on-child abuse” rather than “peer-on-peer abuse” is used throughout the updated guidance. Now available in Safeguarding Appendix.</p> <p>Training for governors emphasises that governors and trustees should receive appropriate safeguarding and child protection training at induction, and then at regular intervals.</p> <p>Equality Legislation- Equality Act 2010</p> <p>Part 5- This section has been expanded to incorporate guidance previously covered in the DfE’s Sexual violence and sexual harassment between children in schools and colleges advice. It also provides new information, emphasising: • the importance of explaining to children that the law is in place to protect rather than criminalise them • the importance of understanding intra-familial harms, and any necessary support for siblings following incidents • the need for schools and colleges to be part of discussions with statutory safeguarding partners.</p> <p>All have been reflected in both the Policy and associated appendices.</p>	
3.1	Alison Dann	Additional statement as requested by B2Ws partners.. "If we are delivering training as part of a subcontract, we will follow the Lead Contracts referral process for Safeguarding"	17/05/2023
4.0	Alison Dann	<p>A full review of the published 2023-24 KCSiE has been conducted with the following additions included within the safeguarding policy and procedure:</p> <ul style="list-style-type: none"> • DSL responsibilities has been updated to include paragraph 103 pg. 28- IT filtering and monitoring. • Section 'Use of Monitoring and IT' now include paragraph 124 pg.32- Staff Safeguarding and training should include an understanding of the filtering and monitoring used to safeguard learners. • Pg.10 of this policy has updated information sharing paragraph 57 pg.17 DPA and UK GDPR do not prevent the sharing of information. • Pg 16 of this policy- Forced marriage to child marriage, highlighting the changes in law February 2023. • Updated Lado details to include both Manchester (B2WCT) and London (JIT) Pg.17. • Safeguarding details for the whole group have been updated Pg.8. <p>JIT and B2WCT safeguarding policy and procedure have now been brought together for one document that encompasses both JIT and B2WCT learners.</p>	01/09/2023

**For the purpose of clarity, the term "B2W" refers to the family of B2W Group organisations – Back to Work Complete Training and Just IT.*

** The term 'colleagues' relates to all staff whether a B2WCT or JIT employee.*

Statement

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

If we are delivering training as part of a subcontract, we will follow the Lead Contracts referral process for Safeguarding.

Relevant Legislation and Related Policies

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

- The Equality Act 2010
- The Domestic Abuse Act 2021
- Education and Training (Welfare of Children) Act 2021
- The Children's Acts 1989 and 2004
- Education and Skills Act 2008
- Mental Capacity Act 2005
- The Care Act 2014
- Counterterrorism and Security Act 2015
- Working Together to Safeguard Children 2018
- Prevent Duty Guidance 2015
- Special Educational Needs and Disability Code of Practice 2015
- Safeguarding Disabled Children: Practice Guide 2009
- Voyeurism (Offences) Act 2019
- Safeguarding Vulnerable Groups Act 2006
- Guidance for safer working practice for those working in education settings 2015
- Manchester Safeguarding Children Board and MSCB Child Protection Procedures
- Manchester Adult Safeguarding Board.
- <https://www.cityoflondon.gov.uk/services/social-care-for-adults/safeguarding-adults>
- <https://saferlondon.org.uk/safeguarding-adults-policy-procedures>
- <https://www.londonsafeguardingchildrenprocedures.co.uk/>
- <https://www.cityoflondon.gov.uk/services/children-and-families/child-protection>
- <https://www.cityoflondon.gov.uk/services/children-and-families/referrals>

Key Publications

- Further education and skills inspection handbook September (2023)
- KCSIE September 2023/24

Legal Definitions -For the purpose of this policy:

Children or young person

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

Adults at risk

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

Safeguarding

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

Radicalisation

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

Policy Aims

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

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

Prevention/Protection

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

- Create a culture where sexual harassment and online sexual abuse are not tolerated, identify issues, and intervene early to better protect children and adults. All staff should be able to reassure victims that they are being taken seriously and that they will be supported and kept safe. A victim should never be given the impression that they are creating a problem by reporting abuse, sexual violence, or sexual harassment. Nor should a victim ever be made to feel ashamed for making a report.
- Work to establish and maintain an ethos where learners feel secure, are encouraged to talk and are always listened to.
- Include regular consultation with learners e.g., through learner surveys and learner voice.
- Ensure that learners and colleagues know that there is a member of staff/s in the B2W Group whom they can approach if they are worried or in difficulty.
- Include safeguarding across the induction process and opportunities which equip learners and colleagues with the skills they need to stay safe and know who to turn to for help.
- If we are delivering training as part of a subcontract, we will follow the Lead Contracts referral process for Safeguarding.

Roles and Responsibilities

Colleagues

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

Safeguarding Terms

The following should be considered when working with learners:

- Sexual abuse or inappropriate relationships- Peer on peer sexual abuse and harmful sexual behaviour.
- Sexual harassment- This can be a one-off incident or an ongoing pattern of behaviour.
- Physical and emotional abuse or neglect, including Female Genital Mutilation
- Exploitation, including financial, sexual, forced marriage or gang related activity.
- Neglect
- Grooming behaviour
- Domestic violence
- Bullying, including cyber bullying, bullying in the training centre or the workplace.
- Victimisation
- Self harm
- Inappropriate taking of and/or sharing of unsolicited photographs (sharing of nude/ semi-nude images and Up-skirting)
- Unsafe activities or environments
- Crime, including knife crime and gang related activity.
- Trafficking

A full list of safeguarding terms with descriptors is available in safeguarding appendices and must be read in conjunction with this policy/procedure

Identifying Harm

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

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

Identifying Radicalisation

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

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

Designated staff with responsibility for Safeguarding:

- The Designated Safeguarding Lead (DSL) is a senior member of staff from the B2W Group Board and takes lead responsibility for safeguarding across B2WCT and JIT.
- The B2W Group has 1 Deputy Designated Safeguarding Lead (DDSL) who is trained to the same standard as the DSL and works within JIT.

- Back 2 Work Complete Training and Just IT both have 5 Deputy Safeguarding Officers.
- All members of the safeguarding team carries out those functions necessary to ensure the ongoing safety and protection of learners by ensuring that:
- They will be available (during B2W Group hours) for staff, learners and parents to discuss safeguarding concerns. Out of hours (10pm-6am) the safeguarding mailbox can be accessed and has an automatic reply set up with emergency details provided.

The safeguarding Team Across The Group

DSL B2W Group	Alison Dann Group Director Quality & People	Telephone Number 0161 974 6122	Deputy DSL Just IT	Vicki Parker Quality Director	Telephone Number
DSO B2WCT	Ben Waite Associate Director People	Telephone Number 0161 528 4717	DSO Just IT	Peter Gilliland Lead IQA	Telephone Number 07944681929
DSO B2WCT	Gayle Dawkes Senior HR Executive	Telephone Number 0161 513 3019	DSO Just IT	Caroline Onyema- Matthews (Business Coach -PM)	Telephone Number 07971494603
DSO B2WCT	TBC		24 hour safeguarding email BeSafe@Justit.co.uk		
24 hour safeguarding email safeguarding@B2Wgroup.com					
Report all concerns via email immediately					

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

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

1. Ensuring that the policy and reporting procedure are monitored and reviewed in accordance with changes in related legislation and guidance.
2. Has responsibility for understanding the filtering and monitoring systems and processes in place with IT and service providers.
3. Communicating the policy and reporting procedure to all colleagues and ensuring that they are provided with information, advice, and training on the protection of young people and vulnerable adults.
4. Acting as the main contact for the protection of young people and vulnerable adults.
5. Establishing and maintaining contacts with Local Authorities and the Police.
6. Maintaining confidential records of reported cases and the action taken.
7. Maintaining up to date knowledge on Safeguarding and Prevent issues.

8. Managing the Safeguarding and Prevent Action Plan.

Multi-agency working

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

Information sharing, GDPR and data protection

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

Use and Monitoring of IT

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

Logging of Safeguarding Cause for Concerns

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

In accordance with GDPR, information contained within this log and within individual cause for concern forms will only be accessible to those individuals actively involved with the Safeguarding Team operations, or with Governance over Safeguarding. However, this data is also handled with "Keeping Children Safe in Education 2023-24" guidance which stipulates that "DPA and UK GDPR do not prevent the sharing of information for the purposes of keeping children safe and promoting their welfare. If in any doubt about sharing information, staff should speak to the designated safeguarding lead (or a deputy). Fears about sharing information must not be allowed to stand in the way of the need to safeguard and promote the welfare of children" Therefore, should we be required to do so, the data contained within said documentation will be shared with relevant parties such as LADO (Local Authority Designated Safeguarding Officer), Prevent Channel, the Police and any other organisations/parties that we are duty bound to report to in light of Safeguarding and Prevent.

The Local Authority Designated Officer (LADO) has responsibility for coordinating the process of investigations, providing advice and guidance to the employer, to ensure that cases are dealt with as quickly as possible and consistently with a fair and thorough process. The Director of Quality and Performance, or in their absence/where the allegation relates to them, the Directors, should consult the LADO directly. Manchester's LADO can be contacted by calling 0161 234 1214. Or by Email: quality.assurance@manchester.gcsx.gov.uk. London's LADO can be contacted by calling 07795 090649. Or by Email: LADO@cityoflondon.gov.uk .

The LADO will determine:

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

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

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

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

any witnesses and other relevant factors.

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

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

Escalation of Cause for Concerns logged.

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

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

Allegations against the DSL

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

Code of Conduct for Colleagues

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

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

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

How to Respond and Report

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

- Remain calm and reassure the person that they have done the right thing in speaking up.
- Listen carefully and give the person time to speak.
- Do not voice an opinion.
- Do not ignore the concern or be judgmental or dismissive.
- Explain that only professionals that need to know will be informed, but never promise confidentiality.
- Act immediately and don't try to address the issue yourself.
- Report the concern – alert a Safeguarding Officer to the concern directly in person/by telephone and then formally report the concern by email to safeguarding@b2wgroup.co.uk
- Complete a safeguarding referral form online accessed via safeguarding SharePoint.

- Write a statement giving as much detail as possible, including date and time, what was said, any names or parties mentioned and how you responded.
- Do not make assumptions, consult with persons not directly involved in the situation or make promises.
- The Designated Safeguarding Lead will ensure that the relevant procedures are followed and will inform HR about any allegations.
- The Designated Safeguarding Lead will inform the Local Authority Designated Officer in the first instance to determine if there is a genuine case for concern and a need for further action.
- In matters relating to radicalisation the Designated Safeguarding Lead will refer the matter (or seek advice from) the Prevent Lead, who in turn, may seek advice from the Local Authority's Channel Panel Chair or Police Prevent Lead.
- If the report is passed to authorities such as the Police for investigation, the Designated Safeguarding Lead will act as the main liaison officer and will ensure that relevant colleagues are kept informed, including the Managing Director, and HR where a colleague is concerned.
- In the case of allegations against an B2W colleague, these must be reported to HR. B2W Training is required to report instances of misconduct or unsuitability to work with children or vulnerable adults to the Disclosure and Barring Service (DBS). This would generally apply when the colleague has been permanently suspended for reasons of misconduct or unsuitability to work with children or vulnerable adults.

Learners who are particularly Vulnerable

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

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

If colleagues become aware of learners within these specific group, this information should be referred to the safeguarding team.

B2W Relevant Policies and Procedures

- Safeguarding Procedure
- Prevent Strategy

- Equality and Diversity Policy
- Health and Safety Policy
- Whistleblowing Policy
- Grievance Policy
- Anti-Bullying Policy
- Staff behaviour Policy
- Safer Recruitment Policy
- Learner Disciplinary Policy
- E-Safety Policy
- Staff Disciplinary Policy
- Subcontractors Procedure for reporting safeguarding concerns

Safeguarding Procedure

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

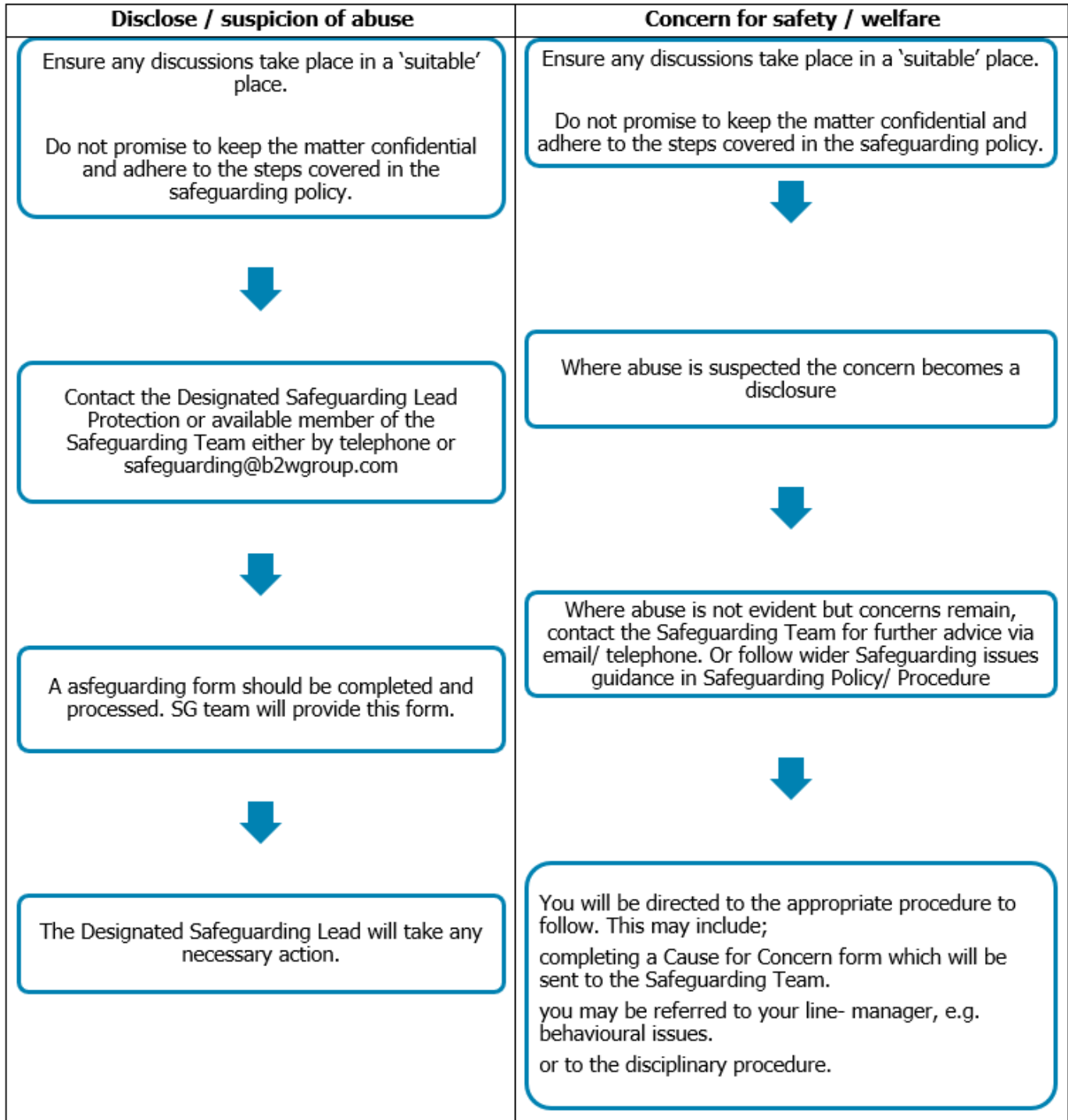
How to make a referral to the Safeguarding Team?

- Use the dedicated email service: safeguarding@B2Wgroup.com and BeSafe@Justit.co.uk which will automatically be sent to the Safeguarding Team outlining in the message the key points that a safeguarding concern has been raised.
- Subcontractors- Refer to subcontractors procedure for reporting concerns.

What should be referred to the Safeguarding Team?

Safeguarding Flowchart

Please follow the below for Just IT email Besafe@Justit.co.uk



Pre-course Disclosures

- Any disclosures by potential learners relating to probation, spent or unspent convictions should be reported to the safeguarding team using the safeguarding referral form found in the safeguarding section of SharePoint.
- All colleagues must be alert to, and aware of the signs of abuse, these may include changes in behaviour or a failure to perform or develop as expected. However, recognising abuse may be difficult and colleagues need to take notice not only of major incidents but also other signs which may cause concerns.

Specified Safeguarding Issues include: (Appendix 1)

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

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

Wider safeguarding Concerns:

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

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



Document: SGP	Version: 4.0
Approved By: Luke Muscat Issue Date: 01.09.2023	Page 18 of 18