Blue Lights Digital Ltd (BLD) Safeguarding and Prevent Policy

Policy Title	BLD Safeguarding and Prevent Policy
Owner	N.Curry
Date Written	9th September 2025
Review	L. Curry
Approved By	N.Curry
Review Date	9th September 2027

welfare, and protection of all learners, staff, and stakeholders. This policy outlines our approach to safeguarding in accordance with the statutory guidance outlined in Keeping Children Safe in Education (KCSIE) 2024. We aim to create an environment where all learners can thrive and feel safe. Safeguarding is everyone's responsibility, and we expect all staff, stakeholders, and visitors to adhere to the guidelines set out in this policy.

This Policy aims to detail the framework for promoting and ensuring the safeguarding and protection of all applicants and apprentices. Safeguarding means "recognising that the needs, well -being and safety of all our applicants and apprentices are considered at all times and that actions relating to this are in line with legislation, recommendations and guidelines." All adults who work with children and young people are accountable for the way in which they exercise authority, manage risk, use resources, and safeguard children and young people. A duty is placed on BLD to safeguard and promote the well -being of children and young people. This includes the need to ensure that all adults who work with children and young people are competent, confident, and safe to do so.

Our aims are to:

- Promote fundamental British values, including freedom of speech, rights to be safe and listened to, by creating an environment that encourages every learner to raise any concerns.
- Encourage all learners to develop a sense of autonomy and independence in their learning and development.
- Enable all learners to have the self-confidence and the vocabulary to resist inappropriate approaches.

- Work with employers to build their understanding of and commitment to the principles of Safeguarding and Prevent duty.
- Liaise with other statutory agencies to ensure Safeguarding and Prevent duty legislative procedures are current.
- Liaise with external agencies to support staff and learners where a safeguarding and/or Prevent concern require it.

Policy Statement

Blue Lights Digital Ltd (BLD) is fully committed to safeguarding and promoting the welfare of young people and vulnerable adults. We recognise our responsibility and acknowledge that it is the duty of our workforce in its entirety to uphold British Values and safeguard the welfare of all stakeholders by creating an environment that protects them from harm and reduces any potential risks of being exposed to violence, extremism, exploitation, or victimisation. We believe that every learner, regardless of their age, gender, disability, religion, or ethnic background, has the right to be protected from harm and to receive appropriate care and support.

We will ensure:

- Effective safeguarding procedures are in place and followed.
- All staff, including volunteers and contractors, are trained and equipped to identify and respond to safeguarding concerns.
- All staff are appropriately trained in safeguarding and to understand the risk of radicalisation, challenging extremism, their role in implementing the Prevent Duty and the impact this has on their job role, and how to refer an individual who they feel is at risk .
- Our safeguarding practice complies with the relevant guidance, including KCSIE 2024 , Working Together to Safeguard Children (2023), and other relevant local and national policies.
- Relevant employment and security checks are undertaken within our safer recruitment procedures, that all adults within Blue Lights Digital Ltd (BLD) , who have access to learners, have been checked as to their suitability in line with statutory requirements and as outlined in KCSIE 2024 Part Three: Safer Recruitment. This will support in creating a culture that is safe and safeguards the welfare of learners

Policy Purpose and Scope

This policy sets out the principles, practices, and responsibilities for safeguarding and the steps BLD will take to protect the welfare of all learners, including those at risk of harm, abuse, neglect, or exploitation.

This policy applies to all staff members, including:

- Senior Leaders
- Tutors, Assessors, and Coaches
- Administrative and Support Staff
- Volunteers
- Contractors

This policy covers the legislative requirements and recommendations pertaining to the protection of children, young people, and adults at risk in the UK, in accordance with statutory guidance on safeguarding and promoting the welfare of learners in education.

There is also very useful guidance given by the following which have informed the contents of this policy:

- The Government entitled " Keeping Children Safe in Education "
- The British Council entitled " Safeguarding Under 18s ".

This Policy is based on the guidance issued by the Department of Education to include:

- The Children Act, 1989, provides the legal framework for the protection of people under 18 in the UK, specifically sections 17 & 47
- Statutory guidance on safeguarding and the promotion of the welfare of people under 18 in the UK under section 11 of the Children Act, 2004
- Section 93 of the Education and Inspections Act, 2023 guidance on the use of reasonable force and section 26 of the Equality Act, 2010
- Education Act 2002 and 2011
- Working Together to Safeguard Children (March 2023)
- Safeguarding Children and Vulnerable Groups Act (2006)
- Safeguarding Children and Safer Recruitment in Education (2007) and (2012)
- Counter Terrorism and Security Act 2015
- Multi -Agency child protection procedures and practice guidelines.

The purpose of the policy and its supporting documents will be to:

- Provide protection for the learners and customers on Blue Lights Digital Ltd (BLD)'s programmes regarding safeguarding and Prevent Duty
- Provide employees with guidance on procedures they should adopt if they suspect a learner may be experiencing, or be at risk of, harm, abuse or radicalisation
- Provide employees with training, guidance and a code of conduct
- Ensure all services and staff operate within the required legal framework that surrounds safeguarding and Prevent including the Prevent Duty Guidance

Safeguarding

The key principles of safeguarding at Blue Lights Digital Ltd (BLD) are:

1. **Prevention**: We will ensure the creation of a safe and supportive learning environment, including the promotion of healthy relationships, positive behaviour, and well-being.
2. **Protection**: We will take all reasonable steps to prevent learners from being harmed. This includes identifying potential risks and acting swiftly when concerns arise.
3. **Proportionality** : When dealing with the risk we will ensure that any response made is appropriate to the level of risk prevented and fully respect the learner in deciding what is best for them.
4. **Partnerships**: We will work closely with external agencies (such as local authorities, the police, and safeguarding boards) to ensure a coordinated response to safeguarding concerns.

Safeguarding is defined as the protection of learners and the promotion of their welfare. Safeguarding comprises four main aims:

- Protection from maltreatment or significant harm
- Preventing impairment of health or development
- Ensuring all learners have the opportunity to experience circumstances consistent of safe and effective care
- Taking action to enable people to achieve the best outcomes

Working Together to Safeguard Children, 2023 defines maltreatment as; ' Inflicting harm or failing to prevent harm'

The Children Act, 1989, 2004 defines harm as; 'Ill-treatment or the impairment of health or development' Significant can be defined as; 'Compared to the health and development of another with that which could be reasonably expected of a similar person (child, young person, adult or learner)'

Blue Lights Digital Ltd (BLD) 's safeguarding arrangements are designed to protect all our learners, employees,and stakeholders:

- 'Child' means anyone under the age of 18
- 'Young person' means anyone aged 14 to 17
- An adult at risk means a person, aged 18 or over, living in certain situations, detained in custody, supervised in the community or receiving specific services.

Blue Lights Digital Ltd (BLD) understands that there are numerous recognised barriers to learning and categories of significant harm or maltreatment which a learner may experience, such as:

Harassment and bullying
Forced marriage
Physical abuse
Sexual abuse
Emotional abuse
Neglect
Domestic violence
Financial abuse
Institutional abuse
Discriminatory abuse

Blue Lights Digital Ltd (BLD) is mindful that a number of other situations may render a person vulnerable such as - victims of domestic abuse, migrants, living in a drug-misusing family, living in areas of high crime, being likely to face racism or having caring responsibilities.

Blue Lights Digital Ltd (BLD):

- Adopts an inclusive approach to safeguarding. We understand the importance of recognising the signs and symptoms of potential maltreatment or significant harm and how to report and refer a concern

- Recognises that a learner who is abused, experiences bullying or is witness to violence may feel alone, frightened and confused. We understand our responsibility to provide a stable, encouraging, and safe environment

- Accepts that experiencing harm may significantly affect the behaviour of a learner, ranging from what is perceived to be normal to aggressive or withdrawn. Additional information on safeguarding and detailed definitions of the above categories can be found in the Safeguarding and Prevent Framework and reporting procedure.

Under 18's General

- No member of staff should be left alone with an U18/young person where they cannot be observed by others
- Physical contact between adults and under 18's is usually not acceptable except in extenuating circumstances
- It is an offence under the Sexual Offences Act 2003 for any person in a Position of Trust to engage in sexual activity of any sort with students under the age of 18 even though the legal age of consent is 16
- Under no circumstances should visitors be allowed access to the premises unaccompanied when students who are under 18 are present

- Staff should be alert to strangers frequently waiting outside workplace premises with no apparent purpose
- Learners receive a regular U18 meeting with an appropriately trained interviewer with a select question bank approved by the designated officer
- There are regular welfare slots at team meetings for updates
- No member of staff should contact a learner under the age of 18 on social media either before, after or during the learner's course of study
- Socialising with learners outside of workplace at activities or events which are not arranged by Blue Lights Digital Ltd (BLD) is permitted provided all the learners in the group are over 18.

Whistleblowing

Whistleblowing is an important aspect of a safeguarded institution whereby staff and volunteers are encouraged to share concerns about a colleague's behaviour in confidence, with the Workplace or Safeguarding Officer, line manager or senior manager or Head Office HR as appropriate. Working with vulnerable groups including minors and young people places staff and volunteers in positions of power. To retain the trust of vulnerable people, it is essential that all reasonable steps are taken to ensure this power is exercised responsibly. There may be situations whereby staff or volunteers have concerns about the conduct of a colleague towards a participant. All members of Blue Lights Digital Ltd (BLD) have the right and the responsibility to raise concerns, without prejudice to their own position, about the behavior of staff, managers, volunteers, learners , or others, which may be harmful to those in their care and will receive appropriate support when doing so.

Whistleblowing should be part of transparent work practices and is not intended to set up mistrust or suspicion among staff and volunteers. Refer to Blue Lights Digital Ltd (BLD)' Whistleblowing Policy for further details.

How to handle a disclosure by a learner under the age of 18

If a learner makes an allegation or disclosure of abuse against an adult or another learner or young person, it is important that you:
• Listen to them;
• Let them know that you take what they are saying seriously;
• Do not attempt to question or interview them yourself;
• Let them know that you will need to tell someone else to help them.
• Do not promise to keep what they tell you secret but stress anyone you inform will not tell others unless necessary and the aim will be to support and help the young person
• Inform your Designated Safeguarding Lead (DSL) as soon as possible;
• Make a written record of the incident or events.
Sometimes you may just feel concerned about a learner but do not know whether to share your concerns or not. In this situation it is always advised to raise concerns with the Safeguarding Officer, who will signpost or assist as appropriate.

Prevent

Blue Lights Digital Ltd (BLD) Prevent policy includes the BLD Prevent Risk Assessment, ensure this is reviewed in conjunction with this policy. BLD has a Prevent Duty under the Counterterrorism and Security Act 2015, which requires staff to have an awareness of the risks of radicalisation. Blue Lights Digital Ltd (BLD) recognises its responsibility to have a due regard to the need to prevent people from being drawn in to terrorism, focusing on the 3 key objectives :

- Prevent people from being drawn into terrorism and ensure they are given the appropriate advice and support
- Respond to the ideological challenge of terrorism and the threat we face from those who promote it
- Work with sectors and institutions where there is a risk of radicalisation we need to address.

We are committed to preventing learners from being drawn into terrorism or extremist ideologies.

- Risk Assessment: Regular assessments will be carried out to identify learners who may be vulnerable to radicalisation.
- Staff Training: All staff will receive training on the risks of radicalisation and the signs to watch for, in line with Prevent Duty requirements.

In complying with the Prevent Duty, we aim to demonstrate an awareness and understanding of the risk of radicalisation within Blue Lights Digital Ltd (BLD). This risk may vary greatly and can change rapidly, but no area within Blue Lights Digital Ltd (BLD) is entirely risk free.

There are three themes for consideration:

- Effective leadership
- Working in partnership
- Appropriate capabilities

This is set out in our Prevent procedure and Risk Assessment.
An important part of Prevent, is also the promotion of British values. These are the norms that shape our society and which are enshrined in law, through legislation such as the Equality Act 2010.

British values are described as:

- Democracy
- The rule of law
- Individual liberty
- Mutual respect and tolerance for those with different faiths and beliefs, and no faith/belief Safeguarding and Prevent Policy

Learners are encouraged to explore British Values as part of their apprenticeship programme, and contextualised within their programme of study.

What is Extremism?

The Government has defined extremism as "vocal or active opposition to fundamental British values, including democracy, the rule of law, individual liberty and mutual respect and tolerance of different faiths and beliefs". This also includes calls for the death of members of the British armed forces.

What are British Values?

British values are defined as "democracy, the rule of law, individual liberty and mutual respect and tolerance for those with different faiths and beliefs". Training providers are expected to encourage young people to respect other people with protected characteristics as set out in the Equality Act 2010.

Responsibilities of Staff

All staff have a responsibility to:

- Undertake safeguarding and Prevent training annually which is formally recorded by the HR Team
- Be aware of when it is appropriate to refer concerns to the Designated Safeguarding Officer
- Exemplify British values of “democracy, the rule of law, individual liberty and mutual respect and tolerance for those with different faiths and beliefs” into their day-to-day work ethic and practice
- Read the Equality Act 2010 Policy

The Counter Terrorism and Security Act (2015) places a duty on specified authorities, including local authorities and childcare, education, and other children’s services providers, in the exercise of their functions, to have due regard to the need to prevent people from being drawn into terrorism (“The Prevent Duty”)

Prevent is about keeping our learners both safe and within the law. The Prevent Duty is not about preventing learners from having political and religious views, rather to support them to develop and discuss those views or act on them in non-extremist ways.
The current threat from terrorism in the United Kingdom may include the exploitation of vulnerable people to involve them in terrorism or in activity in support of terrorism. The normalisation of extreme views may also make children and young people vulnerable to future manipulation and exploitation.

Blue Lights Digital Ltd (BLD) is clear that this exploitation and radicalisation should be viewed as a safeguarding concern and that protecting young/vulnerable learners from the risk of radicalisation is part of our safeguarding duty. Responding to suspicions of radicalisation and extremism

We are alert to changes in a learner's behaviour or attitude which could indicate that they need help or protection. When any member of staff has concerns that a learner may be at risk of radicalisation or involvement in terrorism, they should speak with the On - Duty Designated Safeguarding Officer for investigation and action. Staff take care not to influence the outcome either through the way they speak to or question learners.
We will continue to welcome the learner whilst investigations are being made. The learner may choose to withdraw from learning activities whilst investigations take place. We follow the procedures as set by the Local Safeguarding Board in relation to the delivery of services and designated roles and tasks in supporting the learner, family, and employer, after any investigation.

All suspicions and investigations are kept confidential and shared only with those who need to know.

Any information is shared under the guidance of the Regional Prevent Coordinator. Numerous factors can contribute to and influence the range of behaviours that are defined as violent extremism, but most young people do not become involved in extremist action. For this reason, the appropriate interventions in any case may not have any specific connection to the threat of radicalisation, for example they may address mental health, relationship, or drug/alcohol issues.

Channel

Channel is a multi-agency approach to provide support to individuals who are at risk of being drawn into terrorist related activity.

It is led by the regional Police Counter -Terrorism Unit, and it aims to:

- Establish an effective multi-agency referral and intervention process to identify vulnerable individuals.
- Safeguard individuals who might be vulnerable to being radicalised, so that they are not at risk of being drawn into terrorist -related activity.
- Provide early intervention to protect and divert people away from the risks they face and reduce vulnerability.

The Channel programme focuses on providing support at an early stage to people who are identified as being vulnerable to being drawn into terrorism. It provides a mechanism for organisations to make referrals if they are concerned that an individual might be vulnerable to radicalisation. An individual's participation in the programme is entirely voluntary at all stages.

Training Providers have a duty to cooperate with the Channel programme in the carrying out of its functions, and with the Police in providing information about an individual who is referred to Channel (Section 38, Counter Terrorism and Security Act 2015).

Further guidance about duties relating to the risk of radicalisation is available in the Prevent Duty Guidance for FE.

Blue Lights Digital Ltd (BLD) responsibilities

All staff have a responsibility to follow the guidance laid out in this policy and related documents, and to respond to any concerns using the specified procedures. We expect all staff to promote good practice by being excellent role models, contribute to discussions about safeguarding and the Prevent Duty positively and to be actively involved in promoting best practice. Staff responsibilities
for safeguarding and Prevent are explicitly defined in their job descriptions.

- Blue Lights Digital Ltd (BLD) will carry out its responsibilities under all relevant legislation, regulations, and formal guidance for the protection of children and adult at risks
- Support the development of every apprentice in ways which will foster security, confidence, and independence
- Provide an environment in which apprentices feel safe, valued, and respected
- Implement preventative safeguarding measures to help raise awareness of safeguarding and protect apprentices from maltreatment or harm
- Ensure that employers are aware of their safeguarding obligations, through guidance and training
- Maintain open channels of communication with each employer. Apprentices may act very differently depending on their environment and may feel more comfortable discussing sensitive issues with different people
- Ensure that safe recruitment measures are implemented for staff working in regulated activity with learners, specifically those under 18
- Employ designated members of staff responsible for raising awareness of safeguarding and prevent, providing specialist support to staff, learners, and clients when necessary
- Support all staff affected by their experiences of safeguarding concerns and protect learners by encouraging staff to share concerns using the confidential safeguarding@bluelightsdigital.com email address or by contacting the Designated Safeguarding Officer .

Blue Lights Digital Ltd (BLD) Board

- An appropriate Safeguarding and Prevent Duty policy is in place
- Sufficient resources including time, funding, training supervision and support, are allocated to ensure that the policy can be implemented effectively
- The policy is subject to annual monitoring and review

- One board member has responsibility for overseeing Safeguarding and Prevent Duty issues demonstrating a clear line of accountability at the most senior level
- Blue Lights Digital Ltd (BLD) recognises its responsibility to implement, maintain and regularly review the procedures that are designed to prevent or notify suspected abuse.

Management Team

- Implementing the Safeguarding and Prevent Policy
- Monitoring, reviewing, and updating the Safeguarding and Prevent Policy
- Monitoring the work of and supporting the Designated Safeguarding Lead (DSL)
- To deter potential, unsuitable individuals from applying to Blue Lights Digital Ltd (BLD) by demonstrating our attentiveness and vigilance in relation to safeguarding through our website and job advertisements
- To reject at interview stage anyone where we have doubts about suitability.

Designated Safeguarding Lead (DSL), Deputy Safeguarding Officer

The responsibilities of the Lead Safeguarding Officers

- Promoting good practice in relation to Safeguarding and Prevent
- To promote awareness to staff of the need to safeguard children and to recognise that safeguarding is everyone's responsibility
- Developing and maintaining effective links with relevant external agencies, including the sharing of information
- Providing support and advice to staff who share a concern or disclosure about a learner and maintaining appropriate records of concerns, incidents, or disclosures on a secure central risk register
- Immediately investigating significant concerns and referring to the local Safeguarding Children's Board or Adult Safeguarding Board when necessary
- Blue Lights Digital Ltd (BLD) will monitor all those that fall into the under 18 or vulnerable category through a regular welfare call and this is logged on a learner welfare tracker spreadsheet
- Oversight of the creation and maintenance of a secure, confidential, single central file to record staff DBS certificate details, safe recruitment details, emergency contact information and learner data for apprenticeship programmes
- Oversight of the delivery and review of Blue Lights Digital Ltd (BLD) staff training in safeguarding and Prevent
- Oversight and delivery of the Prevent management procedure and risk self - assessment
- Ensuring that all non-confidential documentation relating to the Apprenticeship Safeguarding Policy and procedures is made available to all staff, learners and employers and the safeguarding referral procedure is made available to every learner-facing member of staff
- To provide guidelines for staff in handling matters relating to actual or suspected child abuse

- To ensure staff act professionally .

Staff responsibility

All staff have a duty to safeguard and promote the welfare of our applicants and apprentices. We all have a statutory and moral duty to protect children and young people. If anyone hears, or becomes aware of anything that leads them to believe that the safety or welfare of any child or young person is at risk due to neglect, physical, emotional, or sexual abuse, they MUST pass on the information to the DSL.

Additionally, staff have a duty to:

- Understand and fulfil their safeguarding responsibilities as outlined in this policy statement, the Safeguarding Framework and Reporting Procedure, and any supporting documents
- Blue Lights Digital Ltd (BLD) will advise all employers of the existence of the BLD Safeguarding Policy and Procedures, and the fact that this may require cases to be referred to the investigative agencies in the interests of the learner
- Ensure that all learner data is kept confidential in line with Data Protection Policy (GDPR)
- Report any safeguarding concerns or disclosures immediately to the DSL, using the email: safeguarding@bluelightsdigital.com in line with the reporting concerns procedure and supporting guidance
- Maintain strict confidentiality with learners in line with this policy and guidance from the Designated Safeguarding Lead (DSL)
- Engage in safeguarding and prevent training and complete safeguarding assessments and qualifications as required
- Act on the basis that the welfare of the learner is of paramount concern and, if in doubt, to immediately seek advice from the Designated Safeguarding Lead (DSL)
- Be alert to signs of abuse as well as other children in need issues
- Be prepared to contribute to whatever actions are needed to safeguard the applicant or apprentice
- Read at least Part 1 of KCSIE and any updates communicated – confirming understanding in writing
- Abide by the Sexual Offences Act 2003
- Refrain from physical contact – children and young people should only be touched in ways that are appropriate to our professional or agreed role and responsibilities
- Treat children and young people with dignity and respect even in those circumstances where difficult or challenging behaviour is observed
- Advise a colleague if 1:1 working is required
- Discuss and raise awareness of issues, supported by a monthly welfare newsletter
- Signpost learners to the ETF side-by side course to develop their own understanding and value The 5 R's

Everyone has a responsibility to actively make the learning environment safe and secure for all by following the 5 R's:

Recognise - One of the most important roles for any employee is to be able to recognise abuse or neglect in the course of their everyday work. Sometimes, the signs are obvious such as broken bones or cuts and bruises. However, sometimes the signs are a lot less easy to identify.

Respond - All employees working with young and vulnerable people need to be alert to signs of abuse or neglect and know how to respond appropriately (including knowing who in their organisation to share their concerns with and where appropriate, knowing how to ask relevant nonleading questions to see if there is a reasonable and consistent explanation for the signs observed).

Recording - When recording an incident, a Safeguarding Referral Form must be completed. The document must be sent to safeguarding@bluelightsdigital.com. Whilst you can record observations, do not interpret, or give opinion as this may bias the information provided and jeopardise any future investigation into the allegation.

Report - Any issues or concerns, allegations or suspicions relating to safeguarding must be taken seriously and reported to a Safeguarding Designated Lead.

Refer - Where required, the Safeguarding Representative will refer or support you with guidance on next steps and/or signposting the relevant external agency.

The Designated Safeguarding Lead (DSL) (DSL) is: Nick Curry BLD CEO. Any concerns should be reported to him at nick@bluelightsdigital.com

Deputy Designated Safeguarding Lead (DDSL): Matt Service. Contact: safeguarding@bluelightsdigital.com
Board Director responsible for Safeguarding: Nick Curry
Safeguarding enquiries should be directed to the DSL in the first instance: nick@bluelightsdigital.com/07496073383.

Welfare Call

A welfare call is conducted monthly by a trained member of staff with safeguarding lead approved questions, this forms another means of checking on welfare and safety of any learner deemed as at risk or under the age of 18.

Recruitment

Safe recruitment practices are followed as follows

- Job or role descriptions for all roles involving contact with young people and/or adult at risks contain reference to their safeguarding responsibilities
- There are person specifications for roles, which contain a statement on core competency about young person/adult at risk protection/safeguarding

- Shortlisting is based on formal application processes/forms, including the submission of CVs
- Interviews are conducted according to equality of opportunity principles and interview questions are based on the relevant job description and person specification
- Security checks (NPPV3 and SC) are conducted for specific roles for all staff working with young people and adult at risk
- No individual is confirmed in post until vetting checks have been successfully completed.

Blue Lights Digital Ltd (BLD) maintains a central list of staff, with dates of when their vetting checks were made and certificate numbers. All staff who are involved in direct or remote contact with apprentices will be subject to vetting checks.

Support for staff

Induction for new staff

Blue Lights Digital Ltd (BLD) provides an induction for all new staff, which includes a comprehensive coverage of safeguarding and Prevent issues. This includes an introduction to the Safeguarding and Prevent Duty policy and related procedures, roles, and responsibilities, and how to identify and report safeguarding and Prevent Duty issues. This also applies to Board members .

On-going training

All staff who are in contact with learners undertake safeguarding and Prevent Duty training at an appropriate level. Teaching staff will be equipped fully with the knowledge and confidence to discuss these topics with apprentices. An appropriate level training qualification will be refreshed at least every 2 years for everyone; however, knowledge and skills will be refreshed at regular intervals, at least annually.

Regular updates

Safeguarding and Prevent is a regular agenda item at team meetings, senior management meetings, board meetings and one-to-ones.
The Designated Safeguarding Lead will update colleagues with new information as it becomes available.

Monitoring and Review

This policy will be monitored through update reports presented to the Apprenticeship Leadership Team and will be formally reviewed annually.

Subcontracting

Where Blue Lights Digital Ltd (BLD) works with any subcontract provider the following arrangements will be maintained

- regular checking of safeguarding arrangements in partner organisations
- safeguarding is a fixed agenda item on any subcontract reporting meetings
- service level agreements include clear minimum expectations, arrangements for reporting safeguarding and Prevent issues, and non-compliance procedures.

Confidentiality

Blue Lights Digital Ltd (BLD) recognises that all matters relating to safeguarding will only be shared with individuals who need to be made aware of the situation to appropriately discharge.

BLD responsibilities and duty of care.

All staff must be aware that they have a responsibility to immediately disclose information which, if not shared, may compromise a learner's safety or welfare. All staff will be fully supported by the Designated Safeguarding Lead .
Staff must always endeavour to share our intention to report a concern or refer to the safeguarding referral procedure, with parents/carers of young learners and the learner themselves in all cases unless to do so would put the learner at greater risk of harm.
Staff must not discuss the case with anyone other than those involved in the case. If staff have any concerns about the progress of the case or have any other concerns these must be discussed with the Designated Safeguarding Lead .

Welfare and Pastoral Support

All learners have a named tutor/skills coach who provides first line support with any learning-related or personal difficulties. In most instances, these can be resolved through liaison with the apprentice and their workplace manager. In some instances, the Delivery Manager may provide additional support and guidance to the learner and tutor. Where welfare or personal concerns develop into safeguarding or Prevent Duty Concerns, the usual reporting procedure should be followed and the matter raised with the Designated Safeguarding Lead.

Employers

Employers of apprentices are required to comply with Blue Lights Digital Ltd (BLD) Safeguarding and Prevent Duty Policy and related procedures, as stated within employer agreements. This policy serves to make employers aware and acknowledge that Blue Lights Digital Ltd (BLD) has a statutory duty to safeguard and promote the welfare of individuals under the age of 18 years old and adults at risk over the age of eighteen (18) years old pursuant to the Children Act 2004 and the Safeguarding Vulnerable Groups Act 2006.

All employers of apprentices have an obligation to ensure that their employees, contractors, and agents comply with the requirements of the Children Act 2004 and the Safeguarding Vulnerable Groups Act 2006 to the extent that they apply to the employer; and to confidentially report to the Designated Safeguarding Lead, any concerns relating to an apprentice or other learner enrolled with Blue Lights Digital Ltd (BLD), or an employee or associate of Blue Lights Digital Ltd (BLD).

Appendices

Local Safeguarding Children Boards bring together all services for children and young people in a local area to focus on improving outcomes for all children and young people.

The outcomes that are most important to children and young people are:

- Being Healthy
- Staying safe
- Enjoying and achieving
- Economic wellbeing
- Making a positive contribution

Safeguarding Procedures

These procedures should be read in conjunction with the Department for Education and Skills document 'What to do if you're worried a child is being abused' March 2015.

Purpose - The purpose of these guidelines is to ensure that the rights of children and adult at risk are protected through staff awareness of the issues and the following of the statutory and local guidelines in the reporting of concerns. It is the responsibility of all staff working within BLD to record and report Child Protection concerns, i.e. where they believe a child has been or is at risk of abuse, neglect, or significant harm. This responsibility extends to all staff and not just those specifically working with under 18s.

Definition of terms - The Safeguarding Policy describes the support and protection procedures for all learners under the age of 18, or vulnerable learners over this age, who may be “at risk” of abuse.

The definition of a “child” - “Child” is defined as all young people under the age of 18, in accordance with the 1989 Children Act .

The definition of a “Adult at risk” - “Adult at risk” is defined as, “a person who is, or may be in need of community care services by reason of mental or other disability, age or illness; and who is or may be unable to take care of him or herself, or unable to protect him or herself against significant harm or exploitation .”

Categories of Abuse

Children can be potentially abused within the family, community, and in work by employees (including those employed to promote their welfare and protect them from abuse), volunteers, visitors, and fellow students. Expert and professional organisations are best placed to provide up-to date guidance and practical support on specific safeguarding issues and the Designated Safeguarding Lead will liaise with appropriate external agencies. Issues that may arise that staff should be aware of and look out for are:

• **Physical Abuse**: may involve hitting, shaking, throwing, burning, or scalding, drowning, suffocating, or otherwise causing physical harm to a child and adult at risk . Physical harm may also be caused when a parent or carer feigns the symptoms of, or deliberately causes ill health to a child and adult at risk who they are looking after. This is commonly described using terms such as 'fictitious illness by proxy 'or 'Munchausen's syndrome by proxy'.

• **Emotional Abuse**: is the persistent emotional ill-treatment of a child or adult at risk such as to cause severe and persistent effects on the child and adult at risk's emotional development. It may involve conveying to children or adult at risk that they are worthless and unloved, inadequate, or valued only so far as they meet the needs of another person. It may involve age or developmentally inappropriate expectations being imposed on children and adult at risk. It may involve causing children or adult at risks frequently to feel frightened or in danger, or the exploitation or corruption of children and adult at risk. Some level of emotional abuse is involved in all types of ill treatment of a child or adult at risk, though it may occur alone.

• **Sexual Abuse**: involves forcing or enticing a child or adult at risk to take part in sexual activities, whether the child or adult at risk is aware of what is happening. The activities may involve physical contact, including penetrative (e.g. rape) or non-penetrative acts. They may include non-contact activities, such as involving children or adult at risk in looking at, or in the production of, pornographic materials or watching sexual activities, or encouraging children or adult at risk to behave in sexually inappropriate ways.

• **Neglect**: is the persistent failure to meet the child's or adult at risk's basic physical and/ or psychological needs, likely to result in the serious impairment of the child or adult at risk's health or development. It may involve a parent or carer failing to provide adequate food, shelter and clothing, failure to protect a child or adult at risk from physical harm or danger, or failure to ensure access to appropriate medical care or treatment. It may also include neglect of, or unresponsiveness to, a child or adult at risk's basic emotional needs.

• **Significant Harm**: Some children or adult at risk may be in need because they are suffering or likely to suffer significant harm. The Children Act 2004 V section 47 (1) introduced the concept of significant harm as the threshold that justifies compulsory intervention in family life in the best interest of the children.

• **Financial Abuse**: some children and adults at risk may be abused or exploited financially including fraud and extortion.

• **Peer on peer abuse**: Peer on peer abuse is behaviour by an individual or group of individuals which can be a one-off incident or repeated over time. Peer on peer abuse is behaviour that intentionally hurts another individual or group either physically or emotionally. It is more likely that females will be victims and males' perpetrators, but all peer-on-peer abuse is unacceptable and will be taken seriously. Peer-on-peer abuse can take many forms including serious bullying (including cyberbullying), up-skirting, relationship abuse, domestic violence, child sexual exploitation, youth and serious youth violence, financial abuse, harmful sexual behaviour and/or gender-based violence and is often motivated by prejudice against particular groups steered by a dislike for a person's race, religion, gender, sexual orientation, special educational needs or disabilities; or where a young/vulnerable person is adopted or in care, has caring responsibilities, is suffering from a health problem, is frequently on the move (e.g. those from military families or the travelling community), is experiencing a personal or family crisis, has actual or perceived differences, (e.g. physical or cultural differences).

• **Risks/ abuse related to family/cultural belief/faith:** It is important to remember that many young/vulnerable learners are a part of a family. Some families have certain values and beliefs that can cause harm to a young/vulnerable learner. An example of this can include strong beliefs or a sense of honour or shame that can prevent people from seeking or accepting the help they need. A strong cultural or religious belief in the sanctity of marriage may dissuade people from leaving their partners, even if they are violent. In addition, many religions and cultures have strong beliefs around sex outside marriage, making it very hard for young, unmarried, pregnant women to get the help they need. Differences in culture or religion between partners, or between parents and children, may also make it more difficult for individuals to understand and support each other. Where one partner perceives their faith and heritage to be superior to, or more important than, their partner's it can lead to a power imbalance and an erosion of the other partner's self-esteem. In extreme cases the young/vulnerable person who are perceived as "disobedient" or "different" are believed to be possessed by a spirit controlling their behaviour. The young/vulnerable person can be physically and emotionally abused to exorcise the spirit.

• **Bullying and Harassment:** bullying can include a variety of behaviours from one individual/group to another individual/group such as name calling, offensive language, coercion, hitting, pushing, theft or damage to belongings, cyber, spreading harmful messages, hate crime or mate crime which is befriending someone with the intent to exploit them in some way. Please refer to BLDs" Harassment Policy for further detail.

• **Cyber Bullying and E-Safety:** the safe and responsible use of technology, is sometimes presented as primarily a young/vulnerable learner protection issue. While young/ vulnerable learners do need support to keep themselves safe online the risks associated with the use of technology (e.g. internet, text or video messaging, email, chatrooms, social media networking sites) to embarrass, humiliate, threaten, intimidate, or bully an individual to gain power and control over them. There is also the mismanagement of personal data, risks of financial scams, identity theft, grooming, and radicalisation . Access via online platforms to inappropriate and harmful extremist content is now the preferred

avenue for those searching for terrorist propaganda with recent data highlighting the continued high numbers of under 18's being arrested for terrorist offences. Risks associated with online gaming also need to be recognised including inappropriate and upsetting content, online predators, identity theft and bullying.

• **Risk to self and/or others:** this may include but is not exclusive to self-harm, suicidal tendencies , or potential risk of harming others, which may or may not include young/ vulnerable learners. This may be because of an individual experiencing a significant level of personal, emotional trauma and/or stress.

• **Domestic Violence:** can be physical, emotional, sexual, neglect. This category also covers forced marriages and honour-based violence. Some young/vulnerable learners may experience issues with drugs or alcohol to self-medicate or via dependence.

• **Female Genital Mutilation (FGM)**: victims of FGM are likely to come from a community that is known to practice FGM. Professionals should note that females at risk of FGM may not yet be aware of the practice or that it may be conducted on them, so sensitivity should always be shown when approaching the subject. The FGM mandatory reporting duty is a legal duty provided for in the FGM Act 2003 (as amended by the Serious Crime Act 2015). The legislation requires staff to report where, during their professional duties, they either are informed by a female under 18 that an act of FGM has been carried out on her, observe physical signs which appear to show that an act of FGM has been carried out on a female under 18 and they have no reason to believe that the act was necessary for the female's physical or mental health or for purpose with labour or birth. For the purposes of the duty, the relevant age is the female's age at the time of disclosure /identification of FGM (i.e. it does not apply where a woman aged 18 or over discloses, she had FGM when she was under 18).

• **Forced Marriage**: one or both spouses do not consent to the marriage or consent is extracted under duress. Duress includes both physical and emotional pressure. A clear distinction must be made between a forced marriage and an arranged marriage. In arranged marriages, the families of both spouses take a leading role in choosing the marriage partner but the choice whether to accept the arrangement remains with the young/vulnerable person.

• **Modern slavery**: encompasses slavery, human trafficking, forced labour and domestic servitude. Traffickers and slave masters use whatever means they have at their disposal to coerce, deceive, and force individuals into a life of abuse, servitude, and inhumane treatment.

• **Sexting:** this is when someone sends or receives a sexually explicit text, image, or video. This includes sending 'nude pics' or 'rude pics' or 'nude selfies . Pressuring someone into sending a nude picture can happen in any relationship and to anyone, whatever their age, gender, or sexual preference. Once the image is taken and sent, the sender has lost control of the image and the image could end up anywhere. By having in their possession or distributing to others indecent images of a person under 18, many young/vulnerable people are not aware that they could be committing a criminal offence under the Sexual

Offences Act 2003. Any direct disclosure by a learner (male or female) will be taken very seriously. A learner who discloses they are the subject of sexual imagery is likely to be embarrassed and worried about the consequences. It is likely that disclosure is a last resort and they may have already tried to resolve the issue themselves. When an incident involving sexting comes to our attention, we will follow the guidance as set out in the UKCCIS publication Sexting in Schools and Colleges:

Responding to incidents and safeguarding young/vulnerable people.

• **Initiation/Hazing**: hazing is a form of initiation ceremony which is used to induct newcomers into an organisation such as a school or sports team etc. Hazing can also be used as initiation into a street or other 'gang .' There are several different forms, from relatively mild rituals to severe and sometimes violent ceremonies. The idea behind this practice is that it welcomes newcomers by subjecting them to a series of trials which promote a bond between them. After the hazing is over, the newcomers also have something in common with older or established members of the organisation or 'gang ,' because they have all experienced this as part of a 'rite of passage .' Many rituals involve humiliation, embarrassment, abuse, and harassment. These types of abuse rarely take place in isolation and often indicate wider safeguarding concerns.

Abusive behaviour can happen to a young/vulnerable learner in a learning environment and it is necessary to consider what abuse is and looks like, how it can be managed and what support and intervention can be put in place to meet the needs of the individual and what preventative strategies may be put in place to reduce further risk of harm.

There may be reports where the alleged incident is between two learners from the same or different training establishments but is alleged to have taken place away from the premises. The safeguarding principles, and our duty to safeguard and promote the welfare of the learner remain the same regardless of where the incident took place and regardless of whether the incident was online or offline.
We will not dismiss abusive behaviour between young/vulnerable learners as 'normal' and our thresholds for investigating claims and allegations are the same as for any other type of abuse.

Preventing violence and ensuring immediate physical safety is Blue Lights Digital Ltd (BLD)' priority but we also acknowledge that emotional abuse can be just as damaging if not more so than physical violence.

We also acknowledge that low level disruption and the use of offensive language can have a significant impact on its target. If left unchallenged or dismissed as 'banter' or 'horseplay ,' it can also lead to reluctance to report other behaviour, this also applies to the Incels (involuntarily celibate) terminology that has now entered communities with regards . An Incel is a member of an online subculture of people who define themselves as unable to get a romantic or sexual partner despite desiring one , predominantly seen as a male supremacy movement, de-humanising 'Stacey's' and encouraging the male to take what he wants. Training and updates provided on these topics through the Newsletter and staff weekly updates by email.

Additional forms of abuse:
In addition, Keeping Children Safe in Education identifies that there are wider safeguarding issues that should be considered and acted upon. The statutory guidance lists sixteen specific issues and provides further links to information on all these areas.

The specific areas are:

- Child Sexual Exploitation
- Domestic Violence
- Fabricated or induced illness
- Gangs and Youth Violence, county lines
- Mental Health
- Radicalisation
- Teenage Relationship Abuse
- Drugs
- Faith Abuse
- Gender-based violence
- Private Fostering
- Trafficking

Designated Safeguarding Officer contact information (DSO)

To contact the Designated Safeguarding Officer or wider Safeguarding team please email safeguarding@bluelightsdigital.com or call +44 (0)1223 919607

Blue Lights Digital Ltd (BLD) Head Office, The Officers Mess, Royston Road, Duxford, Cambridge, CB22 4QH

When to Take Action & How

Once you suspect or know of any abuse of any child or adult at risk , you should immediately inform the Designated Safeguarding Lead (DSL) in person or by telephone. Even if you have only heard rumours of abuse, or you have a suspicion but do not have firm evidence, you should still contact the Designated Safeguarding Lead (DSL) to discuss your concerns.
It is important to understand that your responsibilities extend to suspicion of abuse in any area of the child or adult at risk's life, not just in the BLD learning environment.
You must also contact Designated Safeguarding Lead (DSL) if you know or suspect that a member of staff or learner has a previous history of abuse of children and/or adult at risk.
If you become aware of any allegations against a member of staff this must always be escalated to the Designated Safeguarding Lead (DSL). If the Designated Safeguarding Lead (DSL) is not immediately available, you should then contact the Deputy Lead Safeguarding Officer or the Designated Safeguarding Officer (DSO) .
You must not try to investigate the matter on your own. Staff are not equipped or qualified to do so.

If, following your initial contact with the Designated Safeguarding Lead (DSL) , it is decided that the matter should be taken further; a written report must be prepared. A written report is essential to prevent any misrepresentation of your findings, and should be sent to the Designated Safeguarding Lead (DSL) within 24 hours of the suspicion arising. The report should be factual and should not include opinions or personal interpretations of the facts presented. The report should contain as much detail as possible, including any apparent physical signs of abuse or other circumstances which led to your suspicions, or the account given to you of abuse by the child or adult at risk concerned, as accurately as you are able to record it. The report should be signed, dated and a copy stored in a secure place. If you are unsure about what to write, you can get advice from the Designated Safeguarding Lead (DSL) and a template is available.

If a child or adult at risk comes to you with a report of apparent abuse, you should listen carefully to the child or adult at risk, using the following guidelines. When listening to a child or adult at risk staff must:

- Allow the child or adult at risk to speak without interruption
- Remember the TED principles (Tell me, Explain to me, Describe to me)
- Make accurate notes including age, time, date, place, and people who are present as well as what was said/disclosed – the nature of any injuries, if applicable, should also be included
- Never trivialise or exaggerate the issue
- Never make suggestions
- Never coach or lead the child or adult at risk in any way
- Reassure the child or adult at risk , let them know you are glad they have spoken up and that they are right to do so
- Always ask enough questions to clarify your understanding, do not probe or interrogate – no matter how well you know the child or adult at risk – spare them having to repeat themselves over and over
- Be honest – let the child or adult at risk know that you cannot keep this a secret; you will need to tell someone else
- Try to remain calm – remember this is not an easy thing for them to do
- Do not show your emotions – if you show anger, disgust, or disbelief, they may stop talking. This may be because they feel they are upsetting you or they may feel your negative feelings are directed towards them
- Let the child or adult at risk know that you are taking the matter very seriously
- Make the child or adult at risk feel secure and safe without causing them any further anxiety.

At the earliest opportunity involve the Designated Safeguarding Lead (DSL).
The Designated Safeguarding Lead (DSL) will be responsible for liaising with external agencies and recording essential information about each case and for collecting reports and notes as appropriate.
Any detailed information about a case will be confined to the Designated Safeguarding Lead (DSL), (if not involved in the allegations) and the Apprenticeship Director and any external agencies the Designated Safeguarding Lead (DSL) determines to engage. The

Manager(s) and staff reporting the allegations will be kept informed of the progress of the case on a 'need to know' basis.

What Happens Next?

Considering all the information available, the Designated Safeguarding Lead (DSL) will decide on the next steps, which may include taking no further action. In most cases the Designated Safeguarding Lead (DSL) will seek advice from the Local Authority Designated Officer (LADO) and agree what further action is necessary, which may include:

- Seek further advice from the Local Safeguarding Children Board (LSCB)
- Undertake further investigation under the direction of the LADO or support an investigation by the LSCB
- Make a referral to the appropriate agency, as signposted
- Report the incident to a designated Social Worker, as signposted
- Report the matter to the police if a crime is suspected

If a referral is made, this must be confirmed in writing to the appropriate agency within 24 hours. The Designated Safeguarding Lead (DSL) may consider that those involved may require counselling. Where it is felt there is a need for counselling (which could be for the child, other students, staff, parents, or carers involved) the Designated Safeguarding Lead (DSL) will make the necessary arrangements.

Allegations against Staff

The primary concern of the organisation is to ensure the safety of the child and adult at risk. It is essential in all cases of suspected abuse by a member staff that action is taken quickly and professionally whatever the validity. There are occasions where a child or adult at risk will accuse a member of staff of physically or sexually abusing them. In some cases, this may be false or unfounded. However, in some cases the allegations may be true. Any instance of a child or adult at risk being abused by a member of staff is particularly serious. On the other hand, for an innocent person to be accused of such an act is a serious ordeal which can result in long term damage to their health and career. If any member of staff suspects any other member of staff of abusing a student, it is their responsibility to bring these concerns to the Designated Safeguarding Lead (DSL) . On being notified of any such matter the Designated Safeguarding Lead (DSL) shall:

- Seek and follow advice from the LADO
- Take such steps as they consider necessary to ensure the safety of the child or adult at risk in question and any other child or adult at risk who might be at risk
- Ensure that a report of the matter is completed by the person who reported the original concern
- Put in place the steps necessary to follow the advice of the LADO

If the allegation concerns the Designated Safeguarding Lead (DSL) , the matter should be discussed with the Managing Director of BLD, in addition to following the normal safeguarding procedures highlighted in this document.

Signposting

Alternative to Samaritans (for Young People)
Get Connected is a confidential 24 hour free telephone helpline that might be a suitable alternative to the Samaritans – www.getconnected.org.uk or 0808 808 4994
Bullying (including Cyber) http://www.saferinternet.org.uk/about/helpline
Child Sex Exploitation http://www.nspcc.org.uk/preventing -abuse/child -abuse -and-neglect/child-sexual exploitation/what -is-child -sexual -exploitation/ or http://www.stopitnow.org.uk/ or 0808 1000 900

Domestic Violence For women: http://www.nationaldomesticviolencehelpline.org.uk/ or 0808 2000 247

For men: https://mensadviceline.org.uk/
Drug or Alcohol Abuse
Drugs - http://www.talktofrank.com/ or call: 0300 123 6600 text: 82111
Alcohol - https://www.drinkaware.co.uk/understand -your -drinking/is -your -drinking -a-problem/alcohol -support -services or call: 0300 123 1110
Both - http://www.addaction.org.uk/
Eating Disorders https://www.eatingdisorderhope.com/treatment -for-eating -disorders/eating -disorder -hotlines
E-Safety - http://www.saferinternet.org.uk/about/helpline or 0844 381 4772
Extremism, Radicalisation and Terrorism -children -from -radicalisation -theprevent -duty or 020 73407264 email: counter.extremism@education.gsi.gov.uk
Faith Abuse http://www.equalityadvisoryservice.com/app/home or 0808 800 0082
FGM https://www.womankind.org.uk/fgm -organisations -offering -advice -and-support/
Forced Marriage Karma Nirvana Victim Support 0800 5999 247
https://www.gov.uk/guidance/forced marriage
Forced Marriage Unit email fmu@fco.gov.uk or 020 7008 015;
Outreach email fmuoutreach@fco.gov.uk ; Facebook: Forced Marriage page; X : @FMUnit Gangs and Youth Violence
For concerned adults - http://www.nspcc.org.uk/preventing -abuse/keeping -children safe/staying-safe-away -from -home/gangs -young -people/ or 0808 800 5000
For young people - http://www.childline.org.uk/Pages/Home.aspx or 0800 1111
Gender Based Violence Solace Advice Hub email advice@solacewomensaid.org.uk or 0808 802 5565
Women and Girls Network Advice Hub email advice@wgn.org.uk or 0808 801 0660
24 Hour Domestic Violence Helpline 0808 2000 247
Living with a Family Member's Addiction to Alcohol or Drugs http://www.adfam.org.uk
Mental Health Problems https://www.nhs.uk/mental -health/
Self-Harm or Suicidal Thoughts
Suicide https://www.samaritans.org/

Self-Harm https://www.crisistextline.org/topics/self -harm/#what -is-self-harm -1
Sexting http://www.nspcc.org.uk/preventing -abuse/keeping -children -safe/sexting/ or call: 0808 800 5000 (18 and over) 0800 1111 (under 18)
Teenage pregnancy https://www.nhs.uk/pregnancy/support/teenage -pregnancy/
Trafficking, Exploitation and Modern Slavery
https://www.nhs.uk/pregnancy/support/teenage -
pregnancy/

Reporting a Safeguarding Concern

If you have a safeguarding concern, follow the steps below:

1**Recognise** – Be alert to any signs of abuse, neglect, radicalisation or risk.

2. **Respond** – If a learner discloses information, listen carefully, reassure them, and avoid leading questions.

3. **Report** – Immediately contact the Designated Safeguarding Lead (DSL):
- Nick Curry (CEO)
- Email: nick@bluelightsdigital.com
- Mobile: 07496073383
- Safeguarding mailbox: safeguarding@bluelightsdigital.com

4. **Refer** – The DSL will assess the concern and, where appropriate, refer to external agencies (LADO, Police, Social Services, Prevent Coordinator).

5. **Record** – Complete a safeguarding referral form and submit to the DSL within 24 hours.

Remember: If a learner is in **immediate danger**, call 999.