



## Safeguarding Procedure

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### DOCUMENT CONTROL

Version	Name	Comment	Date
<b>1.0</b>	Alison Dann	First edition (Review of current safeguarding policy and procedure conducted and incorporated both documents into one full procedure) Includes KCSIE 2025	15/09/2025
<b>2.0</b>	Alison Dann	Will review when KCSIE 2026 Published	30/09/2026

**Key Notes** *\*For the purpose of clarity, the term "B2W" refers to the family of B2W Group organisations – Back to Work Complete Training, Just IT, BePro and ECTA. \* The term 'colleagues' relates to all staff whether Back to Work Complete Training, Just IT, BePro and ECTA employees.\*If we are delivering training as part of a subcontract, we will follow the Lead Contracts referral process for Safeguarding.\* B2W will obtain written confirmation of safeguarding arrangements from all subcontractors and alternative providers*

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## 1.0 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. Governors and trustees will receive safeguarding and Prevent training at induction and at regular intervals thereafter. Safeguarding will be a standing item at board meetings to ensure robust oversight.

## 2.0 Policy Aims

- Provide a safe learning environment where learners feel confident to raise concerns.
- Ensure staff understand their safeguarding responsibilities and are trained at induction and refreshed annually.
- Act swiftly and proportionately to safeguard learners at risk of abuse, neglect, exploitation, or radicalisation.
- Monitor learners at risk and contribute to multi-agency assessments and plans.
- Ensure safe recruitment and maintain a Single Central Record.
- Build effective working relationships with statutory partners (local authority, social care, police, health).
- Ensure safeguarding remains a governance priority with regular oversight.

## 3.0 Legal Framework and Guidance

This policy is underpinned by the following legislation and statutory guidance:

- Children Act 1989 and 2004
- Education Act 2002 (s.175 duty to safeguard in education and training)
- Education and Skills Act 2008
- Education (Pupil Registration) Regulations 2006 (as amended) – attendance monitoring linked to safeguarding
- Equality Act 2010
- Domestic Abuse Act 2021
- Mental Capacity Act 2005
- Care Act 2014

- Counter-Terrorism and Security Act 2015 (Prevent Duty)
- Safeguarding Vulnerable Groups Act 2006
- Voyeurism (Offences) Act 2019
- Data Protection Act 2018 and UK GDPR
- Human Rights Act 1998
- Working Together to Safeguard Children (2023)
- Keeping Children Safe in Education (KCSIE) 2025
- Working Together to Improve School Attendance (statutory from 2024) – applied proportionately to FE learners aged 16–18
- SEND Code of Practice 2015
- Safer Working Practice Guidance (2019 update)
- Local safeguarding partnership procedures (Manchester, London, Middlesbrough) are followed where relevant

#### **4.0 Legal Definitions** -For the purpose of this policy:

##### **4.1 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 2025) to reflect the changes made in working together to safeguard children.

##### **4.2 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.

##### **4.3 Adults at risk**

- In line with the Care Act 2014, safeguarding adults includes risks of: financial exploitation, modern slavery and trafficking, domestic abuse, neglect or self-neglect, discriminatory abuse alongside other vulnerabilities. For B2W this relates to any learner who meets the criteria above on either our Apprenticeship programmes, Bootcamps and/or Adult provision (ASF).

##### **4.4 Radicalisation**

- Is the process of a person legitimising support for, or use of, terrorist violence. Most people who commit terrorism offences do so of their own agency and dedication to an ideological cause.

#### **4.5 Identifying Radicalisation**

All staff must remain vigilant to the risk of radicalisation. It can be subtle and difficult to recognise, but warning signs that a learner or colleague may be at risk include:

- Failure to uphold or actively rejecting British Values: democracy, rule of law, individual liberty, mutual respect, and tolerance of different faiths and beliefs (and those with none).
- Social isolation from family, friends, or peer learning groups.
- Speaking in a way that appears scripted or rehearsed.
- Showing unwillingness or inability to openly discuss their views.
- Developing a sudden disrespectful or hostile attitude towards others.
- Displaying increased levels of anger or agitation.
- Becoming increasingly secretive, especially regarding internet use or online activity.

**Staff should record and report concerns immediately to the DSL or safeguarding team, even if only one or two indicators are present.**

#### **5.0 Safeguarding Culture**

B2W group believe in a culture of Safeguarding and promoting the welfare of individuals and as safeguarding is at the heart of everything we do We are committed to:

- Creating a culture of vigilance where all staff and learners understand safeguarding is everyone's responsibility.
- Promoting a safe, respectful environment where concerns, including those about sexual harassment, abuse or violence, are taken seriously and acted upon.
- Embedding safeguarding within the curriculum and daily practice, helping learners to recognise risks and build resilience.
- Ensuring staff receive regular training so they are confident in identifying, reporting, and managing concerns.
- Working in partnership with external agencies to provide effective support and intervention.

#### **6.0 Prevention/Protection**

- We create a culture where sexual harassment, abuse, online exploitation, bullying and unsafe practices

are not tolerated. Victims will be listened to, taken seriously, and supported. Learners and staff are encouraged to share concerns through multiple reporting channels.

## 7.0 Multi-Agency Working

- B2W works with local safeguarding partners (Manchester, London, Middlesbrough) and statutory agencies. We contribute to early help, child protection plans, and Prevent referrals via Channel where required.

## 8.0 Attendance and Safeguarding

- For learners aged **16–18**, persistent or unexplained absence will be treated as a safeguarding concern and escalated to the DSL and, if necessary, Children's Social Care.
- For **adults (19+)**, absence will be escalated if linked to risk of harm, neglect, exploitation or radicalisation.
- Attendance monitoring is part of early intervention, in line with *Working Together to Improve School Attendance*.

## 9.0 Online Safety

We recognise online risks under the **Four Cs**:

- **Content** (harmful material, misinformation, disinformation, conspiracy theories)
- **Contact** (grooming, exploitation)
- **Conduct** (cyberbullying, sexting, harmful behaviours)
- **Commerce** (scams, gambling, financial exploitation)

We also highlight emerging AI risks, including deepfakes, sextortion, grooming through AI chatbots, and radicalisation online.

All IT equipment is filtered and monitored. Staff training includes online harms, AI awareness, and safe reporting.

## 10.0 Subcontractors

- When learners are placed with subcontractors or external providers, written confirmation of safeguarding arrangements must be obtained.
- B2W retains overall safeguarding responsibility.

## 11.0 Roles and Responsibilities

- **All Staff-** Must identify concerns, report immediately, and read *KCSIE Part One and Annex A* annually.
- **Designated Safeguarding Lead (DSL)-** Senior leader with overall responsibility across B2W Group.
- **Designated safeguarding officers-** Available across the providers to respond to referrals.
- **Governors-** Must receive safeguarding and Prevent training at induction and refreshers. Safeguarding is a standing agenda item at board meetings.

## 12.0 Training

- All staff receive safeguarding induction and annual refreshers.
- Training covers online harms, Prevent, sexual harassment, exploitation, and emerging risks (e.g. AI).
- Governors and trustees receive induction and refresher training.

## 13.0 Information Sharing & GDPR

- Information will be shared lawfully under the Data Protection Act 2018 and UK GDPR, where necessary to protect learners.
- Staff cannot promise confidentiality.
- Multiple emergency contacts will be held for each learner.

## 14.0 Safer Recruitment

We ensure robust recruitment in line with statutory requirements:

- Enhanced DBS checks
- Barred list checks for regulated activity
- Verification of identity, qualifications, employment history
- Ongoing vigilance for staff conduct concerns

## **15.0 Code of Conduct for Staff**

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.

## **16.0 Allegations Against Staff**

- Allegations against staff will be reported to the DSL and LADO.
- Low-level concerns are recorded and managed under safer working practice guidance.
- Where dismissal or resignation occurs due to safeguarding concerns, referrals will be made to the Disclosure and Barring Service (DBS).
- If a staff member is permanently suspended for misconduct or unsuitability to work with children or adults at risk, B2W is legally required to make a referral to the Disclosure and Barring Service (DBS).
- This duty applies even if the staff member resigns before the investigation concludes.

## **17.0 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 Bob Busby and can be contacted confidentially via email at [bobbusby@hotmail.co.uk](mailto:bobbusby@hotmail.co.uk)

## **18.0 How to Respond and Report**

If you become aware of a safeguarding concern or allegation, you must follow these steps without delay:

### **Initial Response**

- Stay calm and reassure the person they have done the right thing in speaking up.
- Listen carefully and allow them time to share their concern.
- Do not express personal opinions, judge, or dismiss the concern.
- Do not promise confidentiality — explain that information will be shared only with professionals who need to know in order to protect them.

## **19.0 Immediate Actions**

- Act promptly — do not attempt to investigate or resolve the matter yourself.
- Report the concern immediately:
  - Alert a Safeguarding Officer directly (in person or by phone).
  - Formally submit the concern via the relevant provider's safeguarding inbox.
- Complete a safeguarding referral form, providing clear factual information.
- Record a statement with as much detail as possible (dates, times, names, what was said, and how you responded).
- Do not make assumptions or discuss the concern with anyone not directly involved.

## **20.0 Role of the Designated Safeguarding Lead (DSL)**

- The DSL will ensure the correct safeguarding procedures are followed.
- HR will be informed where allegations involve staff.
- The DSL will inform the Local Authority Designated Officer (LADO) to determine next steps.

- In cases of radicalisation, the DSL will consult with the Prevent Lead and, if necessary, refer to the Local Authority's Channel Panel Chair or Police Prevent Lead.
- If the matter is referred to external agencies (e.g. Police), the DSL will act as main liaison officer and ensure updates are provided to the Managing Director and HR.

## 21.0 The safeguarding Team Across The Group

<b>DSL B2W Group</b>	Alison Dann Group Director Quality & People	Telephone Number 0161 974 6122
<b>DSO</b>	Ben Waite Associate Director People	Telephone Number 0161 528 4717
<b>DSO</b>	Gayle Dawkes Senior HR Executive	Telephone Number 0161 513 3019
<b>DSO</b>	Chris Middleton Safeguarding Officer	Telephone Number 0161 513 3489
<b>DSO</b>	Natasha England Grp Associate Director Quality	
<b>DSO</b>	Vicky Marlor Senior Grp People Officer	
<b>DSO</b>	Mark Jarman, Centre Manager	
<b>24 hour safeguarding emails</b> <ul style="list-style-type: none"> <li>• <a href="mailto:safeguarding@B2Wgroup.com">safeguarding@B2Wgroup.com</a></li> <li>• <a href="mailto:BeSafe@Justit.co.uk">BeSafe@Justit.co.uk</a></li> <li>• <a href="mailto:Safeguarding@beprodevelopment.co.uk">Safeguarding@beprodevelopment.co.uk</a></li> <li>• <a href="mailto:safe@ectatraining.co.uk">safe@ectatraining.co.uk</a></li> </ul>		

## 22.0 How to make a referral to the Safeguarding Team?

- Use the dedicated email service which will automatically be sent to the Safeguarding Team outlining in the message the key points that a safeguarding concern has been raised and completion of safeguarding referral form.
- Subcontractors- Refer to subcontractors procedure for reporting concerns. B2W will obtain written confirmation of safeguarding arrangements from all subcontractors .

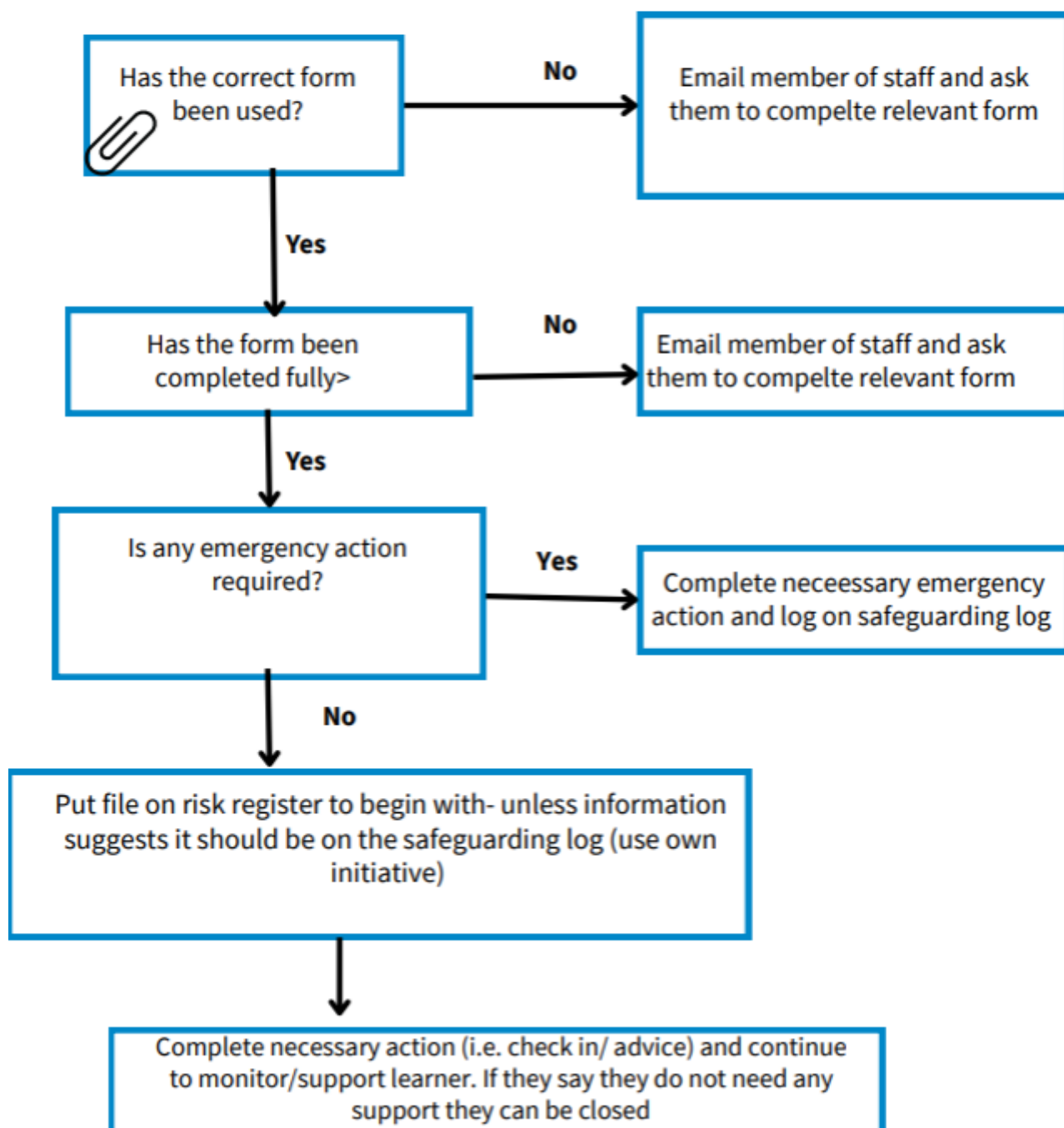
## 23.0 Safeguarding Referral Process

**Use Appendix 1:** Safeguarding Referral Form when making a report to the Safeguarding Team. Completing the form in full provides the team with the detailed information they need to respond quickly and appropriately.

**The flowchart below outlines how the referral process works**



# Safeguarding referral process



## 24.0 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 Group CEO 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 Group CEO on actions appropriately until matter is closed.

## 25.0 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. 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.

## **26.0 Low-Level Concerns and Staff Conduct**

- Staff must report low-level concerns about adults that do not meet the threshold for an allegation but may indicate a risk pattern.

## **27.0 Record Keeping and Information Sharing**

- All safeguarding concerns must be recorded clearly, accurately, and chronologically.
- Records will be stored securely and transferred safely when a learner moves to another setting.
- Information is shared on a need-to-know basis, in line with statutory guidance and data protection

## **28.0 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.

**29.0 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
<b>Bullying &amp; Harassment</b>	<b>Anti-Bullying Policy</b>	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
<b>Behaviour – negatively effecting the learning and wellbeing of others</b>	<b>Disciplinary Policy</b>	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
<b>First Aid</b>	<b>Health and Safety Policy</b>	Named first aid representatives are available in the policy if intervention is available-Advice and guidance can be provided by HR.
<b>Mental Health</b>	<b>HR Policies</b> <b><u>MHFA team</u></b>	If there is a safeguarding concern, colleagues are to follow safeguarding procedure
<b>Pregnancy</b>	<b>Pregnancy Procedures</b>	HOD to complete risk assessment with learner and submit to Head of HR team.
<b>Violence/Aggressive Behaviour</b>  <b>Illegal/Dangerous Items. (e.g. drugs, including 'legal highs') or something dangerous (e.g. knife).</b>	<b>Disciplinary Policy</b> <b>Learner code of conduct</b> <b>Colleagues behaviour policy</b>	Manager to invoke disciplinary and suspend learner if necessary

## **28.0 B2W Relevant Policies and Procedures**

- Safeguarding Appendices
- 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 Referral Form

<b>Section 1: Details of person at risk</b> <b>Completed by referring individual</b>			
<b>Name:</b>		<b>DOB:</b>	
<b>Telephone number:</b>			<b>Gender:</b>
<b>Are they a learner?</b>	Yes <input type="checkbox"/> No <input type="checkbox"/>		<b>Email address:</b>
			<b>(IF yes) What programme are they on?</b>
<b>Is the person aware of the referral?</b>			Yes <input type="checkbox"/> No <input type="checkbox"/>
<b>Does the person at risk have any support needs or vulnerabilities?</b>			<i>(please describe any needs or vulnerabilities the adult at risk may have, including any medical needs)</i>

<b>Section 2: current situation</b> <b>Completed by referring individual</b>		
<b>Is the person in immediate danger?</b>	Yes <input type="checkbox"/>	No <input type="checkbox"/>
IF <b>YES</b> : please describe. (including whether emergency services have been called)		
Have any immediate actions been identified to reduce the potential harm? i.e. signposting	Yes <input type="checkbox"/>	No <input type="checkbox"/>
IF yes, please describe actions taken:		
<b>For all concerns pls complete this section: - Factual details of disclosure</b> <i>this should include outline of concern being raised, details of times, anyone involved and places where possible</i>		
<b>Has the person taken any steps to receive support prior to this? If so, please explain</b>		

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**REMAINDER FORM COMPLETED BY SAFEGUARDING TEAM**

<b>Section 3: Type of concern and further information</b>				
Discriminatory	Domestic	Financial or material	Modern slavery	Neglect and/or acts of omission
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Psychological	Physical	Sexual abuse	Exploitation	Victim of a crime
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Homelessness	Mental health	Bereavement	Other health needs	Other (please specify)
<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Home address:		Post code		
Religion:	Ethnicity:	Nationality:		
Is an interpreter required?	Yes <input type="checkbox"/> No <input type="checkbox"/>	Language required:		
Does the person at risk understand what is happening? Do they have mental capacity, in your opinion?	Yes <input type="checkbox"/>	No <input type="checkbox"/>		

<b>Section 4: Details of alleged person to have caused harm (if applicable)- Completed by DSL</b>				
Name		DOB		Gender
Home address:		Postcode		



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Are they a learner?	Yes <input type="checkbox"/> No <input type="checkbox"/>	IF yes- what programme are they on?	
What is the relationship, if any, of the alleged perpetrator?			
Does the alleged perpetrator live with the person at risk?			
Is the alleged perpetrator the main carer?	Yes <input type="checkbox"/> No <input type="checkbox"/>		
Is the alleged perpetrator aware that a concern has been raised?	Yes <input type="checkbox"/> No <input type="checkbox"/>		

**Section 5: Does a risk assessment need to be completed? To be completed by safeguarding**

Details of risk assessment:

<b>Section 6: Details of person raising concern/making referral</b>			
Name		Job title	
Organisation			
Contact details	Email:	Number:	
Form completed by		Date completed:	
Signature			