

Safeguarding & Prevent Policy

How to contact us

BC Arch Limited T/A Arch Apprentices take our Safeguarding & Prevent responsibilities very seriously. If you wish to report anything to us, please immediately contact us using one of the below methods.

The **Arch Safeguarding & Prevent Hotline** is available 9am – 5:30pm Monday to Friday on **0203 911 3420** or email us at **Safeguarding@archapprentices.co.uk**

Outside these hours you can contact any of the following free: **SAMARITANS** on 116 123, **MIND** on 0300 123 3393, **FRANK** on 0300 123 6600, or **CHILD LINE** on 0800 1111 **Reporting Harmful Content:**
<https://reportharmfulcontent.com/report/>

Our commitment, we will:

- Provide a safe environment for all employees to work and learners to train
- Promote the health, safety and welfare of children and vulnerable adults by providing opportunities for them to undertake their training/employment safely
- Respect and promote the rights, wishes, feelings and values of children and vulnerable adults
- Promote and implement appropriate procedures to safeguard the well-being of children and vulnerable adults
- Protect children and vulnerable adults from abuse, harm, and neglect
- Provide training and advice to employees and learners on the potential of extremism, the dangers of radicalisation and promote British Values
- Recruit, train, and support employees to adopt good practice to safeguard and protect children and vulnerable adults from abuse, harm, and neglect, and to minimise the risk to themselves
- Require employees to adopt and abide by this policy statement and the procedures set within
- Respond to any allegations of misconduct or abuse of children and vulnerable adults in line with this policy and the procedures set within, as well as implementing, where appropriate, the relevant disciplinary and appeals procedures
- Ensure through safer recruitment and the BC Arch Ltd selection processes, that Disclosure and Barring Service (DBS) checks and references that refer to candidates' suitability to have substantial access to children and vulnerable adults are taken up for all appropriate posts



Mark Creighton – CEO

Date: 28th September 2021

Introduction

BC Arch Ltd recognises its responsibility to take all reasonable steps to promote safe practice, to protect children and vulnerable adults from abuse, harm and neglect and prevent people being drawn into terrorism.

BC Arch Ltd also acknowledges that the welfare of children and vulnerable adults is everyone's responsibility and expects all employees, learners and visitors to operate in an inclusive manner.

This policy will be updated regularly to take account of national legislative changes. In addition, it will be reviewed following any organisational changes.

This policy and the procedures set within are based on the following principles:

- The welfare of children and vulnerable adults is a primary concern
- All children and vulnerable adults, whatever their age, culture, disability, gender, language, racial origin, social-economic status, religious belief, and/or sexual identity etc. have the right to be protected from abuse, harm and neglect
- It is everyone's responsibility to report potential radicalisation, abuse, harm and neglect. In such instances, BC Arch Ltd will act responsibly and where applicable report concerns to the appropriate authorities
- All incidents of alleged poor practice, misconduct or abuse, whether reported via the whistle-blowing policy or otherwise, will be taken seriously and dealt with appropriately
- All personal data will be processed in accordance with the requirements of the General Data Protection Regulation (GDPR) (EU)2018

Scope

This document is the Safeguarding & Prevent Policy for BC Arch Ltd and takes into account all those who are in receipt of or providing different BC Arch Ltd services (irrespective of age and circumstance).

This policy sets out the procedures that BC Arch Ltd would expect to be used to:

- Ensure service providers are doing their utmost to protect children, and vulnerable adults with whom theywork
- Ensure service providers protect themselves from harm and potential false allegations

Aim

BC Arch Ltd aims to implement these procedures by:

- Respecting and promoting the rights, wishes and feelings of children and vulnerable adults
- Providing all employees with information, instruction and training that will ensure that they are properly equipped to:
 - identify where there might be a problem
 - refer concerns to BC Arch Ltd



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- protect themselves from false accusations of abuse, harm, or neglect
- Ensuring that all suspicions or allegations involving learners and employees are dealt with effectively and efficiently, and that, where appropriate, BC Arch Ltd disciplinary and appeals procedures are implemented
- Ensure that employees whose work is directly with learners are subject to the appropriate level of Disclosure & Barring Service (DBS) check before beginning work. This check will be repeated every three years.

Principles

Key principles underpinning this policy are:

- The welfare of the individual is paramount
- Everyone has the right to protection from abuse, harm and neglect
- Learners and employees know how to keep themselves safe from the dangers of radicalisation and extremism
- Employees should work in an open and transparent way
- Employees should avoid any conduct which would lead any reasonable person to question their motives or intentions

Background

The 'Children Act 2004' places a duty on key statutory agencies to safeguard and promote the welfare of children and adults, i.e., to ensure services safeguard and promote the welfare of children and adults and ensure that anyone else providing services also provides safe practices.

In practical terms, this means that BC Arch Ltd has a responsibility to provide a safe environment for children and vulnerable adults, in which their welfare is of paramount importance. BC Arch Ltd aims for every learner (regardless of background or circumstances) to have the support they need to stay safe, be healthy, enjoy and achieve, as well as advice on the following:

- Protection from abuse, harm or neglect
- Prevention of development or health impairment
- Living in safe circumstances
- Access to effective care

Sharing concerns

BC Arch Ltd is committed to working in partnership with parents, guardians, carers and other outside parties involved (local employers, schools, social services, local children's boards). Therefore, in some situations it is important for the Designated Safeguarding Lead (DSL) to discuss concerns with them. For example, if a learner seems withdrawn, it might be useful to communicate with a relative or social worker.

In some circumstances, a child or vulnerable adult might be placed at greater risk if such concerns are shared (e.g. a parent/carer might be responsible for abuse and or might not respond to the situation in the child or vulnerable adult's best interests). The DSL will decide upon what is the appropriate action in terms of informing a parent, guardian or carer; the child or vulnerable adults' welfare being the priority.

Contact details

Contact details of the DSL will be displayed on notice boards in each delivery location and in every training room. The personal mobile/home telephone numbers of BC Arch Ltd employees should not be given to learners.

During the induction process, all learners will be made aware of the following:

- BC Arch Ltd contact details
- The contact names and details that are relevant to the Safeguarding Helpline and Samaritans. It will also be clarified that BC Arch Ltd employees only answer the phone during working hours (09:00-17:30)

Working with external contractors and partner organisations

Any contractor or sub-contractor engaged by BC Arch Ltd in areas where they are likely to come into contact with learners i.e. children or vulnerable adults, should be shown this policy and be asked to comply fully with the terms of this policy. Workers with the potential to come into contact with learners i.e. children or vulnerable adults, will be subject to the appropriate level of DBS check according to their role.

Roles and Responsibilities

Leadership and management

The CEO has overall responsibility for Safeguarding & Prevent strategy at BC Arch Ltd. All Board members must complete Safeguarding & Prevent training. The DSL undertakes the role of the Senior Lead and drives the implementation of safeguarding and raising of awareness across the business teams. The DSL is responsible for overseeing the implementation of Safeguarding & Prevent and for managing the performance of these activities. All employees are responsible for reporting any safeguarding issues or concerns.



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Designated Safeguarding Lead

The DSL reports to the Head of Learning Quality & Curriculum who reports to the Managing Director of Apprenticeships who reports to the Chief Operating Officer. The DSL is responsible for how Safeguarding is implemented across the organisation. The DSL works directly with the Head of Learning Quality & Curriculum to ensure there is a link between Safeguarding, Prevent and the Quality Improvement Plan whilst identifying training needs and the monitoring and implementation of Safeguarding within the organisation.

They will also have responsibility for:

- Implementing and promoting BC Arch Ltd children and vulnerable adults safeguarding policy and its procedures
- Regularly reporting to the Senior Management Team about identified performance indicators based on safeguarding of children and vulnerable adults
- Acting as the main contact within BC Arch Ltd for the protection of children, vulnerable adults and prevent responsibilities
- Providing information and advice on the protection of children and vulnerable adults
- Ensuring all relevant information is communicated to all designated persons
- Keeping abreast of developments and understanding the latest information on data protection, confidentiality and other legal issues that impact on the protection of children and vulnerable adults
- Encouraging good practice and supporting procedures to protect children and vulnerable adults
- Establishing and maintaining contact with local statutory agencies including the local authority, police and Prevent co-ordinators
- Working (With HR, if relevant) to maintain confidential records of reported cases and actions taken, and liaising with the statutory agencies to ensure they have access to all necessary information
- Taking the lead with specific allegations where there are suspicions of abuse, harm or neglect of a child or vulnerable adult
- To respond to employees' referrals as a Designated Safeguarding Lead
 - Escalate all reported issues to the Head of Learning Quality & Curriculum so that details can be logged on to the confidential monitoring system
 - Assist the Head of Learning Quality & Curriculum in preparing reports each academic year so as to identify trends in any safeguarding issues that may be raised, and lessons learned
- Offer advice to employees and employers in relation to safeguarding of apprentices
- Keep up to date with legislation and guidance in relation to safeguarding apprentices

People Experience team

When recruiting new employees BC Arch Ltd will ensure appropriate checks are made and records kept. They will also deal with any employee safeguarding/welfare issues, as appropriate. They:



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- Will ensure that safeguarding and prevent training is part of the induction programme for all new employees
- Will, through safer recruitment and selection processes, ensure that the appropriate level of DBS checks and references that refer to candidates' suitability to have substantial access to children and vulnerable adults are taken up before commencement of post, where appropriate
- Will maintain a record of all employees who have completed a DBS check and are considered suitable for work involving substantial access to children and vulnerable adults
- Will ensure that DBS disclosures and references are kept secure and confidential, in line with the current DBS Code of Practice

Managers

Managers need to monitor employees in order to ensure that the BC Arch Ltd safeguarding policy and procedures are adhered to. They:

- Are responsible for making sure that their employees are aware of, understand and act in accordance with this policy and related guidance, regardless of the hours their employee's work
- Must make sure that any contractors, agents, or other representatives whom they engage to undertake duties on their behalf which involve contact with learners and adults, understand and comply with this policy
- Will (in conjunction with the BC Arch Ltd People experience team) through safer recruitment and selection processes, ensure DBS checks are taken up for all appropriate posts

Employees

- Should attend appropriate Safeguarding and Prevent training if their role involves substantial access to children or vulnerable adults. This training will form part of the overall employee's training plan
- Should not begin any unsupervised activity involving substantial access to children or vulnerable adults prior to a DBS check being in process
- Should be aware of what constitutes appropriate and inappropriate conduct for those employees in charge of children and vulnerable adults
- Should know who the Safeguarding Lead is and how to contact them
- Have a responsibility to inform a nominated person of any allegation of abuse, harm, or neglect

Definitions

Children: Anyone under the age of 18 years

Vulnerable adult: Anyone 18 and over who is or may be

- In need of community care services
- Unable to care for themselves
- Unable to protect themselves against significant harm or exploitation
- Physically or mentally ill
- Vulnerable due to another factor not noted above (for this reason we class all BC Arch Ltd learners as being potentially vulnerable adults, and offer safeguarding support to all learners)

Employee: Anyone working for, or on behalf of BC Arch Ltd, whether paid or voluntary

Employers: Those employing apprentices in their own workplace

Substantial Access:

- Where an individual is regularly caring for, training or supervising a child or vulnerable adult
- Where an individual has sole charge of children or vulnerable adults

What is defined as abuse?

Abuse occurs when a person or group of people, harms a child or vulnerable adult. The following are viewed by BC Arch Ltd as being the main categories of abuse:

Neglect: Where a responsible adult (e.g. a parent or carer) fails to meet an individual's basic physical needs such as food, warmth, clothing, attention and affection.

Physical abuse: Where a child or vulnerable adult is hit, shaken or injured in some way, or where a responsible adult (e.g. a parent/carer) fails to prevent such activities from happening.

Sexual abuse: Where a child or vulnerable adult is forced to take part in sexual activity. Such activity can include any form of sexual behaviour e.g. inappropriate touching, penetrative and non-penetrative acts, exposure to pornographic material or to its production, prostitution, the use of explicit sexual language, and encouraging a child or vulnerable adult to behave in sexually inappropriate ways.

Emotional abuse: Where a child or vulnerable adult is subjected to frequent threatening, taunting or sarcastic behaviour, bullying, the persistent withholding of affection, or extreme over-protection. Racist or sexist conduct and certain inappropriate initiation ceremonies fall within this category.

Financial abuse: Where a child or vulnerable adult is exploited for the financial gain of an individual or organisation. Examples include identity theft and money laundering.



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Online Abuse: Online abuse is any type of abuse that happens on the internet. It can happen across any device that's connected to the web, like computers, tablets and mobile phones. And it can happen anywhere online, including:

- Social media
- Text messages and messaging apps
- Emails
- Online chats
- Online gaming
- Live-streaming sites

*See online safety policy

This policy will be communicated to all employees on appointment to the organisation, and ongoing updates will be disseminated via managers and training.

Relevant aspects of this policy will be explored with learners during induction and throughout the apprenticeship.



Annex 1 - Safeguarding

BC Arch Ltd Safeguarding is underpinned by the following principles:

- Learners first
- Independence
- Accountability and transparency

The principles to Safeguarding learners

The six principles below have been incorporated into the Care Act 2014 statutory guidance and should inform all safeguarding practice:

- Empowerment – people being supported and encouraged to make their own decisions and give informed consent
- Prevention – it is better to take action before harm occurs
- Proportionality – the least intrusive response appropriate to the risk presented
- Protection – support and representation for those in greatest need
- Partnership – local solutions through services working with their communities
- Accountability – transparency in delivering safeguarding

We recognise that:

- The welfare of the learner is paramount
- All children, regardless of age, disability, gender reassignment, race, religion or belief, sex, or sexual orientation have a right to equal protection from all types of harm or abuse
- Some learners are additionally vulnerable because of the impact of previous experiences, their level of dependency, communication needs or other issues
- Working in partnership with children, their parents, carers, and other agencies is essential in promoting welfare

We will seek to keep learners safe by:

- Valuing, listening to and respecting them
- Using our safeguarding procedures to share concerns and relevant information with agencies who need to know, and involving children, parents, families, and carers 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 developing and implementing an effective online safety policy and related procedures
- Recruiting employee safely, ensuring all necessary checks are made
- Providing effective management for employee and contractors through supervision, support, training, and quality assurance measures
- Recording and storing information in a professional manner

- Ensuring that we provide a safe physical environment for our learners, employee, and contractors, by applying health and safety measures in accordance with the law and regulatory guidance

Responding to suspicions and allegations of abuse, sexual abuse, harm and neglect

Safeguarding is the responsibility of every employee. There is a further responsibility to recognise, respond, report and record all suspicions of abuse, harm or neglect of children, and vulnerable adults.

BC Arch Ltd is committed to responding to and reporting safeguarding concerns appropriately and trains its employees in accordance with this.

BC Arch Ltd recognises that information received about a child or vulnerable adult might fall into one of the categories below:

- Suspicion/allegation of abuse, harm, or neglect where a BC Arch Ltd employee are the alleged perpetrator
- Suspicion/allegation of abuse, harm, or neglect where a child or vulnerable adult is the alleged perpetrator
- Suspicion or allegation of abuse, harm, or neglect where a third party is the alleged perpetrator
- Suspicion/allegation of inappropriate conduct (e.g. accessing pornographic images of under-18s)

Any employee, whether a recipient of or provider of BC Arch Ltd services is expected to respond appropriately and report any suspicion or allegation of abuse, harm or neglect to the DSL.

Sexual Harassment: What is Sexual Harassment?

Sexual harassment is unwelcome sexual behaviour that's offensive, humiliating or intimidating. It can be written, verbal or physical, and can happen in person or online. Anyone can be the victim of sexual harassment. Refer to the Online Safety Policy for further details.

Online sexual harassment is defined as unwanted sexual conduct on any digital platform. It includes a wide range of behaviours that use technology to share digital content such as images, videos, posts, messages, pages etc. on a variety of different platforms (private or public).

- Non consensual sharing of images and videos
- Exploitation, coercion, and threats



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- Sexualised bullying
- Unwanted sexualisation

All concerns odd Sexual harassment should be reported to the DSL immediately as outline in this policy.

The responsibility to seek advice and decide whether to refer suspicions of abuse, harm, neglect and sexual harassment to a local authority children's service, the police or any other applicable agency is only that of the DSL, and not that of any other employee. In extenuating circumstances however, a member of the Senior Management Team might need to make a referral.

Useful links

- Channel Strategy and Prevent Duty <https://www.gov.uk/government/publications/counter-terrorism-strategy-contest>
- Home Office www.homeoffice.gov.uk
- Disclosure & Barring Service (and related links) <https://www.gov.uk/dbs-update-service>
- Ofsted www.ofsted.gov.uk
- The "safe learner" concept <http://www.safelearner.info/>
- Sexual abuse in schools and colleges: <https://www.gov.uk/government/publications/review-of-sexual-abuse-in-schools-and-colleges>

Annex 2 – Prevent

The Prevent strategy

The strategy covers all forms of terrorism, including far right extremism and some aspects of non-violent extremism. BC Arch Ltd will always support children and vulnerable adults who are at risk of being drawn into terrorist activity through the Channel process, which involves several agencies working together to give individuals access to services such as health and education, specialist mentoring and diversionary activities.

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

BC Arch Ltd Prevent coordinator at DfE is **Chris.rowell@education.gov.uk +44 (0) 738 487 2518**

How to react to concern, allegation or disclosure

In line with the 5 Rs approach, the ability to recognise signs that might indicate abuse is of fundamental importance. Whether the abuse occurs on BC Arch Ltd premises, in the home, at work or in any other setting, all those involved in meeting learners' needs should be aware of the 5 Rs.

Possible abuse can then be recognised, investigated, and acted upon seamlessly and effectively.

Signs and symptoms of abuse of children or vulnerable adults can include an abuse disclosure. BC Arch Ltd will train those employees with regular contact with apprentices to understand signs of possible abuse, and to know how/to whom to report concerns

Recognise:

Employees who work with children and vulnerable adults are trained to recognise that the following might indicate that abuse has taken place: excessive tiredness, external injuries, tearfulness, changes in appearance, excessive gifts, STIs, pregnancy, unusual aggression, emotional withdrawal and homelessness. This is not an exhaustive list.

Respond:

BC Arch Ltd recognises that an appropriate response is vital. No report of or concern about possible abuse should never be ignored. In order to determine the most appropriate response, it must be determined whether an allegation involves employees, a fellow learner, or another. Clarity is vital.



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In the event of a disclosure, do not lead or probe with questions. Remain calm and demonstrate attentiveness and concern. Listen well. Inform the person sharing the disclosure with you that the concern they have raised must be recorded and passed on. Inform the person that this will be done on a limited 'need to know' basis, with as few persons as possible knowing the identity of the complainant. Also mention that confidentiality cannot be guaranteed, for example if the alleged victim is under 18.

Reassure the person they have done the right thing in reporting their concerns, and state that you will do everything you possibly can to support them. Do not make unrealistic promises. Ensure that the complainant and the subject of the allegation are treated in line with policy and guidance.

It is vital to listen carefully to any information that a child or vulnerable adult discloses with reference to abuse, harm or neglect. Whilst listening, the following good practice is essential:

Do:

- React calmly; try not to show disbelief or project other emotional reactions
- Avoid saying 'I believe you'. Instead tell the child or vulnerable adult that victims are never to blame for abuse/harm/neglect and that any victim has the right to make a disclosure
- Take the information seriously, recognising the difficulties in interpreting what a child or vulnerable adult says
- Keep questioning to a minimum, to ensure clear and accurate understanding of what has been said
- Inform a Safeguarding Lead immediately
- Make a full record of what has been said, heard or seen. Do this as soon as possible, noting down the individual's own words

Don't:

- Ask leading questions (for legal reasons, amongst others)
- Verbally speculate about what might have happened
- Introduce personal information from your own experiences
- Apportion blame or pass judgment
- Approach an alleged abuser
- Guarantee confidentiality.
- Tell the learner that 'everything will be alright'

Report:

Report your concerns by telephone to the DSL that working day. In the event of this not being possible, report your concerns to your line manager. In all cases, when a report is received your report should, without delay and having carefully recorded the information, report this to the DSL.

Once you have reported concerns about abuse to the DSL, the responsibility for taking any further decisions and/or actions resides with the DSL.

Record:

Once you have spoken to the DSL make notes using the BC Arch Ltd abuse disclosure form

Refer (to external authorities):

This is the responsibility of the DSL only – or of a member of the senior management team in extenuating circumstances.

Curriculum

BC Arch Ltd learners develop critical thinking skills which will support them in resisting extremism. There exist opportunities for apprentices to discuss challenging topics and events in a supported environment. BC Arch Ltd delivery team continuously develop their own approaches to implementing British values to support apprentices in resisting extremism while developing their political views.

Clear agreed referral channels

Every person at BC Arch Ltd, including apprentices know what they need to do if they are concerned about a peer or employee. The process of referral within BC Arch Ltd and externally is clear and unambiguous. Complying with the Prevent duty includes promoting and exemplifying British values: i.e. democracy, rule of law, individual liberty, tolerance and mutual respect and different faiths and beliefs.

All BC Arch Ltd delivery and support teams must attend Safeguarding and Prevent duty training and report any Safeguarding and Prevent concerns to the DSL. All employees are always expected to uphold the values embedded within the Equality Act 2010. They should use any relevant opportunities to promote the British values.

Identification of concerns might include the following, although this list is not exhaustive:

- Expression of views which are discriminately against protected groups or individuals
- Third party reports of concerns about behaviour e.g. plans to travel abroad or extremist activities
- Evidence of discriminatory treatment of other groups or individuals
- Evidence of bullying behaviour or harassment
- Evidence of non-compliance with the providers and employers' expectations of behaviour
- Possessing, accessing extremist materials
- Evidence of family concern about vulnerability to extremism
- Expression of extremist views including on social media
- Use of extremist language
- Threats of violence

BC Arch Ltd is committed to supporting vulnerable learners through its safeguarding and prevent agenda in order to prevent potential radicalisation and maximise the learning experience to enable successful destinations, careers and life prospects.

Useful websites:

- Channel Strategy and Prevent Duty <https://www.gov.uk/government/publications/counter-terrorism-strategy-contest>
- Home Office
- www.homeoffice.gov.uk
- Disclosure & Barring Service (and related links) <https://www.gov.uk/dbs-update-service>
- Ofsted
- www.ofsted.gov.uk



Annex 3 – Safer recruitment

BC Arch Ltd will take all reasonable steps to ensure unsuitable people are prevented from working with learners. BC Arch Ltd will carry out employee selection and recruitment process for all employees who have contact with children and vulnerable adults on a regular basis. These employees will undergo the appropriate level of DBS check, which is to include volunteers where they are required to work with children and vulnerable adults.

BC Arch Ltd request that all of its contractors, temporary or volunteer employees undergo employee selection and recruitment process where they are required to work with children and vulnerable adults.

References

References will be sought as required. Where possible, at least one of the two required references will be sought from an employer/voluntary organisation in which the applicant worked with children and adults.

Process

Full details of the arrangement for selecting and engaging employees is set out in the BC Arch Ltd employee recruitment policy.

Induction

Induction process for the newly appointed employees will include the following:

- Health & Safety
- Safeguarding & Prevent policies and procedures
- Administration
- Assessment of training
- Roles and responsibilities

Probation

Newly appointed employees will complete an agreed period of probation upon commencement of their employment, during which their understanding of safeguarding will be developed through mandatory Safeguarding and Prevent training. This training will be provided as soon as possible after commencement of post (in all cases within three months). Refresher training will be provided annually.

Information, instruction and training

Appropriate training will be provided to all BC Arch Ltd employees. The level of training required will be identified in accordance with the responsibilities of the post, but will include:

- Working with and protecting children and vulnerable adults
- Other identified training needs
- On-going support and guidance where needed



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What if an employee is accused of poor practice in terms of safeguarding?

Senior management in line with the People experience team may withdraw their duties at the earliest opportunity, dependent on the severity of the practice, and suspend on full pay.

The People experience team will investigate the allegations and make a written record of the details of the event.

If found to be poor practice rather than abuse, harm or neglect, then the Line Manager and the People experience team will consider:

- Appropriate training and supervision
- Reviewing general company practice in relation to safeguarding children and vulnerable adults
- Implementing standard disciplinary procedures

What if an employee is accused of abuse, harm or neglect?

Suspension of the individual will be carried out by the People experience team in accordance with the disciplinary procedure. At the time of suspension, the individual will be informed of the reason for the suspension and will be given the opportunity to make a statement should they wish to do so.

Notification of the suspension and reasons will be conveyed in writing to the employee in accordance with disciplinary procedures. The People experience team will investigate the allegations and make written record of details of the event. If abuse is confirmed:

- Relevant agencies will be notified
- Disciplinary procedures will be implemented
- General company practice in relation to safeguarding children and vulnerable adults will be reviewed if necessary

Managing false or malicious allegations

If the allegation is found to be false or malicious then the individual will receive an account of the circumstances and/or investigation if appropriate, and a letter confirming the conclusion of the matter.

Code of practice and behaviour

This document is designed to:

- a) protect children and vulnerable adults
- b) allow employees to safeguard themselves (against malicious or misplaced allegations at work, amongst other things)

As this guidance cannot cover all eventualities; employees must take responsibility for ensuring that they avoid actions which would lead any reasonable person to question their motives and intent. If in doubt about the appropriateness of certain actions, speak to the DSL.

Lone workers (i.e. being the only person on BC Arch Ltd premises)

Where possible, completely avoid lone working. Familiarise yourself with periods at which academies are closed and/or colleagues are on annual leave so that you can plan around this in advance. If lone working seems likely (e.g. if a colleague needs to go home due to illness), contact your line manager immediately. If the employee feels that lone working is appropriate, arrangements will be made to contact them later that day. Discussion about issues such as medical needs, lighting, fire evacuation procedure, locking up, carrying a phone etc. might also be necessary.

Working one-to-one with learners

If possible, within your job role, avoid working one-to-one with learners. If one-to-one working is necessary, ensure:

- That it is approved by your line manager/the DSL and use a room in which you can be seen by others, keep the door open, and sit by a glass panel where possible. In addition, inform a colleague (in the presence of the learner) where you will be working and why
- You never meet a learner for work reasons away from BC Arch Ltd or the employer's premises without permission from your line manager/DSL.

Allowing learners to work without employee supervision

- Avoid allowing learners to work in a training room without employee supervision if possible
- Arrange a system with your colleagues whereby every room is confirmed to be empty before locking up – be sensitive to the fact that a visual check of each room is necessary

Being alone with learners

Never put yourself in a position where you are the only employee in a building with a learner/some learner. Bear in mind that it is important not to overlook this issue early in the morning or during lunch breaks.

Reporting incidents

Always report, record and inform (your line manager/DSL) if the following occurs:

- A learner makes an abuse/harm/neglect disclosure inform the DSL by telephone that working day
- A learner is accidentally or deliberately hurt by an employee/another learner
- First aid is performed on a learner
- A learner seems very distressed
- A learner significantly misunderstands or misinterprets something that an employee/another learner has said
- A learner/employee/appears to be sexually aroused by an employee/learner
- A learner is restrained in self-defence

Annex 4 – Risk assessment and Prevent action plan

Leadership

1. Takes ownership of extremism/radicalisation concerns and appropriate oversight is provided.

- Selects an appoint Safeguarding and Prevent Lead that covers all locations
- Updates Board on Safeguarding and Prevent actions
- Appointed Safeguarding and Prevent Lead (Louise Atherton)
- Updates from DfE Prevent coordinator
 - Current threat level to the UK – **SUBSTANTIAL**
 - Current threat from Northern Ireland-related terrorism – **SEVERE**
 - **Daesh-inspired** attacks by 'lone actors' – low cost, low planning, low skill
 - **Returnees**
 - **Mental Health** and **learning disabilities**
 - **Al-Muhajiroun (ALM)** – less open; continue to attempt to radicalise and recruit
 - **Extreme Right Wing (XRW)** – persistent but low – recruitment target age: 16-25

IT Strategy

2. Appropriate Prevent awareness training offered
3. Learners and employees understand the risks attached to accessing terrorist and extremist material online and understand the process in these areas.
4. Learners accessing extremist material online

- Quality and Compliance has reviewed the Acceptable use of the IT Policy in light of the Prevent Duty.
- Updated policy to be posted on the web and made available to all employees/learners.
- Face-to-face Prevent Awareness Sessions have been delivered by the London Prevent Regional Coordinator.
- Ensure IT filters are in use always, making accessing unsuitable material very difficult. Monitoring software allows employees to log any attempts to access extremist material.



Training

5. Employees and learners understand the reasons for the implementation of the Prevent Strategy, and the responsibilities are in relation to this.
6. Employees are aware of what they should do in the event of any concerns being raised.

- Training sessions have been delivered to key employees by the London Prevent Regional Coordinator.
- Prevent training modules available for all employees, management and board members.

Site Security

7. Access controls

- Effective arrangements are in place to manage access to the site by visitors
- Wearing of ID badges on site for all

Addendum Covid-19 – Safeguarding and Prevent

This is an addendum to the Safeguarding and Prevent Policy held which maintains use throughout the pandemic.

Safeguarding contact details:

Louise Atherton remains as the Designated Safeguarding Lead, there has been no changes to how learners or employees raise concerns for the welfare of our learners to the DSL.

Louise Atherton

Contact: Safeguarding@archapprentices.co.uk

Telephone: 0203 911 3420

Learners:

Email safeguarding@archapprentices.co.uk

Call our dedicated Safeguarding phone number: 0203 911 3420

Employees:

Email safeguarding@archapprentices.co.uk

Call our dedicated Safeguarding phone number: 0203 911 3420

Complete our online Microsoft Form found [HERE](#)

Context:

- Coronavirus has presented itself in extraordinary circumstances and we continue to deliver our products with some changes, from face to face delivery to fully online delivery for some of our programmes. We understand we are working in a difficult period.
- This addendum does not remove the Safeguarding and Prevent Policy we have in place but counts as an addition to.

Instruction:

- When validating proof of identity documents to apply for a DBS check, we will initially accept verification of scanned documents, rather than being in physical possession of the original documents. This approach is in line with revised guidance from the Disclosure and Barring Service
- Employees now complete all tuition, reviews, and meetings (internal and external) remotely.



Education & Skills
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- Safeguarding messages have been placed onto company screensavers with details of the DSL and how to report any learner concerns (remotely)
- All employees and learners continue to be covered by the Arch Safeguarding and Prevent policy.
- All learners have access to Student Success for support and information through the normal channels. No changes to working hours.
- Apprentices maintain their relationship with their tutors and Learning Development Coach's (LDCs), and a record of wellbeing is maintained in their E-portfolio's.
- Information has been updated on the learner platform including information of support groups and support organisations that learners can reach out to for additional support and advice
- Apprentices have been contacted individually to check on wellbeing
- Employees have been given additional information of suggested topics to discuss with their learners, the DSL has been on hand to support all employees
- A new communication channel has been created (on Teams) for instance updates. As a standard, weekly posts are shared to update the business.
- The DSL has been joining department meetings more frequently to provide updates and acts as the main sounding board for any learner or employee concerns
- Prevent updates and training continue remotely via webinars and email
- Our website has been frequently updated with COVID-19 updates for all our customers - [COVID-19 Updates](#)
- Employees are updated and have access to support in-house through the DSL.



Document control

DOCUMENT NAME	VERSION	MASTER COPY LOCATION
Arch Apprentice Safeguarding Policy	6	Avado Compliance SharePoint

Unless stated within the body of this document, the owner is responsible for maintaining document control and facilitating compliance, as well as the management of review, updates, and changes.

OWNER	ROLE / ORGANISATION	CONTACT
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AUTHOR	ROLE	CONTACT
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REVISION HISTORY

Version	Date	Amended By	Summary of changes
1	July 2012	Sam Sawyer	Baseline
2	Aug 2019	Sam Sawyer	Updates to DSL and safeguarding team
3	Aug 2019	Keith Harvey	Branding update and published version
4	June 2020	Lisa Stevens	Updates to DSL and Prevent current threat level addendum added for COVID 19
5	July 2021	Lisa Stevens	Update to Reporting, update to Covid 19 addendum
5	12/08/21	Keith Harvey	Branding update
6	28/09/2021	Lisa Stevens	Strengthened Sexual harassment elements of the policy


DOCUMENT REVIEWS

This document has been reviewed for QC purposes by the following, in addition to those on the 'approvers' list.

Version	Date	Name	Title / Role
1	27/01/19	Sam Sawyer	CQO
2	31/07/19	John Pritchard	Director of Quality
3	31/07/19	Sam Sawyer	CQO
4	Sep 20	Louise Atherton	Quality Assurance and Safeguarding & Prevent officer
4	Sep 20	Amy Crawford	COO
5	12/08/21	Keith Harvey	Head of Group Risk and Compliance
6	28/09/21	Keith Harvey	Head of Group Risk and Compliance

APPROVALS

This document requires the following approvals for implementation and / or for any change in content.

Version	Date	Name	Title / Role	Approval Status	Signatures
V6	2021-09-28	Amy Crawford	Chief Operating Officer	Approved	
V6	2021-09-28	Mark Creighton	Chief Executive Officer	Approved	