

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, and reference will be made to these policies throughout:

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

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:

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- **Physical abuse:** Including, but not limited to hitting, punching, pushing or other physical assault. Inappropriate use of restraint, purposefully making someone uncomfortable (i.e. opening a window to make them cold), misuse of medication, unauthorised restraint.
- **Sexual abuse:** Including but not limited to harassment (ie wolf whistling, misogynistic or sexist comments and ‘jokes’), abuse (ie inappropriate touching, unsolicited hugs/kisses, sexual photography, non-consensual masturbation) and rape or attempted rape.
- **Psychological abuse:** Including but not limited to enforced or manipulated isolation of an individual from services, social functions, friends and education. Failure to respect privacy. Intimidation, coercion, threatening language, humiliation, bullying (including cyber-bullying) and verbal abuse. Threats of harm or abandonment. Preventing someone from meeting their cultural and religious needs.
- **Neglect:** Failing to provide adequate care for an individual. This could include failure to provide or allow access to food, shelter, heating, personal and medical care. Preventing access to glasses, hearing aids etc. Failure to administer medication as prescribed.
- **Financial abuse:** Including but not limited to theft of money or possessions. Fraud and scamming, including using someone else’s identity to access financial services and loans. Preventing a person from accessing their own money, benefits or assets.
- **Domestic abuse:** Can be all of the above. Please see the government’s statutory guidance on Domestic abuse for further details.¹
- **Modern slavery:** This is where an individual is exploited, forced to work or sold. It can include human trafficking, forced labour, sexual exploitation and debt bondage.
- **Discriminatory abuse:** Unequal treatment of an individual based on protected characteristics as defined by the Equality Act of 2010². Verbal abuse, inappropriate language or derogatory remarks in relation to a protected characteristic. Harassment or deliberate exclusion on the grounds of a protected characteristic.
- **Organisational abuse:** The mistreatment of people in their workplace due to poor or inadequate care or support, or systematic poor practice.
- **Self-neglect:** Lack of self-care, including personal hygiene, health and surroundings. Self – harm, inability or unwillingness to manage personal affairs
- **Online abuse:** Online abuse is any type of abuse that happens on the internet. It can happen across any device that's connected to the web, like computers, tablets and mobile phones. And it can happen anywhere online, including: social media, text messages and messaging apps, emails, online chats, online gaming. www.nspcc.org.uk

For the purposes of this policy, BMS Progress also includes the following:

- **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

¹ <https://www.gov.uk/government/publications/domestic-abuse-act-2021/domestic-abuse-statutory-guidance-accessible-version#chapter-2--understanding-domestic-abuse>

² <https://www.legislation.gov.uk/ukpga/2010/15/contents?view=plain>

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criminal activity, including county lines.

- **Bullying**, including cyberbullying
- **Child-on-child abuse (peer-on-peer)**, including harmful sexual behaviour
- Gangs, youth violence and serious violence
- So-called “honour-based” abuse
- Youth-produced sexual imagery (sexting)

3.3 Heightened Awareness

We recognise that some learners may be experiencing periods of heightened vulnerability due to personal circumstances such as bereavement, family breakdown or divorce, menopause, or other significant life events.

Where staff become aware of such factors, we take a proactive and trauma-informed approach to safeguarding. This includes offering timely pastoral support, adjusting learning expectations where appropriate, maintaining regular check-ins, and ensuring learners know how to access internal and external support services.

All staff are expected to remain vigilant to changes in behaviour or wellbeing, respond sensitively, and escalate concerns in line with safeguarding procedures. Our aim is to create a safe, inclusive environment where learners feel understood, supported, and able to continue their learning without disadvantage.

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 – KCSIE (2025)
- Working Together to Safeguard Children (2023)
- 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)

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5. Safeguarding Roles and Responsibilities

The Operations Director, David Cooper, is responsible for the oversight of the company's Safeguarding and Wellbeing Policy.

5.1 Governance

BMS have appointed a member of the Advisory Board to be responsible for Safeguarding, David Cooper. It is their responsibility to:

- Maintain an up-to-date knowledge of national guidance concerning safeguarding.
- Ensure the DSL and DSOs undertake regular training in Safeguarding.
- Ensure BMS Progress has an up-to-date Safeguarding Policy in place.
- Liaise with the Managing Director and DSL over matters regarding Safeguarding and Prevent.
- Regularly report back to the board on the current effectiveness of safeguarding within BMS Progress.
- Ensuring safeguarding considerations are embedded in all policies and activities.

5.2 All employees:

- Contribute to creating a safe learning environment for all.
- Are aware of and follow BMS Progress's Safeguarding policies and procedures; they recognise, respond, and report any concerns that may be raised about the safety and welfare of a vulnerable person.
- 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 Operational managers, Development Coaches and Trainers:

- Ensure that the learning environment is safe and that Safeguarding is embedded within coaching and teaching practices to educate learners on staying safe, building resilience, and developing critical thinking skills.
- Report safeguarding and wellbeing concerns through the correct channels.

5.4 Designated Safeguarding Officers:

- Respond to Safeguarding concerns within agreed timescales and keep accurate case notes.

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- Report to the DSL to escalate any concerns that may require more specialist support.
- Refer cases of suspected abuse or concern to the appropriate services which may include child or adult social care (Local Authority) or Police.
- Carry out assessments to determine the level of risk, raise concerns inform the Local Authority and other partner organisations of any concerns.
- Refer people who require support to mental health, or substance misuse services and other charity organisations.
- Discuss cases with BMS Progress's employees on a "need to know basis" to protect the person's right to confidentiality.
- Raise awareness about Safeguarding on an ongoing basis.
- Liaise with any case managers, social care workers, and appropriate senior leadership or employees regarding any matters of Safeguarding and safety.

5.5 Designated Safeguarding Lead and Deputy Designated Safeguarding Lead:

- Will always be available during BMS Progress's open hours or arrange suitable cover when this is not possible.
- 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.
- Ensuring all staff complete annual safeguarding and Prevent training
- Lead safeguarding, Prevent and safer-recruitment across all apprenticeship provision.
- Advise senior leaders/board on safeguarding risks, incidents, trends and required actions.
- Act as main contact for all safeguarding and Prevent concerns about apprentices.
- Decide on actions and make referrals to social care, adult safeguarding, police, Channel and other agencies.
- Maintain a single central register of all staff and colleagues who liaise with learners or have access to learner data.
- To ensure all staff have updated DBS checks, as aligned with the requirements set out in the BMS Progress Safer Recruitment policy.
- Oversee secure case records, information-sharing and transfer of safeguarding files.
- Ensure all staff (including Associates) receive induction and regular safeguarding Prevent and online-safety training.
- Set and monitor safeguarding expectations with employers, including in agreements and due-diligence checks.
- Ensure reviews/tri-partite meetings explicitly check apprentice welfare, safety and bullying/harassment.
- Coordinate support and risk management for vulnerable apprentices and monitor data for

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safeguarding patterns.

- Lead on Prevent risk assessment, online-safety arrangements, and keeping policies aligned with current guidance.

5.6 Learners

- Complete all safeguarding modules via BMS Progress' Aptem platform including British Values, radicalisation and extremism awareness, sexual harassment and staying safe online.
- Read and adhere to BMS Progress's Safeguarding policy and procedures.
- Develop and take responsibility (at a level that is appropriate for their individual age, ability and vulnerabilities) for keeping themselves and others safe, including online.
- Treat others with dignity and respect and adhere to codes of conduct
- Report safeguarding concerns where they feel unsafe or worried about others

5.7 Employers

- Provide a safe, inclusive and supportive working environment for all apprentices.
- Protect apprentices from harm, discrimination, bullying, harassment and unsafe working practices.
- Ensure appropriate day-to-day supervision is in place and proportionate to the apprentice's role and experience.
- Make sure apprentices know who they can speak to within the workplace if they feel unsafe or have a concern.
- Report any safeguarding or wellbeing concerns promptly to the training provider's Designated Safeguarding Lead.
- Work in partnership with the training provider to promote wellbeing and maintain open communication about any concerns.
- Support reasonable adjustments and respond sensitively to personal or contextual factors affecting safety, attendance or performance.
- Follow agreed safeguarding procedures and contribute to a culture where apprentices feel safe, valued and able to thrive.

5.8 Visitors & Associates Responsibilities

Any member of staff hosting a visitor is responsible for providing access to this policy via our website and all visitors will be expected to:

- act responsibly and in accordance with health and safety and to seek clarification from a member of staff if they do not understand something.
- report any safeguarding concerns they identify or notice during a visit to a member of staff immediately

All staff inviting external speakers should ensure they follow the procedures for authorisation set out in the Guest Speaker Policy.

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6. Safer Recruitment and Safe Working Practices

The organisation operates robust safer recruitment practices which are outlined in BMS Progress Safer Recruitment Policy. These include:

- Enhanced DBS checks where roles involve contact with learners
- Verification of identity, qualifications and employment history
- Right to work checks
- At least one trained safer recruitment decision-maker

Safe working practices include:

- Professional boundaries with apprentices
- Appropriate use of technology and communication
- Lone working risk management
- Clear reporting and escalation routes

7. Induction, training and ongoing updates

All employees of BMS Progress LLP are in positions of trust with learners and external employers. Staff always need to be aware of this and act accordingly.

Training for all employees on safeguarding and wellbeing are included in the induction for all staff and an annual update on the policy will be included in team meetings.

The Designated Safeguard Lead will have Designated Lead Training and a Level 3 in Safeguarding Qualification.

Development Coaches and Trainers who deliver programmes to learners who are under 18 years of age at the time of starting their apprenticeship, will be required to read Part 1 of Keeping Children Safe in Education (2025). This will be arranged by the Designated Safeguarding Lead.

8. 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.

BMS Progress uses the 5 R's of safeguarding – Recognise, Respond, Report, Record and Refer – to structure its response to any safeguarding allegation or concern.

Recognise

All staff, associates and volunteers at BMS Progress are expected to remain vigilant to signs and indicators of abuse, neglect or exploitation, including disclosures made directly by an apprentice or third party. Staff must treat any allegation or concern as potentially serious, regardless of the perceived credibility of the person raising it.

Respond

Staff must respond calmly, listen carefully and avoid asking leading questions or investigating themselves. They should reassure the apprentice that they have done the right thing in speaking up, avoid making

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promises of confidentiality they cannot keep, and explain that the information will be shared only with people who need to know in order to keep them safe.

Report

As soon as possible – and always on the same working day – staff must report the allegation or concern to the Designated Safeguarding Lead (DSL) or a deputy DSL at BMS Progress, following the internal safeguarding reporting procedure.

[Safeguarding Referral Form](#)

If there is an immediate risk of serious harm, staff must contact the emergency services first and then inform the DSL at the earliest opportunity.

Record

Staff must make a factual, contemporaneous written record of what they have seen, heard or been told, including dates, times, names, the apprentice's own words where possible, and any actions taken. Opinions, assumptions and diagnoses must be avoided; the record should be signed, dated and submitted promptly to the DSL using the agreed [reporting system or form](#).

A member of the safeguarding team will risk assess the concern, acknowledge, and respond within 4 hours. Cases risk assessed a emergency or high priority the coach will be contacted immediately.

All concerns are logged on the Safeguarding Log and monitored until resolved. The DSL and DDSL will decide the level of concern. Each case will be revisited by DSL and DDSL monthly, and a log kept.

Refer

The DSL (or deputy DSL) is responsible for deciding whether the concern meets the threshold for referral to external agencies such as children's social care, adult safeguarding, the police, Channel/Prevent or the Local Authority Designated Officer (for allegations about staff). The DSL will coordinate further actions, liaise with employers where appropriate, and ensure ongoing support and safety planning for the apprentice while maintaining confidentiality and information-sharing in line with legislation and local safeguarding arrangements.

8.1 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. All online sessions with apprentices should be recorded via Teams, with the consent of the apprentice.

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,

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or leaves employment during a safeguarding investigation, the DSL will notify the Disclosure and Barring Service (DBS) as required.

8.2. Disclosures

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

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

Low Priority

Where there is no immediate threat or risk to an individual's mental, emotional or physical wellbeing, BMS Progress will support the learner internally. This may include providing additional pastoral support, offering wellbeing check-ins, liaising with the Development Coach, or initiating a break in learning where appropriate.

Medium Priority

Where there is a possible threat or emerging risk to an individual's mental, emotional or physical wellbeing, the DSL will put in place appropriate support measures. This may include signposting to early help resources such as Mind, Andy's Man Club, the NSPCC, Citizens Advice, or the NHS. The DSL will continue to monitor the situation closely and review progress regularly with the Development Coach.

High Priority

Where there is an immediate threat or significant risk to an individual's mental, emotional or physical wellbeing, the DSL will escalate the concern without delay to the appropriate external agency. This may include relevant local safeguarding bodies, social services, or the police, depending on the severity and nature of the risk.

Emergency

Where an individual is at imminent risk of serious harm or requires urgent medical or safeguarding intervention, staff must contact emergency services (999) immediately. The DSL must be informed as soon as practicable, and all actions should be recorded in line with safeguarding procedures. In such cases, ensuring the learner's immediate safety takes absolute priority over all other processes.

9. Support

BMS Progress is committed to providing appropriate support, including:

- Pastoral and wellbeing support
- Reasonable adjustments for vulnerable learners

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- 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.

10. 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.

11. 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

12. List of Contacts

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13. Additional Statements concerning Safeguarding

13.1 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

13.2 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

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- Cyberstalking: Persistent harassment, including threats of harm

13.3 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.

13.4 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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13.5 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.

14. Approval

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) – 07812 037 117 / davidc@bmsprogress.com

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