



BBE
TRAINING



A CITRUS GROUP
COMPANY

Safeguarding Policy



Safeguarding Policy

BBE Training Limited

Safeguarding Children and Adults at Risk Policy and Procedure

1. Policy Statement

BBE Training Limited is committed to safeguarding and promoting the welfare of all learners, staff and other individuals who engage with our services.

We recognise our responsibility to provide an environment in which children, young people and adults at risk are protected from abuse, neglect, exploitation, harassment and other forms of harm.

Safeguarding is the responsibility of everyone working for or on behalf of BBE Training Limited. All staff, tutors, assessors, internal quality assurers, contractors and other representatives are expected to remain alert to safeguarding concerns and to report concerns promptly in accordance with this policy.

BBE Training Limited will take all safeguarding concerns, disclosures and allegations seriously and will respond in a fair, proportionate and timely manner.

2. Scope of the Policy

This policy applies to:

- all BBE Training Limited learners;
- employees and managers;
- tutors, trainers, assessors and internal quality assurers;
- temporary and agency staff;
- contractors, consultants and volunteers;
- employers and third parties involved in the delivery of BBE Training Limited qualifications or programmes; and
- any other individual undertaking activities on behalf of BBE Training Limited.

The policy applies to classroom, workplace, online, remote and blended learning environments and to any other activity undertaken as part of a BBE Training Limited programme.

Safeguarding concerns may arise inside or outside the learning environment. Staff must not disregard a concern simply because the suspected abuse or harm is unrelated to the learner's qualification or training.

3. Location and Availability of the Policy

This policy will be made available to staff, learners and relevant third parties.

Staff involved in the management, delivery, assessment or quality assurance of qualifications must know how to access this policy and understand the safeguarding procedures relevant to their role.

Learners will be provided with appropriate information about safeguarding and how to raise a concern.

4. Communication of the Policy

BBE Training Limited will ensure that safeguarding arrangements are communicated appropriately throughout the organisation.

All staff involved in the management, delivery, assessment and quality assurance of qualifications must understand:

- their safeguarding responsibilities;
- how to recognise potential indicators of abuse, neglect or exploitation;

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- who the Designated Safeguarding Officer (DSO) and Deputy DSO are;
 - how and when to report a concern;
 - how safeguarding information should be recorded;
 - the importance of confidentiality and appropriate information sharing; and
 - what action to take where there is an immediate risk of harm.
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5. Definitions

5.1 Children and Young People

For the purposes of this policy, a **child** is anyone who has not yet reached their 18th birthday.

The fact that an individual may be aged 16 or 17, living independently, in employment or undertaking further education does not change their status as a child for safeguarding purposes.

5.2 Adults at Risk

For the purposes of adult safeguarding, BBE Training Limited will use the principles established by the Care Act 2014.

An adult may require safeguarding where they:

- have needs for care and support;
- are experiencing, or are at risk of, abuse or neglect; and
- as a result of those needs are unable to protect themselves from the risk or experience of abuse or neglect.

The term **adult at risk** is used throughout this policy rather than the older term “vulnerable adult”.

6. Safeguarding Principles

BBE Training Limited’s approach to safeguarding is based upon the following principles:

- safeguarding is everyone’s responsibility;
 - the welfare and safety of the individual is paramount;
 - safeguarding concerns will be taken seriously;
 - concerns must be reported promptly;
 - individuals raising genuine concerns will be treated fairly;
 - safeguarding information will be handled sensitively and shared only where appropriate;
 - records must be accurate, factual and securely maintained;
 - concerns will be escalated to appropriate external agencies where necessary;
 - the views and wishes of the person affected should be considered wherever appropriate and safe to do so;
 - no member of staff should attempt to conduct their own safeguarding investigation; and
 - safeguarding decisions will be made in the interests of protecting individuals from harm.
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7. Types of Safeguarding Concerns

Safeguarding concerns may include, but are not limited to:

- physical abuse;
- sexual abuse or sexual harassment;
- emotional or psychological abuse;
- neglect or acts of omission;
- financial or material abuse;
- discriminatory abuse;
- domestic abuse;
- coercive or controlling behaviour;
- bullying and cyberbullying;
- online abuse and exploitation;
- sexual exploitation;
- criminal exploitation;
- modern slavery and human trafficking;
- radicalisation and extremism;
- female genital mutilation;
- forced marriage;
- honour-based abuse;
- organisational or institutional abuse;
- self-neglect in the context of adult safeguarding;
- peer-on-peer or child-on-child abuse; and
- any other behaviour or circumstances that place a child or adult at risk of significant harm.

Safeguarding concerns can arise from something an individual says, something a member of staff observes, information received from another person, online activity or a pattern of behaviour or circumstances.

8. Accountability and Responsibility

BBE Training Limited has overall responsibility for ensuring appropriate safeguarding arrangements are established, implemented, monitored and reviewed.

Safeguarding responsibilities will be allocated to appropriately trained members of staff, including a **Designated Safeguarding Officer (DSO)** and, where appointed, a **Deputy Designated Safeguarding Officer (Deputy DSO)**. The organisation will ensure safeguarding policies and procedures are available for scrutiny by relevant awarding organisations, regulators, customers and other authorised bodies where appropriate.

9. Designated Safeguarding Officer (DSO)

The DSO has lead operational responsibility for safeguarding within BBE Training Limited.

The DSO's responsibilities include:

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- acting as the principal point of contact for safeguarding concerns;
- receiving and reviewing safeguarding reports from staff, learners and third parties;
- assessing the seriousness and urgency of concerns;
- ensuring immediate action is taken where someone may be at risk of harm;
- deciding whether concerns should be referred to children's social care, adult social care, the police, Local Authority Designated Officer (LADO) or another appropriate agency;
- seeking advice from appropriate safeguarding agencies where required;
- maintaining accurate and confidential safeguarding records;
- ensuring actions, decisions, outcomes and reasons for decisions are documented;
- monitoring ongoing safeguarding cases;
- ensuring information is shared appropriately and lawfully;
- liaising with senior management where appropriate;
- providing safeguarding advice and guidance to staff;
- supporting the development and delivery of safeguarding training;
- ensuring staff understand reporting and escalation procedures;
- reviewing safeguarding practices and recommending improvements;
- monitoring patterns or trends in safeguarding concerns;
- supporting referrals relating to Prevent or other safeguarding risks where appropriate; and
- ensuring safeguarding procedures remain consistent with current legislation and statutory guidance.

The DSO is **not expected to personally investigate allegations of abuse**. Their responsibility is to receive, assess, record, refer and coordinate the appropriate safeguarding response.

10. Deputy Designated Safeguarding Officer

Where appointed, the Deputy DSO will support the DSO and act in their absence.

The Deputy DSO should receive appropriate safeguarding training and have sufficient authority to respond to safeguarding concerns.

Responsibilities may include:

- receiving safeguarding concerns;
- providing advice to staff;
- taking immediate safeguarding action when required;
- maintaining safeguarding records;
- making or supporting external referrals;
- monitoring safeguarding cases; and
- escalating significant concerns to the DSO and senior management.

The appointment of a Deputy DSO does not remove the overall lead responsibility of the DSO.

11. Responsibilities of All Staff

Every member of staff has a responsibility to safeguard learners.

Staff must:

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- remain alert to signs of abuse, neglect, exploitation or other harm;
- listen carefully when a learner raises a concern;
- take disclosures seriously;
- report concerns promptly to the DSO or Deputy DSO;
- create an accurate factual record of the concern;
- maintain appropriate confidentiality;
- complete required safeguarding training;
- follow this policy and associated procedures;
- cooperate with authorised safeguarding enquiries; and
- raise concerns about unsafe or inappropriate safeguarding practice.

Staff must **not**:

- promise a learner complete confidentiality;
- investigate allegations themselves;
- confront an alleged perpetrator;
- ask unnecessary or leading questions;
- attempt to determine whether an allegation is true or false;
- discuss safeguarding information with people who do not need to know; or
- delay reporting because they are uncertain whether the concern is sufficiently serious.

Where in doubt, the concern should be reported to the DSO.

12. Responsibilities of Tutors, Trainers and Assessors

Because tutors, trainers and assessors have direct contact with learners, they have an important role in identifying safeguarding concerns.

In addition to the responsibilities applying to all staff, they should:

- maintain appropriate professional boundaries;
- monitor significant changes in learner behaviour, attendance or engagement where these could indicate a safeguarding concern;
- respond appropriately to disclosures;
- immediately report concerns through the safeguarding procedure; and
- ensure learning activities are conducted within a safe and professional environment.

Tutors and assessors should not attempt to provide counselling or specialist safeguarding support unless appropriately qualified and authorised to do so.

13. Identifying, Recording and Reporting Safeguarding Concerns

BBE Training Limited will use the following process whenever a safeguarding concern is identified.

Stage 1 – Identify

A concern may arise through:

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- direct disclosure;
- observation;
- information provided by another individual;
- changes in behaviour or circumstances;
- online communications;
- unexplained injuries;
- inappropriate conduct;
- allegations against staff; or
- other information that reasonably indicates a risk of harm.

Staff do not need proof that abuse has occurred before reporting a concern.

Stage 2 – Consider Immediate Safety

The member of staff must consider whether the individual or anyone else is in immediate danger.

Where there is an immediate threat to life or serious harm, emergency services must be contacted by calling 999.
The DSO must be informed as soon as practicable.

Stage 3 – Listen and Reassure

Where an individual makes a disclosure, staff should:

- remain calm;
- listen carefully;
- take the disclosure seriously;
- allow the individual to speak in their own words;
- avoid expressing disbelief or judgement;
- avoid leading questions;
- explain that the information may need to be shared with people who can help; and
- make clear that the concern will be taken seriously.

Stage 4 – Record

The member of staff must make a written record as soon as possible.

The record should include:

- name of the person concerned;
- date and time of the concern or disclosure;
- date and time the record was created;
- factual details of what was observed;
- the individual's own words where relevant;
- details of any witnesses;
- immediate actions taken;
- name of the person making the record; and
- who the concern was reported to and when.

Records should distinguish clearly between **fact, observation and opinion**.

Stage 5 – Report

The concern must be reported to the DSO **without unnecessary delay**.

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Where the DSO is unavailable, the concern must be reported to the Deputy DSO or another nominated senior safeguarding contact.

Stage 6 – Assess and Escalate

The DSO or Deputy DSO will consider:

- the nature and seriousness of the concern;
- immediate and ongoing risks;
- whether other individuals may be at risk;
- the wishes of the person concerned where appropriate;
- previous safeguarding information;
- whether specialist advice is required; and
- whether an external referral should be made.

Where appropriate, the DSO may refer the matter to:

- children's social care;
- adult social care;
- the relevant Local Authority Designated Officer;
- the police;
- the relevant local safeguarding partnership;
- the Disclosure and Barring Service;
- Prevent/Channel arrangements;
- an awarding organisation or regulator; or
- another appropriate safeguarding body.

Stage 7 – Record the Decision

The DSO must record:

- the concern;
- information considered;
- risk assessment;
- advice obtained;
- actions taken;
- referrals made;
- decisions reached;
- reasons for those decisions;
- outcomes; and
- any further monitoring required.

Stage 8 – Monitor and Review

Where appropriate, the DSO will monitor the concern until no further safeguarding action is required.

Safeguarding records will be retained securely in accordance with BBE Training Limited's data protection and record-retention arrangements.

14. Safeguarding Reporting Pathway

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Concern identified or disclosure received

↓
Is anyone in immediate danger?
YES → Call 999 → Inform DSO immediately
NO → Record factual information → Report to DSO
↓
DSO unavailable?
Report to Deputy DSO / nominated senior safeguarding contact
↓
DSO assesses concern and level of risk
↓
External referral/advice required?
YES → Refer to appropriate safeguarding agency
NO → Record decision and implement appropriate internal action
↓
Record all decisions, actions and outcomes
↓
Monitor and review until safeguarding action is complete

15. Allegations or Concerns About Members of Staff

Any allegation or safeguarding concern involving an employee, tutor, assessor, contractor, volunteer or other individual working on behalf of BBE Training Limited must be reported immediately.

The concern must normally be reported to the DSO and appropriate senior manager.

Where the allegation concerns the DSO, it must be reported directly to an appropriate senior manager or other nominated safeguarding contact who is independent of the allegation.

The person who is the subject of the allegation must not be responsible for assessing or managing the safeguarding concern.

BBE Training Limited will consider whether the allegation requires referral to the relevant Local Authority Designated Officer, police, Disclosure and Barring Service, awarding organisation or another relevant authority.

Internal disciplinary procedures may also apply, but these must not interfere with or compromise safeguarding or criminal investigations.

BBE Training Limited will also recognise its responsibility to protect employees from malicious or unfounded allegations and will ensure allegations are managed fairly, confidentially and objectively.

16. Concerns About Safeguarding Practice and Whistleblowing

Staff who believe safeguarding procedures are not being followed, a concern has not been properly addressed, or an individual remains at risk must escalate their concerns.

Staff should raise the matter with the DSO, Deputy DSO or appropriate senior manager.

No employee will be disadvantaged for raising a genuine safeguarding concern in good faith.

17. Confidentiality and Information Sharing

Safeguarding information is sensitive and must be handled appropriately.

Information should normally be shared only with individuals or agencies that need the information to protect the person concerned or others from harm.

Staff must never promise absolute confidentiality when receiving a safeguarding disclosure.

Data protection requirements do not prevent appropriate information sharing where this is necessary and lawful for safeguarding purposes.

The DSO will determine, where appropriate, what information should be shared, with whom and for what purpose.



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18. Safeguarding Records

Safeguarding records must:

- be factual and objective;
- identify the person creating the record;
- include dates and times;
- record decisions and reasons for those decisions;
- document referrals and outcomes;
- be kept securely;
- have restricted access; and
- be retained and disposed of appropriately.

Safeguarding records should be kept separately from general learner information where appropriate, with access limited to authorised personnel.

19. Staff Training and Awareness

BBE Training Limited will promote safeguarding awareness throughout the organisation.

Staff will receive safeguarding training appropriate to their responsibilities and role.

Training and development may include:

- recognising signs of abuse and neglect;
- responding to disclosures;
- safeguarding children;
- safeguarding adults at risk;
- Prevent and radicalisation awareness;
- online safeguarding;
- professional boundaries;
- reporting procedures;
- information sharing;
- allegations against staff; and
- changes to legislation and statutory guidance.

The DSO and Deputy DSO will undertake appropriate enhanced safeguarding training relevant to their responsibilities and keep their knowledge current.

20. Safer Recruitment and DBS Checks

BBE Training Limited is committed to safer recruitment practices.

Appropriate pre-employment checks will be undertaken in accordance with the nature of the role and applicable legal requirements.

Where a role involves regulated activity or otherwise meets the eligibility requirements, the appropriate Disclosure and Barring Service (DBS) check will be undertaken.

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BBE Training Limited will ensure that DBS checks are undertaken only where the position is legally eligible for the relevant level of check.

Recruitment procedures may include:

- identity checks;
 - employment history;
 - references;
 - qualification verification;
 - right-to-work checks;
 - DBS checks where applicable; and
 - consideration of suitability to work with children or adults at risk.
-

21. Learner Awareness and Support

Learners will be provided with appropriate safeguarding information, advice and guidance.

Learners will be informed:

- how to report a safeguarding concern;
- who they can contact within BBE Training Limited;
- that safeguarding concerns will be taken seriously;
- that information may need to be shared to protect them or another person; and
- where additional external support may be available.

Reasonable adjustments will be considered to ensure learners with additional communication or support needs are able to understand and access safeguarding arrangements.

22. Online and Remote Learning

Safeguarding responsibilities apply equally to online and remote learning.

Staff must maintain the same standards of professional conduct and boundaries during virtual delivery as during face-to-face delivery.

Safeguarding concerns arising through Moodle, Microsoft Teams, email, online meetings or other digital communication must be reported in accordance with this policy.

Staff should use BBE Training Limited-approved systems and accounts for learner communications wherever required by organisational procedures.

23. External Agencies and Partnerships

BBE Training Limited recognises that effective safeguarding may require cooperation with external organisations.

Where necessary, BBE Training Limited will work with relevant:

- local authorities;
- children's social care services;
- adult social care services;
- safeguarding partnerships;
- police;

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- health services;
- Local Authority Designated Officers;
- Prevent/Channel services;
- Disclosure and Barring Service;
- awarding organisations;
- regulators; and
- other appropriate agencies.

Staff must cooperate appropriately with authorised safeguarding enquiries while maintaining confidentiality and data protection requirements.

24. Statutory and Regulatory Framework

BBE Training Limited will have regard, where relevant to its activities and learners, to current safeguarding legislation and statutory guidance, including:

- Children Act 1989;
- Children Act 2004;
- Care Act 2014;
- Safeguarding Vulnerable Groups Act 2006;
- Protection of Freedoms Act 2012;
- Equality Act 2010;
- Counter-Terrorism and Security Act 2015;
- Modern Slavery Act 2015;
- Data Protection Act 2018;
- UK General Data Protection Regulation (UK GDPR);
- Human Rights Act 1998;
- Working Together to Safeguard Children;
- relevant statutory adult safeguarding guidance; and
- other applicable safeguarding legislation, statutory guidance, awarding organisation requirements and regulatory requirements.

BBE Training Limited will review relevant statutory and regulatory developments and update this policy where necessary.

25. Policy Monitoring

BBE Training Limited will monitor the effectiveness of this policy through appropriate measures, which may include:

- review of safeguarding incidents and concerns;
- staff training records;
- learner and staff feedback;
- safeguarding trends;

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- outcomes of external referrals;
- quality assurance activities;
- complaints and concerns;
- awarding organisation feedback; and
- changes to statutory or regulatory requirements.

Information used for monitoring purposes will be appropriately anonymised where possible.

26. Review of the Policy

This policy will be formally reviewed **annually**, or earlier where required as a result of:

- changes in legislation or statutory guidance;
- changes to awarding organisation requirements;
- a significant safeguarding incident;
- recommendations following an investigation or review;
- changes to BBE Training Limited's activities;
- regulatory requirements;
- identified weaknesses in existing arrangements; or
- feedback from learners, staff, customers or other stakeholders.

The review will ensure that safeguarding procedures remain effective, proportionate, current and consistently applied.

27. Key Safeguarding Contacts

Designated Safeguarding Officer (DSO):

Name: _____

Job Title: _____

Telephone: _____

Email: _____

Deputy Designated Safeguarding Officer:

Name: _____

Job Title: _____

Telephone: _____

Email: _____

Senior Manager / Alternative Safeguarding Contact:

Name: _____

Job Title: _____

Telephone: _____

Email: _____

Emergency Services: 999

Local authority safeguarding contact details should be maintained separately and made readily available to relevant staff.

28. Policy Approval

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Policy Owner: BBE Training Limited

Responsible Officer: Designated Safeguarding Officer

Approved By: _____ P Eddy _____

Date Approved: _____ Sept26 _____

Review Date: _____ June27 _____

Version: _____ V2 _____

