

Safeguarding & Wellbeing Policy

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1. Objective

The objective of this policy is to ensure that BMS Progress provides a safe, supportive, and inclusive environment in which all learners, apprentices, staff, and visitors are protected from harm. This policy sets out the framework through which BMS Progress safeguards children, young people, vulnerable adults, and promotes wellbeing, dignity, and respect for all.

Safeguarding and wellbeing underpin all activities at BMS Progress and are central to our organisational values, culture, and practices.

2. Introduction

Safeguarding is Everybody's Responsibility.

BMS Progress is committed to safeguarding and promoting the welfare of all learners, apprentices, staff, and visitors. We recognise that safeguarding is everyone's responsibility and that all individuals who come into contact with children, young people, and vulnerable adults have a role to play in protecting them from abuse, neglect, exploitation, and harm.

We acknowledge that some individuals, particularly those aged 18 and under or those identified as vulnerable adults, may require enhanced safeguarding measures. Through robust policies, training, and procedures, BMS Progress aims to identify concerns early, provide appropriate support, and prevent issues from escalating.

BMS Progress promotes an ethos of safeguarding, with zero tolerance of abuse and harmful behaviour, ensuring that anyone raising a concern feels confident that it will be listened to, taken seriously, and acted upon appropriately.

This policy has been produced in conjunction with:

- Prevent Policy
- Safer Recruitment Policy
- Whistleblowing Policy
- E-Safety Policy
- Complaints Policy
- Learner Code of Conduct

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3. Definitions

3.1 Definitions for the purposes of this policy

Child: The Children's Act 1989 defines a 'child' as a person under the age of 18.

The fact that a child has reached 16 years of age, is living independently or is in further education, is a member of the armed forces, or is custody in the secure estate for children and young people, does not change his or her status or entitlement to services or protection.

Vulnerable Adult: The Safeguarding Vulnerable Groups Act 2006 Section 59 defines a 'vulnerable adult' as a person aged 18 and over and:

- Receiving a social care service
- Receiving a health service
- Living in sheltered accommodation
- Detained in custody or under a probation order
- Requiring assistance in the conduct of his/her affairs
- Receiving a service or participating in an activity targeted at older people
- Persons with disabilities (learning or physical)
- Persons with mental health conditions
- Victims of abuse or those at risk of abuse.

Safeguarding: Protecting individuals from maltreatment, preventing impairment of health or development, and ensuring safe and effective care.

Abuse: Any behaviour that causes harm, endangers life, or violates an individual's rights, whether intentional or unintentional.

3.2 Types of Abuse

Safeguarding concerns may include, but are not limited to:

- **Physical abuse:** Assault, inappropriate restraint, misuse of medication.
- **Sexual abuse:** Harassment, non-consensual contact, sexual exploitation, rape.
- **Psychological abuse:** Bullying, intimidation, coercion, isolation, verbal abuse.
- **Financial abuse:** Theft, fraud, exploitation of finances or benefits.
- **Domestic abuse:** Any controlling, coercive, threatening or violent behaviour.
- **Modern slavery:** Human trafficking, forced labour, exploitation.
- **Neglect:** Failure to meet basic physical or emotional needs.
- **Discriminatory abuse:** Abuse linked to protected characteristics.

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- Organisational abuse: Poor care or systemic failings within institutions.
- Self-neglect: Failure to care for personal health, hygiene, or safety.
- Online abuse: Abuse occurring via digital platforms or technology.
- Forced marriage and Female Genital Mutilation (FGM): Illegal practices involving coercion or harm.
- Radicalisation: The process by which individuals come to support extremism or terrorism.
- Child sexual and criminal exploitation: Coercion or manipulation of children into abusive or criminal activity.

4. Compliance with Legislation

This policy complies with all relevant safeguarding legislation and statutory guidance, including but not limited to:

- Keeping Children Safe in Education (2023)
- Working Together to Safeguard Children (2022)
- Children Act 1989 and 2004
- Safeguarding Vulnerable Groups Act 2006
- Education & Skills Act 2008
- Education and Training (Welfare of Children) Act 2021
- Equality Act 2010 and Public Sector Equality Duty
- Data Protection Act 2018
- Human Rights Act 1998
- Counter-Terrorism and Security Act 2015 (Prevent Duty)

5. Responsibilities

5.1 BMS Progress Responsibilities

BMS Progress is responsible for:

- Establishing and maintaining effective safeguarding systems and procedures
- Appointing trained Designated Safeguarding Leads
- Ensuring safer recruitment practices, including DBS checks
- Providing regular safeguarding, Prevent, and wellbeing training
- Maintaining accurate safeguarding records and logs

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- Working in partnership with statutory agencies and safeguarding boards
- Ensuring safeguarding considerations are embedded in all policies and activities

5.2 Employee Responsibilities

All staff must:

- Act in the best interests of learners at all times
- Uphold professional boundaries and appropriate conduct
- Complete mandatory safeguarding and Prevent training annually
- Be vigilant to signs of abuse, neglect, or exploitation
- Prioritise a safeguarding issue brought to their notice over all other work
- Report safeguarding concerns immediately to the DSL/DDSL
- Never investigate concerns themselves

5.3 Learner, Visitors & Associates Responsibilities

All learners, visitors, contractors, and associates are expected to:

- Treat others with dignity and respect
- Adhere to codes of conduct
- Report safeguarding concerns where they feel unsafe or worried about others

6. Procedure

It is the responsibility of everyone to report any concerns about abuse immediately to the Designated Safeguarding Lead (DSL) or Deputy DSL. Where concerns relate to the DSL, a Director must be contacted.

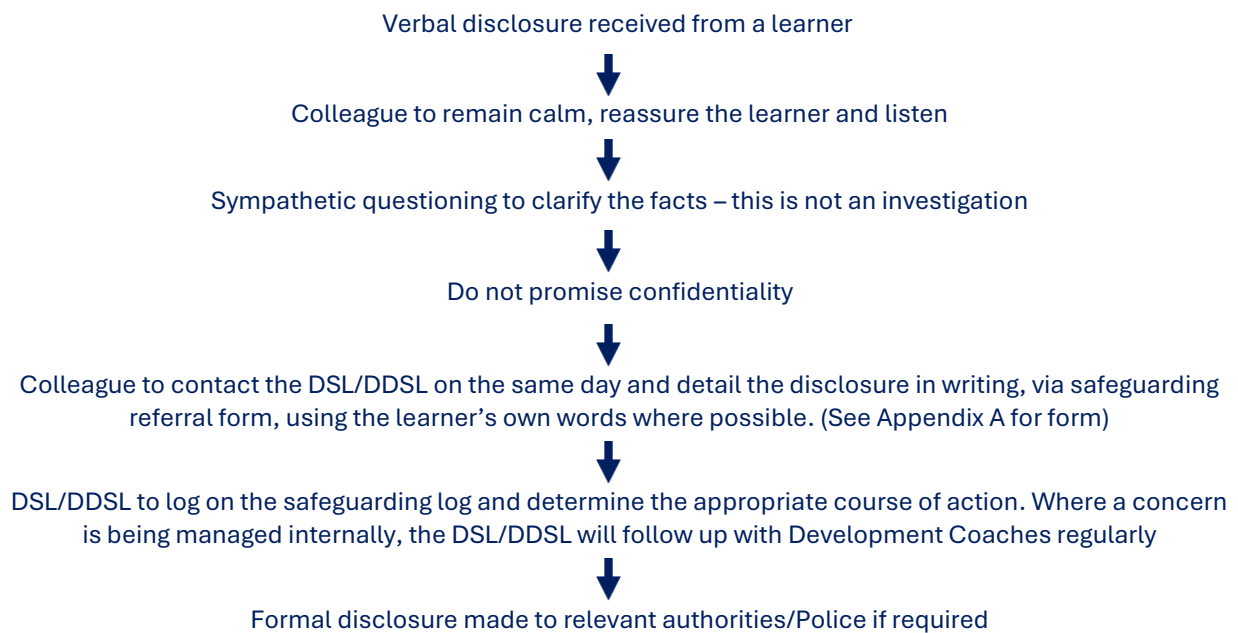
The safeguarding process includes:

- Immediate response to disclosures
- Accurate recording using safeguarding referral forms
- Assessment of risk by the DSL/DDSL
- Internal support measures where appropriate
- Referral to statutory agencies or police when required

All concerns are logged on the Safeguarding Log and monitored until resolved.

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6.1 Managing a Safeguarding Issue



6.2 Procedure for allegation against staff

All staff must act in a professional manner at all times and take care not to place themselves in a vulnerable position when working with children, young people, apprentices or adults at risk. Wherever possible, one-to-one meetings should be conducted in a visible environment and in view of other adults.

Occasionally, complaints or allegations may be made against a member of staff. These will be managed sensitively and fairly to ensure that both the individual raising the concern and the member of staff involved are appropriately safeguarded.

Any staff member receiving an allegation must treat it seriously and immediately inform their line manager, who will escalate the matter to the Designated Safeguarding Lead (DSL) and Managing Director. Where the allegation concerns the staff member's line manager, it must be reported directly to the DSL and/or Managing Director.

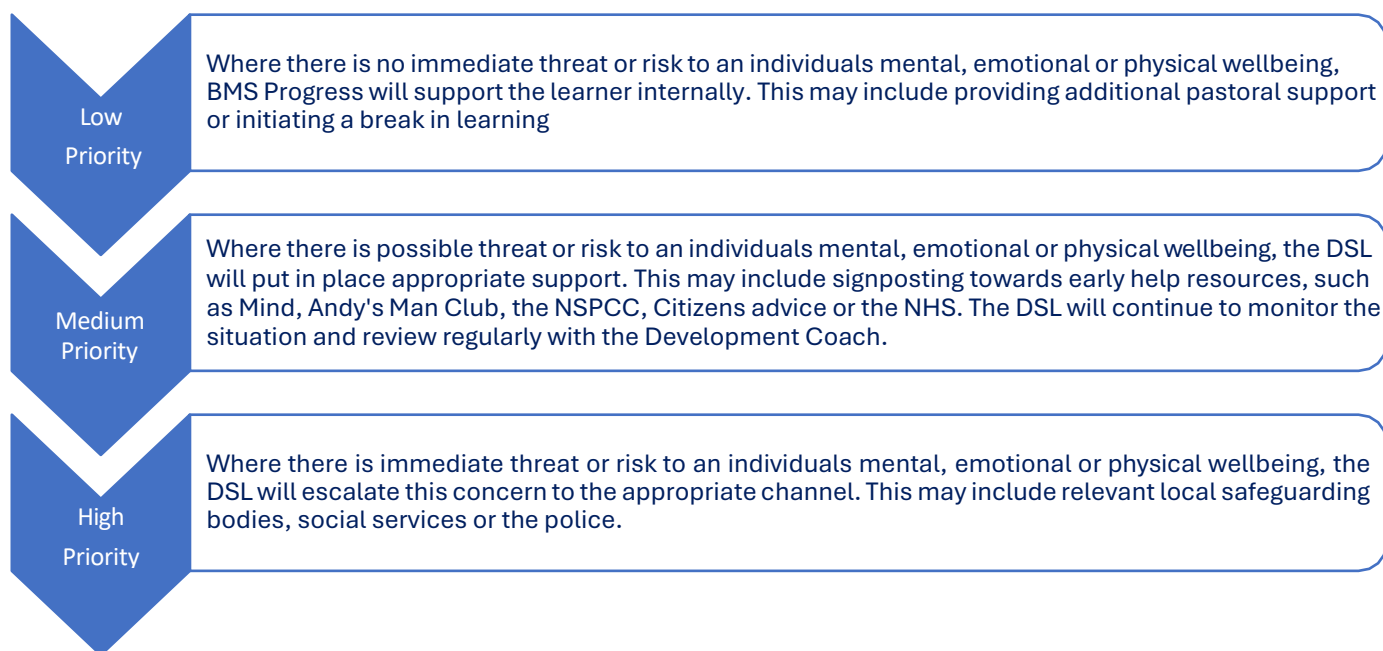
No attempt should be made to investigate the matter, gather statements, or interview individuals unless directed by the DSL and Managing Director. Where necessary, a staff member may be suspended while an investigation is undertaken.

If an allegation is found to have been made maliciously, the DSL will determine an appropriate response, which may include disciplinary action or other suitable measures. Where a member of staff is dismissed, or leaves employment during a safeguarding investigation, the DSL will notify the Disclosure and Barring Service (DBS) as required.

7. Disclosures

The type of disclosure and level of concern will dictate the next steps that the DSL/DDSL take. These are defined as:

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Concerns may arise through:

- Direct disclosure from a learner
- Observation of behaviour or indicators of abuse
- Third-party information
- Online activity or communications

All concerns, regardless of perceived severity, must be reported promptly. Delays in reporting may place individuals at further

8. Support

BMS Progress is committed to providing appropriate support, including:

- Pastoral and wellbeing support
- Reasonable adjustments for vulnerable learners
- Education on healthy relationships, consent, and online safety
- Support for learners affected by abuse, harassment, exploitation, or criminal influence
- Collaboration with employers, families, and external agencies where appropriate

Support is tailored to age, need, and vulnerability.

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9. Policy Enforcement

Compliance with this policy is mandatory. Monitoring includes:

- Training completion records
- Safeguarding audits and reviews
- Central safeguarding and DBS registers
- Quality assurance processes

Failure to comply may result in disciplinary action or referral to relevant authorities.

10. Consequences

Failure to adhere to this policy may:

- Place individuals at risk of harm
- Result in disciplinary action for staff
- Lead to dismissal and referral to the Disclosure and Barring Service where safeguarding thresholds are met
- Result in termination of contracts for associates or partners

11. List of Contacts

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12. Additional Statements concerning Safeguarding

12.1 Statement on Child-on-Child Abuse

BMS Progress is committed to creating a safe learning environment and a culture in which sexual harassment, sexual abuse and online abuse are not tolerated. Staff are expected to model respectful and appropriate behaviour, and learners are supported to understand what constitutes acceptable and unacceptable behaviour, and to feel confident in seeking help when needed.

In line with Ofsted's review of sexual abuse in schools and colleges, BMS Progress recognises that the absence of reported incidents does not mean abuse is not occurring. We work collaboratively to ensure that staff, learners and employers of those aged 18 or under are confident in recognising potential signs of child-on-child abuse and understand how to report concerns.

Child-on-child abuse may include, but is not limited to:

- Sexual violence, harassment and upskirting
- Sexting
- Receiving or sending unsolicited sexual images or videos
- Bullying and cyberbullying
- Physical assault

12.2 Statement on Cyber-bullying and E-Safety

BMS Progress recognises that recognise that online harm presents a significant and growing risk to children, young people and vulnerable adults, and to ensure that concerns arising from digital environments are identified, reported and managed in line with safeguarding procedures.

Cyber-bullying is the use of electronic communication to intimidate, harass or abuse others. This can occur via mobile phones, tablets, computers and online platforms such as social media, messaging apps and online forums. Children using social media without supervision and vulnerable adults may be particularly at risk due to increased emotional or cognitive vulnerability.

Cyber-bullying and online abuse may include:

- Flaming: Online arguments involving hostile or offensive messages
- Denigration: Posting or sharing harmful or false information about someone
- Exclusion: Deliberately leaving someone out of online groups or activities
- Outing: Sharing private or sensitive information, images or videos
- Impersonation: Pretending to be someone else to cause harm
- Harassment: Repeated sending of malicious messages
- Cyberstalking: Persistent harassment, including threats of harm

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12.3 Statement on Sexual Harassment and Sexual Consent

BMS Progress adopts a zero-tolerance approach to sexual harassment and sexual violence, as set out in the BMS Progress Sexual Harassment Policy. All staff are trained to recognise sexual harassment, support learners appropriately, and report all concerns to the safeguarding team. Sexual harassment will never be dismissed as “banter” or a joke.

Sexual harassment is any unwelcome conduct of a sexual nature that causes offence, humiliation or intimidation, or creates a hostile environment. It may be physical, verbal or non-verbal.

Examples include, but are not limited to:

- Unwelcome physical contact or sexual assault
- Sexual advances, comments, jokes or gestures
- Threats or rewards used to gain sexual favour
- Repeated unwanted invitations or contact
- Sex-based insults
- Sending or displaying sexually explicit messages or materials
- Wolf-whistling

Anyone can be a victim of sexual harassment, regardless of sex or sexual orientation. What matters is that the behaviour is unwanted. Sexual harassment may arise from power imbalances, such as between managers and staff or trainers and learners, and is prohibited in all settings, including training environments, online spaces and work-related social events.

All harmful sexual behaviour, including online sexual abuse, must be reported to the Designated Safeguarding Lead (DSL). Concerns are taken seriously, responded to promptly, and recorded on the safeguarding log. Where appropriate, a learner’s employer will be informed.

Sexual consent means freely agreeing to take part in sexual activity, with the capacity and freedom to make that choice. Consent can be withdrawn at any time and may apply to some activities but not others. Any sexual activity without consent is sexual violence.

Through the personal development curriculum and relevant subject delivery, BMS Progress educates learners and apprentices about consent and healthy relationships. All staff complete training on induction, with annual updates as part of a whole-provider approach to prevention.

12.4 Statement on Prevent – Radicalisation and Extremism

Under the Counter-Terrorism and Security Act 2015, BMS Progress has a duty to prevent individuals from being drawn into terrorism (the Prevent duty), as set out in the BMS Progress Prevent Policy.

The Prevent policy aims to maintain a safe, supportive learning and working environment. BMS Progress recognises that exposure to extremist views can place learners at risk of harm; therefore, concerns relating to radicalisation or extremism are treated as safeguarding issues and managed through established safeguarding reporting and support procedures.

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12.5 Statement on County Lines

County Lines refers to organised gangs that exploit children and vulnerable adults to transport and sell drugs, often using mobile “deal lines.” These gangs use coercion, intimidation, violence, and sexual exploitation to control victims.

Children and vulnerable adults involved should be seen as victims rather than offenders. Risks are higher for those who have experienced neglect, abuse, social isolation, poverty, homelessness, mental health issues, learning disabilities, substance misuse, or connections to gangs.

Signs of involvement may include unexplained travel, multiple phones or SIM cards, sudden changes in behaviour, withdrawal from peers, unexplained injuries, or relationships with controlling individuals.

Including County Lines in our safeguarding policy ensures staff can recognise exploitation, understand the risks, and take appropriate action to protect learners and vulnerable adults.

12.6 Statement on the Designated Safeguarding Lead (DSL)

The DSL and Deputy DSL are responsible for:

- Receiving and recording safeguarding concerns from learners or staff.
- Promptly assessing information and clarifying details where needed.
- Making formal referrals to statutory safeguarding agencies or the police when required.
- Maintaining a single central register of all staff who liaise with learners or have access to learner data.
- Ensuring all staff have up-to-date DBS checks in line with policy requirements.
- Ensuring all staff complete annual safeguarding and Prevent training.

This policy has been approved by the Directors of BMS Progress and will be reviewed and updated as required.

Any questions should be directed to:

David Cooper (Operations Director) – 07812037117 / davidc@bmsprogress.com

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