



# Safeguarding & Prevent Policy

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## Contents

<b>1. Introduction &amp; Framework</b>	<b>4</b>
<b>2. Our Commitment &amp; Policy Aims</b>	<b>5</b>
Zero Tolerance Approach	5
<b>3. Policy Aims</b>	<b>5</b>
<b>4. Scope of this Policy</b>	<b>6</b>
Subcontractors and Subcontracted Provision	6
<b>5. Definitions &amp; Abbreviations</b>	<b>7</b>
Safeguarding Children & Young People	7
Safeguarding Adults	7
Child in need	7
‘Looked after’ children and young people	7
Adults at Risk	8
Mental and Physical Health & Wellbeing	8
Contextual Safeguarding	8
Prevent Duty	8
British Values	9
Radicalisation	9
Terrorism	9
Principles of Safeguarding	9
Notes on Abbreviations	10
<b>6. Roles &amp; Responsibilities</b>	<b>10</b>
All staff will:	10
The Governing Board will:	11
The Director of Quality & Curriculum will:	11
The Designated Safeguarding Lead will:	11
The Safeguarding Team (DSO’s and DSL) will:	12
Recruiting Managers will:	12
<b>7. Staff Recruitment</b>	<b>12</b>
Capita Employment Screening Standard & Procedure	12
Safer Recruitment	12
Disclosure & Barring Service (DBS) Checks	13
<b>8. Staff Training</b>	<b>13</b>
Safeguarding Training Programme	13
Refresher Training	13



<b>9. Reporting a Concern .....</b>	<b>14</b>
Contacting the Safeguarding Team .....	14
Concerns identified by Learners .....	14
Concerns Identified by Staff .....	14
Concerns identified by Third Parties .....	15
Safeguarding Risks within the Capita Learning Context .....	15
Confidentiality Statement and Information Sharing .....	15
<b>10. Safeguarding &amp; Working Practices.....</b>	<b>16</b>
Guidance for Engaging Learners Through Digital Media .....	16
Digital/Social Media Guidelines .....	16
SMS/Text Messaging .....	16
Email .....	16
Social Networking and Instant Messaging .....	17
Professional Boundaries .....	17
Site Visits (During COVID-19).....	17
<b>11. Teaching learners about safeguarding and Prevent .....</b>	<b>17</b>
<b>12. External Speakers.....</b>	<b>18</b>
<b>13. Allegations against Capita Learning Staff.....</b>	<b>18</b>
<b>14. Monitoring and Review.....</b>	<b>19</b>
<b>Appendix 1- Managing a Disclosure.....</b>	<b>20</b>
Reporting a concern to the safeguarding team .....	20
<b>Appendix 2- Specific Risks within the Capita Context .....</b>	<b>22</b>
Abuse.....	22
Criminal Exploitation .....	24
Female Genital Mutilation (FGM) .....	24
Peer on Peer Abuse.....	24
Harmful sexual behaviour .....	25
Bullying.....	25
Mental Health .....	25
Child missing from education: (under the age of 18) .....	25
Radicalisation .....	25
<b>Appendix 3 - Useful Contacts .....</b>	<b>27</b>
Additional Support & Contacts.....	27
Employee Assistance Programme .....	28
Remploy .....	28
External Support & Contacts .....	28



Other Specialist Support Services .....	30
Prevent Regional Coordinators .....	31
<b>Appendix 4 – Disclosure &amp; Barring Service (DBS) Checks.....</b>	<b>32</b>
DBS Checks – Indicative Levels by Role .....	32
DBS Check Renewal Cycle .....	32
<b>Appendix 5 – Staff Training Programme .....</b>	<b>33</b>
Refresher Training.....	33
Other Mandatory Updates .....	33
<b>Appendix 6 - Safeguarding Policy (COVID-19 Addendum) .....</b>	<b>34</b>

## 1. Introduction & Framework

Capita Learning aims to provide the highest possible standards of care for all learners and staff. As such, we recognise our responsibilities for safeguarding vulnerable adults and young people and are committed to working with all stakeholders to provide effective safeguarding across all aspects of our work.

Capita Learning will remain mindful of its duty of care and other legal obligations such as those it owes under the Health and Safety at Work Act 1974 and the General Data Protection Act 2018.

This policy should also be read in conjunction with the following legislation and guidance:

- [Keeping Children Safe in Education 2021 \(KCSIE\);](#)
- [Working Together to Safeguard Children 2018 \(Updated 2020\);](#)
- [Safeguarding Vulnerable Groups Act 2006](#)
- [Counter-Terrorism and Security Act 2015](#)
- [Disqualification under the Childcare Act 2006 \(2018\);](#)
- [Prevent Duty Guidance for England and Wales \(2015\);](#)
- [Channel Duty Guidance: Protecting vulnerable people from being drawn into terrorism \(2015\);](#)
- [Multi-agency statutory guidance on FGM \(2016\);](#)
- [Information sharing: advice for practitioners providing Safeguarding services \(2018\);](#)
- [Sexting in schools and colleges: responding to incidents and Safeguarding](#)
- [Young people \(UK Council for Child Internet Safety \(UKCCIS\), 2016\);](#)
- [Children missing education \(2016\);](#)
- [Child sexual exploitation: definition and a guide for practitioners’ local leaders and decision makers working to protect children from child sexual exploitation \(2017\)](#)
- [Sexual violence and sexual harassment between children in schools and colleges \(2018\)](#)
- [Protection of Freedoms Act 2012](#)
- [General Data Protection Act 2018](#)

This policy should be read in conjunction with the following staff/learner documents:

- [Capita Employee Handbook](#)
- [Capita Code of Conduct](#)
- [Capita Safeguarding Policy & Framework](#)
- [Capita Employment Screening Standard & Procedure](#)
- [Anti-Racism, Discrimination, Harassment & Bullying Policy](#)
- [Diversity and Inclusion Policy](#)



- [Health, Safety and Environment Policy](#)
- [Information & Cyber Security Policy](#)
- [Speak Up Policy](#)

## 2. Our Commitment & Policy Aims

At Capita Learning we are committed to fulfilling our social, moral, and legal responsibilities to safeguard the welfare of every young person or vulnerable adult. In fulfilling this commitment, Capita Learning will provide a safe and friendly environment for all stakeholders and ensure effective protection from harm (including radicalisation and extremism).

Capita Learning believes that:

- Every learner has the right to enjoy a safe, caring, and inclusive learning and working environment
- Every learner should always be valued, respected as an individual and treated with dignity
- Every learner has the right to learn and/or work in a democratic environment where core British values are modelled and actively promoted by staff
- Every learner has the right to learn in an environment where any form of discrimination, abuse, harassment, bullying, or victimisation are strictly unacceptable
- Every learner has the right to expect staff to listen to them when they need to express themselves and to take any necessary action to provide support where this might be required

Capita Learning ensures it adopts a culture of vigilance where learners' welfare is promoted and where timely and appropriate safeguarding action is taken for any learner who needs extra help or who may be suffering, or likely to suffer harm.

All staff must recognise that ignoring abuse and other potential safeguarding risks is not an option. They must, therefore, report any concerns for the well-being of learners in accordance with this policy and guidance, which has the full commitment of Capita's Senior Management Team.

### Zero Tolerance Approach

Capita Learning operates a 'zero tolerance' approach to all instances of abuse, bullying, harassment, discrimination, or exploitation. This applies in all instances and whether the identified concern is physical, sexual, or emotional in form.

The principles of good standards of behaviour and respect for others are embedded within the Capita Group values and are, therefore expected of all individuals and organisations throughout their association with Capita Learning. We are, however, mindful that there are instances where these standards may not be achieved and are committed to investigating all instances where a potential/actual risk to safety or welfare is raised as a safeguarding concern.

## 3. Policy Aims

This policy has been developed to:

- Ensure that all stakeholders understand their safeguarding responsibilities and are equipped to take all reasonable measures to assess and minimise the risk of harm to learners.
- Ensure that processes are in place to enable all stakeholders to develop a clear understanding of the potential safeguarding risks to learners or staff and can identify these within the Capita Learning context.
- Ensure that clear procedures are in place to enable timely reporting and effectively manage responses where any safeguarding concerns might be identified.



To achieve this, Capita Learning will:

- Provide a safe environment for all stakeholders by ensuring thorough risk assessment and safe working practices are put in place.
- Embed a culture of safeguarding across the organisation by ensuring all staff operating procedures and learner information includes reference and information about this policy.
- Establish procedures for reporting and responding to safeguarding concerns (including allegations of abuse and radicalisation) and ensure these are applied consistently by all staff.
- Embed safer recruitment procedures across the organisation, ensuring that training, candidate checks, questions and vetting processes are integral elements of the recruitment procedure.
- Provide appropriate training for all staff as part of their induction, and through additional refresher sessions, including additional training which may be required for specific roles.
- Embed effective information-sharing protocols with staff and key partners, such as employers in order to report concerns to outside agencies, where appropriate
- Promote awareness across the organisation through providing regular updates on emerging themes relating to Safeguarding and the Prevent Duty, British values, and policy/legislative changes.
- Have a designated Safeguarding Lead who will report to the Director of Quality and Curriculum and will take the strategic lead in relation to Safeguarding learners.
- Equip learners with the skills they need to keep themselves safe online in their work and build resilience in their personal lives
- Raise employee awareness of Safeguarding and Prevent issues such as minimising risk, recognising abuse, and treating all learners with respect.
- Ensure that subcontractors and partners have appropriate Safeguarding and Prevent policies and procedures and that these are checked when tendering for work with Capita
- Ensure that any external speakers or visitors are always vetted and accompanied
- Work in partnership with Local Safeguarding Boards, Prevent Coordinators, and other Child Protection Agencies, where applicable
- Review the effectiveness of policies and procedures where there has been a Safeguarding or Prevent concern

#### **4. Scope of this Policy**

This policy covers all activities associated with delivery of adult education programmes provided by Capita Learning, including:

- Capita Learning Apprenticeships
- The Firefighter Development Apprenticeship Programme
- Adult Education Programmes

All responsibilities and processes within this policy, therefore, apply to all learners, Capita Learning staff, sub-contractors and temporary staff whilst working with Capita Learning.

#### **Subcontractors and Subcontracted Provision**

We are committed to working closely with all our subcontractor partners to ensure the effective implementation of this policy as part of this support our due diligence processes include an annual review of all relevant operational process in place with each subcontractor (including relevant policies day to day processes, provision for staff training, etc).



## 5. Definitions & Abbreviations

Capita Learning is committed to providing the highest possible standard of safeguarding and welfare support to all learners and staff, irrespective of their age or individual circumstances. It is, however, important to note that different frameworks and requirements may apply, dependent on an individual's specific context.

### Safeguarding Children & Young People

Safeguarding children and young people refers to processes relating to those under 18 years of age. Specific responsibilities in relation to children and young people are outlined within the statutory guidance document "Keeping Children Safe in Education" which is updated annually. Within this guidance safeguarding is defined as:

- Protecting children from maltreatment.
- Preventing impairment of children's health or development.
- Ensuring that children are growing up in circumstances consistent with the provision of safe and effective care.
- Taking action to enable all children to have the best outcomes.

At Capita Learning we believe that it is our moral duty to provide the best possible support for our learners. We are, therefore, committed to taking all necessary steps to promote welfare and safety children within our community, whether, or not, this is required within our statutory duties.

### Safeguarding Adults

Safeguarding Adults refers to processes relating to those over 18 years of age. The Care Act 2014 establishes a duty to protect adults from abuse and neglect, and also emphasises the importance of actions to protect vulnerable adults.

Factors considered within identification of a vulnerable adult includes (but is not restricted to) individuals with any of the following:

- Learning Difficulties
- Disability (physical or mental)
- Physical Impairments
- Sensory Impairments
- Mental Health Needs
- Age Related Frailty
- Dementia
- Brain Injuries
- Drug, Alcohol or Substance Problems

At Capita Learning we believe that it is our moral duty to provide the best possible support for our learners. We are, therefore, committed to taking all necessary steps to promote welfare and safety of adults within our community, whether, or not, this is required within our statutory duties.

### Child in need

A child in need is defined under the Children Act 1989 as a child who is unlikely to achieve or maintain a reasonable level of health or development, or whose health and development is likely to be significantly or further impaired, without the provision of services; or a child who is disabled.

### 'Looked after' children and young people

The term 'looked after' refers to children and young people who are in the care of the Government or who are provided with accommodation for a continuous period. Children and young people who





live away from home for other reasons whilst not being 'looked after' may still be vulnerable. This also includes those that were referred to as previously looked after and who may be vulnerable to harm, or face educational barriers to attendance, or have mental health concern or a learning, behavioural or emotional need.

## Adults at Risk

An 'Adult at Risk' is any person aged 18 years and over who is (or may be) in need of additional care or support as a result of their increased vulnerability. To help ensure we provide the best possible safeguarding support for learners and staff, we consider the risks associated with the circumstances of each individual and not just their characteristics. Though not an exhaustive list, the following factors may be considered when determining the level of risk associated with an individual's circumstances:

- Mental health difficulties
- Learning, physical or sensory impairments
- A related frailty or illness
- Exposure to abuse, domestic violence or disproportionate influence
- Substance misuse and/or addiction
- Asylum seeker / Refugee status

## Mental and Physical Health & Wellbeing

The World Health Organisation defines health as 'a state of complete physical, mental and social wellbeing and not merely the absence of disease or infirmity'. Having due regard to mental health is, therefore, required to ensure the good overall health of learners and staff.

With the impact of COVID-19 learners may feel extremely overwhelmed either working from home or returning to their place of work. For up-to-date information on government guidelines relating to COVID-19 please [click here](#).

Poor mental health, and physical health could be a wider safeguarding concern. More information on support available can be found in Appendix 3 of this policy.

## Contextual Safeguarding

Contextual Safeguarding is an approach to understanding and responding to an individual's experiences of significant harm throughout all aspects of their lives (including outside their family and home). This approach recognises the different relationships an individual may have and influences they may experience in their education/professional environment, peer groups, online and in their community.

It is important that we consider the risks to individuals through wider extra-familial harm (such as exploitation) during their wider experiences within their community – An individual's physical and social spaces beyond the family and home are crucial factors in their likelihood of risk and, therefore, also crucial to engage in helping to keep them safe.

## Prevent Duty

The UK Government places a duty on specified authorities (including schools, colleges, and education providers) to have "due regard to the need to prevent people from being drawn into terrorism". Within this Duty, we are required to ensure a greater awareness towards the potential vulnerabilities to extremism and potential indicators of engagement with extremist ideologies, and





implement actions to safeguard all individuals from extremism, extremist ideologies, and radicalisation.

Fulfilling our responsibilities within the Prevent duty requires all Capita Learning staff to remain vigilant to the potential indicators of radicalisation and extremist behaviours, and to take steps to report any concerns associated with this area as a safeguarding concern – Please refer to Appendix 2 for further details of the potential indicators.

### British Values

Fundamental British values underpin what it is to be a citizen in a modern and diverse Great Britain which values all members of the community and celebrates diversity. Promoting the fundamental British values is identified as a key element of the Prevent strategy.

These values are shared by many democratic nations and are defined within the Prevent Strategy as: Democracy, Rule of Law, Individual Liberty and Respect and Tolerance. At Capita Learning, we actively promote British values through our culture and through delivery of our learning programmes.

### Radicalisation




Radicalisation refers to the process by which a person comes to support terrorism and extremist ideologies associated with terrorist groups. Extremism is the vocal or active opposition to our fundamental British values, including Democracy, the Rule of Law, Individual Liberty and the Mutual Respect and Tolerance of different faiths and beliefs.

### Terrorism




Terrorism is a by-product of radicalisation. Terrorism is an action that endangers or causes serious violence to a person/people; causes serious damage to property; or seriously interferes or disrupts an electronic system.

### Principles of Safeguarding

Capita Learning will follow the six key safeguarding principles needed to protect people in line with the Care Act 2014:

	<p><b>1. Empowerment</b></p> <p>Ensuring people are supported and confident in making their own decisions and giving informed consent.</p> <p>Empowerment gives individuals choice and control over decisions made.</p>
	<p><b>2. Protection</b></p> <p>Providing support and representation for those in greatest need.</p> <p>Organisations can put measures in place to help stop abuse from occurring and offer help and support to those at risk.</p>
	<p><b>3. Prevention</b></p> <p>It is crucial to try and take action before harm occurs, preventing neglect, harm or abuse is the primary objective.</p> <p>Prevention is the act of organisations working to stop abuse before it happens. Raising awareness, training staff and making information easily accessible are all ways that they can demonstrate prevention measures and encourage individuals to ask for help.</p>



	<p><b>4. Proportionality</b></p> <p>We must take a proportionate and least intrusive response to the issue presented.</p> <p>Proportionality ensures that services take each person into account when dealing with abuse. They will respect each individual and assess any risks presented.</p>
	<p><b>5. Partnerships</b></p> <p>Forming partnerships with local communities can create solutions as they can assist in preventing and detecting abuse.</p> <p>Partnerships give organisations the opportunity to work together, as well as with the local community.</p>
	<p><b>6. Accountability</b></p> <p>Being accountable and having complete transparency in delivering safeguarding practice.</p> <p>Safeguarding is everyone’s business and accountability makes sure that everyone plays their part when it comes to safeguarding vulnerable people. Everyone is accountable for their actions as individuals, services and organisations.</p>

### Notes on Abbreviations

Throughout this policy and guidance, reference is made to ‘learner’. This refers to all individuals engaged on a learning programme with Capita Apprenticeships (including the Firefighter Development programme) and individuals directly enrolled on any other learning programme offered by the Capita Adult Education provision.,

The following abbreviations are used throughout this document:

- DSL – Designated Safeguarding Lead
- DSO – Designated Safeguarding Officer
- SPOC – Single Point of Contact within employer organisations
- LSCPs – Local Safeguarding Children Partners (or partnerships)

## 6. Roles & Responsibilities

Safeguarding and promoting the welfare of learners and staff is everyone’s responsibility. All Capita Learning staff, therefore, have a part to play in ensuring the best possible support and care is provided. All staff working with Capita Learning are required to:

### All staff will:

- Be familiar with, understand and adhere to this policy and all mandatory guidance (including relevant parts of the Department for Education’s statutory safeguarding guidance, Keeping Children Safe in Education) and the Prevent duty, and engage with all updates as provided.
- Be familiar with, understand and adhere to the Capita Staff ‘Code of Conduct’
- Be familiar with the potential risks which apply to the Capita Learning context and understand the potential indicators of these concerns and remain vigilant to these in all aspects of work within the organisation (Please refer to Appendix 2 for further details of the risks that apply to this context).
- Be familiar with and understand the process for dealing with a disclosure relating to a safeguarding concern (Please refer to Appendix 1 for further details).



- Be familiar with and understand the process for referring a safeguarding concern, including any concerns relating to learners and any allegation made against a member of staff.
- Report instances of actual or suspected safeguarding concerns to the Designated Safeguarding Officer, in line with the processes outlined within this policy and the legal duty for reporting FGM.
- Complete all relevant training and development identified by Capita Learning and be aware of all responsibilities outlined within this policy and within relevant statutory documents or other guidance.

Alongside their general responsibilities as a member of staff, specific post-holders also have the following responsibilities associated with their role(s):

#### **The Governing Board will:**

- Hold overall responsibility for ensuring that Safeguarding is effective across the organisation.
- Have accountability for ensuring that effective processes are in place across the organisation.
- Review and annually approve the Safeguarding & Prevent Policy, ensuring it complies with all legal, moral, and social responsibilities relevant to its application.
- Provide oversight through review of all Board updates and assess the impact of this policy in achieving our legal, moral, and social responsibilities in relation to safeguarding.
- Appoint a nominated board member to liaise with the Designated Safeguarding Lead (DSL) and Director of Quality & Curriculum on Safeguarding issues.
- Ensure that appropriate time, funding and resources are made available to the Designated Safeguarding Lead to enable effective implementation of this policy and all associated processes.

#### **The Director of Quality & Curriculum will:**

- Hold responsibility for Safeguarding and have accountability for ensuring that effective processes are in place across the organisation.
- Report to the Governing Body regularly regarding the effectiveness of safeguarding and implementation of related policies.
- Ensure that the Designated Safeguarding Lead provides effective strategic leadership of safeguarding, and that policy and/or legislative amendments are made within an appropriate timeframe.
- Support the Designated Safeguarding Lead and other members of the safeguarding team to ensure the effective delivery of all safeguarding processes across all elements of the organisation.

#### **The Designated Safeguarding Lead will:**

- Hold responsibility for the implementation of this policy and all related procedures, ensuring that all processes across the organisation provide effective safeguarding.
- Promote a culture of vigilance where all staff are aware and can confidently execute their responsibilities within this policy and its associated processes
- Ensure that all staff receive appropriate training and understand the key risks (including abuse, neglect, peer on peer abuse (including violence and sexual violence), Criminal Exploitation, FGM, Prevent and online safety) and are aware of the potential indicators of these harms.
- Ensure that the Single Central Record (SCR) is accurate and up to date so that records confirm that appropriate checks have been completed on all Capita Learning staff.
- Be available for all staff to discuss safeguarding concerns and take a lead of management on the organisation's response to any safeguarding concerns, including referrals to other agencies where this is required.
- Lead the response to any allegations made against staff in relation to safeguarding, liaising with the Director of Quality & Curriculum, as appropriate.
- Ensure all safeguarding concerns are effectively recorded and that appropriate responses are implemented following any concern that is raised.



- Ensure the effective monitoring of safeguarding concerns, including analysis of trends/patterns, and identifying any lessons to be learned following the management of any safeguarding issues.
- Provide regular updates to the Director of Quality & curriculum and Board outlining the safeguarding context and operational effectiveness of safeguarding processes.
- Keep up to date with the latest national and local guidance, requirements and risks, ensuring that these are shared with the safeguarding team and wider staff through regular updates.

**The Safeguarding Team (DSO's and DSL) will:**

- Ensure all safeguarding concerns are recorded in line with the established processes, and that all concerns are effectively responded to.
- Keep up to date with emerging issues, including attending regular meetings to discuss any relevant national and local updates.

**Recruiting Managers will:**

- Ensure Safer Recruitment practices and the Capita Employment Screening Standard & Procedure are followed when recruiting for posts,.
- Ensure appropriate action is taken within the response to any allegation made against a member of staff.

## **7. Staff Recruitment**

Capita Learning is committed to recruiting high quality staff and will ensure that all recruitment processes support the provision of the highest possible standards of safeguarding for learners and staff.

### **Capita Employment Screening Standard & Procedure**

In accordance with the Capita Employment Screening Standard & Procedure, all staff joining Capita Learning are required to complete pre-employment vetting checks.

### **Safer Recruitment**

To ensure we achieve these aims, all staff recruitment is completed in accordance with the following procedures:

- All managers involved in recruitment have undertaken Safer Recruitment training.
- All offers of employment are made following a face-to-face interview that explores attitudes, motivation, temperament, and personal qualities, as well as skills and experience relevant to the role.
- All offers of employment/work are conditional to satisfactory references and an appropriate Disclosure & Barring Service (DBS) check
- All appointments are subject to the Capita Group Recruitment and Screening Policy and processes
- Where candidates are recruited from overseas, extra care is taken in pursuing references and carrying out the relevant checks. Where appropriate, advice from the DBS Overseas Information Service is obtained
- All staff are made aware of Capita's Safeguarding and Prevent policy and procedures, and their obligations regarding safeguarding learners as part of their induction.

If it is necessary for someone to start work at short notice, before checks are completed, a thorough risk assessment is carried out and must be approved by the Divisional Information & Security Officer (DISO) - All such assessments are documented and kept confidentially. Until their DBS disclosure is received by Capita, the individual is supervised by a DBS-checked member of staff



## Disclosure & Barring Service (DBS) Checks

All offers of employment/work are conditional to an appropriate vetting process, including Disclosure & Barring Service (DBS) check. The level of DBS checks required is dependent on the role being recruited, but this may be completed at Basic, Standard or Enhanced level and is dependent on the type of activity and contact with learners that is associated with the role.

For further information about the DBS checks and how they apply to indicative roles, please see Appendix 4.

It is Capita Learning policy that DBS checks are renewed every 3 years throughout the period of service with the organisation.

## 8. Staff Training

All relevant elements of Safeguarding training are a mandatory requirement for all Capita Learning staff, and will form part of their induction and ongoing CPD. To achieve our commitment to providing the highest possible standard of safeguarding for learners and staff, our safeguarding training programme is designed to ensure that staff:

- Understand their role in delivering safeguarding and providing a culture of vigilance to support all learners and staff.
- have a working knowledge of the safeguarding issues faced by learners and are aware of the potential signs that learners may be at risk or experiencing difficulties.
- understand the referral/reporting process for raising concerns, and can provide accurate, high-quality information to support the referral.
- Receive alerts and updates relating to specific risks to learners and staff, or updated guidance and processes.

### Safeguarding Training Programme

The training programme includes mandatory elements required within the Capita Safeguarding Framework as well as elements which are specific to the business area. Our training programme is reviewed annually by the Designated Safeguarding Lead to ensure that this provides the necessary information and support for staff – Further details of the current training programme can be found in Appendix 5.

### Refresher Training

All Capita Learning staff are required to maintain an up-to-date working knowledge of safeguarding. To support colleagues in achieving this, all staff are required to complete 'refresher training' as follows:

**Capita Group Training:** In accordance with the Capita Group Safeguarding Framework, all Capita Learning staff are required to complete the Capita Group Safeguarding training module every 3 years.

**Capita Learning Annual Refresher:** All Capita Learning staff are required to complete a business specific annual refresher programme to ensure they are aware of any relevant updates and legislative changes and maintain a good working knowledge of the potential risks that apply to the Capita Learning context.



## 9. Reporting a Concern

All concerns relating to learner safety or welfare should be considered as a safeguarding concern and reported to the safeguarding team at the earliest opportunity. When considering a potential concern, it is important to remember that the context surrounding safeguarding issues is often complex and that the information identified might be part of the picture. To ensure we provide the highest possible standard of safeguarding it is, therefore, expected that anyone identifying a potential concern should consider that that this might be part of a wider context, and should refer this concern irrespective of how small they might perceive it to be.

### Contacting the Safeguarding Team

Capita Learning offer safeguarding support during normal working hours (Monday to Friday: 9am to 5.30pm). During these hours, learners and staff can contact the safeguarding team as follows:

Safeguarding Contact	Contact Details
Capita Safeguarding Hotline	Telephone: 0370 123 4725 Email: <a href="mailto:safeguarding@capita.co.uk">safeguarding@capita.co.uk</a>
Designated Safeguarding Lead	Telephone: 07783 783913 Email: <a href="mailto:Alex.Palombo@capita.com">Alex.Palombo@capita.com</a>

Should a concern arise outside of normal working hours then this may be reported to the local police authority or to an alternative external support agency – See Appendix 3 for further details of relevant support networks.

**Please Note:** If the concern potentially involves an imminent harm/risk to life, or a serious Prevent incident occurs, you can also contact the following organisations out of hours:

Type of Concern	Organisation	Contact
Potential harm or risk to life	Police	999
Prevent related concern	National terrorist Hotline	0800 789321

### Concerns identified by Learners

In the first instance learners should discuss any concerns with their Talent Coach. Any concern raised with a Talent Coach will be managed sensitively and escalated to the safeguarding team in accordance with established disclosure and reporting processes – See Appendix 1 for further details.

If the Talent Coach is unavailable, or there are instances where the learner feels it might not be appropriate to discuss the particular concern with their Talent Coach, then the learner may contact a member of the safeguarding team directly using the details above.

### Concerns Identified by Staff

If a staff member has any concern regarding the safety or welfare of a learner or member of staff, they must take the following action:

- The staff member must contact the duty safeguarding officer using the relevant **Safeguarding Hotline** (see details above). If the concern involves a potential imminent risk or danger to life or, for any reason, a member of the safeguarding team cannot be contacted via the hotline then the concern should be raised with the Designated Safeguarding Officer.





- Following contact with the safeguarding team, the concern must be recorded in writing using the safeguarding referral process – Please refer to the “Duty DSO Details” entry in your calendar for links to the reporting form.

Staff must only gather sufficient information to establish and record that there is concern but should not consider it their responsibility to investigate the concern prior to reporting it to the safeguarding team – For further details of the process to manage a disclosure from a learner or member of staff, please refer to Appendix 2 of this policy.

### **Concerns identified by Third Parties**

To help us ensure the safety and welfare of our learners and staff we are committed to responding to information received from 3<sup>rd</sup> parties (persons other than those directly involved with Capita Learning). Any concern identified by a 3<sup>rd</sup> party should be referred to their nominated contact at Capita Learning, or through direct contact with the safeguarding team via the details above.

Information received from a third-party regarding a safeguarding concern cannot be ignored and should be referred to the safeguarding team by the member of staff receiving this information (in a similar way to all other concerns). Where possible, anyone receiving details of a concern from a third party should confirm the following:

- The nature of their concern(s) and when the concern arose
- How and why their concerns have arisen
- What involvement the 3<sup>rd</sup> party has or have had with the learner
- Whether the person referring the concern can be contacted by the safeguarding team or would prefer to remain anonymous.

Any Capita Learning staff receiving details of such a concern should contact the duty designated safeguarding officer to refer the concern as soon as possible.

### **Safeguarding Risks within the Capita Learning Context**

All staff should have a working knowledge of the specific risks that might apply to the Capita Learning context. Further details of the likely risks faced by learners and staff, along with potential indicators associated with these risks can be found in Appendix 2 of this policy.

### **Confidentiality Statement and Information Sharing**

Capita Learning will operate on the premise that all information imparted to a member of staff will be treated in confidence. Learners may trust a member of staff with issues of a personal nature and wherever possible their confidences should be respected. Staff must not make promises on confidentiality which they may be unable to keep.

Furthermore, staff should always make a learner fully aware of any situation where a duty of care deems that confidentiality cannot and must not be maintained. This would be the case in child and vulnerable adult protection situations. Learners may disclose information that is difficult for the member of staff to deal with without further advice/support. In such cases, the learner should be told that the situation will be discussed with a specialist Staff member. Any decision to break confidentiality should always be preceded by informing the learner of what is about to happen and the reason for the decision.

Capita Learning are committed to sharing information for the purposes of Safeguarding and promoting the welfare of children and young people in line with Working Together to Safeguard Children 2018 (Updated 2020) and considerations of The General Data Protection Act 2018.





## 10. Safeguarding & Working Practices

All Capita Learning staff are required to ensure that their actions and conduct have due regard to the safety and wellbeing of others and make sure that they do not cause harm to others or place them at any undue risk. As a general principle, therefore, all staff must ensure that they do not engage in actions and/or conduct which:

- Directly endangers, or is likely to endanger, other people
- If repeated against or in relation to others, would endanger (or is likely to endanger) other people
- Involves sexual material relating to children (including possession of such material)
- Involves sexually explicit images depicting violence against human beings (including possession of such images)
- Is of a sexual nature involving an adult at risk or child

All Capita Learning staff are also required to make sure they adopt 'safe working practices' and ensure that all actions adhere to the safeguarding requirements outlined within this policy and other relevant guidance. Within this context it is important that staff consider both the actions being taken and the context within which the action applies.

### Guidance for Engaging Learners Through Digital Media

Communicating effectively and appropriately with learners in a variety of ways is an integral aspect of Capita Learning's work. Telephone contact, texting, e-mail, face to face work and virtual work are all vital tools for supporting learners' personal and professional development. Learners use electronic methods of communication as a primary vehicle, with much of their social interaction and peer education occurring in these spaces.

Given the pace of change in this area, the principles outlined in these guidelines should be seen as applying to emerging technologies and/or applications.

To protect both individual staff members and Capita from the consequences of allegations relating to the use of digital media, all staff should adhere to the following guidelines alongside wider guidance provided through Capita Group IT system training:

### Digital/Social Media Guidelines

- Staff should apply the same rules and standards of best practice when communicating with learners via digital media as in face-to-face communication
- Extra diligence must be taken to ensure messages cannot be misinterpreted
- If staff receive verbally abusive or threatening messages; or if they worry about the safety of the sender or someone else, they must contact their line manager and a Capita DSO/DSL.

### SMS/Text Messaging

- Mobile phones are allocated to staff as an operational necessity and should be the only phone number used to communicate with learners.
- Under no circumstances should staff give their personal mobile or home number to a learner.
- Mobile phones are issued for business use; any misuse of the phone may be a disciplinary issue.
- If necessary, staff work mobile numbers can be publicly displayed i.e., on posters, clearly stating the staff member's name.

### Email

- All staff will be given an email address on joining Capita; this should be the only email account used to communicate with learners.



- Under no circumstances should a staff member give their personal email address to a learner
- Emails should only be sent to learners during what could be perceived as 'reasonable hours' (e.g., 7am-8pm depending on learner workplace practices)
- Materials sent will be unbiased and meet equal opportunities criteria in terms of ethnicity, sexual orientation, gender, disability, religion, and beliefs and age

### **Social Networking and Instant Messaging**

- In order to protect themselves from risk of allegations, we recommend that staff using Social Networking Sites for personal use should set their privacy settings so only friends can view their profile
- Staff intending to use Social Networking Sites in a work capacity should do so from a separate profile than their personal profile.
- In the event that a member of staff sets up a work profile, they must inform their line manager of the existence of this profile and the login details for it
- Messages sent via Social Networking Sites should only be sent to learners during 'reasonable' hours (as per email section above)
- Staff should not put photographs of work activities on their personal profiles
- Staff must not accept a friend request on social media from a learner
- Staff must complete the mandatory training on Capita Group Social Media and Information Security Awareness

### **Professional Boundaries**

Capita expects staff to protect the professional integrity of themselves and the organisation. The [Capita Code of Conduct](#) details that if professional boundaries and/or policies are breached, this may result in disciplinary procedures.

### **Site Visits (During COVID-19)**

Capita's priority is to protect the welfare of our Staff, learners, clients, and societies in which we operate. In response to the spread of COVID-19, we ask all colleagues to respect Capita Group's guidance on COVID-19, including following best practice for personal hygiene standards, our policies on business travel and business continuity.

In accordance with Capita Group procedures, our approach remains 'virtual first'. That means all engagements should continue to be held and/or attended virtually by phone or videoconference unless there is a clear rationale and business justification.

If there is a business requirement for a face-to-face engagement, you must follow the guidance set out within section 4 of the Capita Group guidance document "Capita's approach to COVID-19". If you have any specific questions or concerns, please speak to your line manager or email the Capita COVID-19 Support team on [coronavirus\\_support@capita.com](mailto:coronavirus_support@capita.com).

## **11. Teaching learners about safeguarding and Prevent**

Safeguarding and ensuring that learners understand the potential risks they might encounter are important elements of the learning journey within all our programmes. Alongside information and guidance shared within all learner induction processes, Capita learning utilises opportunities to embed Safeguarding within all curriculum pathways; learners receive guidance in relation to key risks, understand how to reduce risks to themselves and others, and build resilience. This embedded approach helps us ensure that learners have the opportunity to consider the impact of potential risks within their individual business sector and can explore the implications in relation to their individual role.



Learners are provided with the opportunity to talk about safeguarding issues within the learning environment and on a 121 basis. They are made aware of the processes by which any concerns they have can be raised, including the processes for reporting a concern as well as how any report will be handled

## 12. External Speakers

We recognise that the vast majority of delivery for Capita Learning programmes is completed by Capita staff or subcontracted specialists. It is, therefore, unlikely, that External Speakers will form an integral element of our learning programmes

For the purposes of this policy, an External Speaker is defined as someone that is neither:

- A registered learner,
- A representative from a learner's employer,
- An employee of Capita Learning
- A sub-contracted provider engaged by Capita Learning

In any instance where a member of staff would like to engage an External Speaker then they are required to be mindful of any potential impact on Capita's reputation, and to also consider that Capita Learning has a responsibility within the Prevent Duty to ensure that learners are not exposed to extremist ideologies or content.

It is important, therefore, that any member of staff wishing to involve an external speaker within the delivery of a learning activity adheres to the following process:

- Ensure that any requested External Speaker has an appropriate reputation and that steps are taken to identify the content of information to be communicated to learners
- Ensure that arrangements are in place for the external speaker to be fully supervised by an appropriate member of staff throughout their contact with learners.
- Provide a summary of the planned activity and content overview to the Designated Safeguarding Lead who will review the request and confirm/decline its appropriateness

Capita Learning reserve the right to refuse contributions from any External Speaker if prior consent is not provided, or if any other concern arises which might create a safeguarding risk to learners and/or staff.

## 13. Allegations against Capita Learning Staff

Any allegation of abuse, or other safeguarding concern raised against members of staff, will always be treated seriously. Any such allegation must be referred directly to the Designated Safeguarding Officer, or the Director of Quality & Curriculum if the allegation relates to the Designated Safeguarding Officer.

Following receipt of any allegation against a member of staff, actions will be taken both to protect the learner and the accused member of staff. The Designated Safeguarding Officer/Director of Quality & Curriculum will take any appropriate steps to ensure the safety of the learner, and any others who may be at risk - These may include ensuring that the member of staff is not placed in a vulnerable situation while investigations take place.

Following receipt of any allegation made against a member of staff, the allegation will be fully investigated in line with Capita's internal processes and any relevant external frameworks or legislation.



### **Low Level Concerns**

A low-level concern is any concern that a member of staff has acted in a way that is inconsistent with the staff code of conduct or with processes covered by this policy, and that concern does not meet the threshold or is not considered serious enough to refer to the local authority designated officer (LADO). Examples of low-level concerns could include:

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

Capita Learning are committed to ensuring the best possible standards of safeguarding and will, in accordance with national guidance, maintain records of all recorded low-level concerns.

Where there is a complaint against a member of staff which reaches the threshold, there may also be criminal (Police) investigations and/or a child/vulnerable adult's protection investigation, carried out by the Local Area Designated Officer and/or Social Services.

## **14. Monitoring and Review**

The Director of Quality and Curriculum is responsible for monitoring this Policy. To support the monitoring of this policy, the Designated Safeguarding Officer will provide regular updates on the safeguarding context (including the number of reported concerns, any emerging themes and national/local updates) and the operational effectiveness of all safeguarding processes. Details from these updates will be presented to the Board during each scheduled meeting

This policy and the associated guidance and procedures is made available to all staff and learners and is reviewed annually by the Designated Safeguarding Lead and the Director of Quality & Curriculum.



## Appendix 1- Managing a Disclosure

Staff may observe signs that lead them to develop a safeguarding concern. For example, a member of Capita Learning staff might be concerned that a learner is suffering from abuse or harassment, is exposed to harmful sexual behaviour, is being exposed to extremist content, becoming radicalised, or experiencing poor mental health - Please refer to [Appendix 2](#) for further details of the potential risks and indicators of specific safeguarding concerns.

In addition to these concerns, a learner or member of staff might make a direct disclosure to a member of staff regarding a safeguarding concern. If a learner, or member of staff, discloses abuse, harassment, or any other safeguarding concern to a member of staff, he or she must take the disclosure seriously and follow the process outlined below:

- Ensure that the person making the disclosure is not currently at risk, or in any imminent danger (Providing advice on how to rectify this if they are not safe).
- Inform the learner or staff member that it is OK for them to disclose their concern and that their disclosure will be taken seriously by Capita Learning.
- Establish if the learner or staff member making the disclosure is legally a child (under 18 years of age) as this may be important when the safeguarding team are developing a response.
- Listen carefully to what the learner or staff member is saying
- Inform the learner or member of staff that because this is a serious matter, it cannot remain confidential - The staff member receiving the disclosure should inform the other person that the safeguarding team will be notified, and they will review the facts and decide on what action may be necessary.
- Record as much information relating to the concern as is practical, ensuring that any details recorded include the words used by the person making the disclosure (where possible).
- Ask questions where these are required to confirm what you have heard, but do not ask any leading questions or suggest any phrases which should be used.
- Undertake to keep the learner informed as to any action that is proposed and to support the learner through this

All concerns identified through a disclosure must be referred to the safeguarding team as follows:

- The staff member must contact the duty safeguarding officer using the relevant **Safeguarding Hotline** (see Appendix 3 for contact details). If the concern involves a potential imminent risk or danger to life or, for any reason, a member of the safeguarding team cannot be contacted via the hotline, then the concern should be raised with the Designated Safeguarding Lead.
- Following contact with the safeguarding team, the concern must be recorded in writing using the safeguarding referral process – Please refer to the “Duty DSO Details” entry in your calendar for links to the reporting form.

**Please note:** It is not the staff member’s responsibility to investigate what has happened or to establish whether a safeguarding issue has taken place. It is, however, essential that all disclosures are taken seriously and that full details of the disclosure are reported to the safeguarding team as soon as possible.

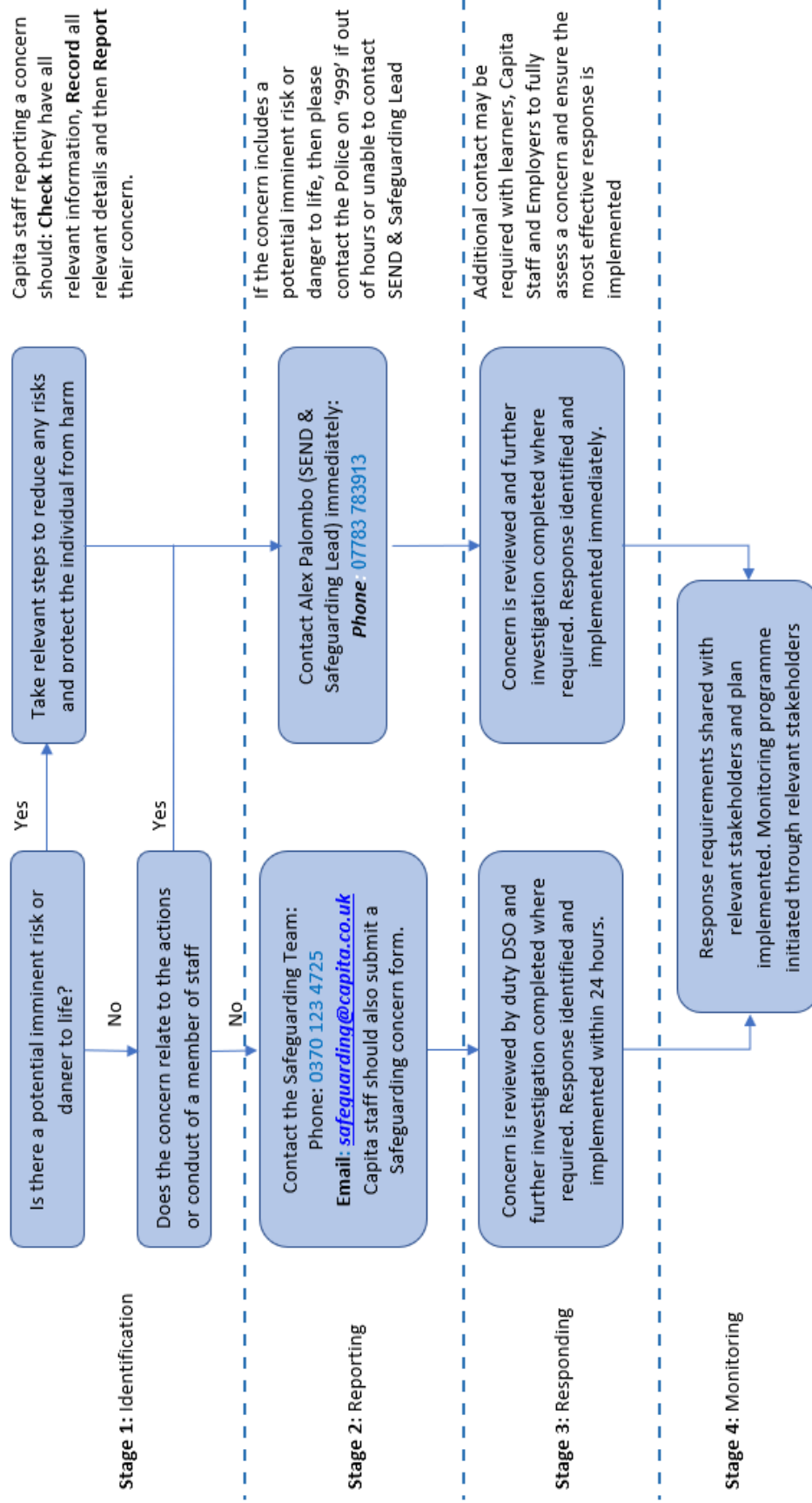
### Reporting a concern to the safeguarding team

Capita Learning offer safeguarding support during normal working hours (Monday to Friday: 9am to 5.30pm). During these hours, learners and staff can contact the safeguarding team via the safeguarding hotline – [Click here](#) for details of contact numbers or refer to the process overview on the following page.



## Reporting a Safeguarding Concern

**Note:** This reporting process may be used by Learners, Capita Staff, Employers, and other individuals who have a Safeguarding concern.





## Appendix 2- Specific Risks within the Capita Context

It is important that all staff working for Capita Learning understand the range of safeguarding risks that may apply to our learning context. Within this section you will find a reminder of the potential risks that might be faced by learners and staff, along with an overview of the likely indicators of these concerns.

This appendix should be read alongside Part One of Keeping Children Safe in Education 2021 and is designed to accompany information shared with staff during training sessions and through our monthly Safeguarding & Prevent Newsletter.

### Abuse

Abuse is defined as any form of maltreatment that intentionally harms or injures another person. A victim may be abused because of someone inflicting harm, or as a result of someone failing to act to prevent harm.

Guidance provided within Keeping Children Safe in Education outlines 4 principal forms of abuse; whilst this guidance relates specifically to children and young people who are under 18 years of age, these forms of abuse still apply to adult learners:

Physical Abuse	
<b>Definition</b>	Actions which cause physical harm to another person. Physical harm may also be caused when symptoms of illness are fabricated or where illness deliberately induced.
<b>What does this Include?</b>	<ul style="list-style-type: none"> <li>▪ Assault, hitting, slapping, punching, kicking, hair-pulling, biting, pushing</li> <li>▪ Physical punishments, including Involuntary isolation or confinement</li> <li>▪ Inappropriate or unlawful use of restraint and misuse of medication (e.g., over-sedation)</li> <li>▪ Forcible feeding or withholding food</li> <li>▪ Unauthorised restraint, restricting movement (e.g., tying to a chair)</li> </ul>
<b>Key Indicators</b>	<ul style="list-style-type: none"> <li>▪ Unexplained injuries or inconsistency with the account of what happened</li> <li>▪ Frequent injuries or injuries that are inconsistent with the person's lifestyle</li> <li>▪ Bruising, cuts, burns and/or marks on the body or loss of hair in clumps</li> <li>▪ Subdued or changed behaviour in the presence of a particular person</li> <li>▪ Failure to seek medical treatment or frequent changes of GP</li> </ul>

Emotional Abuse	
<b>Definition</b>	The persistent emotional maltreatment of another person, such as to cause severe and adverse effects on emotional development.
<b>What does this Include?</b>	<ul style="list-style-type: none"> <li>▪ Intimidation, coercion, harassment, use of threats, humiliation, or verbal abuse (including cyber bullying)</li> <li>▪ Preventing the expression of choice and opinion</li> <li>▪ Addressing a person in a patronising or infantilising way</li> <li>▪ Removing mobility or communication aids or intentionally leaving someone unattended when they need assistance</li> <li>▪ Preventing someone from meeting their religious and cultural needs</li> <li>▪ Failure to respect privacy</li> </ul>
<b>Key Indicators</b>	<ul style="list-style-type: none"> <li>▪ Withdrawal or silence when a particular person is present</li> <li>▪ General withdrawal or changes in the psychological state of mind</li> <li>▪ Insomnia</li> <li>▪ Low self-esteem and/or low confidence</li> <li>▪ Uncooperative and aggressive behaviour</li> <li>▪ A change of appetite, weight loss/gain</li> <li>▪ Signs of distress: tearfulness, anger</li> </ul>





Sexual Abuse	
<b>Definition</b>	Sexual abuse involves forcing or enticing another person to take part in sexual activities, not necessarily involving a high level of violence, and whether the victim is aware of what is happening.
<b>What does this Include?</b>	<ul style="list-style-type: none"> <li>▪ Rape, attempted rape, or sexual assault</li> <li>▪ Non- consensual masturbation of others</li> <li>▪ Non- consensual sexual penetration or attempted penetration (inc. Mouth)</li> <li>▪ Any sexual activity that the person lacks the capacity to consent to</li> <li>▪ Inappropriate looking, sexual teasing or innuendo or sexual harassment</li> <li>▪ Indecent exposure</li> </ul>
<b>Key Indicators</b>	<ul style="list-style-type: none"> <li>▪ Bruising, bleeding, pain or irritation in the genital area, arms, neck, or legs</li> <li>▪ Unusual difficulty in walking or sitting</li> <li>▪ Uncharacteristic use of explicit sexual language or withdrawal from relationships</li> <li>▪ Poor concentration, withdrawal, sleep disturbance or self-harming</li> </ul>

Neglect	
<b>Definition</b>	The persistent failure to meet someone's basic physical and/or psychological needs, likely to result in serious impairment of their health or development.
<b>What does this Include?</b>	<ul style="list-style-type: none"> <li>▪ Failure to provide or allow access to food, shelter, clothing, heating, stimulation, personal or medical care</li> <li>▪ Failure to administer medication as prescribed</li> <li>▪ Not taking account of individuals' cultural, religious or ethnic needs</li> <li>▪ Ignoring or isolating the person, including preventing access to visitors</li> </ul>
<b>Key Indicators</b>	<ul style="list-style-type: none"> <li>▪ Poor personal hygiene or unkempt</li> <li>▪ Malnutrition and/or dehydration</li> <li>▪ Living in squalid or unsanitary conditions</li> <li>▪ Neglecting household maintenance</li> <li>▪ Collecting many animals and/or keeping them in inappropriate conditions</li> <li>▪ Non-compliance with health or care services (inc. glasses, hearing aid, etc)</li> </ul>

In addition to the 4 principal categories of abuse identified within Keeping Children Safe in Education, several other types of abuse are defined in relation to adults. It is important to note that these forms of abuse may be experienced as physical abuse, emotional abuse, sexual abuse or neglect and the following descriptions, therefore, provide an overview of the context, but the likely indicators remain as outlined above:

**Discriminatory Abuse:** Any form of abuse that arises as a result of discrimination based on a protected characteristic, as defined within The Equality Act 2010 (age, disability, gender reassignment, marriage and civil partnership, pregnancy and maternity, race, religion and belief, sex or sexual orientation)

**Domestic Abuse:** Any form of abuse that takes place within a domestic or family environment. This might include violence, aggression, intimidation and/or coercion. It is important to note that victims might be male or female (though the majority are female), and that victims are often less likely to report this abuse than other forms of abuse. We should also be aware that Domestic Abuse also affects others that might witness abusive acts, even though they are directed towards another member of the household.

**Financial Abuse:** Includes Theft of money or possessions (including scams); Preventing a person from accessing their own money, benefits, or assets; Denying assistance to access benefits; Misuse of benefits or direct payments in a family home; Exploitation of a person's money or assets, e.g., unauthorised use of a card



**Honour-based abuse** So-called ‘honour-based’ abuse encompasses incidents or crimes which have been committed to protect or defend the honour of the family and/or the community, including female genital mutilation (FGM), forced marriage, and practices such as breast ironing. Non-violent forms of abuse may also take place. Abuse committed in the context of preserving “honour” often involves a wider network of a family or the community and can include multiple perpetrators.

### **Criminal Exploitation**

Criminal exploitation refers to situations where an individual or group coerce, control, manipulate, deceive, or force other(s) to engage in criminal activities. Victims may become involved:

- (a) in exchange for something the victim needs or wants
- (b) for the financial or other reward
- (c) through violence or the threat of violence

This normally takes place where there is an imbalance of power and criminals, therefore, often target children or vulnerable adults. It is also important to note that many instances may, at face value, appear to have been consensual, though this is likely to be associated with the victims’ potential vulnerabilities.

Criminal exploitation encompasses a wide range of offences; the following descriptions are, therefore, included to highlight some of the more prevalent concerns:

**Child sexual exploitation (CSE):** is a form of child sexual abuse. It occurs when the criminal exploitation involves sexual activity with a child or young person under the age of 18.

**Child Criminal Exploitation (CCE):** refers to any situation where the exploitation involves criminal acts being undertaken by a person under the age of 18.

**County lines:** is a term used to describe the networks used by organised criminals to transport Drugs between different geographical areas of the country. Gangs often exploit children or young people to transport supplies of drugs from large cities to rural areas and coastal towns

**Cuckooing:** refers to instances where organised criminals take over the home of a vulnerable person for the purpose of conducting criminal activity. Gangs often use ‘cuckooing’ in combination with ‘county lines’ activities to sell drugs and may take over a victims house for regular periods each day or for a single extended period.

**Modern Slavery:** Refers to a range of situations where adults are criminally exploited and includes human trafficking, forced labour, domestic servitude, sexual exploitation (e.g., escort work, prostitution or pornography) and debt bondage (being forced to work to pay off debts that realistically they never will be able to).

### **Female Genital Mutilation (FGM)**

FGM comprises all procedures involving partial or total removal of the external female genitalia or other injury to the female genital organs. It is illegal in the UK and a form of child abuse with long-lasting harmful consequences. Should you find that you are concerned about a learner that has been subjected to this or have any suspicions then you must report this to the police and raise with the Designated Safeguarding Lead.

### **Peer on Peer Abuse**

Peer on peer abuse refers to abuse that takes place between people of a similar age or stage of development. It is more commonly (but not exclusively) used in reference to children and young people and can involve individuals and/or groups. It can take various forms and include serious bullying, relationship abuse, domestic violence, child sexual exploitation, harmful sexual behaviour, and/or gender-based violence.



## Harmful sexual behaviour

Harmful sexual behaviour is an umbrella term that includes sexual violence and sexual harassment. Capita recognises that problematic, abusive, and violent sexual behaviours are inappropriate and may cause developmental damage. Harmful sexual behaviour can occur online and offline (both physical and verbal). Safeguarding concerns associated with harmful sexual behaviour will normally require intervention from the Police or local safeguarding partnership agency.

## Bullying

Bullying involves a deliberate act of verbal, physical and/or social behaviour that intends to cause physical, social and/or psychological harm to another. It can involve an individual or a group misusing their power, or perceived power, over one or more persons who feel unable to stop it from happening. It is generally considered to be bullying if such acts are repeated or ongoing, but any instance where such deliberate acts are identified should be reported as a safeguarding concern.

**Cyber bullying:** Cyber bullying refers to instances where acts of bullying take place using the internet and/or digital communication (e.g., social networking sites).

## Mental Health

Mental health refers to an individual's emotional, psychological, and social well-being. An individual's mental health can affect how they think, feel, act and engage with the wider world, and can also determine how they respond to stress or make choices. Mental health conditions are complex and often occur concurrently, but the following information provides an outline of the most common conditions identified amongst adults:

**Anxiety:** Abnormal worry or fear over certain situations. The level of anxiety felt varies between individuals and can be linked to a variety of triggers (including specific actions/events, social situations, but may also be more general): Anxiety affects people in different ways but can include. Restlessness; difficulties with sleep; rapid breathing/heartbeat; swearing/hot flushes; feeling dizzy; nausea; feeling emotional; having a sense of dread and increased self-consciousness.

**Depression:** Those affected experience 'low moods' for an extended period, or this may be continuous. Where symptoms are more acute, depression can affect everyday life and in the most severe cases it often leads to suicidal thoughts and/or can result in self-harm or suicidal attempts. Depression affects people in different ways but can include. Feeling down, upset, or tearful; feeling restless or agitated; feeling empty or numb; unable to relate to others; low self-confidence or self-esteem; feeling hopeless or despairing.

**Post-Traumatic Stress Disorder (PTSD):** Is a condition which can be experienced following a traumatic event. The condition may affect individuals for a short or extended period and in some cases may appear permanent. In many cases, those who suffer from PTSD will experience anxiety, depression, flashbacks, and other difficulties. PTSD is a complex condition and symptoms of anxiety and/or depression are often also present. Those with this condition may also experience flashback's, nightmares, intense distress, and sensations of pain/grief, etc)

## Child missing from education: (under the age of 18)

All children, regardless of their circumstances, are entitled to a full-time education. A child going missing from education may be an indicator of abuse or neglect. In addition, children who go missing or run away from home or care may be in danger and are vulnerable to crime. Should you identify any instance where a learner is missing you must ensure you report this as a safeguarding concern.

## Radicalisation

Radicalisation refers to the process by which a person comes to support terrorism and extremist ideologies associated with terrorist groups. Individuals and groups associated with extremist ideologies are known to target and take steps to influence vulnerable individuals with the intention



of radicalising them. It is worth noting that isolation, grievance, and loss are characteristics that can make individuals more vulnerable to radicalisation, and that radicalisation does not only take place in instances where the victim is 'groomed'. Alongside physical, vocal and symbolic associations with extremist groups, key indicators that radicalisation might be taking place include; withdrawal or isolation from friends/family/previous interests, stating opinions as if they were scripted, unwillingness to discuss views/opinions, and emotional changes. If you are concerned that an individual is associated with an extremist organisation, or that someone is being radicalised then please refer this as a safeguarding concern immediately.



## Appendix 3 - Useful Contacts

All concerns identified by learners, staff or 3<sup>rd</sup> parties should be referred to the duty Designated Safeguarding Officer or Designated Safeguarding Lead using the following contact details:

Safeguarding Contact	Contact Details
Capita Safeguarding Hotline	Telephone: 0370 123 4725 Email: <a href="mailto:safeguarding@capita.co.uk">safeguarding@capita.co.uk</a>
Designated Safeguarding Lead	Telephone: 07783 783913 Email: <a href="mailto:Alex.Palombo@capita.com">Alex.Palombo@capita.com</a>

Should a concern arise outside of normal working hours then this may be reported to the local police authority or to an alternative external support agency – See the #External Support & Contacts' section below for further details of relevant support networks.

**Please Note:** If the concern potentially involves an imminent harm/risk to life, or a serious Prevent incident occurs, you can also contact the following organisations out of hours:

Type of Concern	Organisation	Contact
Potential harm or risk to life	Police	999
Prevent related concern	National terrorist Hotline	0800 789321

If your concern relates to a member of Capita Learning staff then please contact the Designated Safeguarding Lead directly, or the Director of Quality & Curriculum if the concern relates to the Designated Safeguarding Lead:

Safeguarding Contact	Contact Details
<b>Designated Safeguarding Lead</b> Alex Palombo	Telephone: 07783 783913 Email: <a href="mailto:Alex.Palombo@capita.com">Alex.Palombo@capita.com</a>
<b>Director of Quality &amp; Curriculum</b> Kathryn Wills	Telephone: 07710 382 905 Email: <a href="mailto:Kathryn.Wills@capita.com">Kathryn.Wills@capita.com</a>

### Additional Support & Contacts

Contact Name	Role	Contact Details
Helen Bartlett	Deputy Designated Safeguarding Lead	Tel: 07783783308 Emaki: <a href="mailto:helen.bartlett@capita.com">helen.bartlett@capita.com</a>
Elaine Clarke	Safeguarding Officer	Tel: 0759 4523424 Email: <a href="mailto:Elaine.Clarke@capita.com">Elaine.Clarke@capita.com</a>
Mike Hamilton	Safeguarding Officer	Tel: 07716 225841 Emaki: <a href="mailto:Michael.Hamilton@Capita.com">Michael.Hamilton@Capita.com</a>
Claire Hudson	Safeguarding Officer	Tel: 07851 245 409 Emaki: <a href="mailto:Claire.Hudson@capita.com">Claire.Hudson@capita.com</a>
Melissa Maguire	Safeguarding Officer	Tel: 07541 604 766 Email: <a href="mailto:Melissa.Maguire@capita.com">Melissa.Maguire@capita.com</a>



Andrea Porter	Safeguarding Officer	Tel: 07511412953 Emaki: <a href="mailto:Andrea.Porter@capita.com">Andrea.Porter@capita.com</a>
Emma Valentine	Safeguarding Officer	Tel: 07753 223678 Emaki: <a href="mailto:Emma.Valentine@capita.com">Emma.Valentine@capita.com</a>

### Employee Assistance Programme

Capita offers all staff access to an independent Employee Assistance Programme (EAP) which is managed by an external partner. Access to the EAP is free and allows Capita employees to access resources to help manage stress and anxiety, offer direct access to counselling and practical advice on personal or work matters. It is a confidential service and independent of Capita. For further information and to access the Employee Assistance Programme, please use the following details:

**24/7 Confidential Telephone Line:** 0800 015 5630

**Access to resources (via PeopleHuib webpage):** [Click Here](#)

### Remploy

In addition to the Employee Assistance Programme, learners enrolled on an apprenticeship programme and Capita Learning staff can also access mental health support and counselling through Remploy. Remploy are an independent provider who are funded by the Department for Work & Pensions and offer programmes to support learners and staff via self-referral. The following contact details can be used to get in touch with Remploy:

**Confidential Telephone Line:** 0300 456 8114

**Access to advice (via Remploy webpage):** [Click Here](#)

### External Support & Contacts

Alongside any support or intervention that may be implemented by the safeguarding team in response to a specific concern, the following contacts might be useful within wider support for learners or staff:

Concern	Support available from:	Contact Details
<b>Addiction</b>	Young People and Gambling	0808 8020 133
	Children of Addicted Parents and People (COAP)	<a href="#">via website only</a>
	National Association for Children of Alcoholics	0800 358 3456
	<b>Alcoholics Anonymous (AA) Great Britain</b>	0800 9177 650
	<b>Talk to Frank</b>	<a href="#">via website only</a>
<b>Bereavement</b>	Childhood Bereavement Network	020 7843 6309
	Cruse Bereavement Care	0808 808 1677
	Grief Encounter	<a href="#">via website only</a>
<b>Bullying</b>	Anti-bullying alliance	<a href="#">via website only</a>
	Bullying UK	<a href="#">via website only</a>
	Ditch The Label	<a href="#">via website only</a>
<b>Cancer</b>	Macmillan Cancer Support	0808 808 00 00



<b>Children's Charities</b>	Barnardos	<a href="#">via website only</a>
	Childline	0800 1111
	NSPCC	0808 800 5000
<b>Counselling</b>	British Association for Counselling	<a href="#">via website only</a>
	<b>Remploy</b>	0300 456 8114
<b>Crime</b>	Crime Stoppers	0800 555 111
	Fearless (Crime Stoppers for Young People)	<a href="#">via website only</a>
<b>Domestic Abuse</b>	Galop (LGBT)	0800 999 5428
	National Domestic Violence Helpline	0808 2000 247
	Refuge	0808 2000 247
<b>Drugs</b>	Talk to Frank	<a href="#">via website only</a>
<b>Faith</b>	Muslim Youth Helpline	0808 808 2008
<b>FGM</b>	Africans Unite Against Child Abuse	<a href="#">via website only</a>
	Daughters of Eve	<a href="#">via website only</a>
	Forward UK	0208 960 4000
	NSPCC FGM Helpline	0800 028 3550
<b>Forced Marriage</b>	Karma Nirvana	0800 5999 247
<b>Housing</b>	Shelter	0808 800 4444
<b>LGBTQ+</b>	Coram Voice	0808 800 5792
	<b>Stonewall</b>	0207 593 1850
	The Care Advice Line.	020 7017 8901
<b>Mental Health</b>	Anxiety UK	3444 774
	B-eat eating disorders	0808 801 0711
	Bipolar UK	0333 323 3880
	Heads Together	<a href="#">via website only</a>
	MindEd for Families	<a href="#">via website only</a>
	OCD Action	0845 390 6232
	Remploy	0300 456 8114
	Rethink Mental Illness	<a href="#">via website only</a>
	Samaritans.	116 123
	Sane.	0300 304 7000
	Young Minds	<a href="#">via website only</a>
<b>Online Safety</b>	Child Exploitation Online Protection Centre	<a href="#">via website only</a>
	National Professionals Online Safety Helpline	0344 381 4772





	Net-Aware	<a href="#">via website only</a>
	Safer Internet	<a href="#">via website only</a>
	Think U Know	<a href="#">via website only</a>
<b>Self-Harm</b>	Harmless	<a href="#">via website only</a>
	National Self Harm Network	<a href="#">via website only</a>
	Self-injury support (Girls)	0808 800 8088
<b>Sexual Abuse</b>	MOSAC (Mothers of Sexually Abused Children)	0800 980 1958
	Stop It Now	0808 1000 900
<b>Sexual Health</b>	Sexual Health Helpline	0300 123 7123
	Brook	<a href="#">via website only</a>

### Other Specialist Support Services

The following support services may be of special interest to individuals with SEND needs:

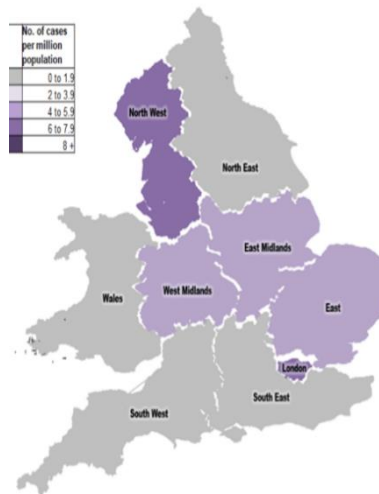
Organisation	Specialist Support	Contact Details
Sign Health	Specialist service providing access to support with health and wellbeing for individuals with hearing impairment.	Tel: 020 3947 2600 Emaki: <a href="mailto:info@signhealth.org.uk">info@signhealth.org.uk</a> Text: 07966 976749 Website: <a href="https://signhealth.org.uk">https://signhealth.org.uk</a>

All agencies identified above accept self-referral from individuals who may wish to seek advice or support in relation to concerns that might have been identified.



## Prevent Regional Coordinators

The Prevent strategy is supported by a network of regional coordinators who work closely with educational providers. Alongside the wider support they offer to us as a provider, they can also offer advice in relation to any Prevent concerns that might arise:



Region	Contact Name	Contact
North East & Yorkshire	Chris Sybenga	Email: <a href="mailto:chris.sybenga@education.gov.uk">chris.sybenga@education.gov.uk</a>
		Phone: 07384 456640
North West	Nigel Lund	Email: <a href="mailto:nigel.lund@education.gov.uk">nigel.lund@education.gov.uk</a>
		Phone: 07384 452146
West Midlands	Hifsa Haroon Iqbal	Email: <a href="mailto:Hifsa.haroon-iqbal@education.gov.uk">Hifsa.haroon-iqbal@education.gov.uk</a>
		Phone: 07785 654148
East Midlands	Sam Slack	Email: <a href="mailto:sam.slack@education.gov.uk">sam.slack@education.gov.uk</a>
		Phone: 07384 452156
Eastern England	Dave Layton-Scott	Email: <a href="mailto:david.layton-scott@education.gov.uk">david.layton-scott@education.gov.uk</a>
		Phone: 07384 452155
South West	Salam Arabi-Katbi	Email: <a href="mailto:salam.katbi@education.gov.uk">salam.katbi@education.gov.uk</a>
		Phone: 07824 083307
South East	Alamgir Sheriyar	Email: <a href="mailto:alamgir.sheriyar@education.gov.uk">alamgir.sheriyar@education.gov.uk</a>
		Phone: 07468 714372
London	Jennie Fisher	Email: <a href="mailto:jennie.fisher@education.gov.uk">jennie.fisher@education.gov.uk</a>
		Phone: 07880 469588



## Appendix 4 – Disclosure & Barring Service (DBS) Checks

All offers of employment/work are conditional to an appropriate Disclosure & Barring Service (DBS) check. The level of DBS checks required is dependent on the role being recruited, but this may be completed at Basic, Standard or Enhanced level and is dependent on the type of activity and contact with learners that is associated with the role.

### DBS Checks – Indicative Levels by Role

The following are included as a guide to the level of DBS checks required for different roles:

#### Apprenticeship Provision

Role (inc. Examples)	Basic	Enhanced	Enhanced (inc. barred list)
<b>Main learner facing roles which include potential regular contact with children or vulnerable adults</b> (e.g., Talent Coach, Specialist Learning Consultant's, Safeguarding Team, etc)			Required
<b>Other learner facing roles with potential repeated contact with children or vulnerable adults</b> (e.g., Operations Manager, Quality Managers, IQA's, EPA's, etc)		Required	
<b>Other learner facing roles with potential influence over children &amp; vulnerable adults</b> (e.g., Enrolments Team, etc)		Required	
<b>Other roles</b> (e.g., Operations Support, Client Partner Team, etc)	Required		

#### Other Adult Education Provisions

Role (inc. Examples)	Basic	Enhanced	Enhanced (inc. barred list)
<b>Main learner facing roles with potential regular contact with vulnerable adults</b> (e.g., Tutor, etc)		Required	
<b>Other roles</b> (e.g., V2L Learner Support Team, etc)	Required		

### DBS Check Renewal Cycle

It is Capita Learning policy that DBS checks are renewed every 3 years throughout the period of service with the organisation.



## Appendix 5 – Staff Training Programme

The training programme is reviewed regularly by the Designated Safeguarding Lead to ensure that it provides the necessary information and support for staff. As a starting point, the following is provided as an outline of the current programme:

Staff Role	Training Element	Training Access
General Staff	Capita Group Safeguarding (Level 1)	Allocated via Workday
	Safeguarding & Prevent – Capita Induction	Induction programme
	Prevent for Practitioners (2021)	<a href="#">Click here to access course</a>
Managers	Capita Group Safeguarding (Level 1)	Allocated via Workday
	Safeguarding & Prevent – Capita Induction	Induction programme
	Safer recruitment in FE (2021)	<a href="#">Click here to access course</a>
	Prevent for leaders and managers (2021)	<a href="#">Click here to access course</a>
Board Members	Safeguarding in the FE & Training Sector	<a href="#">Click here to access course</a>
	Prevent for governors and board members (2021)	<a href="#">Click here to access course</a>
Capita Group Safeguarding Representatives	Capita Group Safeguarding (Level 2)	Allocated via Workday
Safeguarding Team	Capita Group Safeguarding (Level 2)	Allocated via Workday
Designated Safeguarding Lead	Designated Safeguarding Lead Certification	Advanced Level (External)

### Refresher Training

All Capita Learning staff are required to maintain an up-to-date working knowledge of safeguarding. To support colleagues in achieving this, all staff are required to complete 'refresher training' as follows:

**Capita Group Training:** In accordance with the Capita Group Safeguarding Framework, all Capita Learning staff are required to complete the Capita Group Safeguarding training module every 3 years.

**Capita Learning Annual Refresher:** All Capita Learning staff are required to complete a business specific annual refresher programme to ensure they are aware of any relevant updates and legislative changes and maintain a good working knowledge of the potential risks that apply to the Capita Learning context.

### Other Mandatory Updates

Alongside completion of all refresher training, all colleagues are required to maintain an up to date understanding of the regulatory frameworks and current risks faced by our learners. All Capita Learning colleagues are, therefore, expected to engage with the following regular updates:

Update	Frequency	Update Accessible via:
Keeping Children Safe in Education – Part 1 (Apprenticeship Team only)	Annually - September	<a href="#">Click to access document</a>
Capita Safeguarding & Prevent Newsletter	Monthly	Published Monthly



## Appendix 6 - Safeguarding Policy (COVID-19 Addendum)

This addendum applies during the period of closure / partial closure / adapted delivery model due to Covid-19 and reflects updated advice from the Government. It sets out changes to our normal Safeguarding policy in light of the Department for Education's guidance Coronavirus: safeguarding in schools, colleges and other providers, and should be read in conjunction with that document. Unless stated below, Capita's normal safeguarding procedure remains in place.

Capita Learning is committed to safeguarding and promoting the welfare of all learners and Staff within the organisation. This situation remains the same despite the difficult circumstances brought about by the COVID-19 outbreak.

The Department for Education's (DfE's) definition of 'vulnerable children' includes those who:

- Have a social worker, including learners:
- With a child protection plan
- Assessed as being in need
- Looked after by the local authority
- Have an education, health and care (EHC) plan

The Department for Health defines Vulnerable adults as:

An adult at risk is any person who is aged 18 years or over and at risk of abuse or neglect because of their needs for care and or support.

As a result of the changes brought about because of the outbreak, the following will apply:

### Designated (Deputy) Safeguarding Lead Arrangements

The Designated Safeguarding Lead or Deputy Safeguarding Lead is available via telephone or through Microsoft Teams during all operational hours.

### Learners with Safeguarding Concerns

Learners with Safeguarding concerns can contact the DSL by telephoning the Safeguarding Helpline or via email. The email address is available on BUD and included in staff email signatures.

### Vulnerable Learners

Capita Learning will continue to work with any outside agency as required to ensure the safeguarding of all learners. Contact will be maintained with any learner in furlough who has expressed concerns regarding mental health to ensure they are aware of support available and to escalate support if required. Capita will continue to work with Local Safeguarding Partners during this period and raise concerns that meet the threshold for referrals.

### Learners on Site

Capita Learning will refer to Government guidance on Education settings and Capita Group guidance on how to implement social distancing and advice from Public Health England on handwashing and other measures to limit the spread of COVID-19.

### Remote Learning

All staff will use either Microsoft Teams when delivering to learners and ensure waiting rooms are in place to safeguard learners where this is appropriate. Capita will continue to have appropriate filtering and monitoring systems in place. All staff are to adhere to the Acceptable Use agreements and Online Safety Policy. Concerns should be raised when learners cannot be contacted who remain in learning during this period.



### **Welfare Concerns**

All welfare concerns should be reported to the Designated Safeguarding Officer or Designated Safeguarding Lead using the appropriate safeguarding referral mechanism and appropriate support will be provided to support the learner. Staff are reminded that they need to remain vigilant to the sign of abuse and emotional distress.

### **Mental Health**

Capita will continue to direct learners to charities that can provide mental health support as required. During this time, Capita will continue to make use of Remploy services as required and Staff have access to counselling support if needed.

### **Induction and Safer Recruitment**

In accordance with Government guidance validation of documents will take place through a live video link and possession of the physical document must be observed by the person completing the validation of the document. Scanned documentation will then be sent to the person completing the check. This procedure will be in place whilst remote induction is used during the COVID-19 period. (<https://www.gov.uk/government/news/covid-19-changes-to-dbs-id-checking-guidelines>).

### **Equality and Diversity**

Capita Learning are aware that Covid-19 will provide different challenges to different people as we adapt to new ways of working. This impact is likely to affect the physical and emotional well-being of staff and learners as we make changes to both the physical environment and the way we use technology to support others. We must consider the impact of different groups to try to minimise the impact of Covid-19 to individuals based on their unique circumstances and to promote inclusion for all.

### **Mental Health Support**

Mental health support is available to all Staff. This can either be accessed by contacting one of the mental health first aiders or by contacting the confidential support line available through Employee assistance or via Remploy - Support and counselling can be accessed through these services. Support for learners and staff can also be accessed through contact with the safeguarding team via the relevant safeguarding hotline, or by referral through a Talent Coach. If support is provided to a learner, a referral should be completed to aid the tracking of support needs.

### **Equipment and Technology**

All staff will use Microsoft Teams to communicate virtually. Videos should be turned on to aid all staff. Immersive technology can be enabled by individual staff or learners to ensure they have an environment that supports their communication needs. This includes translate which will provide a transcript of communication. Staff are reminded to avoid jargon and communicate clearly to ensure that this feature can be enabled. Microsoft Teams also has a text feature for any staff member or learner that may need to communicate in this manner. Health and Safety courses have also been undertaken by Staff to support them with maintaining good posture and a good working environment. All managers are asked to assess if further reasonable adjustments are required, and any adjustments identified should be raised with the local SHE representative who will provide additional support and guidance. Employees with a poor internet connection should seek support from Capita's IT support service who may be able to provide practical advice and solutions.

### **Communication**

Meetings should be held with all staff within the business to support their emotional well-being. Staff in furlough (during any applicable periods) are welcome to attend meetings if they feel this would be supportive. Contact should be maintained with those in furlough to check their well-being on at least a weekly basis.



**Other Considerations**

All other circumstances will be assessed, and actions identified as they arise to ensure that Capita Learning continues to feel a welcoming environment to all.

Staff attending work-place settings should familiarise themselves with any changes to the environment before attending and follow the risk assessment guidance.

