

Document Control		
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Version: 5.5	Author: K. Smith	Strictly Confidential: Y

Change Log				
Date:	Change Description:	Proposed:	Actioned:	Approved:
13 Jan 2017	<ul style="list-style-type: none"> Minor changes to key tools list to align with documented processes 		KS	<i>K. Smith</i>
8 Aug 2017	<ul style="list-style-type: none"> Addition of clause relating to ESFA in appendix 2 to match clause 5.5 of Apprenticeship Agreement 		KS	<i>K. Smith</i>
23 Aug 2017	<ul style="list-style-type: none"> Reviewed and updated policy in light of Prevent Duty training. 	SB	KS	<i>K. Smith</i>
17 Oct 2017	<ul style="list-style-type: none"> Addition of detail regarding prevent responsibilities and widen scope in respect of Apprenticeship 	KS	CH	<i>K. Smith</i>
22 Nov 2017	<ul style="list-style-type: none"> Addition of annual completion of Prevent Duty training in tools 	KS	CH	<i>K. Smith</i>
13 Dec 2017	<ul style="list-style-type: none"> Addition of annual completion of Safeguarding awareness training in tools 	KS	CH	<i>K. Smith</i>
18/12/17	<ul style="list-style-type: none"> No change made – policy reviewed and reissued 	K. Smith 18/12/17	K. Smith 18/12/17	<i>K. Smith</i>
23/01/18	<ul style="list-style-type: none"> Multiple changes made following Designated SG Officer training and SG Awareness training 	K. Smith 20/12/17	K. Smith 23/01/18	<i>K. Smith</i>
08/02/18	<ul style="list-style-type: none"> Addition of Incident Log to tools, plus additional Safe Recruitment checks in Recruitment policy 	C.Hughes 06/02/18	C.Hughes 16/02/18	<i>K. Smith</i>
09/04/18	<ul style="list-style-type: none"> Additional info regarding reporting of Prevent concerns 	C. Hughes 09/04/18	C. Hughes 09/04/18	<i>K. Smith</i>
06/06/18	<ul style="list-style-type: none"> Removal of reference to Emergency Contact details – amended process due to GDPR 	K. Smith 25/05/18	C.Hughes 06/06/18	<i>K. Smith</i>
21/11/18	<ul style="list-style-type: none"> Additional info following review of Ofsted guidance (Prevent responsibilities, frequency of training) 	C.Hughes 07/11/18	C.Hughes 21/11/18	<i>K. Smith</i>
25/01/19	<ul style="list-style-type: none"> Additional info following DSL and Prevent WRAP training Review of structure and appendices, including procedure for dealing with incidents 	K. Smith 22/01/19	C.Hughes 25/01/19	<i>K. Smith</i>
02/05/2019	<ul style="list-style-type: none"> Additional info re disclosure of convictions by apprentices and other learners at enrolment 	K. Smith 02/04/19	C. Hughes 02/05/19	<i>K. Smith</i>
08/07/2019	<ul style="list-style-type: none"> Review against RoATP application guidance Various edit and additions 	S. Baldry 02/07/2019	C.Hughes 08/07/2019	<i>K. Smith</i>
15/10/2019	<ul style="list-style-type: none"> Addition of Prevent related contact 	K.Smith 21/06/2019	C.Hughes 15/10/2019	<i>K. Smith</i>
04/11/2019	<ul style="list-style-type: none"> Removal of Prevent related content as inc. in Prevent Policy 	K.Smith 04/11/2019	H.Lees 04/11/2019	<i>K. Smith</i>

Change Log				
Date:	Change Description:	Proposed:	Actioned:	Approved:
09/01/2020	<ul style="list-style-type: none"> Added action to Tools section to reissue and reread Part 1 of KCSIE on an annual basis 	KS	CH 09/01/2020	<i>K.Smith</i>
11/03/2020	<ul style="list-style-type: none"> Updated Appendix 1 to capture new process for updating the SIL as agreed at team meeting on 070220 Updated Tools section to capture additional detail regarding the recruitment checks undertaken 	KS 07/02/2020	HL 11/03/2020	<i>K.Smith</i>
27/04/2020	<ul style="list-style-type: none"> Inserted new Appendix 5 (Capella response to COVID-19 and any future pandemics/situations that may require remote training/meeting arrangements) 	K.Smith 07/04/2020	H.Lees 27/04/2020	<i>K.Smith</i>
17/06/2020	<ul style="list-style-type: none"> Amended wording regarding recording of training sessions to reflect current practice Updated the Purpose section to make reference to the H&S Policy 	K.Smith 08/06/2020	H.Lees 17/06/2020	<i>K.Smith</i>
22/06/2020	<ul style="list-style-type: none"> Various updates to Appendix 5 following Ofsted Training Webinar 	K.Smith 17/06/2020	H.Lees 22/06/2020	<i>K.Smith</i>
29/06/2020	<ul style="list-style-type: none"> Inserted Appendix 6 – Template Email used to notify employers that one of their employees has been added to the SIL and updated Policy text to refer 	K.Smith 05/06/20	H.Lees 29/06/2020	<i>K.Smith</i>
04/08/2020	<ul style="list-style-type: none"> Updated to reflect KCSIE 2020 Updated to reflect revised Capella arrangements for updating the Safeguarding and Prevent Concern and Incident Log Updated to reflect requirement for Advisory Board members to undertake Safeguarding Training and read KCSIE (Part One) 	K.Smith 16/07/2020	H.Lees 04/08/2020	<i>K.Smith</i>
25/11/2020	<ul style="list-style-type: none"> Various updates to reflect best practice identified from DSL Training 	K.Smith 11/11/2020	H.Lees 25/11/2020	<i>K.Smith</i>
05/01/2021	<ul style="list-style-type: none"> Updated to include a new appendix 7 regarding Recruitment of Ex-Offenders 	H.Lees 30/11/2020	H.Lees 05/01/2021	<i>K.Smith</i>
26/01/2021	<ul style="list-style-type: none"> Updated to add Becky Grainger as a Deputy DSL 	C.Hughes 25/01/2021	H.Lees 25/01/2021	<i>K.Smith</i>
18/03/2021	<ul style="list-style-type: none"> Updated to reflect revised DBS Checks arrangements for Associates and Advisory Board Member; Augmentation of Appendix 4 	H.Lees 18/03/2021	H.Lees 23/03/2021	<i>K.Smith</i>

Capella Designated Safeguarding Lead (DSL):
Kate Smith, Capella MD Email: kate.smith@capellaassociates.com Phone: 07968 344764
Capella Deputy Designated Safeguarding Leads:
Amrik Gill, Capella Operations Director Email: amrik.gill@capellaassociates.com Phone: 07748648917
Claire Hughes, Capella Quality and Commercial Manager Email: Claire.hughes@capellaassociates.com Phone: 07971 260517
Becky Grainger, Capella Programme Manager Email: becky.grainger@capellaassociates.com Phone: 07905 063029

The Capella Designated Safeguarding Lead and/or the Capella Deputy Designated Safeguarding Leads can be contacted at any time, using the contact details above, regarding a Safeguarding or Prevent Concern.

Purpose

The purpose of this Safeguarding Policy and Procedure is to set out the intentions and key tools that Capella uses to ensure that it safeguards and promotes the physical and mental health and well-being of all people (including all apprentices, delegates, employers and Capella Associates) who are involved in our education, training and apprenticeship programmes.

This Safeguarding Policy and Procedure should be read in conjunction with

- a) our Prevent Policy and Procedure, which sets out the intentions and key tools that Capella uses to ensure that it meets its legal responsibility to “*have due regard to the need to prevent people from being drawn into terrorism*”,
- b) our Health & Safety Policy, which sets out the intentions and key tools that Capella uses to ensure the health, safety and welfare of apprentices, delegates and Associates
- c) our Modern Slavery Policy, which details the systems and controls that Capella has put in place to prevent any form of Modern Slavery taking place within our business and its supply chains.
- d) our Equality, Diversity & Dignity at Work Policy, which sets out the intentions and key tools that Capella uses to ensure that equal opportunity considerations are incorporated into all our business activities, and to build an inclusive and supportive environment where everyone is treated with dignity

This Safeguarding Policy includes how we:

- achieve commitment to the policy in our organisation (Intent)
- promote the policy (Tools and Curriculum)
- train our Associates in implementing the policy (Training)
- ensure protection of apprentices and delegates, and prevention of abuse (Programme set-up and management and Appendices 1, 2 and 5)
- obtain additional support and guidance when required (Contacts)
- monitor IT usage

Appendices to this policy provide additional information on safeguarding:

- Appendix 1 contains The Capella Safeguarding Reporting Procedure which must be used to report safeguarding incidents or concerns.
- Appendix 2 details the actions that will be taken in response to an allegation against a member of the Capella team.
- Appendix 3 contains a Role Description for the Designated Safeguarding Lead (DSL)
- Appendix 4 provides information regarding the 10 Categories of Abuse, and signs to look out for
- Appendix 5 details Capella's response to the COVID-19 Pandemic (and any future pandemics and/or events which may prevent face-to-face contact with Associates/Delegates and other stakeholders).
- Appendix 6 contains a Template copy of the Email that Capella may elect to send to an employer when one of their apprentices/delegates is added to our Safeguarding and Prevent Concerns and Incidents Log.

In addition, Capella's policy with regards to the recruitment of ex-offenders, is contained within Appendix 7 of this policy.

Owners

All Capella Associates, Capella Advisory Board Members, and Capella Training Delivery Sub-contractors must be aware of and work within this policy. The Capella Managing Director takes lead responsibility for deployment of this policy.

The Capella Managing Director is the Designated Safeguarding Lead (DSL), and the Capella Operations Director, and the Capella Quality & Commercial Manager are deputies when the Capella Managing Director is not available. Appendix 3 provides a Role Description for the Designated Safeguarding Lead.

Intent

Capella aim to:

1. Provide a safe and supportive environment for all people to learn, develop, and work.

2. Help to promote educational outcomes for all
3. Identify any individuals who may be suffering, or are likely to suffer, abuse or harm and ensure these instances are reported and actioned appropriately, ensuring that the individual is the central focus.
4. Foster good relations between people sharing a common characteristic and those who don't share that characteristic, and create a fully inclusive environment that is free from bullying, harassment and discrimination (see Capella's Equality, Diversity and Dignity at Work Policy for further information)
5. Stay abreast of changes in published guidelines on Safeguarding and Safe Recruitment.
6. Comply with all regulations and statutory duties in relation to Safeguarding.
7. Create a safe space for free and open debate.
8. Support activities linked to promoting/delivering the Education Inspection Framework (EIF), in particular those relating to Behaviour and Attitudes.
9. Promote a sense of community cohesion both within our provision and within the wider external community.
10. Challenge poor practice in the workplace if identified.
11. Ensure that "everyone is responsible" for fulfilling the purpose and aims of this policy.

Tools

Key tools we will use to ensure Safeguarding is promoted and considered in all business activities are listed below, in the area of operation to which they relate:

Leadership / Policies / Procedures

1. Annual review of this Safeguarding policy.
2. Annual communication of this Safeguarding policy to promote the importance of Safeguarding and ensure all Associates, Advisory Board Members and Training Delivery Sub-contractors understand their responsibilities with regards to Safeguarding.
3. Requesting copies of training/presentation/promotional materials from any guest speakers and reviewing these prior to them being shared with Capella apprentices/delegates and/or contacts, to ensure they do not represent a risk to Safeguarding This should ideally be at least 5 days before delivery.
4. Ensuring that guests are accompanied at all times by a Capella Associate.
5. Always reporting any Safeguarding concerns to the Capella Designated Safeguarding Lead (or in her absence one of the Deputy Designated Safeguarding Leads) as soon as possible, for their inclusion on the Safeguarding and Prevent Concerns and Incidents Log, and, where deemed applicable, notifying the apprentice's/delegate's employer that we have added one of their employees to the Capella Safeguarding and Prevent Concerns and Incidents Log (see Appendix 6 for further details and a copy of the email template).

6. Following the guidelines in Appendix 1 or 2 (as applicable) if Safeguarding situations or concerns arise. The responsibilities of the Designated Safeguarding Lead and deputies are set out in Appendix 3.
7. Acting swiftly, carefully and sensitively if any Safeguarding issues or concerns arise (refer to Appendix 1 and 2)
8. Securely retaining information relating to Safeguarding issues/concerns raised, and action taken, within the Safeguarding and Prevent Concerns and Incidents Log. The Safeguarding and Prevent Concerns and Incidents Log is only accessible to the Designated Safeguarding Lead and the Deputy Designated Safeguarding Leads, and is password protected. The password must not be shared with any other parties.
9. Ensuring safe recruitment of new Associates and Training Delivery Sub-contractors by requiring all Associates, Advisory Board Members and Training Delivery sub-contractors to obtain, and provide Capella with visibility of, a Basic DBS Check as part of the recruitment process. See Capella's Recruitment Process Map (PM15) for further information regarding the recruitment process.
10. Requiring all Associates, Advisory Board Members and Training Delivery Sub-Contractors to obtain, and show to Capella, their Basic DBS Certificate every two years following the commencement of their contract, and ensuring that the following information regarding this DBS Certificate is recorded in Capella's Approved Provider Register:
 - DBS Certificate Number
 - Date of Issue of DBS Certificate
 - DBS Certificate Type
 - Initials of Capella Associate to whom DBS Certificate shown and date seen
11. Checking that all Training Delivery Sub-Contractors have suitable Insurance arrangements in place via receiving a copy of their Insurance Policy.
12. Associates working within the Capella Code of Conduct

Training

13. Ensuring all Associates and Apprenticeship Training Delivery Sub-Contractors who work directly with apprentices/delegates are suitably trained by:
 - a. Capturing status and plans on the Capella Skills Matrix and Approved Provider Register
 - b. Maintenance of records on Approved Provider Register (Single Central Record)
 - c. Considering any new/additional training needs as part of the review of this policy
 - d. Ensuring that all Capella Associates, Capella Advisory Board Members and Apprenticeship Training Delivery Sub-Contractors complete Safeguarding Training as part of the Induction or Contracting process (as applicable) and that they refresh this training every 2

years thereafter - <https://www.highspeedtraining.co.uk/safeguarding-people/safeguarding-vulnerable-adults-training-course.aspx>

- e. Completion every 2 years of Designated Safeguarding Lead training (e.g. via Solvendis) for the Designated Safeguarding Lead and Deputy Designated Safeguarding Leads
- f. Annual reminder to Associates, Advisory Board Members and Apprenticeship Training Delivery Sub-Contractors to read, at a minimum, Part 1 of the current live version of Keeping Children Safe In Education (KCSIE).

(Note: Frequency of training may be increased subject to incidents arising)

- 14. Completion of Safer Recruitment Training prior to recruitment of new team members, if such training has not been undertaken by a member of the Recruitment Panel in the last 2 years, using [https://www.educare.co.uk/files cms/programmes/Safer Recruitment.pdf](https://www.educare.co.uk/files/cms/programmes/Safer%20Recruitment.pdf)

Programme set-up and management

- 15. Encouraging and developing open relationships with all Capella apprentices/delegates and contacts
- 16. ProGo action to prompt consideration of:
 - a. known Safeguarding risks associated with overseas travel and delivery
 - b. employer nominated Safeguarding contact, and training of same
 - c. known Safeguarding concerns / issues relating to an apprentice/delegate joining / taking part in a Capella programme (see Appendix 4 for signs to look out for)
 - d. whether an apprentice/delegate is Young (ie under 18) or vulnerable (ie a person who, for any reason, may be unable to take care of themselves or protect themselves against significant harm or exploitation) and should be subject to a Risk Assessment
- 17. Acting swiftly, carefully and sensitively if an apprentice/delegate discloses criminal convictions at enrolment. Each case must be considered on an individual basis, but where an unspent conviction is disclosed on enrolment documents:
 - a. Associate must report the information to the Capella Designated Safeguarding Lead (DSL) or, in her absence, a Deputy DSL. The Capella DSL, or in her absence a Deputy DSL, will then, if deemed appropriate, record the information on the Capella Safeguarding and Prevent Concerns and Incidents Log.
 - b. If the apprentice/delegate is considered to be at risk, and/or the apprentice/delegate has given their consent, the Capella DSL may liaise with the Employer Safeguarding Lead to establish whether the unspent conviction constitutes a safeguarding issue/concern. Following any such discussions the Capella DSL must update the Safeguarding and Prevent Concerns and Incidents Log with the outcomes of the discussion, recording whether any action is to be progressed or whether it was agreed that no further action is required.

- c. Capella DSL & (where applicable) Employer to decide whether appropriate for the apprentice/delegate to be enrolled onto programme

Contacts

18. Capturing and then sharing Safeguarding information with others as required on a strictly “need to know basis” to ensure appropriate action is taken, and ensuring compliance with latest legislation and guidance in relation to Data Protection. Data Protection and GDPR should not be a barrier to sharing Safeguarding concerns.

Curriculum

19. Sharing of relevant guidance and material, including further sources of information and support, with apprentices/delegates in order to raise awareness of Safeguarding, (including in areas such as on-line safety and British Values), via the Apprenticeship Support Resources available on Capella’s website (<https://capellaassociates.freshdesk.com/support/home>) and material embedded throughout Capella programmes.
20. Programme information that makes apprentices/delegates involved in our programmes aware of the existence of this policy and the Support Resources available via our website:
(<https://capellaassociates.freshdesk.com/support/home>)

Monitoring of the Policy

Safeguarding is reviewed at least 8 times per year as driven by our Team Meeting Standard Agenda and Advisory Board Standard Agenda. Incidents, issues and concerns appertaining to Safeguarding are regularly monitored by the DSL and/or the Deputy DSL’s and are recorded in the Safeguarding and Prevent Concerns and Incidents Log by the DSL and/or the Deputy DSL’s.

Records of incidents, issues and concerns (names may be redacted) may be reviewed by members of the Capella Advisory Board. Should recurrent issues or patterns emerge these will be reported into the Risk Assessment Register.

Our Programme Review agenda includes specific reference to Safeguarding and any changes that have occurred since programme set-up.

We also use our Self-Assessment (SAR) to evaluate our educational Safeguarding provision, using standard Ofsted criteria. Although there are no separate grade descriptors for Safeguarding, we consider that such evaluation is good practice. We identify which descriptor best matches current Safeguarding provision, then identify actions, where necessary, to reach the next grade descriptor.

Review and Updates

This policy will be reviewed every 12 months or in the event of:

- (a) publication of new guidelines/official communications, or
- (b) any incident being reported, upon its conclusion; whichever is the sooner.

This policy is reviewed in line with the statutory requirements laid out in the following documents:

- Keeping Children Safe in Education —Sept 2020 (Updated January 2021)
- Working together to Safeguard Children – Aug 2018
- Inspecting safeguarding in early years, education and skills settings – September 2019
- DfE Regulated Activity in Relation to Children: Scope – Factual Note by HM Government

Appendix 1: The Capella Safeguarding Reporting Procedure for Safeguarding and Prevent incidents, issues or concerns

Key things to remember if we are advised of, or suspect / identify, Safeguarding concerns, or possible abuse:

1. NOTICE – CHECK – SHARE
Remember both physical and mental health are relevant to safeguarding.
2. “Reassure, Record (verbatim), Report”
3. Do not offer confidentiality.
4. Listen carefully and stay calm – we need to listen without making assumptions or judgements.
5. Gather as much information as possible, asking simple, open questions such as “Can you tell me what happened?”. Question normally and without pressure, checking understanding of what we have heard. Never ask leading questions and do not put words into their mouth. Record information word for word; do not summarise.
6. Reassure them that by telling us, they have done the right thing.
7. Find out what the individual would like to happen but make them aware that we may have to act against their wishes (e.g. they may ask you not to disclose to anyone else).
8. Inform them that we must pass the information on, but that only those that need to know about it will be told. Inform them of who the matter will be reported to as well as when and how.
9. Report the Safeguarding Concern/Incident as soon as possible and no later than the end of the day that the concern/incident was noticed/occurred, to the Capella DSL, or in her absence a Capella Deputy DSL, for their capture within the Capella Safeguarding and Prevent Concerns and Incidents Log.
10. If considered appropriate (see Appendix 6 for further details), Capella MD or Ops Director may elect to inform the nominated employer HR or Safeguarding contact for the individual. If such communication is deemed appropriate this should take place as soon as possible, and the Safeguarding and Prevent Concerns and Incidents Log should be updated to capture details of the discussion and actions/next steps agreed (including, if applicable, any actions that it has been agreed should not be taken), and timescales for completion of actions. –Actions agreed may include contact with appropriate agencies (e.g. Regional Prevent Duty Lead, police, etc). If verbal contact is made with appropriate agencies, such

contact should be confirmed in writing immediately and Capella should request acknowledgement of receipt. The Capella Safeguarding and Prevent Concerns and Incidents Log should be updated to record agreed actions and actions taken.

11. Capella Designated Safeguarding Lead to alert appropriate agencies if the concern is considered to be a potential criminal act, and then follow-up in writing immediately and request acknowledgement of receipt.
12. Alert the Local Authority / Social Services if an emergency is identified – Google search “out of hours social care” or “emergency social services” for the relevant region/county of the learner / individual concerned. Follow-up in writing immediately and request acknowledgement of receipt. The referral should be made to the Local Authority for the area where the learner lives. If the concern relates to the learning setting, the referral should be made to the Local Authority in which the setting is located.
13. As soon as possible, write down the main points relating to the situation including:
 - a. Name and contact details of person writing the report plus date, time and signature
 - b. Names and contact details of people involved with the concern
 - c. Details of any action taken
 - d. Facts relating to the circumstances including date, time and location of specific incidents, as well as any witnesses. Where appropriate this should be verbatim.
 - e. Details of any immediate or impending danger to the people concerned.Appropriate terminology, which does not imply guilt, should be used within reports and records (eg Person 1 rather than “the victim”).
14. Make notes of any subsequent discussions. Where appropriate these notes should be verbatim.
15. Associates must not investigate concerns or allegations themselves but must report them immediately to the Capella Designated Safeguarding Lead (Capella MD) or in her absence one of the Deputy Safeguarding Leads, for their recording in the Safeguarding and Prevent Concerns and Incidents Log.
16. Capella Designated Safeguarding Lead (Capella MD, or in MD absence Deputy Designated Safeguarding Lead), must update the Safeguarding and Prevent Concerns and Incidents Log with details of action taken.
17. Following the incident, Capella Designated Safeguarding Lead to reflect on actions and capture / share learning, as appropriate.

Appendix 2: Actions taken in response to an allegation against a Capella Associate or a Training Delivery Sub-contractor utilised by Capella

The below actions will be followed where it is alleged that any Associate contracted (or sub-contracted) to work for Capella Associates has:

- behaved in a way that has harmed an apprentice/delegate, or may have harmed an apprentice/delegate;
 - possibly committed a criminal offence against or related to an apprentice/delegate;
 - behaved towards an apprentice/delegate in a way that indicates he or she may pose a risk of harm to an apprentice/delegate; or
 - behaved or may have behaved in a way that indicates they may not be suitable to work with apprentices/delegates
1. Capella MD (DSL) or Ops Director (Deputy DSL) will consider the most appropriate course of action to take during the investigation into the allegation. Appropriate courses of action may include
 - redeployment of the Associate or Training Delivery Sub-contractor so that they have no direct contact with apprentices/delegates
 - redeployment of the Associate or Training Delivery Sub-Contractor so that they do not have unsupervised access to apprentices/delegates
 - where there is cause to suspect that an apprentice/delegate or apprentices/delegates may be at risk of harm, or the case is so serious that it may constitute grounds for contract termination, suspension of the Associate or Training Delivery sub-contractor may be considered. All options to avoid suspension will be considered prior to taking that step. If suspension is considered necessary, the rationale and justification for the suspension, along with the alternatives that have been considered and why they were rejected, will be recorded, and written confirmation of the suspension and a named Capella contact regarding the suspension will be sent to the Associate or Training Delivery sub-contractor within one working day. Every effort will be made to maintain confidentiality and guard against unwanted publicity and/or reputational damage while an allegation is being investigated or considered.
 2. Capella MD (DSL) to alert the client or host organisation, as appropriate.
 3. Capella MD (DSL) to obtain written details including information about times, dates, locations and names of potential witnesses. Where appropriate this should be verbatim. Appropriate terminology, which does not imply guilt, should be used within reports and records (eg Person 1 rather than “the victim”).
 4. Capella MD (DSL) to conduct a thorough investigation of the allegation, with written conclusions and actions. The following definitions should be used when determining the outcome of allegation investigations:

- **Substantiated:** there is sufficient evidence to prove the allegation;
 - **Malicious:** there is sufficient evidence to disprove the allegation and there has been a deliberate act to deceive;
 - **False:** there is sufficient evidence to disprove the allegation;
 - **Unsubstantiated:** there is insufficient evidence to either prove or disprove the allegation. The term, therefore, does not imply guilt or innocence;
 - **Unfounded:** to reflect cases where there is no evidence or proper basis which supports the allegation being made.
5. Capella MD (DSL) to alert appropriate agencies if the allegation is considered to be a potential criminal act and then follow-up in writing immediately and request acknowledgement of receipt.
 6. Capella MD (DSL) to notify the ESFA of any circumstances arising in connection with the delivery of Capella obligations under the ESFA Apprentice Agreement for Training Providers which could give rise to legal liability, have an adverse effect on the reputation of the ESFA or call into question Capella's suitability to deliver training to apprentices. Then confirm this in writing immediately and request acknowledgement of receipt.
 7. Capella MD (DSL) or Ops Director (Deputy DSL) to organise training, Professional Development or mentoring for the Associate or the Training Delivery Sub-contractor, if circumstances appropriate.
 8. Replace the Associate, or Training Delivery sub-contractor, as appropriate.
 9. If the Associate or Training Delivery sub-contractor harmed, or posed a risk of harm, to a young person (aged 18 or under) or a vulnerable adult (ie a person who, for any reason, may be unable to take care of themselves or protect themselves against significant harm or exploitation) and where:
 - a) the harm test was satisfied in respect of that individual
 - b) the individual has received a caution or conviction for a relevant offence or there is reason to believe that the individual has committed a listed relevant offence and
 - c) the individual has been removed from working in regulated activity, or would have been removed had they not leftthe Capella MD will notify the Disclosure and Barring Service (DBS) that the Associate or the Training Delivery sub-contractor has been dismissed or removed due to safeguarding concerns, or that they would have been had they not resigned.

Appendix 3

Designated Safeguarding Lead (DSL) – Role Description

The primary Designated Safeguarding Lead (DSL) is Capella's MD (Kate Smith). In the MDs absence, responsibilities are to be covered by Operations Director (Amrik Gill) and/or Quality & Commercial Manager (Claire Hughes) and/or Programme Manager (Becky Grainger), who have also completed Designated Safeguarding Lead training and who act as Deputy Designated Safeguarding Leads.

Contact Details for the DSL and the Deputy DSL's are available on Page 3 of this Policy. The DSL and Deputy DSL's can be contacted at any time regarding a Safeguarding or Prevent Concern relating to a Capella apprentice/delegate or Associate.

The Designated Safeguarding Lead (DSL), or in her absence a Deputy Designated Safeguarding Lead, will take responsibility for safeguarding all apprentices/delegates.

The DSL and Deputy DSLs have a responsibility to liaise with relevant statutory agencies, such as the police, social care and health services, Safeguarding Boards.

The DSL and Deputy DSLs will provide support, advice and guidance to stakeholders on an on-going basis and on any specified safeguarding issue as required.

The DSL role includes:

- Ensuring Capella is meeting its legal and statutory requirements
- Undertaking an annual review of, and if needed updating, the Safeguarding policy
- Making sure the Safeguarding policy is fully implemented and followed by all stakeholders
- Providing support, supervision and advice for stakeholders with a safeguarding and/or Prevent concern
- Keeping own Safeguarding and Prevent training up to date
- Ensuring that all Associates and Advisory Board Members undertake Safeguarding and Prevent training as part of their induction, and that they refresh this training every two years thereafter
- Ensuring that a register is kept of all Associates and Advisory Board Members who have completed safeguarding training
- Making sure that the Safeguarding Policy is fully implemented and followed by all Associates and Advisory Board Members
- Keeping all stakeholders (including apprentices and delegates) informed of good practice and new legislation and guidance with regards to Safeguarding and Prevent
- Helping to promote educational outcomes for all

- Fostering good relations between people sharing a common characteristic and those who don't share that characteristic
- Supporting activities linked to promoting/delivering Education Inspection Framework (EIF) requirements, in particular those relating to Behaviour and Attitudes
- Understanding the Safeguarding and Prevent referral procedures and knowing how to contact and establish links with the local authority, the Multi-Agency Safeguarding Hub (MASH), the Channel Programme and/ or the police
- Liaising with and making referrals to appropriate agencies about apprentices/delegates, where there are safeguarding and/or Prevent concerns
- Regularly reviewing safeguarding with stakeholders, including providing regular Safeguarding Updates to the Capella Advisory Board and, where required, liaising with Ofsted to inform them of any safeguarding actions taken
- Dealing with allegations against a member(s) of the Capella Team or a third-party contracted by Capella to provide training courses to apprentices/delegates
- Capturing any incident details in line with the Safeguarding policy and ensuring that these are safely and securely stored in Capella's Safeguarding and Prevent Concerns and Incidents Log, and, where applicable, in the Capella MD's secure file storage area.

In all instances, Capella Deputy Safeguarding Leads must ensure that:

- They deputise for the Designated Safeguarding Lead (Capella MD) in her capacity as DSL should she be unable to perform the DSL role for any reason
- The Designated Safeguarding Lead (Capella MD) is taking appropriate and timely action
- Where appropriate, they challenge the Capella MD
- They keep their own Safeguarding and Prevent training up to date
- Should they have any safeguarding concerns regarding the Capella MD that they raise these with an independent member of the Capella Advisory Board

Appendix 4

Safeguarding – Categories of Abuse

This appendix details the 10 Categories of Abuse, along with their definitions and provides indicators of abuse and signs/symptoms that all should be aware of:

1. **Physical Abuse:** occurs when a person hurts, or tries to hurt, another person by way of bodily contact or physical force, such as hitting, slapping, pushing, kicking, restraint or the misuse of medication.

Signs to look out for: unexplained bruising, burns, cuts, and/or fractures; history of unexplained injuries; weight loss

2. **Psychological Abuse (also known as Emotional Abuse):** occurs when a person attempts to frighten, control or isolate another person. Psychological abuse can take many forms such as verbal abuse (eg name-calling, shouting; talking to someone in a derogatory, patronising or humiliating manner); bullying; cyber-bullying; depriving someone of support and/or contact with other people; threatening to abandon someone.

Signs to look out for: withdrawal or a change in someone's psychological state; an air of silence when a particular person is present; unexplained weight loss or gain; tears and/or anger; low self-esteem; insomnia

3. **Sexual Abuse:** is any sexual act that a person does not agree to, including inappropriate touching, inappropriate looking or innuendo, indecent exposure; forcing someone to use pornography and/or send/receive sexual photography; sexual assault; attempted rape; rape; child sexual exploitation (CSE).

Signs to look out for: poor concentration; withdrawal; anxiety; reluctance to be alone with a particular person; bruising; difficulty in walking or sitting; uncharacteristic use of explicit sexual language; self-harming;

4. **Neglect (also known as Acts of Omission):** Neglect can be both physical and psychological and covers acts such as ignoring someone's medical, emotional and/or physical care needs; not providing someone with adequate nutrition, medication, care, support or access to educational services; withholding the necessities of life such as food and heating; preventing someone from making their own choices.

Signs to look out for: clothing being inappropriate, inadequate, ill-fitting, in poor condition and/or unclean; poor environmental conditions; poor personal hygiene; unexplained weight loss; uncharacteristic failure to engage in social interactions

5. **Self-Neglect:** covers a wide range of behaviours including neglecting to care for one's personal hygiene, health or surroundings (including hoarding); self-harming, and not seeking help and support.

Signs to look out for: living in squalid or unsanitary conditions; unkempt appearance; poor personal hygiene; hoarding; signs of self-harming

6. **Financial or Material Abuse:** occurs when someone steals someone's money or belongings, or denies someone access to their money, property or possessions. Financial or Material Abuse covers things such as theft, fraud, scamming, coercion and the misuse or misappropriation of property (cuckooing), possessions or benefits.

Signs to look out for: a person lacks belongings that they should be able to afford; purchase of items that the individual does not require or use; personal items going missing; unreasonable or inappropriate gifts.

7. **Discriminatory Abuse:** refers to unequal treatment, and/or forms of harassment or abusive treatment relating to a person's race, gender, gender identity, age, disability, marital status, pregnancy, sexual orientation, religion or belief.

Discriminatory abuse can take many forms, for example making derogatory comments; verbal abuse; use of inappropriate language (eg racist or homophobic language); harassment; being denied access to services/facilities (eg access to an interpreter or lip-reader); being excluded from activities on the grounds of a protected characteristic.

Signs to look out for: the person appears withdrawn and/or isolated; the person expresses anger, frustration, fear or anxiety; the support offered to the person does not take account of their needs in terms of a protected characteristic

8. **Organisational Abuse (also known as Institutional Abuse):** can occur when the routines in force within an organisation or institution force the service users to sacrifice their own needs, wishes or preferred lifestyle in order to satisfy the needs of the organisation or institution. Organisational Abuse can take the form of neglect or poor professional practice as a result of the structure, policies, processes and practices within an organisation or institution, and may range from one off incidents to on-going ill-treatment.

Signs to look out for: people being referred to, or spoken to, with disrespect; inappropriate care of possessions, clothing or living area; lack of personal clothes and belongings; unhomely or stark living environment; lack of leadership and supervision;

9. **Domestic Abuse:** includes any incident or pattern of incidents of controlling, coercive or threatening behaviour, violence or abuse between those who are, or have been, intimate partners or family members regardless of their gender or sexuality.

Domestic abuse can take many forms, including psychological/emotional abuse (eg the use of controlling behaviour, coercive behaviour, degrading behaviour and threatening behaviour); physical abuse; sexual abuse; financial abuse; forced marriage; female genital mutilation; and so called “honour” based violence.

Signs to look out for: low self-esteem; being very apologetic or meek; bruising, cuts and burns; isolation; anxiety; depression; being agitated; damage to home or property;

10. **Modern Slavery:** occurs when traffickers and slave masters use whatever means they have at their disposal to coerce, deceive and force individuals, including children (Child Criminal Exploitation), into a life of forced labour, domestic servitude, sexual exploitation and slavery.

Signs to look out for: being unkempt or withdrawn; living in dirty, cramped or overcrowded accommodation; lack of personal effects or identification documents; always wearing the same clothes; avoidance of eye contact; being hesitant to talk to strangers;

Related Policies:

- Capella Modern Slavery Policy
- Capella Prevent Policy
- Capella Health & Safety Policy
- Capella Equality, Diversity & Dignity at Work Policy

Sources of further information and support regarding abuse are available on Capella’s website: <https://capellaassociates.freshdesk.com/support/home>

Appendix 5

Capella response to COVID-19

Background

Covid-19 yields new safeguarding risks to Capella, our apprentices/delegates and our employers. This annex documents our response and will also be applicable in the event of other pandemics and other issues which may mean that face-to-face contact with apprentices/delegates and employers is not possible.

Aims

- Conduct an honest and robust assessment of potential risks to Capella Associates (and other stakeholders including sub-contractors and Advisory Board Members), our apprentices/delegates and our employers.
- Use available information and resources effectively to inform decision making.
- Implement countermeasures to remove/minimise risks (including those relating to face-to-face contact) as quickly as possible and monitor the effect of these to ensure desired outcomes are delivered.
- Maintain contact and provide all possible and appropriate support to enable apprentices/delegates and employers to maintain progress on their programmes.

Additional Safeguarding Risks and Actions to be Taken

Additional Safeguarding Risks	Actions to be Taken
Risks to the health and wellbeing of Capella Associates and other stakeholders linked to potential exposure to risks through face-to-face contact with each other, apprentices/delegates and employers	<ul style="list-style-type: none"> • Reschedule planned face-to-face Capella meetings (1:1, Team, Advisory Board etc) as remote meetings use Zoom, MS Teams or similar. • Assess risks for each Associate given the projects they're contracted to deliver and their own personal circumstances then agree/implement actions which may include rescheduling dates and replacing face-to-face sessions with remote sessions). • Review, share and agree/implement plans to follow published guidelines which may include social distancing and hygiene routines.

Additional Safeguarding Risks	Actions to be Taken
Risks to the health and wellbeing of Capella Associates and other stakeholders linked to home-working for extended periods	<ul style="list-style-type: none"> • Schedule regular call with all Associates (and other stakeholders as appropriate). • Send regular email to all Associates and other stakeholders to communicate latest status/plans and potential risks/opportunities for Capella/Associates. • Encourage full use of webcams so that Associates can be seen as well as heard and thereby maximise level of engagement. • Encourage Associates to maintain standard working hours when home-working in order to maintain home/work life balance.
Risks to the health and wellbeing of apprentices/delegates and employers linked to potential exposure to risks through face-to-face contact with Capella and each other	<ul style="list-style-type: none"> • Reschedule planned face-to-face Capella sessions (Training, Programme Reviews, etc) as remote meetings use Zoom, MS Teams or similar. • Assess risks for each programme then agree/implement actions which may include rescheduling dates and replacing face-to-face sessions with remote sessions). • Review, share and agree impact/implementation plans relating to published guidelines which may include social distancing and hygiene routines.
Risks to the health and wellbeing of apprentices/delegates and employers linked to home-working for extended periods	<ul style="list-style-type: none"> • Send regular email to all employers to communicate latest status/plans and potential risks/opportunities for apprentices/delegates/employers (being mindful that apprentices/delegates and employers may be facing need/additional pressures). • Agree any necessary actions to maintain regular contact with apprentices/delegates which may include requesting personal contact details (see Capella Data Protection Impact Assessment). • Increase frequency of contact with apprentices/delegates on the Capella Safeguarding and Prevent Concern and Incident Log if appropriate and as prompted by the register. • Encourage full use of webcams so that apprentices/delegates can be seen as well as heard and thereby maximise level of engagement. • Review/edit Risk Assessment for Programmes including Young and Vulnerable People and agree/implement any actions.

Additional Safeguarding Risks	Actions to be Taken
<p>Risks to apprentices/delegates and Capella Associates linked to remote training/coaching</p>	<ul style="list-style-type: none"> • Check that at least one DSL has completed Advanced on-line safeguarding training. • Videoing/Recording: <ul style="list-style-type: none"> ○ Ensure that only platforms that Capella has authorised for use for online training are used, with these being Zoom, MS Teams and Webex (see Data Transfer and Storage Policy for further information regarding these platforms). ○ Enable and utilise full security settings on any platform used and comply with any guidance/policy issued by employers. ○ If a session is to be recorded for sharing or future use, then the participants must provide their consent. If a participant does not provide their consent the training will not be recorded. Participants may withdraw their consent at any time, following which the recording will be immediately deleted. Further details regarding the recording of training; the means of obtaining consent; the storage and retention of recordings and the distribution of recordings are contained in Capella's Data Transfer and Storage Policy. ○ Where possible, blur backgrounds when working from home. • Encourage use of headsets to cut out background noise and electrical feedback to enable full concentration on the scheduled session. • Encourage apprentices/delegates and employers to review/read the apprenticeship support resources available on Capella's website (www.capellaassociates.com), which includes content relating to staying safe online. • Encourage apprentices/delegates and Associates to maintain standard business dress code when participating in remote training/coaching sessions.

	<ul style="list-style-type: none">• Continue monitoring apprentice/delegate attendance and sending “non-attendance” emails (even for shorter remote sessions).• Seek regular feedback from apprentices/delegates/employers via Socrative or Zoom or Microsoft Forms to check effectiveness of changes and agree any additional actions required.• Consider additional observations of Capella Trainers delivering scheduled training, coaching and/or review sessions to help ensure pedagogical aspects are at least as good as for face-to-face sessions.• Encourage Associates to regularly refer to Capella’s Data Protection Impact Assessment and Data Protection Policy when providing remote training/coaching, in order to ensure that they remain aware of the requirements of these documents.• For programmes that are launched remotely and therefore no face-to-face contact has been made with the apprentice/delegate, the following additional actions are required: (1) Entry in Tracker to record initial discussions on launch day (2) Ensure apprentices/delegates understand the importance of joining all scheduled sessions (3) Strongly encourage full use of webcams so that apprentices/delegates and line managers can be seen as well as heard (4) If physical resources are issued to apprentices/delegates via post, the risks associated with potential spread of virus/infection must be highlighted before they are issued and guidance based on published advice must be shared with recipients.• Seek, review and extract learning and best practice from others.
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Appendix 6 – Reporting of Safeguarding Concerns to Employers

Capella will only report Safeguarding Concerns to employers where the apprentice/delegate has given their consent for Capella to do so, or where the apprentice/delegate is deemed to be at risk and Capella have determined that the employer needs to be informed.

Where Capella has determined that the employer should be made aware of the Safeguarding Concern this will be captured in the Safeguarding & Prevent Concerns & Incidents Log, along with the rationale for doing so. The DSL or a Deputy DSL will be responsible for informing the employer. The employer may be informed via a telephone conversation or via an email. Where the employer is informed via an email the below email template should be utilised.

Email Template - used to notify an employer that one of their employee's has been added to Capella's Safeguarding Register

Notification of Safeguarding Risk

Dear xxx (employer lead),

We have added one of your apprentices/delegates to our Safeguarding Register. We do this whenever we have any concerns at all, no matter how small or large. Our general rule is: "if we're asking ourselves whether this may be a safeguarding issue, then add it to the register". We conduct a monthly review of the register and this drives consideration/planning of any actions and next steps. It also helps highlight any themes or reoccurring/related issues which may indicate a larger concern. Our Safeguarding register is password protected and can only be accessed by our Designated Safeguarding Leads who have all received necessary training.

A summary of the register entry we've made is below:

- Capella reference – SIL-xx
- Date added – xxx
- Overall concern rating (High, Medium Low) – xxx

Please make contact at your earliest opportunity so that we can discuss details and agree actions.

Please be assured that we treat safeguarding with the utmost seriousness. Our policy and practices are designed with this in mind, and also to fully meet the requirements of all providers on the ROATP as well as the Ofsted Education Inspection Framework requirements. A copy of our policy is available on request.

With best regards,

Appendix 7: The Capella Policy with regards to the recruitment of ex-offenders

The DBS Code of Practice, published under Section 122 of the Police Act 1997 advises that it is a requirement that all registered bodies must treat DBS applicants who have a criminal record fairly, and not discriminate automatically because of a conviction or other information revealed. The Code also requires registered bodies to have a written policy on the recruitment of ex-offenders. Capella's policy with regards to the recruitment of ex-offenders is detailed below for your information.

Capella is committed to the fair treatment of its Associates, potential Associates and the users of our services, regardless of their race, gender, religion, sexual orientation, responsibilities for dependants, age, physical/mental disability or offending background.

Capella actively promotes equality of opportunity for all with the right mix of talent, skills and potential and we welcome applications from a wide range of candidates, including those with criminal records.

Capella will only ask an individual to provide details of convictions and cautions that we are legally entitled to know about, which are not protected and where a DBS certificate can legally be requested.

Due to the nature of Capella's work as an Apprenticeship Training Provider, and the need to ensure that appropriate Safeguarding arrangements are in place, it is Capella Policy to:

- Assess applicants' suitability for positions using criminal record checks processed through the Disclosure and Barring Service (DBS)
- Require all Capella Associates (Trainers), Advisory Board Members and Training Delivery Sub-Contractors to have a Basic DBS Check

Capella believe that the above position is proportionate and that it is compliant with the requirements of the ESFA.

Capella is committed to:

- complying fully with the DBS Code of Practice (<https://www.gov.uk/government/publications/dbs-code-of-practice>) and ensuring that all applicants are made aware of the existence of this Code
- ensuring that all application forms, job adverts and recruitment documentation will contain a statement that a Basic DBS certificate will be required to be obtained and shared with Capella in the event of the individual being offered a contract.
- ensuring that we treat all applicants for positions fairly, and that we do not discriminate unfairly against any subject of a criminal record check on the basis of a conviction or other information revealed
- ensuring that we select all candidates for interview based on their skills, qualifications and experience

- ensuring that preparations for recruitment include consideration of latest legislation relating to the employment of ex-offenders (eg the Rehabilitation of Offenders Act 1974) by including a prompt in Capella's Standard Interview Questions document (BP25).
- ensuring that at least one member of any recruitment panel convened by Capella has completed Safe Recruitment training.
- ensuring that during any interview that may take place that all discussion will be open and measured with regard to any offences or other matters that might be relevant to the position. Applicants should note that any failure to disclose information that is directly relevant to the position sought could lead to the withdrawal of an offer by Capella.
- undertaking a discussion regarding any matter revealed on a DBS Certificate with the applicant before withdrawing any conditional offer that may have been made