

Safeguarding Policy September 2024

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Safeguarding Statement

Bright Direction Training is committed to safeguarding all children, young people and vulnerable adults that undertake learning with us. We believe that all children, young people and vulnerable adults have an equal right to protection from abuse, regardless of their age, race, religion, ability, gender, language, background or sexual identity and consider the welfare of the child/ young person / vulnerable adult is paramount.

We will take every reasonable step to ensure that children, young people and vulnerable adults are kept safe and secure so that they can learn and thrive. All suspicions and allegations of abuse will be taken seriously and responded to swiftly and appropriately as per our policy and internal procedures.

Bright Direction Training recognises that safeguarding against radicalisation and extremism is no different to safeguarding against other vulnerability issues that individuals may face. This policy also incorporates protecting vulnerable individuals from being radicalised or exposed to extremist views.

We enable all our staff and those who work with us to make informed and confident decisions regarding safeguarding. We expect everyone (staff, board members, directors and independent contractors) to have read, understood and adhere to this policy and related procedures.

We will provide adequate and up to date training to all staff to ensure that they are able to spot the signs of abuse and know how to deal with their own suspicions, reports of concerns from others and direct reports of abuse from people directly affected.

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

Safeguarding Policy

Useful definitions

Safeguarding

The term '*Safeguarding*' describes the broader preventative and precautionary approach to planning and procedures that are necessary to be in place to protect children and young people from any potential harm or damage.

Safeguarding is more than having background check policies and procedures in place. It means having a culture of vigilance where all staff know their responsibilities and act accordingly and all learners are aware of what they can expect and what to do if they have concerns. It is about providing a deep commitment to place the learner at the centre of our concerns and to build policies, practices and procedures around the learner for them to succeed.

Child or Young Person

In law a child is a child until their 18th birthday. There is no official age at which a 'child' becomes a 'young person'.

Vulnerable Adult

Is a person who is aged 18 or over and is receiving any form of health care (including treatment, therapy or palliative care of any description), receiving a service or participating in an activity which is specifically targeted at people with age-related needs (includes needs associated with frailty, illness, disability or mental capacity), disabilities or prescribed physical or mental health conditions or expectant or nursing mothers living in residential care.

Harm

Harm includes not only ill treatment, but also the impairment of, or allowing an avoidable deterioration in physical or mental health and also includes the impairment of physical, emotional, social or behavioural development.

Neglect

Failing to act appropriately whether intentionally or unintentionally, e.g. ignoring medical or physical care needs.

Abuse

Is a violation of individual human and civil rights by any other person or persons. This can include sexual, physical, financial or emotional abuse and can be distinguished by singular or repeated acts or mistakes.

Radicalisation

The process by which people come to support terrorism and extremism and, in some cases, to then participate in terrorist groups and activities.

Extremism

Vocal or active opposition to fundamental British values, including democracy, the rule of law, individual liberty and mutual respect and tolerance of different faiths and beliefs. We also include in our definition of extremism calls for death of members of our armed forces whether in this country or overseas.

Attendance – Attendance is monitored daily by tutors who inform course administration leads of any non-attendance and lateness. Where learners fail to attend, they are contacted via telephone and text within the first 15 minutes of the start time of the lessons by the course administration leads. Any concerns for welfare will be referred to the designated safeguarding lead in line with the safeguarding policy.

Designated Safeguarding Personnel

Bright Direction Training has a Designated Safeguarding Lead (DSL) and Deputy Safeguarding Lead who are responsible for providing appropriate Safeguarding training and support. The Designated Leads are responsible for acting upon any vulnerable adult or child protection concern. They are in charge of liaising with other external agencies.

The Designated Safeguarding Lead is responsible for overseeing the Safeguarding operation and adherence to policy and procedures. The Designated safeguarding Lead is responsible for reporting on safeguarding analysis on a quarterly basis on Safeguarding and Prevent matters, including analysis of issues and any escalated issues to the board. Designated Safeguarding Leads are responsible for delivering Safeguarding training.

Legislation

The main pieces of legislation relating to Safeguarding which staff should be aware of are:

- Human Rights Act 1988
- United Convention on the Rights of the Child
- Safeguarding Vulnerable Groups Act 2006
- Children Act 1989/ 2004
- The Prevent duty in further education and skills providers - GOV.UK (www.gov.uk)
- Working Together to Safeguard Children 2018 (publishing.service.gov.uk)
- SEND code of practice: 0 to 25 years - GOV.UK (www.gov.uk)
- Keeping Children Safe in Education 2024 (KCIE)
- Information sharing: advice for practitioners (publishing.service.gov.uk)
- Safeguarding Children and Safer recruitment in Education 2009
- Education Act 2002
- Every Child Matters 2004
- Prevent Strategy 2011 updated 2015 and 2023
- Counter-Terrorism and Security Act 2015

Learners

All learners will be introduced to their rights and responsibilities with regards to Safeguarding and Prevent through their induction and initial assessment. Learners will go through a thorough a sign-up procedure with a tutor, where any special needs will be determined, logged and appropriately dealt with. Reviews with learners include specific safeguarding questions, covering areas including Health & Safety, Equality and Diversity and other Bright Direction Training Policies and Procedures. Learners have direct access to their tutor at all times and use this person as their first point of contact if they have any concerns.

Staff Training

All new employees will be introduced to their rights and responsibilities with regards to Safeguarding and prevent as part of their induction with the Designated safeguarding Lead or their line manager. The relevant policies are available to all employees via the Safeguarding pages of the intranet. Staff will receive Safeguarding and prevent update training every two years as a minimum.

The Safeguarding Policy will be reviewed on an annual basis to ensure it covers any changes in legislation and remains suitable for the needs of the organisation. Further updates will be provided on an annual basis to cover Bright Direction Training policies and procedures. Designated people will receive induction training and updates as and when necessary. The Designated safeguarding Lead will meet with the board of directors on a quarterly basis to discuss safeguarding issues and procedures. Any significant changes to related legislation will trigger ad hoc training by Safeguarding Lead and be updated on the system.

E-Safety

Appropriate networking technology has been installed to prevent access to sites on the banned list and to identify high risk behaviour. This is a managed service by Serion Limited.

People in a position of trust:

People in a Position of Trust' are defined as those who work with vulnerable people including children, young people and adults as an employee, volunteer or student in a paid, unpaid or a voluntary basis.

Examples of such concerns could relate to a person who works with adults with care and support needs who has:

- behaved in a way that has harmed, or may have harmed an adult or child
- possibly committed a criminal offence against, or related to, an adult or child
- behaved towards an adult or child in a way that indicates they may pose a risk of harm to adults with care and support needs
- their conduct has raised concern as to their suitability to act in a position of trust

Where staff have concerns regarding people in a position of trust, they must follow the reporting procedure as set out in this safeguarding policy.

Quality Improvement

The Quality Manager will monitor the effectiveness of the Safeguarding policy, practices and procedures through the following methods:

- Learner journey monitoring
- Lesson visits, Observation of Teaching, Learning and Assessment and Learner forums.

Other relevant policies

Please refer to the following policies on the intranet for further guidance:

- Equality & Diversity
- Health & Safety
- Whistleblowing
- Staff code of conduct
- Harassment and bullying
- IT acceptable use
- Student code of conduct
- Student Induction
- Prevent Policy

Background Checks

In recognition of our commitment to making sure students are safe during their time with Bright Direction Training we take all necessary safer recruitment precautions to ensure that all staff have reference checks completed and, where relevant, Basic/Enhanced DBS checks.

Safeguarding procedure

This part of the document sets out what to do if a Safeguarding issue is disclosed, and includes the following:

Responding to a disclosure

Bright Direction Training has developed a series of procedures to follow depending on whether the person involved is a young person (under 18), vulnerable adult or otherwise.

i) If a child makes a disclosure

Follow the 5 R's procedure, keep questions to a minimum and explain what you need to do next. Explain that you may need to pass the information on in order to protect them. Report concerns to a Designated Person immediately and within 24 hours so that a decision can be taken whether to refer onto an external agency. Record the concerns on an Incident Report Form.

ii) If an adult makes a disclosure

Unlike young people, adults have a right to insist upon confidentiality unless there are circumstances which can override this. However, there are circumstances where this information must be passed on, e.g. if this is a vulnerable adult or if there is a chance that the adult has been or is being harmed or abused. Report concerns to a Designated Person immediately and within 24 hours so that a decision can be taken whether to refer onto an external agency. Record the concerns on an Incident Report Form.

Procedures to follow in the event of an alert

Once the Designated Safeguarding Lead has been made aware of a situation, they need to ascertain whether the young person or vulnerable adult is at risk of actual or potential harm or abuse or whether there are sufficient grounds to suspect abuse or potential radicalisation. Following this the DSL may decide that further action is necessary and will refer it on to an external agency or that the situation can be monitored within Bright Direction Training. All issues raised will be recorded in the Safeguarding folder with clear detail of the action taken and/or advice given. The Safeguarding folder will act as a tool for the DSL to monitor the incidents being reported and the advice being given. Please refer to the BDT risk Ladder for guidance on actions that should be followed in Appendix 1.

Guidelines to follow when receiving a disclosure

Safeguarding must be the informed responsibility of all staff, senior management, freelance tutors and board members to ensure the learning environment is safe and secure for all. In order to do so they will need to consider and act on the 5 R's and refer to Bright Direction Trainings Risk Ladder in appendix 1:

The 5 R's

Recognition: The ability to recognise behaviour that may indicate abuse is of fundamental importance. Whether the abuse may occur on Bright Direction Training premises, in the home or in any other setting in which the learner may find themselves, all those playing a role in meeting learners' needs should be aware and informed so that possible abuse can be recognised, investigated and acted upon effectively. Signs and symptoms of abuse of young people and/or vulnerable adults may include direct disclosure (more on this in the 'signs of abuse and radicalisation' section). All staff will be trained to understand signs of possible abuse and know how, where and to whom to report concerns. Staff and freelance tutors should be able to recognise signs of abuse, should know how to respond to learners, how to use appropriate questioning and how to record information accurately. They should be aware of the Bright

Direction Training Safeguarding Procedure Flowchart and how to follow this. Bright Direction Training staff will also be trained to recognise the potential signs of radicalisation in a person (more on this in the 'signs of abuse and radicalisation' section).

Response: Appropriate response by our staff and tutors is vital. No report of or concern about possible abuse should ever be ignored. Staff and tutors should be trained how to determine the most appropriate response and to clarify precise details. They should be aware of the correct protocol i.e.

- Do not lead or probe with questions.
- Remain calm and demonstrate interest and concern while investigating.
- Tell the learner that you cannot promise not to disclose information, but this will be done on a 'need to know' basis.
- Reassure that they have done the correct thing in reporting their concerns and that you will do anything possible to help.
- Record any disclosures via the company's DSL

Reporting: Concerns will be reported to one of the Learning co-ordinators who will record the issue on Incident Report Form and inform the DSL. The DSL or Learning Co-ordinator will discuss next steps with the person reporting or give relevant advice if this is all that is needed, especially where the issue being raised is found to not be a safeguarding issue but one of student welfare. Once concerns have been reported, responsibility for taking any further decisions and/ or actions resides with the DSL.

People in a position of trust – Where concerns are raised in relation to people in position of trust, they must follow the procedure as set out in the safeguarding policy and whistleblowing policy.

Recording: BDT staff are trained to ensure allegations are recorded precisely (if necessary), using the words of the complainant and including accurate quotation. This can include observations about the physical and emotional state of the individual sharing their concerns. Information is recorded and stored securely, confidentially and only accessible to those who need to access it as part of the action taken to resolve the complaint or allegation.

Referral: The decision to refer a complaint or allegation lies with the DSL, having gathered and examined all relevant information. No one else will investigate such a situation. Investigation will involve questioning colleagues, learners, carers, learners, tutors and the complainant, as relevant and necessary. The DSL will have access to organisations and websites in order to seek guidance and help for learners. The DSL will decide what action (if any) to take; i.e. whether to monitor and record a concern or refer it on.

The DSL will maintain and record all safeguarding cases, including any referrals to external agencies.

| <i>Safeguarding personnel list and contact details Position</i> | <i>Name</i> | <i>Contact numbers</i> |
|---|-----------------|------------------------|
| Designated Safeguarding Lead | Jamie MacGregor | 07724298696 |
| Designated Safeguarding Officer | Eden Kavannagh | 01204 859859 |
| Designated Safeguarding Officer | Rob Gibbons | 01204 859859 |

Definitions of specified safeguarding issues

Child sexual exploitation – exploitative situations and relationships where young people receive something (for example food, accommodation, drugs, alcohol, gifts, money or in some cases simply affection) as a result of engaging in sexual activities. Sexual exploitation can take many forms ranging from the seemingly ‘consensual’ relationship, to serious organised crime by gangs and groups.

Bullying including cyberbullying – Bullying is behaviour by an individual or group, repeated over time, that intentionally hurts another individual or group either physically or emotionally. Bullying can take many forms (for instance, cyberbullying via text messages or the internet) and is often motivated by prejudice against particular groups. Many experts say that bullying is an imbalance of power between perpetrator and victim, physical or psychological.

Domestic Violence – 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. The abuse can encompass, but is not limited to psychological, physical, sexual, financial and emotional.

Drugs – The misuse of drugs. Drugs being referred to as alcohol, tobacco, illegal drugs, medicines, new psychoactive substances (legal highs) and volatile substances.

Fabricated or induced illness – There are three main ways of a carer fabricating or inducing illness in a child. These are not mutually exclusive and include, fabrication of signs and symptoms including that of past medical history, falsification of hospital charts and records and specimens of bodily fluids and also falsification of letters and documents, and induction of illness by a variety of means.

Faith abuse – Certain kinds of child abuse that are linked to faith or belief. This includes concepts of witchcraft and spirit possession, demons or the devil acting through children or leading them astray (traditionally seen in some Christian beliefs), the evil eye or djinns (traditionally known in some Islamic faith contexts) and dakini (in Hindu context). Ritual or multi murders where the killing of children is believed to bring supernatural benefits or the use of their body parts is believed to produce potent magical remedies.

Forced marriage – A forced marriage is a marriage in which one or both spouses do not (or in the case of some adults with learning or physical disabilities, cannot) consent to the marriage and duress is involved.

Gangs and youth violence – Street gangs for whom crime and violence are a core part of their identity, although delinquent peer groups can also lead to increased behaviour and youth offending. Although some group gatherings can lead to increased antisocial behaviour and youth offending, these activities should not be confused with serious violence in a gang.

Private fostering – A private fostering arrangement is essentially one that is made privately (that is to say without the involvement of local authority) for the care of a child under the age of 16 (under 18 if disabled) by someone other than a parent or close relative with the intention that it should last for 28 days or more.

Female genital mutilation – FGM comprises all procedures involving the partial or total removal of the female external genitalia or other injury to the female genital organs for non-medical reasons.

Radicalisation – Radicalisation is defined in the prevent strategy as ‘the process by which a person comes to support terrorism and forms of extremism leading to terrorism.

Sexting – The exchange of self-generated sexually explicit images, through mobile picture messages or webcams over the internet.

Teenage relationship abuse – Can include, emotional abuse – name calling, insults, isolation from friends, controlling what you wear and where you go, constant checking up, physical abuse – hitting, punching, pushing, biting, kicking, using weapons, sexual abuse – forcing sex, unwanted kissing or touching, being made to watch pornography against will, pressure to not use contraception, financial abuse – taking/controlling money, forcing you to buy them things, forcing you to work or not work.

Trafficking – a trafficking of persons means the recruitment, transportation, transfer, harbouring or receipt of persons, by means of threat or use of force or other forms of coercion, of abduction, of fraud, of deception, of the abuse of power or of position of vulnerability or of the giving or receiving of payments or benefits to achieve consent of a person having control over another person, for the purpose of exploitation.

Mental health – good or positive mental health is more than the absence or management of mental health problems, it is the foundation for wellbeing and effective functioning both for individuals and for their communities.

Upskirting - Upskirting typically involves taking a picture under a person’s clothing without them knowing, with the intention of viewing their genitals or buttocks to obtain sexual gratification, or cause the victim humiliation, distress or alarm.

Child criminal exploitation – occurs where an individual or group takes advantage of an imbalance of power to coerce, control, manipulate or deceive a child or young person under the age of 18. The victim may have been criminally exploited even if the activity appears consensual.

Child drug exploitation - This can involve children being trafficked away from their home area, staying in accommodation and selling and manufacturing drugs. This can include: Airbnb and short term private rental properties. budget hotels. This has become strongly associated with one specific model known as ‘[county lines](#)’, but it can also include children being forced to work in cannabis factories, being coerced into moving drugs (often forced to insert drugs in their vagina or anus in a practice known as ‘plugging’) or money across the country, forced to commit financial fraud, forced to shoplift or pickpocket

Child on child abuse – Children can abuse other children. This is generally referred to as child on child abuse and can take many forms. It can happen both inside and outside of school/college and online. It is most likely to include, but may not be limited to: bullying (including cyberbullying, prejudice-based and discriminatory bullying); abuse in intimate personal relationships between children/young people; physical abuse; sexual violence, such as rape, assault by penetration and sexual assault; sexual harassment; non-consensual sharing of nude and semi-nude images and/or videos; causing someone to engage in sexual activity without consent; upskirting; and initiation/hazing type violence and rituals.



Sources of Advice and Support Contact Information for signposting

Local Adult Safeguarding Contact Details:

Bolton

- Email: Safeguardingadults@bolton.gov.uk
- Contact Number: 01204 337000

Manchester

- Telephone: 0161 234 5001

Wigan

- <https://apps.wigan.gov.uk/adultsafeguardingreferrals/>

Birmingham

- Email: CSAdultSocialCare@birmingham.gov.uk
- Telephone: [0121 303 1234](tel:01213031234)

South Yorkshire

- Email: asc.howdenhouse@sheffield.gov.uk
- Telephone: 0114 273 4908.

West Yorkshire

- Email: leedsadults@leeds.gov.uk.
- Telephone: 0113 222 4401 / 0113 378 0644

NATIONAL SUPPORT

Adult Learning

Provides information and advice on many different aspects of adult learning including financial advice

NIACE - promoting adult learning -Website: <http://www.niace.org.uk/>

Advice guide

Provides information on a range of topics including contact details of the National Association of Citizens Advice Bureaux

Website: www.adviceguide.org.uk

Autistic Society

Website: <http://www.autism.org.uk/> Email: nas@nas.org.uk

Bereavement

Telephone: 0844 477 9400

Young Person's Free Helpline: 0808 808 1677



Website: <http://www.cruse.org.uk>

Email: helpline@cruse.org.uk

Blind and Deaf Support

See Deaf and Blind Support below

Blind Support

Royal National Institute for Blind People

Website: <http://www.rnib.org.uk/>

Telephone: 0303 123 9999

Bullying and Child Abuse Bullying UK

Website: <http://www.bullying.co.uk>

Email help@bullying.co.uk Kidscape

Telephone: Parents' Anti-Bullying Helpline 08451 205 204 Website:

<http://www.kidscape.org.uk/>

Carers

Website: <http://www.carers.org/>

Email: info@carers.org

Young carers support

Telephone: 0844 800 4361

Website: <http://www.youngcarers.net/>

Email: youngcarers@carers.org

Child Exploitation and Online Protection Centre

Telephone: 0870 000 3344

Website: <http://www.ceop.police.uk/>

Counselling

British Association for Counselling and Psychotherapy

Telephone: 01455 883316

Website: <http://www.bacp.co.uk/>

Email: bacp@bacp.co.uk



NHS Services Search

Website: <http://www.nhs.uk/servicedirectories/pages/servicesearch.aspx>

Deaf Support

Website: <http://www.actiononhearingloss.org.uk/>

Deaf and Blind Support

Website: <http://www.sense.org.uk/>

Email: info@sense.org.uk

Domestic Abuse

Telephone: 0844 8044 999 / 0808 808 8141

Website: <http://www.nationaldomesticviolencehelpline.org.uk>

Email: office@ncdv.org.uk

Drugs

Talk to Frank – for advice and support

Telephone: 0800 77 66 00

Website: <http://www.talktofrank.com>

Email: via the talktofrank website

Elder Abuse

Provides support to prevent the abuse of vulnerable older adults

Telephone: 0808 808 8141

Website: <http://www.elderabuse.org.uk/>

Employment Advice

Jobcentre plus telephone number: 0845 6060 234

Website: <http://www.direct.gov.uk/en/Employment/index.htm>

ACAS – Helps employers and employees solve their problems at work

Website: <http://www.acas.org.uk/index.aspx?articleid=1461>

Faith, Race and Religion

Help groups aimed at particular faiths, races and religions

Muslim

Website: <http://www.myh.org.uk>



Female Genital Mutilation

Acting against violation of women's rights

Website: <http://www.equalitynow.org>

Financial

For free financial advice

Website: <http://www.moneyadvice.service.org.uk/>

Forced Marriage

Speaking up for girls rights

Website: <http://www.plan-uk.org>

Government forced marriage unit

Website: <https://www.gov.uk/forced-marriage>

Housing Benefits

Housing and homelessness charity - Shelter

Telephone: 0808 800 4444

Website: <http://england.shelter.org.uk/>

Government assistance

Website: <http://www.direct.gov.uk/en/index.htm>

Internet Safety

For guidance on internet safety please refer to the following websites:

<http://www.thinkuknow.co.uk>

<http://www.chatdanger.com>

In addition please refer to Child Exploitation and Online Protection Centre information above

Learning Difficulties

Respond – supporting people with learning difficulties

Telephone: 0808 808 0700

Website: <http://www.respond.org.uk/>

Legal

For community advice covered by Legal Aid

Telephone: 0845 345 4 345

Website: <http://www.communitylegaladvice.org.uk/>

Medical Assistance and Health Issues

NHS Walk In Centres (No appointment needed)

NHS advice – non emergency medical and dental help

Telephone: 111

NHS Services Search

Website: <http://www.nhs.uk/servicedirectories/pages/servicesearch.aspx>

Mental Health

Telephone: 0845 766 0163

Website: <http://www.mind.org.uk/>

Email: contact@mind.org.uk

In addition refer to counselling section above

Parent Support

Support line for parents with teenagers

Telephone: 0808 800 2222

Website: <http://www.gotateenager.org.uk>

Personal Safety

Key advisor on personal safety, safety policies and safety at work

Telephone: 020 7091 0014

Website: <http://www.suzylamplugh.org/>

Email: info@suzylamplugh.org

Racism

Advice on dealing with racist bullying

Website : <http://www.bullying.co.uk>

Relationship Problems

Telephone: 0300 100 1234 / 0845 456 130

Website: <http://www.relate.org.uk>

Email: enquiries@relate.org.uk

Samaritans

Telephone : 08457 909090

Website : www.samaritans.org



Self Harm

Self Harm UK - Supporting young people affected by self harm

Website - www.selfharm.co.uk

Sexual Abuse

RAINN – Rape, Abuse and Incest, National Network

Website: <https://www.rainn.org/get-help>

Sexuality

Telephone: 08000 502020

Website: <http://www.stonewall.org.uk>

Terrorism

The latest information on threat levels and how to report suspicions

Website : <https://www.gov.uk/terrorism-national-emergency>

Victim Support

Telephone : 0845 3030900

Whistle Blowing

Telephone : 020 7404 6609

Website : <http://www.pcaw.co.uk/>



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Young Persons Support

Child line

Telephone: 0800 1111

Website:

www.childline.org.uk

Child Rights

Website: <http://www.crae.org.uk/>

NSPCC

Telephone: 0808 800

5000 Website:

www.nspcc.org.uk

Email: help@nspcc.org.uk

Prince's Trust

Support with barriers to their working

lives Telephone: 0800 842 842

Website: <http://www.princes-trust.org.uk/>

Young people in care

Website: <http://www.anationalvoice.org/>