



BCTG Safeguarding Policy and Procedure	
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Safeguarding Policy and Procedure

BCTG Safeguarding Overview

BCTG aims to assure a robust and effective safeguarding culture that is centred on the welfare of the staff and learners by protecting them and creating conditions for them to thrive. By ensuring staff are skilled and supported, minimising the risk of harm, and ensuring anyone in, or impacted by BCTG is empowered to report any concern at any time. BCTG aims to protect learners and staff, including those in provision delivered by sub-contractors. The BCTG policy outlines organisational policy, responsibility, and strategic implementation. This full policy provides the necessary information about safeguarding, including definitions of abuse, the reporting process, and procedures. BCTG recognise that the Prevent Duty forms a crucial part of safeguarding, a full overview can be found in the Prevent policy and procedure.

Our Commitment

All employees who collaborate with learners have a crucial role to play in shaping their lives. We have a unique opportunity to interact in ways that are both positive and inspiring. BCTG policy has been produced to ensure that safeguarding arrangements are in place to prevent and protect children, young people, and adults at risk. Safeguarding is a wide-ranging term that includes having suitable policies, procedures, and risk assessments in place to protect learners and staff.

BCTG staff and learners need to understand how to maintain safe and responsive environments which safeguard all and reduce the risks of abuse in its broadest term. It is the role of all BCTG staff to safeguard and promote welfare, and to enhance awareness of the broader welfare spectrum, specifically the issues facing vulnerable children, young people and adults in society that can affect their wellbeing.

Sub-Contractors need to demonstrate that safeguarding arrangements are in place to prevent and protect children, young people, and adults at risk, reflecting the practices of BCTG.

Objectives

The aim of this policy is to ensure that everyone employed by BCTG, and sub-contractors understands and are aware of the responsibilities of themselves and of others. All employees and sub-contractors should be able to recognise any signs if there is a safeguarding concern and be able to follow safeguarding procedures.

Scope

This policy covers safeguarding of children and adults at Risk – our learners, learners within sub-contracted provision, and those persons in settings in where we practise, which may fall into the category of child or adult at risk. It is inclusive of specific highlighted safeguarding agenda areas – as defined by law, and statutory expectations, as specified in Keeping Children Safe in Education (2023) and in the wider context for all our learners.

Our Duty

Anybody who works in an education setting has a duty to protect the welfare of learners, irrespective of age. As trainers and facilitators in education and having the opportunity of regular

contact with learners, trainers, leaders, and business support staff are well-placed to identify and recognise when there's a potential issue.

Each educator has a professional duty to:

- ensure a safe working environment is provided to learners where they feel heard
- create positive relationships with learners premised on mutual trust and understanding
- be aware of the indicators and symptoms
- ensure vigilance in recognising changes in behaviour or mood
- support the Designated Safeguarding Lead
- follow policies and reporting procedures

Our Responsibility

We all have a responsibility to ensure that children, young people, and adults at risk are protected from harm, informed about potential risks to their welfare, and understand how to seek help. We ensure all concerns are dealt with timely and appropriately. We also have a responsibility to minimise the risk of allegations against employees at BCTG.

All staff are expected to comply with any DBS check requests, trainers, leaders, and business support staff will be subject to an Enhanced DBS check, and where required reception staff will require a basic check. All visitors who have access to learners will present with an enhanced DBS.

It is expected that all staff will have a good understanding of what constitutes a safeguarding or welfare concern, how to provide support, and the channels for escalating a concern. To assist our employees in this, we provide on-going training and awareness, as well as continuous information, advice, and guidance to help staff, stakeholders, and employers feel confident in proactively promoting safeguarding and understanding individual responsibilities.

Confidentiality is an important principle that enables people to feel safe in sharing their concerns and to ask for help. However, the right to confidentiality is not absolute, sharing relevant information with the right people at the right time is vital to good safeguarding practice. Information sharing is essential for the identification of patterns of behaviours, or risks and identifying needs. Fears about sharing information must not be allowed to stand in the way of the need to promote the welfare and protect the safety of children. (Working Together to Safeguarding Children) [Working together to safeguard children - GOV.UK \(www.gov.uk\)](https://www.gov.uk/working-together-to-safeguard-children)

Confidentiality for High-Risk Reporting

The law does not prevent the sharing of sensitive, personal information **within** organisations. If the information is confidential, but there is a safeguarding concern, sharing it may be justified.

The law does not prevent the sharing of sensitive, personal information **between** organisations where the public interest served outweighs the public interest served by protecting confidentiality – for example, where a serious crime may be prevented.

The responsibilities of individuals are detailed below:

The Governance and Advisory Board

Provides support and challenge to ensure effective policy and procedures are in place. There is an identified member of the board to review safeguarding and offer guidance, who will meet with the DSLs for confidential updates and support, to review incidents and reporting processes. Reporting to the advisory board is monthly and the report will include trends and figures based on provision,

age and level of risk, learner data is protected, and a safeguarding reference number is used. An annual report is submitted at the end of a contract year after the final upload.

The Role of Designated Safeguarding Lead (DSL)

Governing bodies and proprietors should ensure an appropriate senior member of staff, from the senior leadership team, is appointed to the role of designated safeguarding lead. The designated safeguarding lead should take lead responsibility for safeguarding and child protection (including online safety). This should be explicit in the role holder's job description.

The designated safeguarding lead should have the appropriate status and authority to carry out the duties of the post. The role of the designated safeguarding lead carries a significant level of responsibility, and they should be given the additional time, funding, training, resources and support they need to carry out the role effectively. Their additional responsibilities include providing advice and support to other staff on child welfare, safeguarding and child protection matters, taking part in strategy discussions and inter-agency meetings. For the purpose of the safeguarding procedure at BCTG there are two DDSL's and the DSL.

Designated Safeguarding Lead:

- will ensure policies are implemented, followed, reviewed, and updated accordingly.
- will maintain links with local multi-agency safeguarding partners including Prevent Coordinators.
- will inform and advise all parties on legislation changes and current safeguarding themes and plan and implement training for all employees including CPD.
- will ensure that all Safeguarding processes and procedures are consistent across BCTG and its sub-contractors
- will conduct investigations where appropriate into welfare concerns reported and consult with external bodies such as safeguarding board where appropriate.
- will support and coordinate the escalation process, overall management of safeguarding issues and report to the board on any issues that arise.
- will review procedures and policies on a timely basis and maintain their own CPD to ensure their role can be fulfilled competently.

The Role Deputy Designated Safeguarding Leads (DDSL)

Any deputies should be trained to the same standard as the designated safeguarding lead and the role should be explicit in their job description. Whilst the activities of the designated safeguarding lead can be delegated to appropriately trained deputies, the ultimate lead responsibility for child protection, as set out above, remains with the designated safeguarding lead, this lead responsibility should not be delegated.

For the purpose of safeguarding procedures at BCTG, sub-contracted provision will have and identified DSL and DDSL to support safeguarding policy and processes.

The Sub-contractor DSLs' will be required to:

- be responsive to safeguarding requests of BCTG
- will be available for safeguarding reviews
- co-ordinate **monthly** reporting from all trainer on welfare concerns
- reporting directly to the DSL immediately any medium or high-level concerns and incidents
- follow BCTG policy and procedures for communication, CPD and
- all safeguarding concerns, incidents and welfare concerns will be reported to the DSL.

All sub-contractors will identify a DSL and DDSL and engage fully with BCTG DSL to assure the quality and responsiveness of their policies and procedures and submit evidence to demonstrate good practice.

Line Managers

Line managers have to consider their duty of care and need to take an active interest in the health and wellbeing of their teams. Having a duty of care means being responsible for your people's health, safety, and well-being. This usually means protecting the welfare of your team members while they're at their regular workplaces, or while they're on official business off-site. Line Managers should undertake the appropriate training to understand their duty of care and apply safeguarding and welfare approaches. Line Managers should be the first point of contact for welfare issues and concerns but can use the support of the DSL. Line managers will be responsible for understanding and reporting High and Medium risk concerns to the DSL/DSO as they occur. Line managers should report staff welfare concerns monthly to the DSL and should maintain accurate records.

Key Contacts

Designated Safeguarding Lead (Strategic DSL)

Kayley Hogg – kayley.hogg@bctg.org.uk

Mobile: 07801 573 815

Deputy Designated Safeguarding Lead (DDSL)

Adele Hackett – Adele.Hackett@bctg.org.uk

Mobile: 07801 573 606

Definitions

Safeguarding is the protection of children and adults at risk from abuse and neglect, promoting health and development, ensuring safety and care, and ensuring optimum life chances. The safeguarding agenda includes a wide range of potential risks.

(See appendix 1 for full definitions and indicators of abuse)

- Abuse (physical, emotional, financial, institutional, sexual, and organisational)
- Self-neglect
- Discrimination
- Child sexual exploitation
- Bullying and cyberbullying
- Domestic abuse
- Substance misuse
- Fabricated or induced illness
- Faith abuse
- Forced marriage
- Gang and youth violence
- Private fostering
- Female genital mutilation (FGM)
- Gender based violence
- Radicalisation
- Sexting

- Relationship abuse, including teenage relationship abuse
- Breast ironing
- Mental health concerns
- Sexual violence and sexual harassment
- Children missing in education
- Trafficking and modern slavery

A child is defined as anyone under the age of 18. An adult at risk (previously vulnerable adult) is defined as any person over the age of 18 and at risk of abuse or neglect because of their need for support or personal circumstance. Alongside the safeguarding agenda above this could be due to, and not limited to any of the following:

- Living in sheltered housing
- Receiving any form of health care
- Receiving a welfare service to support their need to live independently
- Receiving a service due to their age or disability
- Living in residential accommodation such as a care home
- Receiving domiciliary care in their own home
- Expectant or nursing mother living in residential care
- Person under supervision of probation service

While the definitions of a child and adult at risk give the rationale for legislative intervention, it is important to note that a person may be deemed at higher risk of a safeguarding issue affecting them due to other factors. This is termed contextual safeguarding. Examples of areas to consider are:

- Poor numeracy and literacy skill, or specific learning need
- English not a first language
- Unsupportive employer
- Under-represented group acting as a carer for another family member
- Has a disability or social need
- Has an Education, Health, and Care Plan (EHCP)
- Background in offending or is showing signs of being drawn in to anti-social or criminal behaviour, including gang involvement and association with organised crime groups
- Lives 'In Care' or has recently transitioned out of Care
- Is a young carer
- unemployment
- Is frequently missing/goes missing from care or from home
- Is within a family circumstance presenting challenges for the child, such as drug and alcohol misuse, adult mental health issues, domestic abuse or unsupportive.

Training and Educating Employees

All employees will receive safeguarding induction training by day 3 of employment. Following this staff will be allocated online safeguarding courses according to role, to be completed as part of their induction process. The on-line training is reviewed to ensure the most appropriate and up to date training is delivered.

Monthly Focus ON newsletters are distributed via BCTG internal and external communication channels to raise awareness and promote discussion in all areas under the wider safeguarding agenda, including areas such as radicalisation, mental health issues, positive relationships, and staying safe on the internet, to educate employees alongside giving greater knowledge to be passed onto learners.

Safeguarding is reported and discussed during team meetings and is an agenda item at the Senior Leadership Team (SLT) and Governance and Advisory Board meetings. Items discussed include monthly reporting of any safeguarding/welfare concerns, any actions taken and relevant updates in relation to legislation. There is also an annual CPD update for all staff appropriate to their role.

BCTG staff expectations for keeping yourself safe

To maintain yours and the learner's safety, the following are prohibited:

- befriending learners on personal social media sites
- distributing personal telephone numbers
- transporting learners unless this is part of a risk assessed agreement
- directing sarcasm, insults, or belittling comments towards learners or other staff members
- personal relationships with learners

It also important to be mindful of:

- Locations of one-to-one meetings with learners. These should take place preferably in the learning environment or in the workplace.
- Other environments used should be neutral location, discussed and with line managers and diarised on outlook.

Trainers will naturally build a rapport with learners through their learning programme and the learners may see them as a confidante and support, however, professional boundaries must be maintained whenever conducting work on BCTG's behalf.

Staff must be respectful of all young and vulnerable people and appreciate being in a position of trust; staff should listen to their concerns and offer support, uphold confidentiality within certain remits when required, however, be careful not to promise to keep secrets or ask others to do so. We must avoid spending time alone with learners in a closed environment, if this is unavoidable, for example, during a formal assessment/examination, ensure a member of the site staff is aware where you are and monitors this.

If a learner offers you gifts of any sort because of the support through their programme, please refer to the bribery policy for the process to follow. If at any point you feel unsafe in a learner's company inform the site manager, your line manager, the DSO/DSL and leave the premises.

Keeping Learners Safe

All employees are provided an employer handbook available to help them understand BCTG's and their own responsibilities under Safeguarding, Health, Safety and Welfare, and the Prevent Duty. Health and Safety vetting is made of the workplaces. As BCTG sub-contractor provision for Public Sector care programmes, for all employers who are subject to either Ofsted Inspection or CQC Inspection, reports are scrutinised to validate the quality of the working environment. Where an environment has a rating below good, consideration will be given to the suitability for learners. Curriculum leads will review with the managers to complete an Organisational Needs Analysis (ONA) and risk assessments.

The learner induction will involve a discussion and Q&A with the Trainer and learner. The sub-contractor needs to be confident in the employer's ability to keep the learner safe during their employment and to help educate the learner in looking after their own welfare and that of others, while at work. It supports H&S, and other essential legislative requirements such as the need for some learners to have a DBS check.

Learners are made aware of all BCTG relevant policies, who the designated persons are and how to report a concern during their induction to the programme. There is also information given to learners in the learner handbook. Learners can refer to the learner handbook and have access to Canvas, the online platform, where details of BCTG head office and the DSL are available.

Online Safety

Online Safety is being aware of the nature of the possible threats that a person could encounter whilst engaging in activity through the internet, these could be security threats, protecting and managing your personal data, online reputation and management and avoiding harmful or illegal content. These might manifest as online abuse, bullying, threats, impersonation, identity theft, grooming, harassment, or exposure to offensive and/or violent content.

We recognise that:

- the online world provides everyone with many opportunities; however, it can also present risks and challenges.
- we have a duty to ensure that all children, young people, and adults involved in our organisation are protected from potential harm on-line.
- we have a responsibility to help keep children, young people, and adults safe online, when using BCTG equipment or network.
- all children and young people, and adults regardless of age, disability, gender reassignment, race, religion or belief, sex, or sexual orientation, have the right to equal protection from all types of harm or abuse.
- we ensure the safety and wellbeing of children, young people, and adults at risk when they are using the internet, social media, or mobile devices.
- we need to provide staff and learners with the overarching principles that guide our approach to online safety.
- as an organisation, we operate in line with our values and within the law in terms of how we use online devices.
- where learners are accessing equipment provided by BCTG or sub-contractors to access online, a suitable monitoring and filtering system is in place supported by a policy of review and action

We will seek to keep children, young people, and adults at risk safe on-line by:

- providing clear and specific directions to staff on how to behave online through our codes of conduct and provide supervision, support, and training for staff regarding online safety.
- providing support and training for all staff dealing with all forms of abuse, including bullying/cyberbullying, emotional abuse, sexting, sexual abuse, and sexual exploitation.
- supporting and encouraging the young people using our service to use the internet, social media and mobile phones in a way that keeps them safe and shows respect for others
- developing an online safety agreement for use with young people and where appropriate their parents/carers.
- reviewing and updating the security of our information systems regularly.
- ensuring that usernames, logins, email accounts and passwords are used effectively.
- ensuring personal information about the adults and children who are involved in our organisation is held securely and shared only as appropriate.

- ensuring that images of children, young people and adults at risk are used only after their written permission has been obtained, and only for the purpose for which consent has been given.
- examining and risk assessing any social media platforms and new technologies before they are used within the organisation.
- developing clear and robust procedures to enable us to respond appropriately to any incidents of inappropriate online behaviour, whether by an adult or a child/young person.
- making sure our response takes the needs of the person experiencing abuse, any bystanders, and our organisation as a whole into account.

Use of Microsoft Teams/Skype for Meetings and Calls

There are two roles available for meetings: **presenter and attendee**. Presenters can manage meeting participants and share content, while the role of an attendee is more controlled. In many cases **it is safest if learners join meetings as attendees**. This will ensure that they cannot remove other participants, mute others, or have other elevated meeting controls.

Trainers can use the **Who can present?** setting within meeting options to control who joins their meetings as attendees.

Staff need to consider:

- where you conduct your meeting, make sure that it is a quiet space where there is no background conversation or noise.
- to use the 'blur background feature' to protect yourself and confidentiality. Learners should also be offered the option to use this feature.
- meetings are recorded with for all learners for the purpose of evidence, all learners are made aware that meetings are recorded.

Meetings should be arranged in advance and during working hours. There may be exceptions to this to meet learner needs, if this is the case inform your line manager that this is happening. If a parent shows an interest in joining a meeting, schedule a separate meeting with them. This only applies to parents where a learner is under 18 or has high needs. This is to protect learner confidentiality. If at any time during a Microsoft Teams call you feel that a conversation becomes difficult to manage, politely end the call and report to the DSL.

Sexual Violence and Sexual Harassment

Sexual harassment refers to unwanted conduct of a sexual nature which has the purpose or effect of violating someone's dignity or creating an intimidating, hostile, degrading, humiliating or offensive environment for them. BCTG has a commitment to providing a workplace and learning environment free from all forms of harassment and that us nor the employer will tolerate harassment by or against employees, employers, learners, trustees and other third parties, including contractors.

A Definition of Sexual Harassment

The Equality and Human Rights Commission (EHRC) defines sexual harassment as unwanted conduct of a sexual nature. It has the purpose or effect of violating the dignity of a person or creating an intimidating, hostile, degrading, humiliating or offensive environment for them.

Something can still be considered sexual harassment even if the alleged harasser did not mean for it to be. It also does not have to be intentionally directed at a specific person. Experiencing sexual harassment is one of the most difficult situations a person can face. All workers are protected from sexual harassment in the workplace. This applies to one-off incidents and ongoing incidents. This protection comes from both employment law and criminal law, depending on the circumstances involved.

Child on Child Sexual Violence and Sexual Harassment

Sexual violence and sexual harassment can occur between two or more children of any age and sex, from primary through to secondary stage and into college. It can occur also through a group of children sexually assaulting or sexually harassing a single child or group of children. Sexual violence and sexual harassment exist on a continuum and may overlap; they can occur online and face-to-face (both physically and verbally) and are never acceptable.

BCTG staff must make it clear that there is a zero-tolerance approach to sexual violence and sexual harassment, that it is never acceptable, and it will not be tolerated. It should never be passed off as “banter”, “just having a laugh”, “a part of growing up” or “boys being boys”. Failure to do so can lead to a culture of unacceptable behaviour, an unsafe environment and in worst case scenarios a culture that normalises abuse.

Staff must be vigilant in recognising, acknowledging, and understanding the scale of sexual violence and sexual harassment.

We acknowledge that the term ‘peer-on-peer’ has been used frequently and does not refer only to sexual abuse, but also to other forms of child-on-child abuse, such as bullying. The term ‘peer-on-peer abuse’ is helpful in focusing professionals’ attention on the fact that children can abuse other children. However, in the context of sexual abuse it could lead to professionals dismissing potentially harmful sexual behaviour as simply ‘developmental’.

Sharing nudes and semi-nudes

This does not apply to adults sharing nudes or semi-nudes of under 18-year-olds. Sharing nudes and semi-nudes is a form of child sexual abuse and must be referred to the police as a matter of urgency.

In the latest advice for schools and colleges from the United Kingdom Council for Internet Safety (UKCIS, 2020), sharing nudes and semi-nudes is defined as the sending or posting of nude or semi-nude images, videos or live streams online by young people under the age of 18. This could be via social media, gaming platforms, chat apps or forums, it could also involve sharing between devices via services like Apple’s AirDrop which works offline. The motivations for taking and sharing nude and semi-nude images, videos and live streams are not always sexually or criminally motivated.

Sexual Harassment

Sexual harassment is unwanted behaviour of a sexual nature. The law (Equality Act 2010) protects the following people against sexual harassment at work:

- employees and workers
- contractors and self-employed people
- job applicants

To be sexually harassed, the unwanted behaviour must have either:

- violated someone's dignity, whether it was intended or not
- created an intimidating, hostile, degrading, humiliating or offensive environment for them, whether it was intended or not

Sexual harassment includes a wide range of behaviour, such as:

- sexual comments or jokes.
- displaying sexually graphic pictures, posters, or photos.
- suggestive looks, staring or leering.
- propositions and sexual advances.
- making promises in return for sexual favours.
- sexual gestures.
- intrusive questions about a person’s private or sex life and discussing your own sex life.

- sexual posts or contact on social media.
- spreading sexual rumours about a person.
- sending sexually explicit emails or text messages.
- unwelcome touching, hugging, massaging, or kissing.
- criminal behaviour, including sexual assault, stalking, indecent exposure, and offensive communications.

Sexual Violence

Sexual Violence is any kind of sexual activity or act (including on-line) that was unwanted or involved one or more of the following:

- pressure
- manipulation
- bullying
- intimidation
- threats
- deception
- force

In other words, any kind of sexual activity or act that took place without consent.

Consent

Consent means agreeing to something by choice and having both the freedom and capacity to make that choice.

It is **NOT** consent if:

- someone was asleep, unconscious, drunk, drugged or 'on' drugs
- someone was pressured, manipulated, tricked, or scared into saying yes
- someone was too young or vulnerable to have the freedom and capacity to make that choice

Capacity

Capacity means the ability to use and understand information to make a decision, communicate any decision made.

Dealing with Incidents

- all staff are required to be familiar with the definitions and examples of online or offline sexual harassment, and to support us in our efforts to eliminate all kinds of sexual violence and abuse. They are also required to report any suspicions about any form of online sexual harassment or potential instances of it.
- it is especially important that Designated Safeguarding Leads are made aware of every case of potential online or offline sexual harassment, so that all concerns can be appropriately logged and form part of a broader investigation.
- all members of staff are required to inform the Designated Safeguarding Leads (or the police, or local authority, if appropriate) immediately of any instances of online sexual harassment, or anything which could potentially amount to abuse.
- staff should be aware that the police require to be informed of any incident which might constitute a hate crime - meaning any message, image or film which appears to be motivated by hostility or prejudice based on a person's race or perceived race; religion or perceived religion; sexual orientation or perceived sexual orientation; disability or perceived disability; and any crime motivated by hostility or prejudice against a person who is transgender or perceived to be transgender.

- staff should be aware that “just turn it off!” is rarely helpful advice to offer a young person, and staff should be able to offer learners guidance on whom to contact if they believe they are experiencing online sexual harassment of any form, especially during periods of time away from training sessions.
- if or when the subject of sexual violence or gender and sexual inequality arise, staff should communicate to the learners that these are serious problems and not undermine the impact and consequences of these issues.

What to do if an incident on online child sexual abuse comes to your attention

- Report it to your Designated Safeguarding Lead (DSL) or equivalent immediately.
- **Never** view, copy, print, share, store or save the imagery yourself, or ask a child to share or download – **this is illegal**
- If you have already viewed the imagery by accident (e.g., if a young person has showed it to you before you could ask them not to), report this to the DSL (or equivalent) and seek support
- **Do not** delete the imagery or ask the young person to delete it
- **Do not** ask the child/children or young person(s) who are involved in the incident to disclose information regarding the imagery. This is the responsibility of the DSL (or equivalent).
- **Do not** share information about the incident with other members of staff, the young person(s) it involves or their, or other, parents and/or carers
- **Do not** say or do anything to blame or shame any young people involved
- **Do** explain to them that you need to report it and reassure them that they will receive support and help from the DSL (or equivalent)

Concerns or Allegations made about Staff, Volunteers, or Contractors

“Creating a culture in which all concerns about adults (including allegations that do not meet the threshold) are shared responsibly with the right person, recorded, and dealt with appropriately, is critical. If implemented correctly this should encourage an open and transparent culture; to identify concerning, problematic or inappropriate behaviour early, minimise the risk of abuse, and ensure that adults working in education are clear about professional boundaries and act within these boundaries, in accordance with the ethos and values of the institution.”

There are two levels of concern and allegations

1. Concerns/allegations that may meet the harm threshold

This may mean an allegation has been made against children under the age of 18 years old:

- Behaved in a way that has harmed a child, and/or
- Possibly committed a criminal offence against or related to a child and/or
- Behaved towards a child or children in a way that indicates they may pose a risk of harm to children and/or
- Behaved or may have behaved in a way that indicates they may not be suitable to work with children

2. Concerns/allegations that do not meet the harm threshold

Low Level Concern

The term ‘Low Level’ concern does not mean that it is insignificant, it means that the behaviour towards the child does not meet the threshold set out at paragraph 338. A low-level concern is any concern, no matter how small, and even if no more than causing a sense of unease or ‘nagging doubt’, that an adult working in or on behalf of the training provider may have acted in a way that:

- is inconsistent with the staff code of conduct, including inappropriate conduct outside of work; and
- does not meet the allegations threshold or is otherwise not considered serious enough to consider a referral to the LADO

Examples of such behaviour could include, but are not limited to:

- being over friendly with children
- having favourites
- taking Photos of children on their mobile phone or any other device
- engaging with a child on a one-to-one basis in a secluded area or behind a closed door
- using inappropriate sexualised, intimidating, or offensive language

Such behaviour can exist on a wide spectrum, from the inadvertent or thoughtless, or behaviour that may look to be inappropriate, but may not be in specific circumstances, through to that which is intended to enable abuse. (KCSIE 2023)

BCTG will take allegations seriously and address them promptly and confidentially. Reporting allegations must be made to the DSL, who will advise the line manager.

BCTG has a zero tolerance in relation to any kind of abuse

Where an individual has been found to have acted in contravention of this statement, appropriate action will be followed according to that organisations disciplinary process and could include dismissal, exclusion or other withdrawal of service, contract, or support.

BCTG will:

- ensure that responses to reported of unwanted sexual behaviour are not limited to the reporting or complaint processes but also include centring on the learners' welfare and wellbeing
- be aware that victims of sexual violence and sexual harassment wherever it happens, may find the experience stressful and distressing. This will, in all likelihood, adversely affect their educational attainment and will be exacerbated if the alleged perpetrator(s) attends the same school or college.
- ensure that all victims are reassured that they are being taken seriously and that they will be supported and kept safe.
- publicise organisational policies and the available range of responses internally, and signpost to appropriate external services. While this should be outlined as part of the learner's induction, reminders and refresher information should be provided throughout the year.

Mental Health and Wellbeing

Mental ill health and stress are associated with many of the leading causes of disease and disability in our society. Promoting and protecting the mental health and wellbeing is important for individuals' physical health, social wellbeing, and productivity.

Many factors can influence the mental wellbeing of individual staff and learners. Understanding and addressing the factors which affect people's mental wellbeing have a wide range of benefits.

Mental health and wellbeing is seen as a safeguarding duty applied to both staff and learners, reported, monitored, and supported. The Mental Health and Wellbeing Policy supports BCTG commitment to this subject.

Mental health and wellbeing training will be available to staff and learners alike. Submission of monthly welfare forms from Managers, DSO's, Training Advisers assist in monitoring trends. By identifying trends this can inform BCTG QIP and areas for development in training and resources. It is expected that 16–18-year-old learners will have a monthly welfare check either by remote teams or face to face.

BCTG Aim to provide:

- information and raise awareness about mental wellbeing
- opportunities for staff and learner to look after their mental wellbeing
- policies and practices that promote wellbeing
- promote the mental wellbeing of staff and learners

Modern Slavery and Trafficking

Modern Slavery is the exploitation of people who have been forced, deceived, or coerced into a life of labour and servitude. It is a crime hidden from society where victims are subjected to abuse, inhumane and degrading treatment.

Modern slavery is a complex crime that covers all forms of slavery, trafficking, and exploitation. Trafficking includes transporting, recruiting, or harbouring an individual with a view to them being exploited. Modern slavery crimes may involve, or take place alongside, a wide range of abuses and other criminal offences such as grievous bodily harm, assault, rape, or child sexual abuse.

Victims of modern slavery can be men, women, and children of any age across the world. There is an assumption that victims of modern slavery are often trafficked to the UK from other countries, but residents of the UK are also among the victims that are exploited in the UK and other countries. The crime is often hidden from the authorities and the general public. Victims may struggle to leave their situation because of threats, punishment, violence, coercion, and deception, and some may believe that they are not in a situation of exploitation.

What Types of Slavery are there?

The types of slavery are:

- Forced Labour
- Domestic Servitude
- Bonded Labour
- Forced Criminality
- Forced and Early Marriage
- Child Slavery
- Sexual Exploitation
- Organ and Egg Harvesting
- Drug Supply
- Cyber Slavery
- Descent Based Slavery
- Slavery in Supply Chains

BCTG aims to raise awareness, through training, discussion, newsletter and online for trainers and learners.

Protection from Modern Slavery is seen as a safeguarding duty applied to both staff and learners, reported, monitored, and supported, by the DSL

Domestic Abuse

The first statutory cross-government definition of domestic abuse is “any incident or pattern of incidents of controlling, coercive, threatening behaviour, violence, or abuse between those aged 16 or over who are, or have been, intimate partners or family members regardless of gender or sexuality. Gender neutral definitions are used, as anyone can be a victim of domestic abuse, regardless of gender, age, ethnicity, religion, socio-economic status, sexuality or background. Behaviour of a person aged over 16 to another person, each having a personal connection

A personal connection between the victim and perpetrator is key to the definition. Defined as people who are ‘personally connected’ as: intimate partners, ex-partners, family members or individuals who share parental responsibility for a child. There is no requirement for the victim and perpetrator to live in the same household.

Children who see, hear, or experience the effects of domestic abuse and is related or under the parental responsibility of the person being abused or the perpetrator, is also now regarded as a victim of domestic abuse.

Behaviour is abusive if it consists of any of the following:

- Physical or sexual abuse
- Violent or threatening behaviour
- Controlling or coercive behaviour
- Economic abuse
- Psychological, emotional or other abuse

It does not matter whether the behaviour consists of a single incident or a course of conduct.

Conduct that may appear low-level, and any behaviour or pattern suggestive of controlling or coercive behaviour can be a warning of a risk of future violence towards the victim.

(Domestic Abuse: Statutory Guidance 2021)

Protection from Domestic Abuse is seen as a safeguarding duty applied to both staff and learners, reported, monitored, and supported, by the DSL

Poor Working Practices

Good working practices are based on legislation, regulations, and guidance to enable successful productivity, that the workplace is safe and proven to work well and produce good results. Poor working practices can impact on the workforce both physically and mentally. Examples may be staff shortages, low wages, unsafe environment, inadequate training.

Poor working practices may be raised by learners or training advisers, and this should be reported through the safeguarding procedure. We would expect the training adviser to engage with the employer, encourage and support the learner to report concerns to managers. The DSL will support and advise the training adviser, learner and employer to improve working practices.

BCTG complete a Health, Safety and Welfare (HASP) assessment prior to a learner starting on programme. BCTG has an amount of learners entering into the Public sector: early years, young people and health and social care, to further support safer working practices we also review both Ofsted and CQC reports linked to the employer work place.

Leadership and Management

The Senior Leadership Team (SLT) meet monthly where Safeguarding, Health, Equality & Diversity (SHED) is reported on and reviewed. A dedicated Governance and Advisory Board, meets monthly.

The sub-contractors Designated Safeguarding Leads also subject to quality assurance checks based on risk and reporting conducted by the BCTG DSL.

Recording and Reporting

Confidentiality of specific staff and learner details is maintained during reporting and discussions at SLT and Advisory Board.

Reporting to SLT and Governance and Advisory Board does not contain specific detail and is linked to identifying trends and levels, across the provision types, ages, gender, and actions.

The DSL has reviews of cases with the identified Governance and Advisory Board member identified to support and challenge safeguarding policy, practices, procedures and training plan. Safeguarding incidents of a high level will be discussed with the Director when this could have an impact on the business response.

BCTG Definitions used for identifying levels for reporting:

High Risk – Requires immediate action, call and speak with the BCTG DSL by phone.

Any high-risk concerns and issues that could impact on self or others, consider reporting to emergency services. E.g.: Suicidal or Self harming thoughts, threat to self/domestic violence, suspension from work with police, or similar involved

- **all staff and subcontractor DSL's will contact the BCTG DSL directly**
- line Managers must speak with BCTG DSL for support
- the BCTG DSL will maintain contact the sub-contractor DSL for support to coordinate intervention
- reporting and intervention will require to be documented on Form SG10 and submitted to BCTG DSL.
- any external reporting, will be done by the BCTG DSL or the sub-contractor DSL
- any interventions require planned follow up dates
- will produce an action plan with the DSL and any other stakeholders
- consider if there may be long term effects on an individual

Making the decision on a high-risk concern or issues can be difficult, if you are unsure, please contact BCTG's DSL for advice and support.

Medium – Requires reporting to DSL within 2 working days of identification

A medium concern is one that is of concern to the individual, and may be having an impact on their well-being, welfare, learning or work life.

EG: Grief, depression, stress, anything that may need support such as GP, other signposting to a third sector specialist

- reporting and intervention will require to be documented on Form SG10 and submitted to BCTG DSL
- produce an action plan of support of the line manager/training adviser with DSL
- review dates to ensure check-ins with the individual
- may require signposting, information, advice, and guidance
- All staff should be able to sign post to an individual to a support network
- All staff can ask advice of BCTG DSL or DSO

Offering signposting, support, advice, and guidance can be difficult for Line Managers/Training Advisors, and staff are not required to be counsellors and should not try to be. BCTG DSL or the DSO will be able to support.

Low Level – Requires reporting to DSL as a minimum monthly **by the 4th of every month**

A low concern is one that is of concern to the individual, and may be having an impact on their well-being, welfare, learning or work life, but is short term. This may be a reactive response an immediate worry, a short-term worry or welfare concern.

- low level concerns should be documented for all learners and staff,
- form SG11 Welfare Reporting Form should be submitted by **all Line Managers and sub-contracted DSL**
- **All Trainers** should submit form SG11 on the last working day of the month to their identified **sub-contracted DSL or BCTG DSL**
- **Sub-contractor DSL will submit a master SG11 with all identified welfare concerns by 4th of every month**
- A nil submission will be followed up by BCTG DSL
- Follow up support should be planned by the line manager/trainer
- review dates to ensure check-ins with the individual
- may require signposting, information, advice, and guidance
- all staff should be able to sign post an individual to a support network
- all staff can ask advice of BCTG DSL or Sub-contractor DSL

All training staff employed or freelance, and Line Managers responsible for teams of staff are required to submit a monthly SG11 welfare form – or an acknowledgement they have nil to report. Sub-contractors will be required to submit an update to the DSL to demonstrate safeguarding procedures, reporting, and monitoring is in place. All staff who have responsibility of 16–18-year-olds will demonstrate monthly welfare checks are completed and are submitted on Form SG11 to the DSL/DSO.

All staff should recognise that each individual who has a welfare or safeguarding concern can move between low, medium, and high. Staff should be responsible for updating the DSL to close the concern or escalate. High Level reporting will require the DSL to close.

Case Management Reviews and Follow ups

High, Medium, and Low levels reported will require to be identified as on-going or closed. Staff reporting concerns are required to plan review dates and report accordingly.

- **High Risk Incidents – minimum review time required 1-3 days**
Review dates will be planned in the BCTG DSL and sub-contractor DSL calendar and will be completed by phone or face to face, the review update will be documented on Form SG10, and the updated form shared with both DSL's
- **Medium Risk Incidents – minimum review time required 1-2 weekly**
Review dates will be planned in the BCTG DSL and sub-contractor calendar and will be completed either by phone or email, the review update will be documented on Form SG10, and the updated form shared with both DSL's
- **Low Risk Welfare – at a minimum monthly update**

The staff member reporting a low-risk welfare concern are responsible to update and close the concern. The same SG11 Form will be used for all welfare concerns reported by an individual as a continual record of learners on caseloads or staff in line management.

Learners at risk

Low risk welfare concerns: raised by learner – recognising immediate monthly stresses, health or welfare concerns that are not impacting on engagement or their work pattern, however, will require a ‘check-in on welfare’ from the TA on next attendance to close reported concern. This level of welfare concern can be handled by the Trainer, using common sense advice or signposting. Monthly reporting is suitable for Green Risk rating safeguarding.

Medium risk safeguarding or welfare issue or concern: this level should be reported as this occurs during a month. Such as the learner has had sick leave, disengaged from their programme, cancelled visits, physical, mental, social, or other health issues. Any of those that have impacted on engagement with learning and progress of programme. It would be expected that the Trainer would meet with learner to discuss a supportive plan, adjustment to learning, reviewing progress, signposting to other health professionals or third sector specialist, learner is still able to attend programme. Trainers would discuss with the DSL changes to the learning plan to keep learner on track and refer to safeguarding reference number. Amber Risk rating for Safeguarding until the learner is felt to be back on track.

High risk safeguarding issue or concern: learner has been suspended, missing learner, learner has ill health, high risk of harm, issues with the workplace, high risk of leaving due to safeguarding/welfare concern, this would be reported immediately to the DSL, as soon as Trainer’s are aware. Trainers will follow up with learner. Consideration will be given to learners being put on a hold or early leavers, pending further follow up or investigation. Trainer’s will inform DSLs of High-Risk incident with Safeguarding Reference number.

Follow up

Following the 4th working day of the month the BCTG DSL will return a response to each of the DSLs of trends, incidents newly opened, on-going, closed and training update.

BCTG recognises our duty to have clear guidelines for the retention, storage and destruction of child, young person, and adult at risk protection records as part of our safeguarding procedures. These are records that relate to concerns about a child, young person or adult at risk, and/or concerns about risks posed by people working with children.

Associated Policies

- BCTG Safer Recruitment Policy and Procedures.
- Prevent Policy and reporting Procedures
- Equality and Diversity Policy
- Health, Safety and Welfare Policy
- Social Networking and IT Usage Policy
- Anti-fraud, Bribery and Corruption Policy
- Whistleblowing Policy
- Bullying and Harassment Policy
- Staff Handbook
- Data Protection Policy
- Safer Recruitment Policy and Procedure

Policy Review

This policy will be reviewed annually by BCTG Governance and Advisory Board.

January 2025

Appendix 1 Definitions and Indicators of Abuse

TYPE OF ABUSE	DEFINITIONS	INDICATORS
Physical Abuse	Deliberately causing Physical harm. Hitting, punching, biting, kicking, use of weapons etc..	Cuts, bruising, burns, unexplained marks on the skin. timidity, cowering. Covering things up with more clothing etc..
Neglect	The persistent failure to meet a person's basic physical and/or psychological needs, likely to result in serious impairment of health or development. Neglect is when a parent or carer fails to provide adequate food, clothing, shelter (including exclusion from home or abandonment), medical care, or protection from physical and emotional harm or danger.	Withdrawn Fear of going home Poor hygiene Confusion Inappropriate clothing
Self- Neglect	Neglecting to care for one's personal hygiene, health or surroundings and includes behaviour such as hoarding	Poor diet and nutrition Poor personal hygiene Not taking prescribed medication Substance misuse
Emotional/Psychological Abuse	Emotional abuse, threats of harm or abandonment, deprivation of contact, humiliation, blaming, controlling, intimidation, coercion, harassment, verbal abuse, cyber bullying, isolation or unreasonable and unjustified withdrawal of services or supportive networks.	Withdrawn Depression Self-harming Lack of confidence Socially awkward Easily manipulated.
Financial Abuse	Theft, fraud, internet scamming, coercion in relation to an adult's financial affairs or arrangements, including in connection with wills, property, inheritance or financial transactions, or the misuse or misappropriation of property, possessions, or benefits.	Change in appearance. Withdrawn Having no money Not eating properly
Sexual Abuse	Forcing or enticing a child, young person or any person to take part in sexual activities, whether the person is aware of what is happening, could also be indecent exposure or sexual harassment.	Inappropriate behaviour Frequency in the use of the toilet Difficulty sitting down Withdrawn Being secretive about who they are talking to this may be via texting also. Self-harm Irritable or angry
Discrimination	The unjust or prejudicial treatment of different categories of people, especially on the grounds of one of the protected characteristics	Fearful of certain people Avoiding certain situations Being asked to do more than expected of them
Child Sexual Exploitation CSE	Exploitative situations, contexts, relationships where young people receive something (for example- food, accommodation, drugs, alcohol, gifts, money, affection), as a result of engaging with sexual activities. Sexual exploitation can take many forms ranging from 'consensual' relationship where sex is exchanged for affection or gifts,	Change in behaviour. Change in appearance. Increased sexualised behaviour/language. Drug/alcohol abuse Suddenly having expensive things

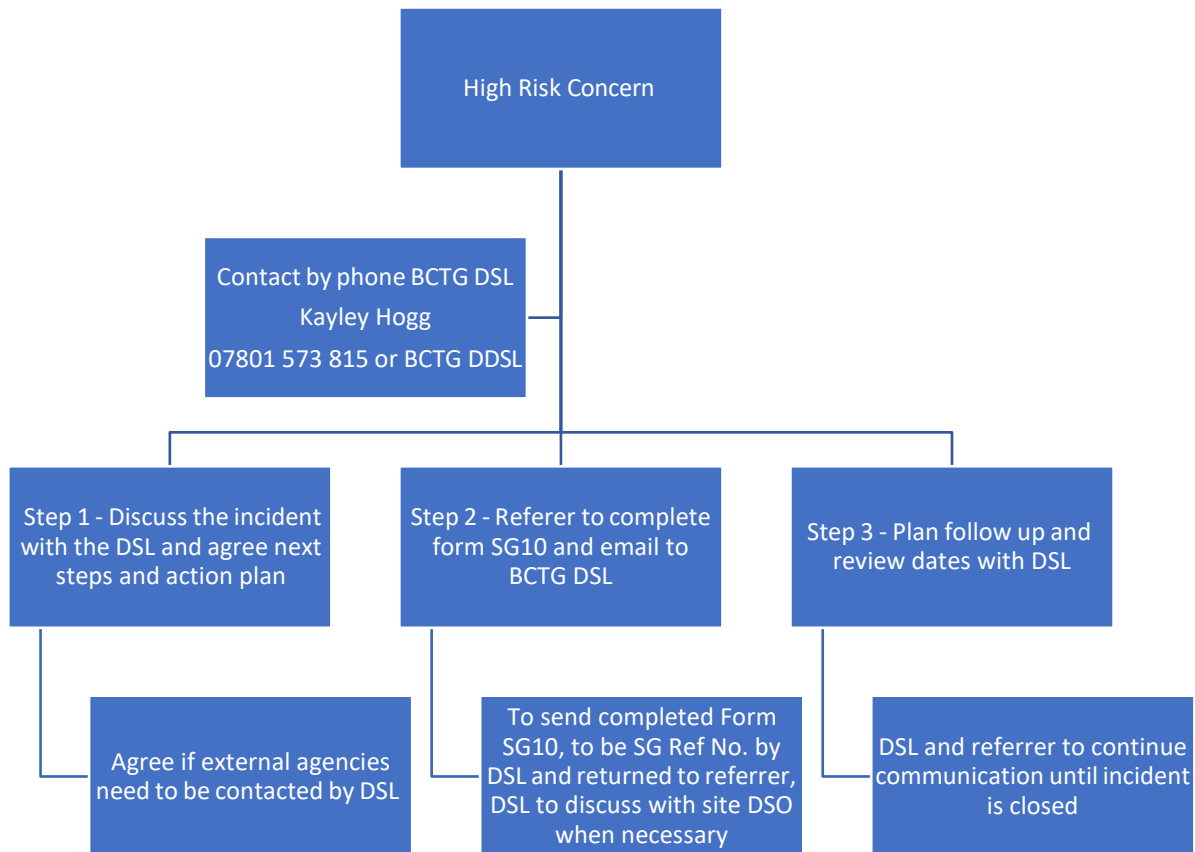
	to serious organised crime by gangs or groups. (KCSIE 2022)	
Bullying/Cyberbullying	Behaviour by group of individuals repeated over time that intentionally hurts another individual or group either physically or emotionally (can be face to face, over text, social media exchanges)	Withdrawn/nervous. Signs of physical and emotional abuse Constant use of or fear of internet usage
Domestic Violence	Incident of pattern of incidents of controlling, coercive, threatening behaviour, violence, or abuse between those aged 16 or over who have been intimate partners or family members can also be honour based. Domestic abuse has been added to the list of safeguarding issues that all staff should be aware of. The guidance makes it clear that domestic abuse: <ul style="list-style-type: none"> • can be psychological, physical, sexual, financial, or emotional • can impact on children through seeing, hearing or experiencing the effects of domestic abuse and/or experiencing it through their own intimate relationships. (updated 2022) 	Signs of physical or emotional abuse Showing signs of being controlled Withdrawn Anxious around others Low self- esteem
Substance Misuse	Alcohol, tobacco, illegal drugs, medicines, or psychoactive substances	Smelling of alcohol Regular hangover symptoms Inability to concentrate Lateness Change in commitment levels Behaviour can be irritable and or aggressive
Fabricated or Induced Illness	Making up signs and symptoms of an illness, falsifying medical records or inducing an illness to someone by any means	Pretending to be ill Talks about attending medical appointments with no proof of appointment Wanting to be ill Attention seeking behaviours
Faith Abuse	Child abuse related to faith or belief, include concepts of witchcraft and spirit possession, rituals, and sacrificial murder. Children and young people are made to believe that magic or witchcraft will be performed on them, in turn creates fear and compliance when being trafficked for domestic slavery or sexual exploitation.	Talking openly about such faith beliefs Nervous
Forced Marriage	One or both spouses do not or cannot, due to vulnerabilities, consent to marriage and duress is involved	Talking about getting married through family connections Recent travel abroad Upholding religious duties
Breast Ironing	The pounding and massaging of a pubescent girl's breasts, using hard or heated objects, to try to make them stop developing or disappear. It is typically conducted by the girl's mother who will say she is trying to protect the girl from sexual harassment and rape to prevent early pregnancy that would tarnish	Unusual behaviour after absence Depression, aggression, withdrawn Looks in physical pain

	the family name, or to allow the girl to pursue education rather than be forced into early marriage	
Gangs and Youth Violence	Gangs where crime and violence are a core part of their identity. It can lead to increased anti-social behaviour and youth offending	May have expensive items, change in behaviour Cuts and bruises, social activity changes Gang tattoos Carrying weapons
Private Fostering	Fostering arrangement without consent of local authority	Moving to different homes regularly Not discussing family life Abandonment characteristics
Female Genital Mutilation FGM	Partial or total removal of female external genitalia or injury to another part of the female genitalia for non - medical reason	Spending a lot of time in the toilet Long trips away from home Difficulty sitting
Radicalisation	Process by which a person comes to support/partake in terrorism and extremism (also includes – political/animal rights and ecological extremist). Extremism is ideology that is far outside the acceptable mainstream attitudes of society. – includes opposition to British values	Long trips away from home Talking about being wronged by a state or political system Strong views about changing life Talk of harming others in plight for cause
Sexting	Exchange of self-generated sexually explicit images through mobile picture messages	Withdrawn Boasting Hiding mobile phones
Teenage Relationship Abuse	Abuse in a relationship – either physical, sexual, emotional, or financial	Withdrawn Constantly looking at phone or answering messages You may detect control aspects Physical signs of abuse
Trafficking and Modern Slavery	Encompasses slavery, human trafficking, forced labour and domestic servitude. Traffickers and slave masters use whatever means they have at their disposal to coerce, deceive, and force individuals into a life of abuse, servitude, and inhumane treatment, including exploitation of the prostitution of young people, forced labour, removal of organs.	Talking about travelling abroad Talking about someone else having control over them Moving homes regularly Avoid eye contact and appear frightened No formal ID Physical or emotional abuse
Mental Health	Absence of psychological wellbeing and effective physical or psychological functioning	Becoming more withdrawn Less punctual than usual Having time off Appears depressed Changes in behaviour or personal appearance
Children Missing Education (While this affects 14–16-year-olds in education, as children are now required to stay in some form of formal education until they are 18 years old, we should investigate any learners that go missing without trace at this age).	Children missing education are children of compulsory school age who are not registered pupils at a school and are not receiving suitable education otherwise than at a school. Children missing education are at significant risk of underachieving, being victims of harm, exploitation, or radicalisation, and becoming NEET (not in education, employment, or training) later in life.	Not showing up without any explanation Not contactable Neither BCTG or employer can get hold of them, or knows where they have gone
Sexual Harassment and or Violence (including peer on peer/child- on-child abuse)	Sexual violence and sexual harassment can occur between two children/young persons of any age and sex. It can also occur through a	Staff should be aware that some groups are potentially more at risk. Evidence shows girls, children with SEND and LGBT children are at greater risk. Whilst not intended to

	<p>group of children or young people sexually assaulting or sexually harassing a single child or group of children. Children/young people who are victims of sexual violence and sexual harassment will find the experience stressful and distressing. This will, could adversely affect their educational attainment. Sexual violence and sexual harassment exist on a continuum and may overlap, they can occur online and offline (both physical and verbal) and are never acceptable. It is important that all victims are taken seriously and offered appropriate support. Sexual assault is intentional touching of a sexual nature, where the other party does not consent. When referring to sexual harassment we mean 'unwanted conduct of a sexual nature' that can occur online and offline. Sexual harassment is likely to: violate a child's dignity, and/or make them feel intimidated, degraded, or humiliated and/or create a hostile, offensive or sexualised environment</p>	<p>be an exhaustive list, OFSTED review stated Girls often view it harassment whereas boys can view as banter sexual harassment can include: Sexual comments, such as: telling sexual stories, making lewd comments, making sexual remarks about clothes and appearance, and calling someone sexualised names. Children being the victim of abuse or harassment may avoid social interaction, be withdrawn, be self-conscious, use sexualised language. Sexual harassment can take place even if not always reported - as many young people view this as behaviour that just happens and do not bother reporting it. Observe and address inappropriate behaviours.</p>
County Lines	<p>Organised criminal distribution of drugs from the big cities to smaller towns and rural areas using children and vulnerable people. The main county line gangs operate from Liverpool and London, but other groups operate in Birmingham and Manchester. The influence is nationwide. These drug networks or gangs groom and exploit children and young people to carry drugs and money. N.B can still be exploitation even if the activity appears consensual.</p>	<p>Can involve force and/or enticement-based methods of compliance and is often accompanied by violence or threats of violence. Can be perpetrated by individuals or groups, males or females, and young people or adults; and is typified by some form of power imbalance in favour of those perpetrating the exploitation. Whilst age may be the most obvious, this power imbalance can also be due to a range of other factors including gender, cognitive ability, physical strength, status, and access to economic or other resources Young and vulnerable people may exhibit:</p> <ul style="list-style-type: none"> • Persistently going missing from school or home and/or being found out-of-area • Unexplained acquisition of money, clothes, or mobile phones
Economic Abuse	<p>Economic abuse involves behaviours that interfere with an individual's ability to acquire, use and maintain economic resources such as money, transportation and utilities. It can be controlling or coercive. It can make the individual economically dependent on the abuser, thereby limiting their ability to escape and access safety.</p>	<p>Examples of economic abuse include:</p> <ul style="list-style-type: none"> • having sole control of the family income. • preventing a victim from claiming welfare benefits. • interfering with a victim's education, training, or employment. • not allowing or controlling a victim's access to mobile phone/transport/utilities/food. • damage to a victim's property
Revenge Porn	<p>Revenge pornography is a broad term usually involving an individual, often an adult ex-</p>	<p>Revenge porn – the distribution of a private sexual image of someone without their consent and with the intention of causing them distress</p>

	partner, uploading onto the internet intimate sexual images of the victim, to cause the victim humiliation or embarrassment.	
Non-fatal Strangulation	The practice typically involves a perpetrator strangling or intentionally affecting their victim's ability to breathe in an attempt to control or intimidate them. The obstruction or compression of blood vessels and/or airways by external pressure to the neck impeding normal breathing or circulation of the blood. No injury or particular level of force is required.	Some examples of non-fatal strangulation include: <ul style="list-style-type: none"> • holding one or two hands around someone's neck • choking or head locking someone with an arm around the neck • tightening a scarf, belt, or other form of ligature around someone's neck • hanging from the neck • placing pressure on the neck using a foot or knee • using the hands to cover a person's mouth and nose • compressing someone's chest to stop or significantly slow their breathing • any other method of restricting someone's breath
Romance Scams	Romance scams involve people being duped into sending money to criminals who go to great lengths to gain their trust and convince them that they are in a genuine relationship. They use language to manipulate, persuade and exploit so that requests for money do not raise alarm bells. These requests might be highly emotive, such as criminals claiming they need money for emergency medical care, or to pay for transport costs to visit the victim if they are overseas.	Signs your friend or family member may be involved in a romance scam: <ul style="list-style-type: none"> • They may be very secretive about their relationship or provide excuses for why their online partner has not video called or met them in person. They might become hostile or angry, and withdraw from conversation when you ask any questions about their partner • They may express very strong emotions and commitment to someone they have only just met • They have sent, or are planning to send, money to someone they have not met face-to-face. They may take out loans or withdraw from their pension to send money

Reporting Procedure and Process - High Risk Level – Concern/Incident



High Risk – Requires immediate action, call and speak with the BCTG DSL by phone.

Any high-risk concerns and issues that could impact on self or others, consider reporting to emergency services

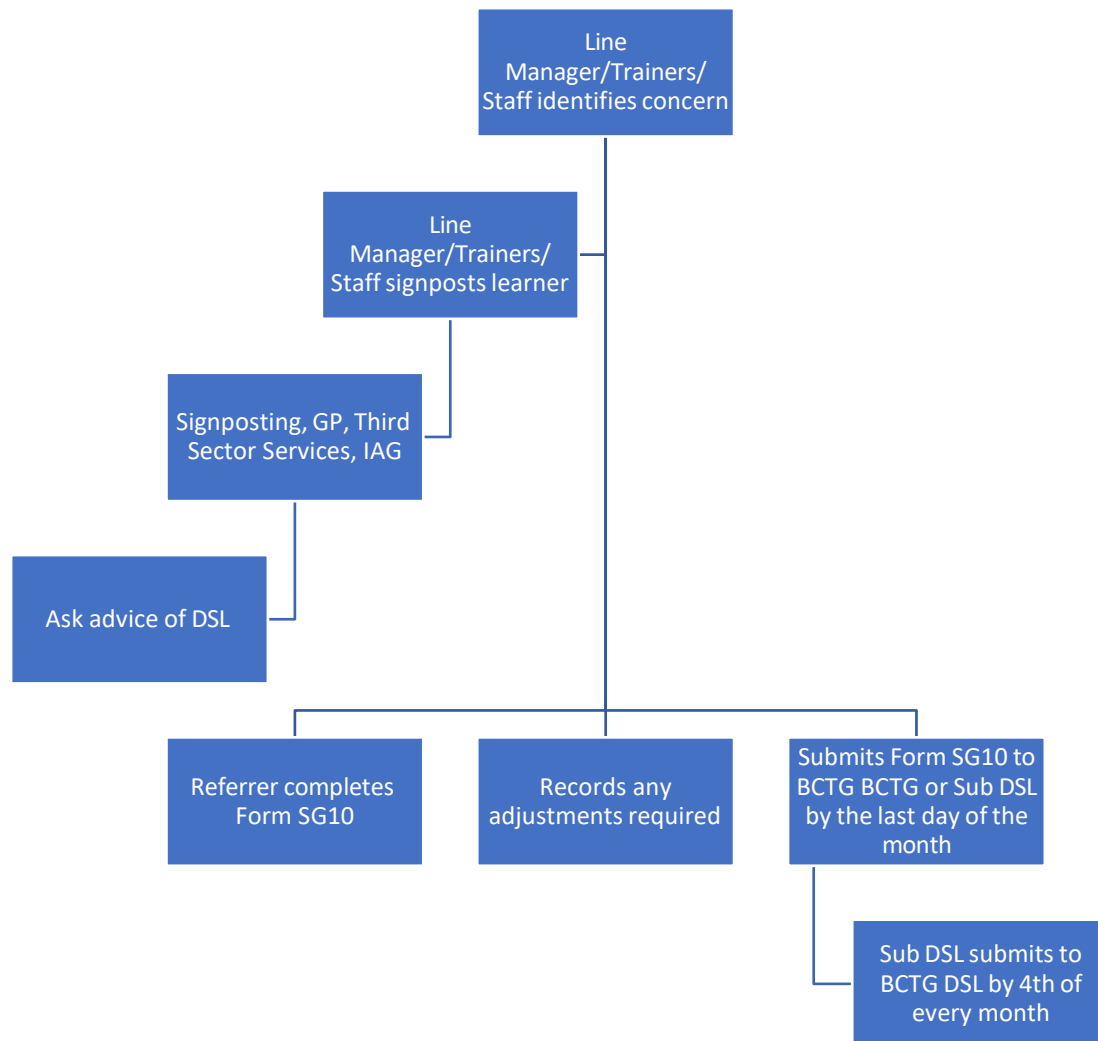
Eg: Suicidal or Self harming thoughts, threat to self/domestic violence, suspension from work with police, or similar involved

- **All staff will contact the BCTG DSL directly**
- Line Managers must speak with BCTG DSL for support
- The subcontractor DSL will contact the BCTG DSL for support to coordinate intervention
- Reporting and intervention will require to be documented on Form SG10 and submitted to DSL.
- Any external reporting, will be done by the DSL
- Any interventions require follow updates with target dates
- Will require an action plan of support with DSL and any other stakeholders
- Consideration of the possibility, there may be long term effects on an individual

Making the decision on a high-risk concern or incident can be difficult, if you are unsure, please contact BCTG’s DSL for advice and support. Should a learner become either an early leaver or go on a break in learning a code from the DSL will be required for it to be processed

High Risk
 Radicalisation, hate speech, racism, self-harm, immediate harm to self or others, domestic violence/abuse, sexual violence/harassment, violent crime, substance misuse
 (examples but not exhaustive)

Medium Risk Level – Concern/Incident



Medium – Requires reporting to BCTG DSL or Sub DSL at a minimum monthly by the last working day of every month

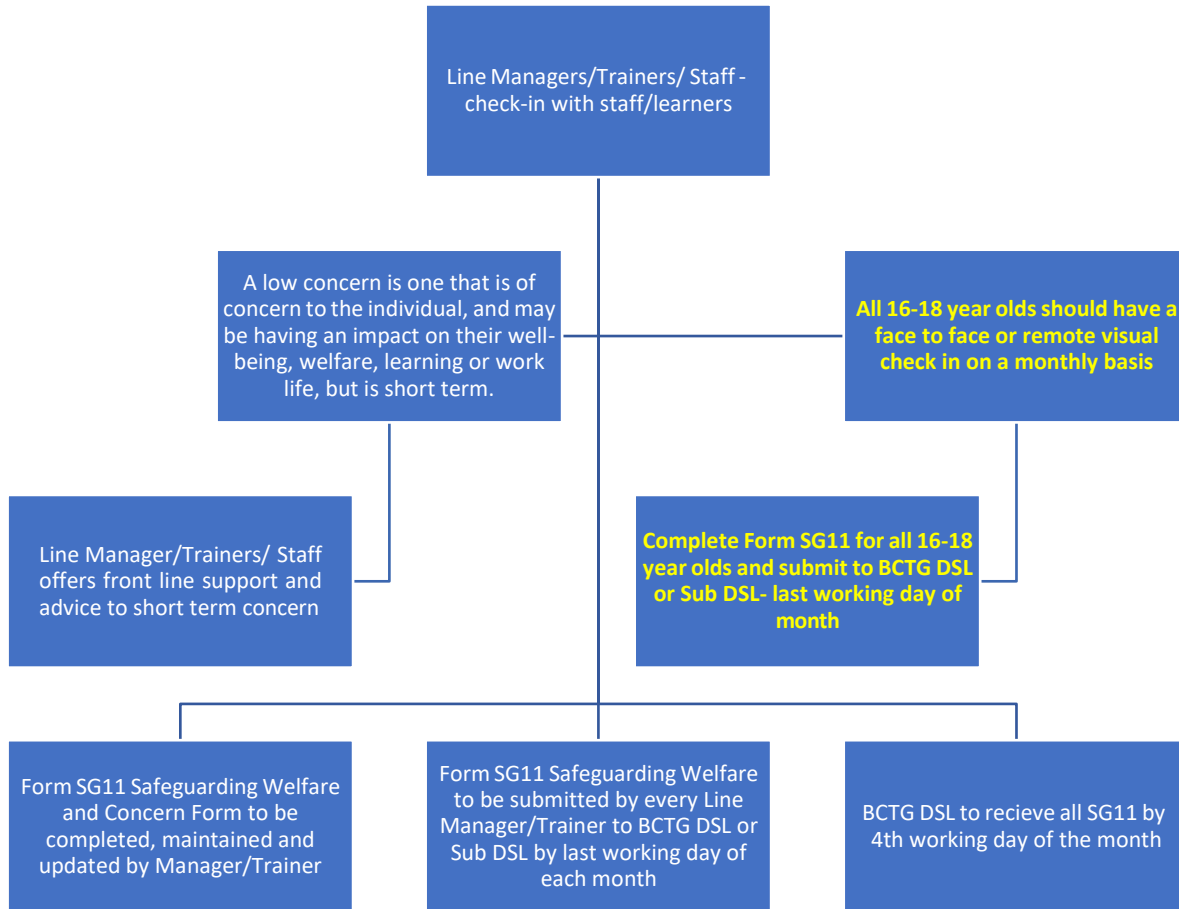
A medium concern is one that is of concern to the individual, and may be having an impact on their well-being, welfare, learning or work life. EG: Grief, Depression, Stress, needs support such as GP, other signposting to a third sector specialist

- reporting and intervention will require to be documented on Form SG10 and submitted to Sub DSL or BCTG DSL
- an action plan of support by the line manager/trainer is required
- requires review dates to ensure check-ins with the individual
- may require signposting, information, advice, and guidance
- all staff should be able to signpost an individual to a support network
- all staff can ask advice of BCTG DSL or Sub DSL

Offering signposting, support, advice, and guidance can be difficult for Line Managers/Trainers, **staff are not counsellors and should not try to be**. Pastoral support is different. BCTG DSL or Sub DSL's will be able to support. Should a learner become either an early leaver or go on hold from learning a code from the DSL will be required for it to be processed.

Medium Risk
 Financial strain, worried about bills, family dynamics, social, peer and community group influencers, bullying, unhealthy stress, anxiety, worries at work, physical health,
 (examples but not exhaustive)

Low Risk Level – Concern and/or Welfare



Low Level – Requires reporting to DSL at a minimum monthly by the 4th of every month

A low concern is one that is of concern to the individual, and may be having an impact on their well-being, welfare, learning or work life, but is short term. This may be a reactive response an immediate worry, a short-term worry or welfare concern.

- Low level concerns should be documented for all learners and staff,
- Form SG11 Welfare Reporting Form should be submitted by **all Line Manager and Trainers**
- **All Trainers should submit form SG11 on the last working day of the month to their identified sub DSL or BCTG DSL**
- **Sub DSL's will submit a master SG11 with all identified welfare concerns by 4th of every month**
- A nil submission will be followed up by BCTG DSL
- Requires a planned follow up Trainer/Line Manager
- Requires check-ins with the individual until closed
- May require signposting, information, advice, and guidance
- All staff should be able to signpost an individual to a support network
- All staff can ask advice of BCTG DSL or Sub DSL

Should a learner become either an early leaver or go on hold a safeguarding reference number from the DSL will be required for it to be processed

Low Risk

Disengagement, increased absence, missing sessions, lack of communication, mental health concerns, anxiety, feeling low, changes in behaviour, disinterest, issues with work environment
(examples but not exhaustive)

