

Safeguarding and Prevent Policy and Procedure

Ref PD/SG&P



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Change Log (for all changes prior to 2021 see Historic Change Log at the end of this policy)				
Date:	Change Description:	Proposed:	Actioned:	Approved:
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>
17/05/2021	<ul style="list-style-type: none"> Updated to capture information relating to C19 Testing of Trainers prior to return to F2F training (Update to Appendix 5 and insertion of new Appendix 6) and updating to reference that Associates & Advisory Board Members must complete Safeguarding Training annually 	K.Smith 30/03/2021	H.Lees 17/05/2021	<i>K.Smith</i>
15/09/2021	<ul style="list-style-type: none"> Incorporated Prevent Policy into Safeguarding Policy Updated to reflect revised DSL/Deputy DSL arrangements agreed at 9/7/21 Advisory Board Meeting Updated to reflect KCSIE 2021 and findings from Ofsted report into sexual abuse in schools & colleges Updated to include the 7 Golden Rules of Information Sharing 	KS July 2021 Advisory Board 9/7/21 KS July 2021	HL 28/07/21	<i>K.Smith</i>
17/12/2021	<ul style="list-style-type: none"> Minor updates following review prior to pre-inspection quality assessment Updates following pre-inspection quality assessment 14-16 October 2021 Updates following 22/10/21 Advisory Board Meeting Updates following review for RoATP reapplication Updates following 10/12/2021 Safeguarding & Prevent Training 	KS 11/10/21 KS 14/10/21 Advisory Board 22/10/21 KS/CH 13/12/21	HL 12/10/21 HL 26/10/21 HL 26/10/21 HL 23/11/21 HL 16/12/21	<i>K.Smith</i>
05/04/2022	<ul style="list-style-type: none"> Updated to reflect latest ICO guidance regarding sharing of info in emergencies References to Covid Procedures/Practices removed Updated to capture requirement to notify ESFA of allegations Updated to capture additional checks carried out if worked/lived outside UK Updated Appendix 5 to capture information about the Prevent Curriculum and Prevent Co-ordinators 	HL 08/03/22 KS 29/03/22	HL 29/03/22 HL 05/04/22	<i>K.Smith</i>

Capella's Safeguarding Statement

Capella's ESFA provider contract requires us to safeguard and promote the welfare of children and High Needs Apprentices aged 19 to 25. As part of our Safeguarding culture, and to ensure no learner is missed, Capella applies the same policies, processes and practices to all learners regardless of age or status.

Designated Safeguarding Lead and Deputy Designated Safeguarding Lead

Capella Designated Safeguarding Lead (DSL)
Kate Smith, Capella MD Email: kate.smith@capellaassociates.com Phone: 07968 344764
Capella Deputy Designated Safeguarding Lead (Deputy DSL)
Claire Hughes, Capella Quality and Commercial Manager Email: Claire.hughes@capellaassociates.com Phone: 07971 260517

The Capella Designated Safeguarding Lead (DSL) can be contacted at any time regarding any Safeguarding or Prevent concerns, using the contact details above. Should the DSL be unavailable, please contact the Deputy DSL.

For details of how to raise a Safeguarding or Prevent Concern please see Appendix 1 of this policy.

In addition to the DSL and the Deputy DSL, Capella also has a number of Designated Safeguarding Support representatives, who are trained to the same level as the DSL and Deputy DSL. The Designated Safeguarding Support Representatives' role is to:

- provide support to apprentices/delegates who are on the Safeguarding & Prevent Concerns and Incidents Log
- liaise with the DSL/Deputy DSL regarding individuals who are on the Safeguarding & Prevent Concerns and Incidents Log as required, and to
- deputise for the DSL and Deputy DSL if both are unavailable. In this situation one of the Designated Safeguarding Support Representatives will be nominated by the DSL/Deputy DSL to act in their place.

Purpose

The purpose of this Safeguarding and Prevent Policy and Procedure is to set out the intentions and key tools that Capella uses to:

- a) ensure that we safeguard and promote the physical and mental health and well-being of all apprentices, delegates, employers and Capella Associates who are involved in our education, training and apprenticeship programmes; and to
- b) ensure that we meet our legal responsibility “*to have due regard to the need to prevent people from being drawn into terrorism*” by ensuring that apprentices/delegates and Associates:
 - understand the risks of radicalisation and extremism,
 - are protected from the threats of radicalisation and extremism, particularly through the promotion of fundamental British Values, and
 - are able to recognise vulnerabilities (factors and characteristics associated with being susceptible to radicalisation) and know how to respond.

This Safeguarding and Prevent Policy and Procedure should be read in conjunction with:

- a) 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
- b) 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
- c) 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
- d) our Data Transfer & Storage Policy which details the Data Retention Periods that Capella use relating to C19 Testing Results and the tools that Capella uses to ensure that all Capella information, resources and assets are managed, stored and disposed of safely and securely
- e) our Delegate Support Policy, which sets out the intentions and key tools that Capella uses to ensure it provides apprentices and delegates with appropriate learning support and reasonable adjustments, in order to ensure they are not disadvantaged as a result of their learning needs, and that they are supported to achieve their full potential
- f) our Associate Code of Conduct and our Code of Conduct for apprentices/delegates, which set out Capella’s expectations of Associates, (including with regards to low-level concerns), and apprentices/delegates,
- g) our Whistleblowing Policy, which sets out the intentions and key tools that Capella uses to ensure that all Capella Associates are able to raise, in confidence, genuine

concerns regarding suspected malpractice without fear of victimisation, subsequent discrimination or disadvantage.

This Safeguarding and Prevent Policy includes how we:

- achieve commitment to this policy in our organisation (Intent)
- safeguard apprentices, delegates and Associates, and protect them from abuse and radicalising influences (Intent, Curriculum, Programme set-up and management, Appendices 1,2 and 5)
- enable apprentices/delegates to obtain support or guidance (Curriculum, Appendix 1 and 3)
- promote the policy (Tools and Curriculum)
- train our Associates to implement this policy and to identify any vulnerabilities or worrying changes of behaviour (Training)
- take action if we have any concerns about an apprentice, delegate, Associate, Advisory Board Member or Training Delivery Sub-Contractor (see Appendix 1)
- share information and obtain additional support and guidance when required
- monitor and assess the impact and effectiveness of this policy in order to drive continuous improvement

Appendices to this policy provide additional information on Safeguarding and Prevent:

- **Appendix 1** contains The Capella Procedure for reporting Safeguarding and/or Prevent 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 further information regarding the Designated Safeguarding Lead (DSL) and Deputy DSL, including a DSL Role Description
- **Appendix 4** provides information regarding the 10 Categories of Abuse, and signs to look out for, including information regarding Peer on Peer Abuse
- **Appendix 5** provides further information regarding the Prevent Duty, including signs to look out for
- **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

The Capella Managing Director takes lead responsibility for deployment of this policy.

The Capella Managing Director is the Designated Safeguarding Lead (DSL). The Capella Quality & Commercial Manager is the Deputy DSL, who deputises for the DSL when she is not available. Appendix 3 contains a Role Description for the DSL and Deputy DSL.

All Capella Associates, Capella Advisory Board Members, and Capella Training Delivery Sub-contractors are made aware of this policy and are committed to working within this policy.

Intent

Capella aim to:

1. Provide a safe, supportive, open and transparent environment for all people to learn, develop, and work.
2. Create a safe space for free and open discussion and disclosure, recognising that an individual may not disclose everything all at once and that maintaining an open dialogue is therefore important.
3. Take a “zero tolerance” approach to all forms of abuse (including sexual violence, sexual harassment and peer on peer abuse) (See Appendix 4 for further information)
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 all forms of bullying, harassment and discrimination (*see Capella's Equality, Diversity and Dignity at Work Policy for further information*)
5. Promote and reinforce fundamental British Values, founded on tolerance and respect for others.
6. Ensure that all apprentices/delegates, Associates, Advisory Board Members and Training Delivery Sub-Contractors are:
 - aware of the risks of abuse, radicalisation and extremism
 - remain vigilant regarding these risks at all times
 - understand the process to raise concerns (no matter how small or low-level these may be perceived to be), and of how these will be handled (see Appendix 1)
7. Identify any individuals who may be suffering, or are likely to suffer, abuse or harm (including harmful sexual behaviour, sexual harassment and/or online abuse) and ensure these instances are reported and actioned appropriately, ensuring that the individual is the central focus.
8. Stay abreast of changes in published guidelines on Safeguarding, Safe Recruitment and the Prevent Duty.
9. Comply with all regulations and statutory duties in relation to Safeguarding, Safe Recruitment and the Prevent Duty.
10. Help to promote educational outcomes for all, and support activities linked to promoting/delivering the Education Inspection Framework (EIF), in particular those relating to Behaviour and Attitudes.
11. Promote a sense of community cohesion both within our provision and within the wider external community.
12. Challenge poor practice and inappropriate behaviour (including between peers) where identified (See Appendix 4 for further information regarding peer-on-peer abuse)

13. Ensure that “everyone is responsible” for fulfilling the purpose and aims of this policy.

Tools

Key tools we will use to ensure that Safeguarding and the Prevent Duty are promoted, that they are at the forefront and underpin all aspects of our business activities, and that our apprentices, delegates and Associates are protected from radicalising influences are listed below, in the area of operation to which they relate:

Leadership / Policies / Procedures

1. Annual review of this Safeguarding and Prevent policy.
2. Annual communication of this Safeguarding and Prevent policy to promote the importance of Safeguarding and Prevent and to ensure that all Associates, Advisory Board Members and Training Delivery Contractors/Sub-contractors understand their responsibilities with regards to Safeguarding and the Prevent Duty.
3. Ensuring that all Associates are aware that Capella’s policy with regards to First Aid is that this must only ever be administered by the First Aiders at the training or meeting venue (i.e. employer site, training venue) .
4. Ensuring that all Associates are aware that it is Capella’s Policy that all training will be undertaken either on-line or at the designated training venue (eg. employer site, training venue) and that Off-Site Educational Visits are not to be undertaken without a risk assessment and prior written authorisation from the Managing Director.
5. Six-monthly review/update of Capella’s Prevent Duty Risk Assessment.
6. Regular contact with Capella’s Regional Prevent Duty Lead for Further and Higher Education (Hifsa Haroon-Iqbal, West Midlands Regional Prevent Co-ordinator).
7. 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 and/or the Prevent Duty (*Note: this should ideally be at least 5 days before delivery*).
8. Ensuring that guests and/or Contractors (other than Training Delivery Contractors/Sub-Contractors) who may have access to apprentices or delegates are accompanied at all times by a Capella Associate.
9. Always reporting any Safeguarding and/or Prevent concerns, no matter how small or low-level these may be perceived to be, to the Capella DSL (or in her absence the Deputy DSL) as soon as possible, for their inclusion on the Safeguarding and Prevent Concerns and Incidents Log, and, where deemed appropriate, to notify 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).

10. Following the guidelines in Appendix 1 or 2 (as applicable) if Safeguarding and/or Prevent situations or concerns arise. The responsibilities of the DSL and the Deputy DSL are set out in Appendix 3.
11. Acting swiftly, carefully and sensitively if any Safeguarding or Prevent issues or concerns arise (refer to Appendix 1 and 2)
12. Securely retaining information relating to Safeguarding and/or Prevent 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 DSL, the Deputy DSL and Capella's Designated Safeguarding Representatives as listed on the Capella User List (CL15) and it is password protected. The password must not be shared with any other parties. *(See Capella's Data Transfer and Storage policy for details regarding the retention period of this information)*
13. Setting out guidance in the Code of Conduct for apprentices/delegates relating to the usage of Capella provided IT equipment/systems *(Note: All Capella apprentices/delegates are allowed to use their own devices, and/or devices provided by their employer, whilst undertaking Capella training programmes – details regarding how equipment/systems must be used are set out in the Capella Data Transfer & Storage policy which includes monitoring and cyber security plus reference to the User List for access permissions and the Cyber Security Workbook for technical specifications and monitoring).*
14. Ensuring that all Associates, apprentices and delegates are aware of the risks associated with online activity and how to keep themselves safe
15. Ensuring safe recruitment of new Associates and Training Delivery Contractors/Sub-contractors by requiring all Associates, Advisory Board Members and Training Delivery Contractors/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.
16. Requiring all Associates, Advisory Board Members and Training Delivery Contractors/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 their DBS Certificate is recorded in Capella's Single Central Record (BP63):
 - Type of DBS Check required (ie Basic)
 - DBS Certificate Number
 - Date of Issue of DBS Certificate
 - DBS Certificate Type
 - Initials of Capella Associate to whom DBS Certificate shown and date seen and confirmation that the Certificate is Clear
17. Requiring all Training Delivery Sub-Contractors to have suitable Insurance arrangements in place and to provide Capella with a copy of their certificate(s). The expiry date of the insurance is captured on Capella's Single Central Record (BP63) which is regularly reviewed.
18. Monitor and assess the impact and effectiveness of this policy in order to drive continuous improvement.

19. Undertaking regular Compliance Assurance checks of this policy and supporting processes in line with Capella's Compliance Assurance schedule (BP23).
20. Undertaking Quarterly analysis of data contained in the Safeguarding and Prevent Concerns and Incidents Log.
21. Undertaking regular analysis of data obtained from feedback surveys with apprentices/delegates, employers and Associates, and action planning to close any gaps.
22. Undertaking regular reviews of the Single Central Record and Skills Matrices for Associates.
23. Undertaking Quarterly analysis of Prevent Duty and other quiz/test data and action planning to close any gaps.
24. Undertaking Learner Deep Dives to identify any gaps and agree plans to address
25. Regularly reporting on the findings of the above analysis to Capella's Advisory Board.
26. Associates working within the Capella Code of Conduct.

Capella aim to safeguard our apprentices/delegates, and to build resilience to extreme narratives in our apprentices/delegates and Associates through training, and considered programme set-up and curriculum design.

Training

27. Ensuring that all Associates and Advisory Board Members, as well as all Training Delivery Contractors/Sub-Contractors who work directly with apprentices/delegates, are trained as follows:

Who	What (summary)	What (curriculum)	When
All Associates; All Advisory Board Members; All Training Delivery Contractors/Sub-contractors	Awareness Training	<ul style="list-style-type: none"> • Safeguarding and Prevent Duty for 16 – 18 year olds and adults 	As soon as possible after appointment and then refreshed annually
DSL; Deputy DSL; and Designated Safeguarding Support Representatives	Designated Safeguarding Lead Training	<ul style="list-style-type: none"> • DSL • Prevent Referrals • Safer Recruitment 	As soon as possible after appointment and then refreshed annually
DSL	Prevent Channel Awareness Training https://www.elearning.prevent.homeoffice.gov.uk/channelawareness ;	Prevent Channel Awareness Training	In advance of attending any Channel Panel

28. Ensuring that a record of the above training is maintained for all Associates and Advisory Board Members, as well as all Training Delivery Contractors/Sub-Contractors who work directly with apprentices/delegates, within Capella's Single Central Record (SCR)(BP63).
29. Requiring all Associates, Advisory Board Members and Training Delivery Contractors/Sub-Contractors to read the sections of the current live version of Keeping Children Safe In Education (KCSIE) that are relevant to their role and responsibilities (as determined by the DSL), and maintaining a record of this information within Capella's Single Central Record (SCR)(BP63).
30. Ensuring that at least one member of each Interview Panel has been trained in Safer Recruitment, and that the details of this are captured in Capella's Single Central Record (SCR)(BP63).
31. Ensuring that each Associate updates their Continuing Professional Development Record and their Skills Matrix to reflect the training that they have undertaken.
32. Ensuring that all Associates and Training Delivery Contractors/Sub-Contractors are aware of indicators that an individual:
 - May be engaged with an extremist group, cause or ideology
 - May have an intention to cause harm, use violence or undertake other illegal acts
 - May be capable of causing harm or contributing directly or indirectly to an act of terrorism
 - May be being abused and/or being subject to harmful sexual behaviour (including sexual harassment and online sexual abuse)and that they know how to respond (see Appendices 4 and 5 for further information regarding indicators)
33. Ensuring that all Associates and Training Delivery Contractors/Sub-Contractors are aware of indicators of low-level concerns, such as:
 - An Associate or Training Delivery Contractor/Sub-Contractor appearing to be overly friendly with an apprentice/delegate
 - The use of inappropriate, sexualised, intimidating or offensive language by an Associate, Training Delivery Contractor/Sub-Contractor and/or an apprentice/delegate
 - Any behaviour which is inconsistent with Capella's Associate Code of Conduct or Capella's Code of Conduct for Apprentices/Delegates (as applicable)and that they know that these must be raised with the DSL/Deputy DSL for recording in the Safeguarding and Prevent Concerns and Incidents Log.
34. Ensuring that any new/additional training needs are considered as part of the review of this policy.

Note: Frequency of training may be increased subject to incidents arising and/or changes in legislation/guidance.

Programme set-up and management

35. Encouraging and developing open relationships with all Capella apprentices/delegates and contacts
36. ProGo action to prompt consideration of:
 - a. known Safeguarding and/or Prevent Duty risks associated with overseas travel and delivery
 - b. employer nominated Safeguarding and Prevent Duty contacts, and training of same
 - c. known Safeguarding and/or Prevent Duty concerns / issues relating to an apprentice/delegate joining/taking part in a Capella programme (see Appendix 4 and 5 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
37. 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 DSL or, in her absence the Deputy DSL. The Capella DSL, or in her absence the 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 outcome 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

Curriculum

38. Sharing of relevant guidance and material with apprentices/delegates in order to raise their awareness of Safeguarding and Prevent, (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>)
 - the latest news via One File
 - material embedded throughout Capella programmes including:
 - Facilitated activities/discussions at Launch, Mid Review, Final Review and the Management Engagement Workshop
 - Guided Learning Modules from the Education Training Foundation

39. Ensuring that our Training Programmes make apprentices/delegates:

- aware of the existence of this policy
- aware of how, and to whom, to raise any concerns and of how these concerns will be handled
- aware of the Support and Guidance Resources (which include signposting to further sources of support) that are available via our website: (<https://capellaassociates.freshdesk.com/support/home>)

Sharing of Safeguarding and/or Prevent information

40. Capturing, and if deemed necessary sharing, Safeguarding and/or Prevent information with others (either within Capella or external to Capella), is always undertaken on a strictly “need to know basis”, and is only undertaken in order to ensure that appropriate action is taken, and to ensure compliance with latest legislation and guidance in relation to Data Protection. Capella are mindful of “The 7 Golden Rules of Information Sharing”, details of which are contained in Appendix 1. All Capella Associates are aware that:

- Data Protection and UK GDPR should not be a barrier to sharing Safeguarding and/or Prevent concerns and that,
- in urgent or emergency situations (eg to help prevent the loss of life or serious physical, emotional or mental harm) Capella will share personal data with relevant organisations or individuals as is necessary and proportionate.

41. If a Prevent concern is raised/identified, the DSL will, in the first instance, contact our Regional Prevent Duty Lead using the contact details detailed in Appendix 5 of this policy, unless a serious or imminent threat to the public or an individual has been identified in which case the first point of contact would be the police. In such a situation normal protocols around confidentiality may be overridden.

Capella’s Regional Prevent Duty Lead will act as the Single Point of Contact for all issues that are referred to her, and will provide guidance regarding next steps, and if deemed appropriate, referral to other regions, and/or Channel.

Monitoring of the Policy

Safeguarding and Prevent are reviewed at least 8 times per year as driven by our Leadership Team Meeting Standard Agenda and Advisory Board Standard Agenda.

All incidents, issues and/or concerns appertaining to Safeguarding and/or Prevent that are reported, or identified, by Capella Associates or Capella’s Training Delivery Contractors/Sub-Contractors are recorded in Capella’s Safeguarding & Prevent Concerns and Incidents Log by the DSL or the Deputy DSL.

The Deputy DSL monitors Capella’s Safeguarding & Prevent Concerns and Incidents Log on a monthly basis, in liaison with Capella’s Designated Safeguarding Support

Representatives. The Deputy DSL may escalate any items on the Log through to the DSL where deemed necessary/appropriate.

The DSL monitors Capella's Safeguarding & Prevent Concerns and Incidents Log on a quarterly basis, and an anonymised update regarding these matters is shared with Capella's Advisory Board on a quarterly basis, including consideration of any trends or systemic issues.

The DSL may escalate any items on the Safeguarding & Prevent Concerns and Incidents Log through to Capella's Advisory Board where deemed necessary (names may be redacted).

Should recurrent issues or patterns emerge as a result of Capella's monitoring, these will be included in Capella's Prevent Risk Assessment.

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

We also use our Self-Assessment (SAR) to evaluate our educational Safeguarding and Prevent provision, using standard Ofsted criteria. Although there are no separate grade descriptors for Safeguarding, we consider that such evaluation is good practice and we therefore identify which descriptor best matches current Safeguarding provision, then identify actions, where necessary, to reach the next grade descriptor. Our Quality Improvement Plan, supported by our Prevent Risk Assessment, contains specific sections regarding the evaluation of risk as it appertains to Prevent.

Review and Updates

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

- (a) publication of new guidelines/official communications, or
- (b) the conclusion of any incident that has been reported

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

- Keeping Children Safe in Education 2021 (DfE, Sept 2021)
- Working together to Safeguard Children – Aug 2018
- Inspecting safeguarding in early years, education and skills settings – September 2019
- Further Education and Skills Inspection Handbook (for September 2021)
- Information Sharing: Advice for practitioners providing safeguarding services to children, young people, parents and carers (HM Government, July 2018)
- DfE Regulated Activity in Relation to Children: Scope – Factual Note by HM Government
- Revised Prevent Duty Guidance for England and Wales – 10 April 2019

- Prevent Duty Guidance: for further education institutions in England and Wales – 10 April 2019
- The Prevent Duty in Further Education and Skills Providers – August 2016
- Work Based Learners and the Prevent Statutory Duty – September 2018
- Counter-Terrorism and Security Act 2015
- Jisc.ac.uk/guides

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

Key things to remember if you are advised of, or suspect / identify, Safeguarding and/or Prevent concerns, or possible abuse (including sexual abuse and/or sexual harassment):

1. NOTICE – CHECK – SHARE

Remember both physical and mental health are relevant to safeguarding. Be mindful of the fact that the individual making the disclosure has placed you in a position of trust.

2. Remember “Reassure, Record, Report”**3. Reassure:**

Reassure them that by telling you, they have done the right thing, and that they will be taken seriously and be supported and kept safe.

Listen carefully, without making assumptions or judgements, and stay calm.

Do not offer confidentiality.

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 you have heard. Never ask leading questions and do not put words into their mouth.

4. Record:

Where possible record information word for word rather than summarising, however if doing so would inhibit the discussion, or hinder engagement, you should make a record as soon as possible after the discussion.

The following information at a minimum should be captured:

- 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.
- e. Details of any immediate or impending danger to the people concerned.

Appropriate terminology, which does not imply guilt, should be used within reports/records (eg Person 1 rather than “the victim”).

Find out what the individual would like to happen but make them aware that you may have to act against their wishes (e.g. they may ask you not to disclose to anyone else).

Be mindful of the fact that an individual may not disclose all information during the first discussion. Make notes of any subsequent discussions that take place. Where possible these notes should be verbatim.

5. Report:

Inform them that you 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.

Report the Safeguarding Concern/Incident to the Capella DSL (or in her absence the Capella Deputy DSL) as soon as possible and no later than the end of the day that the concern/incident was noticed/occurred, in order to enable them to:

- capture details of the incident within the Capella Safeguarding and Prevent Concerns and Incidents Log, and
- complete Capella's "Detection, Severity, Occurrence" assessment to assess risks and needs arising from the incident.

Be mindful of "The 7 Golden Rules of Information Sharing" which are:

- 1 - GDPR isn't a barrier to sharing information
- 2 - Be open and honest
- 3 - Seek advice
- 4 - Share with consent where appropriate
- 5 - Consider safety and wellbeing
- 6 - Necessary, Proportionate, Relevant, Accurate, Timely and Secure
- 7 - Keep a record

Further information regarding "The 7 Golden Rules of Information Sharing" is available in: [Information sharing: advice for practitioners \(publishing.service.gov.uk\)](https://www.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/612222/information-sharing-advice-for-practitioners.pdf)

6. If considered appropriate (see Appendix 6 for further details), the Capella DSL/Deputy DSL 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.

7. Actions agreed (regardless of whether or not the employer has been informed) may include contact with appropriate agencies (e.g.
 - Regional Prevent Duty Lead for prevent related issues,
 - police if a criminal act is known or suspected,
 - social services for safeguarding concerns [*Note: if the concern relates to the learning setting the referral should be made to the Local Authority in which the setting is located, otherwise the referral should be made to the Local Authority for the area where the apprentice/delegate lives which can be found by conducting an online search for “out of hours social care” or “emergency social services” for the relevant region/county of the apprentice/delegate concerned*]
8. 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 kept updated at all times with a record of all agreed actions and actions taken.
9. If Capella refers a safeguarding concern or an allegation of abuse to local authority children’s social care / adult social care and / or the police, Capella must, within 24 hours, inform the ESFA by contacting the Helpdesk (08000 150600 or helpdesk@manage-apprenticeships.service.gov.uk). Such notification must include:
 - the name of the Training Provider,
 - a high-level summary of the nature of the incident (without sharing personal information about victims or alleged perpetrators) and
 - confirmation of whether it is, or is scheduled to be, investigated by the Local Authority and / or the police
10. Associates must not investigate concerns or allegations themselves but must report them immediately to the Capella DSL, or in her absence the Deputy DSL, for their recording in the Safeguarding and Prevent Concerns and Incidents Log.
11. The Capella DSL and Deputy DSL must keep the Safeguarding and Prevent Concerns and Incidents Log up to date with all details of the incident/concern and all actions taken.
12. Following each incident, the Capella DSL/Deputy DSL (as applicable) must reflect on the incident and the actions taken and capture / share learning, as appropriate. This analysis may form part of the quarterly analysis of the Safeguarding and Prevent Concerns and Incidents Log.

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

When dealing with allegations, Capella will:

- Apply common sense and judgement
 - Deal with allegations fairly, consistently, and as quickly as possible
 - Provide effective protection for the person who has made the allegation
 - Support the person subject to the allegation
 - Keep all information regarding the allegation confidential and secure
 - Only share information regarding the allegation with other parties (eg police, DBS, employer) on a “need to know” basis
1. Any allegation that is made against a Capella Associate, or a Training Delivery Contractor/Sub-Contractor utilised by Capella, should be submitted to Capella’s DSL (or in her absence Capella’s Deputy DSL) without delay, either verbally or in writing. Please classify any such correspondence as Highly Confidential. Contact details for the DSL/Deputy DSL are available on Page 2 of this policy.
 2. Any allegation that is made against the Capella MD should be submitted to the Independent Members of Capella’s Advisory Board without delay, by emailing advisoryboard@capellaassociates.com. Please classify any such correspondence as Highly Confidential.
 3. Upon receipt of an allegation against a Capella Associate or a Training Delivery Contractor/sub-contractor utilised by Capella, Capella’s DSL/Deputy DSL (as applicable) will conduct basic enquiries to establish the facts and help them to determine whether there is any foundation to the allegation eg:
 - Where was the individual subject to the allegation at the time of the allegation?
 - Did the individual subject to the allegation come into contact with the person making the allegation, or could they have come into contact with that person, at the time of the allegation?
 - Were there any witnesses to the allegation?
 - Is there any CCTV footage of the allegation?

4. Upon receipt of an allegation against the Capella MD, an extra-ordinary meeting of Capella's Advisory Board (excluding the Capella MD) will be convened, at which the Advisory Board (excluding the Capella MD) will conduct basic enquiries to establish the facts and help them to determine whether there is any foundation to the allegation eg:
 - Where was the individual subject to the allegation at the time of the allegation?
 - Did the individual subject to the allegation come into contact with the person making the allegation, or could they have come into contact with that person, at the time of the allegation?
 - Were there any witnesses to the allegation?
 - Is there any CCTV footage of the allegation?

5. Once the basic enquiries have been completed, the DSL/Deputy DSL/Advisory Board (excluding the MD) (as applicable) will make a risk assessment of the situation and 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 MD, Associate or Training Delivery Contractor/Sub-contractor (as applicable) so that they have no direct contact with apprentices/delegates
 - ensuring that the MD, Associate or Training Delivery Contractor/Sub-Contractor (as applicable) does 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 MD, Associate or Training Delivery Contractor/Sub-contractor (as applicable) 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 will be sent to the MD, Associate or Training Delivery Contractor/Sub-contractor (as applicable) within one working day, along with the contact details for their named Capella point of contact/support. 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.

6. The Capella DSL/Deputy DSL/Independent Member (as applicable) will:
 - conduct a thorough investigation of the allegation, including obtaining written details about times, dates, locations and names of potential witnesses (*Where possible a verbatim record of the discussion should be recorded, however if this would inhibit the discussion or hinder engagement a record of the discussion should be made as soon as possible after the discussion has concluded*). *Appropriate terminology,*

which does not imply guilt, should be used within reports and records (eg Person 1 rather than “the victim”).

- Produce a written outcomes report upon the conclusion of the investigation
7. When determining the outcome of an allegation investigation, the options open to Capella will depend upon the nature and circumstances of the allegation and the information/evidence available.

Capella will use the following definitions 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.
8. Where an allegation is substantiated against an Associate or Training Delivery Contractor/Sub-Contractor, Capella will:
- Immediately terminate their contract with the Associate or Training Delivery Contractor/Sub-Contractor (as applicable)
 - make the substantiated outcome clear when providing references for the Associate/Training Delivery Contractor/Sub-contractor to prospective employers, providing that the information is factual and does not include opinion
 - retain the following information in the Associate/Training Delivery Contractor/Sub-Contractors personnel file until the Associate/Training Delivery Sub-Contractor has reached normal pension age or for a period of 10 years from the date of the allegation (whichever is longer):
 - a clear and comprehensive summary of the allegation
 - details of how the allegation was followed up and resolved
 - a note of any action taken, decisions reached and the outcome
 - a copy of any correspondence regarding the matter that was provided to the individuals concerned
 - a declaration on whether the information will be referred to in any future reference

Where an allegation is substantiated against the MD an extraordinary meeting of the Advisory Board (excluding the MD) will be convened to agree an appropriate course of action.

Where an allegation is substantiated, and the MD, Associate or Training Delivery Contractor/Sub-contractor (as applicable) is found to have 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 left

the Capella DSL/Deputy DSL/Advisory Board (as applicable), will notify the Disclosure and Barring Service (DBS) that the MD, Associate or the Training Delivery Contractor/Sub-contractor (as applicable) has had their contract terminated due to safeguarding concerns, or that they would have been had they not resigned.

9. Where an allegation is determined to be unsubstantiated, unfounded, false or malicious the Capella DSL/Deputy DSL/Advisory Board (as applicable) will:
 - consider whether the person who has made the allegation requires help (eg the allegation may have been a “cry for help”, they may have been abused by someone else) and will act accordingly
 - remove the details of the malicious or false allegation from the Associate/Training Delivery Contractor/Sub-contractor’s/MD’s (as applicable) records, unless the individual gives their consent for retention of the information
 - not include information about the allegation within future references
10. If an allegation is shown to have been deliberately invented or malicious, the Capella DSL/Deputy DSL/Advisory Board (as applicable) may elect to invoke the Disciplinary Procedure detailed within Capella’s Code of Conduct for apprentices/delegates and/or Capella’s Code of Conduct for Associates (as applicable).
11. In all circumstances, including where it has been concluded that no further action is required, the Capella DSL/Deputy DSL/Advisory Board (as applicable) will record the outcome decision (including any sanctions) and the justification for it, and will inform the individual concerned in writing.
12. Where the allegation is considered to be a potential criminal act the Capella DSL/Deputy DSL/Advisory Board (as applicable), will alert appropriate agencies and then follow-up immediately in writing and request acknowledgement of receipt.
13. The Capella DSL/Deputy DSL/Advisory Board (as applicable) will 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.

14. If Capella refers a safeguarding concern or an allegation of abuse to local authority children's social care / adult social care and / or the police, Capella must inform the ESFA by contacting the Helpdesk (08000 150600 or helpdesk@manage-apprenticeships.service.gov.uk) within 24 hours. Such notification must include:
 - the name of the Training Provider,
 - a high-level summary of the nature of the incident (without sharing personal information about victims or alleged perpetrators) and
 - confirmation of whether it is, or is scheduled to be, investigated by the Local Authority and / or the police
15. Where deemed appropriate, the Capella DSL/Deputy DSL/Advisory Board (as applicable) may organise training, Professional Development, mentoring or other support (eg mental health support) for the MD, Associate or the Training Delivery Contractor/Sub-contractor (as applicable) following the conclusion of any investigation into an allegation.
16. Once the investigation into the allegation has concluded, the DSL/Deputy DSL/Advisory Board should review the process that was followed in order to identify any areas for improvement.

Appendix 3

Designated Safeguarding Lead (DSL) and Deputy Designated Safeguarding Lead (Deputy DSL) Roles and Responsibilities

Designated Safeguarding Lead (DSL)

Kate Smith (Capella MD) is the primary Designated Safeguarding Lead (DSL) for Capella, and has lead responsibility for the Safeguarding of all Capella apprentices and delegates, including with regards to Online Safety and Mental Health.

Deputy Designated Safeguarding Lead (Deputy DSL)

Claire Hughes (Capella Quality and Commercial Manager) is the Deputy DSL who acts as the DSL in the DSL's absence, and is also responsible for:

- ensuring that the DSL takes appropriate and timely action
- challenging the DSL where appropriate
- escalating any safeguarding concerns that they may have regarding the DSL to an independent member of the Capella Advisory Board for their investigation

Availability

The DSL can be contacted at any time regarding a Safeguarding or Prevent Concern relating to a Capella apprentice/delegate or Associate. Should the DSL be unavailable, the Deputy DSL should be contacted.

The contact details for the DSL and the Deputy DSL are available on Page 2 of this policy.

DSL and Deputy DSL Roles and Responsibilities

The DSL and Deputy DSL should:

Raise Awareness

- Ensure that every Associate, Advisory Board Member and Training Delivery Contractor/Sub-Contractor has access to, and understands, Capella's Safeguarding & Prevent Policy
- Ensure that all stakeholders (including apprentices and delegates) are informed of good practice and new legislation and guidance with regards to Safeguarding and Prevent
- Ensure that Capella's Safeguarding & Prevent Policy is reviewed at least annually, and that it is regularly updated to reflect statutory requirements and best practice
- Ensure that Capella's Safeguarding & Prevent Policy is available on Capella's website and that Employers and Apprentices/Delegates are made aware of the Policy

- Regularly review Safeguarding with stakeholders, including providing regular updates to Capella's Advisory Board and, where required, liaising with other relevant third parties to inform them of any Safeguarding actions taken

Work with Others

- Act as a source of support, advice, guidance and expertise for all Associates, Advisory Board Members and Training Delivery Contractors/Sub-Contractors with regards to Safeguarding and Prevent matters on both an on-going basis and with regards to any specific safeguarding or prevent issue as required, including supporting these individuals to consider how safeguarding, welfare and educational outcomes are linked
- Act as a point of contact with Safeguarding Partners/Agencies (eg the Local Authority Designated Officer – LADO; police; Channel)
- Liaise with Associates on matters of safety, safeguarding and welfare (including online and digital safety, and mental health) including when deciding whether to make a referral to relevant agencies, in order to ensure that apprentices/delegates' needs are considered holistically
- Promote supportive engagement with the apprentice's/delegate's employer
- Take lead responsibility for promoting educational outcomes by knowing the welfare and safeguarding issues that apprentices and delegates are experiencing/have experienced, and identifying the impact that these may have on the apprentices/delegates attendance, engagement and achievement
- Support the Delivery Team in their provision of additional support and/or reasonable adjustments to those apprentices/delegates who require additional support

Manage and Share Safeguarding and Prevent Information

- Ensure that the Capella Safeguarding and Prevent Concerns and Incidents Log is:
 - Stored securely
 - Only accessible by those who need to see it
 - Kept confidential and up to date at all times
 - Includes a clear and comprehensive summary of the incident/concern
 - Includes notes of any action take, decisions reached and outcomes
 - Details how the concern was followed up and resolved
- Understand the importance of sharing information with other relevant parties (both inside and outside of Capella) (eg Safeguarding Partners; Channel) and understand that the Data Protection Act 2018 and UK GDPR should not be a barrier to sharing Safeguarding and Prevent information.

Manage Referrals

- Understand the Safeguarding and Prevent referral procedures and know how to make referrals (eg to the Channel Programme where a radicalisation concern is

- identified; to the Police where a crime has, or may have been, committed; to the ESFA)
- Understand, and manage, the procedure for dealing with an allegation against an Associate, or a Training Delivery Contractor/Sub-Contractor contracted by Capella, including:
 - referral to the Disclosure and Barring Service,
 - consideration of referral to the Teaching Regulation Agency, where an Associate has their contract terminated due to a risk/harm, or where they would have had their contract terminated if they had not left
 - notification to the ESFA within 24hours of having referred the allegation to the police and/or social services (see Appendix 1 point 11 for contact details and the minimum information that must be provided)

Training

The DSL and Deputy DSL are responsible for ensuring that all Associates, Advisory Board Members and Training Delivery Contractors/Sub-Contractors receive appropriate Safeguarding and Prevent Training upon appointment and every year thereafter, and that a record of this training is maintained in Capella's Single Central Record (SCR)(BP63).

The DSL and the Deputy DSL must undertake the training detailed on Page 8 of this policy, in order to ensure that they:

- have a good understanding of the DSL/Deputy DSL role;
- are able to identify, understand and respond appropriately to issues that arise;
- understand the lasting impact that adversity and trauma can have on behaviour, mental health and wellbeing on all apprentices/delegates (including those who require additional learning support)

and they must ensure that a record of their training is maintained in Capella's Single Central Record (SCR)(BP63).

The DSL and the Deputy DSL must read the entirety of the current live version of Keeping Children Safe in Education upon appointment as a DSL/Deputy DSL and upon the publication of every release of KCSIE published thereafter, and must maintain a record of having done so within Capella's Single Central Record (SCR)(BP63).

Having read the entirety of KCSIE the DSL and the Deputy DSL must determine which parts of the document must be read by Capella Associates, Advisory Board Members and Training Delivery Sub-Contractors, and must ensure that all such parts are read and that a record of such is maintained within Capella's Single Central Record (SCR)(BP63).

In addition to the above, the DSL/Deputy DSL should regularly refresh their Safeguarding and Prevent knowledge and skills (eg by reading safeguarding bulletins, updates and articles and attending training courses). The DSL/Deputy DSL should record details of these refreshers within their CPD Record.

General

- Ensuring that Capella is meeting its legal and statutory requirements with regards to Safeguarding and Prevent
- Ensuring that the Safeguarding & Prevent Policy is fully implemented and followed by all stakeholders
- Encouraging a culture of listening to, and taking account of, the wishes and feelings of all apprentices, delegates and their employers' with regards to any measures that Capella may put in place to protect apprentices/delegates
- Considering how to build trusted relationships with apprentices/delegates and their employers which facilitate communication, and foster good relations including between people who share a common characteristic and those who do not share that characteristic
- Understanding the unique risks associated with online safety and ensuring that all apprentices and delegates, including those who require additional learning support, are kept safe online whilst completing a Capella apprenticeship or training programme
- Supporting activities linked to promoting/delivering Education Inspection Framework (EIF) requirements, in particular those relating to Behaviour and Attitudes
- Maintaining a culture of high aspirations for all apprentices and delegates

Appendix 4 – Categories of Abuse and Information regarding Peer on Peer Abuse

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 Associates and Training Delivery Sub-Contractors 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;

Peer on Peer Abuse

Peer on peer abuse occurs when a person, in particular a young person, is exploited, bullied and / or harmed by their peers who are the same or a similar age. Peer on Peer abuse can take many forms, but is most likely to include:

- Bullying, including cyber-bullying, prejudice-based bullying and discriminatory bullying
- Abuse in intimate relationships between peers
- Physical abuse (eg hitting, kicking, hair pulling)
- Sexual Violence (eg rape, sexual assault)
- Sexual Harassment (eg sexual comments, online sexual harassment)
- Causing someone to engage in sexual activity without their consent
- Consensual or non-consensual sharing of nude or semi-nude images/videos (also known as sexting or youth produced sexual imagery)
- Upskirting
- Initiation/Hazing type violence or rituals

Related Policies:

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



Sources of further information and support regarding abuse, as well as numerous other matters such as online safety and Health & Safety, are available on Capella's website:
<https://capellaassociates.freshdesk.com/support/home>

Appendix 5 - Prevent Duty Responsibilities

The government's strategy for countering terrorism, CONTEST strategy, is split into 4 areas: Pursue, Protect, Prepare & Prevent. All Further Education institutions must comply with the Prevent Duty under the Counter Terrorism Act 2015.

The Prevent strategic objective is to stop people from becoming or supporting terrorists or radicalisation and challenge all forms of terrorism, including the influence from far-right extremist groups. The Prevent duty is to protect people from all streams of extremist activity and not solely aimed at one specific group.

The Prevent strategy has 3 key objectives and will specifically:

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

Prevent is part of safeguarding apprentices/delegates, and all Further Education providers have a duty to safeguard their apprentices/delegates from all aspects of abuse, exploitation and radicalisation. Implementing the Prevent Duty can be a sensitive issue for some apprentices/delegates & communities, and it is important to reiterate that this is not about spying on apprentices/delegates or Associates or about stopping conversations on controversial or sensitive topics. The Prevent Duty is intended to safeguard providers, apprentices/delegates and Associates from being exposed to exploitation or radicalisation and to support the discussion and understanding of complex and controversial issues.

Prevent & British Values

To comply with the Prevent Duty, providers are expected to exemplify British Values in their management, teaching practice & general behaviours.

British Values are defined as –

- Rule of Law
- Individual Liberty
- Mutual respect & tolerance of those from other backgrounds, religions, beliefs,
- Democracy
- Compliance with the Equality Act & those protected by it

The protected characteristics in the Equality Act are –

- Age
- Gender reassignment
- Disability
- Marriage & civil partnership
- Pregnancy & maternity

- Race
- Religion or belief
- Sex
- Sexual orientation

Associates are expected to understand & embed British Values into the apprenticeship/training delivery journey to ensure apprentices/delegates are aware of them, can evidence & exemplify them & understand what it means to be a successful learner & take part in life & Britain today. The table below provides a summary of the assessed activities relating to Prevent that Capella include within their curriculum:

What?	When?
<p>Introduce the importance and basics of Safeguarding Prevent and Cyber Security</p> <p>Facilitated discussions with supporting resources including Freshdesk links, cybercrime quiz to build awareness through review/discuss of answers and review of latest Heat Map to ensure all are aware of latest/emerging risks.</p>	Day 1 - launch
<p>Build knowledge and skills in key topics:</p> <ol style="list-style-type: none"> 1. Radicalisation & Extremism 2. Online Safety 3. What can you trust? 4. British Values <p>Learner self-study using Education and Training Foundation on-line resources with tests and certificates. Lead Trainer to ensure certificates filed.</p>	Introduced at launch - to be complete within 4 weeks
<p>Embed learning to date</p> <p>Learner self-study/reflection using Wider Learning worksheet. Lead Trainer to check completion and learners share examples of answers at following training session.</p>	Handed out at launch – to be complete within 8 weeks
<p>Update and extend learning through application</p> <p>Workshop led by specialist Trainer including facilitated discussions and activities and review of latest Heat Map to ensure all are aware of latest/emerging risks.</p> <p>Preparation for workshop to include review of data from previous assessed activities (cybercrime quiz, ETF modules and Wider Learning worksheet).</p> <p>End of session quiz to assess impact.</p>	2 weeks prior to Mid Review with post-workshop project
<p>Update and extend learning through sharing</p> <p>Workshop led by specialist Trainer including review of completed projects (and resulting evidence for EPA), facilitated discussions and review of latest Heat Map to ensure all are aware of latest/emerging risks.</p> <p>Preparation for workshop to include review of data from previous end of session quiz.</p> <p>End of session quiz to assess impact.</p>	6-8 weeks prior to Final Review

The above activities are in addition to the embedded learning that takes place throughout programmes, in particular linked to setting up and leading improvement teams/activities.

Apprentices/delegates will also be required to understand how to keep themselves protected from risks associated with radicalisation, extremism, forms of abuse, grooming, bullying & staying safe online.

Capella will also work with employers to help ensure apprentices/delegates are not exposed to risks associated with any of the above, and adequate awareness of Prevent & British Values has taken place with workplace mentors, line managers or HR.

Associates must encourage an open culture which allows freedom of speech and exploration of issues that affect apprentices/delegates locally, nationally & internationally. We need to operate a safe place for apprentices/delegates to communicate, but provide challenge where views or discussions become offensive, extreme or upsetting to others.

Associates must be alert to any changes in an individual's behaviour and / or appearance. Such changes could be physical, verbal, or emotional. For all concerns identified, Associates should consider and be mindful of: NOTICE – CHECK – SHARE. Associates should remember that both physical and mental health are relevant to safeguarding.

When considering Prevent / radicalisation related concerns and indicators, Associates should consider the individuals engagement with a group, cause or ideology; intent to cause harm; and capability to cause harm. There may be key indicators in each of these areas. Some examples are listed below:

Example indicators that an individual is engaged with an extremist group, cause or ideology:

- Unkempt clothing, out of context clothing (eg long sleeves in hot weather) and/or changing their style of dress or personal appearance to accord with a group
- Changes in day-to-day behaviour, including increased nervousness
- Social withdrawal and/or mood swings
- Absence and poor performance
- Attitude or behaviour towards social or political news
- Possession of material or symbols associated with an extremist cause
- Attempts to recruit others to the group/cause/ideology
- Communications with others that suggest identification with a group/cause ideology.

Example indicators that an individual has an intention to cause harm, use violence or other illegal means:

- Clearly identifying another group as threatening what they stand for and blaming that group for all social or political ills
- Using insulting or derogatory names or labels for another group
- Speaking about the imminence of harm from the other group and the importance of action now
- Expressing attitudes that justify offending on behalf of the group/cause/ideology
- Condoning or supporting violence or harm towards others.

Example indicators that an individual is capable of causing harm or contributing directly or indirectly to an act of terrorism:

- Having a history of violence
- Having occupational skills that can enable acts of terrorism (such as civil engineering, pharmacology or construction)
- Having technical expertise that can be deployed (e.g. IT skills, knowledge of chemicals, military training or survival skills).

Useful contact numbers and links:

- DfE FE/HE Regional Prevent Duty Co-ordinators:
<https://www.gov.uk/guidance/regional-further-education-fe-and-higher-education-he-prevent-coordinators#how-regional-further-and-higher-education-prevent-co-ordinators-can-help-providers>
- West Midlands Regional Prevent Duty Co-Ordinator:
Hifsa Haroon-Iqbal
Email: hifsa.haroon-igbal@education.gov.uk;
Mobile: 07755 1136132
- DFE Counter-extremism helpline 02073407264
- Police Confidential Hotline 0800 789321
- If you become aware of any terrorist or extremist use of the internet, there is an online reporting form that can be accessed at: <https://www.report-terrorist-material.homeoffice.gov.uk/report>

Appendix 6 – Reporting of Safeguarding and/or Prevent Concerns to Employers

The Capella DSL/Deputy DSL will only report Safeguarding and/or Prevent 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 the Capella DSL/Deputy DSL have determined that the employer needs to be informed.

Where Capella's DSL/Deputy DSL has determined that the employer should be made aware of the 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 used as the basis for such communication.

Email Template

Notification of Safeguarding and/or Prevent Risk

Dear xxx (employer lead),

We have added one of your apprentices/delegates to our Safeguarding and Prevent Concerns and Incidents Log. 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 log". We conduct a monthly review of the log and this drives consideration/planning of any actions and next steps. It also helps highlight any themes or recurring/related issues which may indicate a larger concern. Our Safeguarding and Prevent Concerns and Incidents Log is password protected and can only be accessed by our Designated Safeguarding Lead (DSL) and Deputy DSL, who have both received relevant 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 Safeguarding and Prevent policy is available on our website for your information.

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's 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 Contractors/Sub-Contractors to have a Basic DBS Check upon appointment and every two years thereafter.

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

Historic Change Log Information (all changes prior to 2021)				
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>
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>

Historic Change Log Information (all changes prior to 2021)				
Date:	Change Description:	Proposed:	Actioned:	Approved:
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>