

Bellevue Education International Ltd.

Safeguarding Apprentices

This Policy Applies to Bellevue Education International Ltd.

BELLEVUE APPRENTICESHIPS

Reviewed July 2026

by

Steven Wade and Sam Selby

Next Review - August 2027

Designated Safeguarding Lead: Steven Wade

Deputy Designated Safeguarding Lead: David Williams

Policies, Procedures, Guidance and Documentation Relating to Safeguarding Learners
Should you require any further information please contact the designated safeguarding officers
Steven Wade or David Williams

Introduction

BEI Apprenticeships fully recognises its responsibilities for Child Protection and Safeguarding Adults at Risk. Every apprentice should feel safe and protected from any form of abuse. This policy defines safeguarding as protecting learners from maltreatment, preventing impairment of health or development, and taking action to enable all learners to have the best outcomes.

This policy applies to all staff, volunteers, and subcontractors, and covers all apprentices, including those under 18 and adults at risk.

Scope and Definitions

Unlike a school setting, an apprenticeship provider works with a mixed age demographic. This policy covers two distinct legal frameworks:

- **Safeguarding Children (Under 18):** In line with *Keeping Children Safe in Education* (KCSIE 2025) and *Working Together to Safeguard Children*, a "child" is defined as anyone under the age of 18.
- **Safeguarding Adults (18+):** In line with the **Care Act 2014**, we protect "Adults at Risk"—individuals aged 18 or over who have needs for care and support and are experiencing, or are at risk of, abuse or neglect.

2.1 Dual Status of 16-18 Year Olds Apprentices aged 16-18 occupy a unique position within BEI Apprenticeships. Legally, they are defined as children. While they are professionals-in-training with responsibilities toward the pupils in their host schools, BEI and the Employer owe them a heightened statutory duty of care. This policy ensures they are protected from harm while also being equipped to fulfill their own safeguarding obligations.

Safeguarding for 16-18 Year Olds: The Transitional Context

While apprentices aged 16 to 18 are legally defined as children under the 'Keeping Children Safe in Education' (KCSIE 2025) framework, BEI recognises they are in a unique transitional phase within a professional workplace. Safeguarding for this group must balance the statutory protections afforded to children with the autonomy required for their professional development. For apprentices in this age bracket, staff and employers must be particularly vigilant regarding:

- **Contextual Safeguarding:** Recognising risks outside the home, such as criminal or sexual exploitation, 'county lines,' and workplace-specific harassment.

- **The Prevent Duty:** Monitoring for vulnerabilities to radicalisation, which can often occur as young people navigate new social and professional circles.
- **Professional Boundaries:** Maintaining clear staff-apprentice relationships that respect the apprentice's growing independence while strictly adhering to the Code of Conduct regarding positions of trust.
- **Safe Working Environments:** Ensuring employers provide enhanced supervision and risk assessments tailored to the apprentice's age and relative lack of experience in a high-pressure environment.

3. The Tripartite Relationship (Provider, Employer, Apprentice)

Safeguarding in apprenticeships relies on a partnership between the Training Provider, the Employer, and the Apprentice.

- **Employer Suitability:** We ensure that employers are aware of their safeguarding obligations. We maintain a "culture of safety" where concerns can be raised about practices within the workplace.
- **Workplace Safety:** We expect employers to provide a safe working environment. If an apprentice is at risk in their workplace (e.g., lack of supervision, unsafe equipment, bullying culture), BEI Apprenticeships will intervene.

4. Organisation and Responsibility:

Designated Safeguarding Lead (DSL)

- To ensure the implementation of this policy, the following key members of staff have been identified to assist in the process of assessment and decision making.
- A. The Designated Staff
- DSL: Steven Wade (Group Education Director)
- Deputy DSL: David Williams (Education Director) are responsible for: supporting and assisting staff and learners who are reporting concerns about learners; liaising with and making referrals to the appropriate LA safeguarding team or police. The Group Education Director is also responsible for the Company Anti-bullying procedures and the coordination and organisation of the Company internal learner support services.
- The Designated safeguarding lead is responsible for: supporting and

assisting staff or learners in making referrals; receiving and processing concerns related to the behaviour of staff; vetting of staff including undertaking DBS checks; developing the Staff Code of Conduct. In the absence of Steven Wade and David Williams, concerns should be reported to Mark Malley (CEO). If the concern is related to the behaviour of a member of staff and the Group Education Director is not available then the concern should be reported directly to Mark Malley

- B. Line Managers/directors need to be aware of this policy as all or any staff can consult with them in confidence for advice about how to proceed.
- C. All teaching and support staff, visitors and contractors, or other operators working on the company site are responsible for taking any concern or disclosure about the safety of young people seriously and reporting their concerns as per the attached procedures.
- D. All staff must have relevant training for safeguarding and Prevent as stated in their contract of employment during their probation period. This is supported and monitored by Steven Wade and David Williams.

5. Safe Recruitment

BEI Apprenticeships follows robust recruitment procedures to deter, reject, or identify people unsuited to work with apprentices.

- **Vetting:** We verify identity, qualifications, and previous employment history.
- **DBS Checks:** An enhanced Disclosure and Barring Service (DBS) check (with barred list check where relevant) is obtained for all staff engaging in regulated activity.
- **Contractors:** We ensure appropriate checks are in place for any external staff or contractors.

6. Safeguarding 16-18 Year Olds in School Settings

In addition to the protections afforded to all learners, apprentices under the age of 18 are subject to the following statutory requirements in line with KCSIE 2025:

6.1 Safer Recruitment & Placement

- **Enhanced DBS:** All 16-18 apprentices must have an Enhanced DBS check with barred list checks completed before they commence their placement in a school.
- **Supervision:** Apprentices under 18 must never be left in sole charge of pupils. They must work under the direct supervision of a "regulated" staff member at the host school at all times.
- **Risk Assessment:** A Young Person's Risk Assessment (see Appendix 3) must be completed and signed by the Host School and the Apprentice prior to the start of the apprenticeship to address physical, emotional, and developmental risks.

6.2 Specific Risks for Younger Apprentices Staff and employers must be alert to risks that disproportionately affect the 16-18 cohort:

- **Position of Trust:** Under the Sexual Offences Act 2003, it is a criminal offence for a person in a position of trust (e.g., a teacher or mentor) to have a sexual relationship with a 16 or 17-year-old, even if the apprentice "consents."
- **Peer-on-Peer Abuse:** We recognise that 16-18 year olds are vulnerable to abuse from their own age group (at college/socially) or from older colleagues in the workplace.
- **Exploitation:** This age group is specifically targeted for County Lines drug trafficking and grooming. Indicators include unexplained absences or new, expensive items (refer to Section 7.2).

6.3 Working Hours and Welfare To prevent fatigue and stress, employers must adhere to the Working Time Regulations for young workers:

- Maximum 40 hours per week and 8 hours per day.
- A 30-minute break for any shift lasting more than 4.5 hours.
- 12 hours of rest between working days and 2 days off per week.

7. Recognising Abuse in Adults: The 10 Types (Care Act 2014)

Staff and employers must be vigilant. While children are covered by 4 categories (Physical, Emotional, Sexual, Neglect), **Adult Safeguarding** encompasses **10 distinct types of abuse**. BEI staff are trained to recognise:

1. **Physical Abuse:** Hitting, slapping, pushing, misuse of medication, restraint, or inappropriate physical sanctions.
2. **Domestic Abuse:** Including psychological, physical, sexual, financial, emotional abuse, and 'honour-based' violence.

3. **Sexual Abuse:** Rape, indecent exposure, sexual harassment, unwanted looking or touching, sexual teasing or innuendo, or sexual photography.
4. **Psychological/Emotional Abuse:** Threats of harm or abandonment, deprivation of contact, humiliation, blaming, controlling, intimidation, coercion, harassment, verbal abuse, cyber bullying, isolation, or unreasonable and unjustified withdrawal of services or supportive networks.
5. **Financial or Material Abuse:** *Specific Risk for Apprentices.* Theft, fraud, internet scamming, coercion in relation to an adult's financial affairs (including wages), or the misuse/misappropriation of property, possessions, or benefits.
6. **Modern Slavery:** Encompasses slavery, human trafficking, forced labour, and domestic servitude. Traffickers and slave masters use whatever means they have at their disposal to coerce, deceive, and force individuals into a life of abuse, servitude, and inhumane treatment.
7. **Discriminatory Abuse:** Forms of harassment, slurs, or similar treatment because of race, gender and gender identity, age, disability, sexual orientation, or religion.
8. **Organisational (Institutional) Abuse:** *Specific Risk for Apprentices.* Neglect and poor care practice within an institution or care setting (including a workplace). This ranges from one-off incidents to ongoing ill-treatment due to poor professional practice, policies, or culture within an organisation.
9. **Neglect:** Ignoring medical, emotional, or physical care needs; failure to provide access to appropriate health, care, and support or educational services; the withholding of the necessities of life, such as medication, adequate nutrition, and heating.
10. **Self-Neglect:** This covers a wide range of behaviour neglecting to care for one's personal hygiene, health, or surroundings and includes behaviour such as hoarding.

8. Specific Safeguarding Risks

In addition to the 10 types of abuse, we monitor specific risks relevant to our learners:

8.1 Radicalisation and Extremism (The Prevent Duty)

We are committed to the Prevent Strategy to stop apprentices from being drawn into terrorism.

- **Vulnerability:** Staff alert to changes in behaviour or ideology.

- **Channel Programme:** The DSL may make a referral to 'Channel', a voluntary support scheme.
- **Visiting Speakers:** We vet visiting speakers to ensure they do not promote extremist views.

8.2 Serious Violence and County Lines

- **County Lines:** Gangs exploiting young people to transport drugs/money.
- **Indicators:** Unexplained wealth, new expensive possessions, or unexplained absence.

8.3 Forced Marriage and Honour-Based Abuse (HBA)

- **Response:** Staff must be aware that speaking to the family in these cases can increase risk; the DSL must be consulted immediately.

8.4 Child-on-Child / Peer-on-Peer Abuse

- **Zero Tolerance:** We challenge behaviours often dismissed as "banter".
- **Workplace Context:** This extends to harassment from colleagues in the workplace.

8.5 Sexual Violence and Harassment

- **Harassment:** Unwanted conduct of a sexual nature, including sexual comments, "jokes," or sharing images.
- **Response:** Victims will be supported and taken seriously.

8.6 Online Safety and AI

- **Risks:** Staff recognise online grooming, cybercrime, and "sexting".
- **Generative AI:** We operate a robust approach to using technology, ensuring apprentices understand the safe use of AI.
- This policy operates in conjunction with BEI's Online Safety Policy and Appropriate Use of IT policy. This can be found at the bottom of this policy.

9. Making Safeguarding Personal (MSP)

- **For 18+ Apprentices:** BEI applies the principles of **Making Safeguarding Personal (MSP)**. Safeguarding should be person-led and outcome-focused.

- . We generally require consent to refer to external agencies unless there is a risk to others, a crime is committed, or the adult lacks capacity.
- **For 16-18 Apprentices:** The "Best Interests" principle applies. If a 16-17 year old is at risk of significant harm, **consent is not required** to make a referral to Children's Social Care. While we will involve the apprentice in the process where safe to do so, the legal requirement to protect the child overrides the requirement for consent.

For apprentices aged 18+

Consent: Unlike with children, adults with mental capacity generally have the right to decide whether they want a safeguarding concern reported to Social Care/Police.

- **Exceptions:** We may override consent if:
 - Others are at risk (e.g., other apprentices).
 - A crime has been committed.
 - The adult is being coerced or lacks the mental capacity to make the decision.

10. Reporting Procedures

Any member of staff or employer with a concern must act immediately.

1. **Listen:** Listen to the apprentice carefully. Do not ask leading questions.
2. **Record:** Make a written record including date, time, and essence of conversation
3. **Report:** Pass to the DSL immediately. Do not investigate yourself
4. **Immediate Danger:** Call **999** immediately

11. Whistleblowing and Low-Level Concerns

- **Low-Level Concerns:** We promote an open culture where concerns about adult conduct (e.g., being 'over-friendly') are shared. This can be reported to your L&D Tutor or Course Lead.
- **Allegations against Staff:** Apprentices report their concern to the DSL, Steven Wade. If the allegation is relating to the DSL, this can be reported to the DDSL or directly to the LADO for Southwark. Contacts can be found in Appendix 1 of this policy.

- **Allegations Against Staff involving 16-18s** Where a concern or allegation is made against a member of BEI staff or an employer regarding a 16-18-year-old, the DSL will immediately inform the **Local Authority Designated Officer (LADO)**. We will follow the host school's safeguarding procedures in tandem with our own to ensure the apprentice is protected during any investigation.
- **Supply/Contractors:** Reports about employer conduct will be notified to their employers.
- **Whistleblowing:** This policy is written in conjunction with our policy  Whistleblowing Policy 2526.docx.pdf which outlines the process for sharing concerns and whistleblowing.

12. Culture of Safeguarding

- In addition to the above, we ensure that our apprentices are able to share and seek support when they are experiencing difficulties or personal problems that might not be considered as 'safeguarding' in nature but to enable us to safeguard and support them. An apprentice should feel able to speak to their L&D tutor, or course lead about their worries/ concerns. This will be shared confidentially with the relevant staff and monitored to ensure their ongoing well-being and safety and that our culture of safeguarding is lived.

13. Quality and Monitoring

It is Company policy to ensure that all staff are briefed during their induction, have access to regular training, and that designated personnel have regular contact with consultants and Local Authority Social Care Departments to ensure that guidelines and procedures meet with nationally agreed recommendations.

The policies and procedures will be examined on an annual basis for accuracy and updated on a regular basis.

All staff will be notified of any changes and updates to this policy, and will be required to keep an updated CPD log including safeguarding updates.

Additional information:

This policy should be read in conjunction with:

- Online Safety Policy
- Whistle Blowing Policy
- Bullying and Harassment Policy
- Safer Recruitment Policy

- Prevent Policy
- Prevent reporting procedure

Learner Protection Procedures

Appendix 1: Contact Details

Designated Safeguarding Lead (DSL):

Name: Steve Wade

Email: swade@blvue.com

Phone: (0)20 3817 8000

Deputy DSL:

Name: David Williams

Email: dwilliams@blvue.com

Local Authority Designated Officer (LADO) - Southwark:

Eva Simcock

Email: Eva.Simcock@southwark.gov.uk / Qau.Safeguarding@southwark.gov.uk

Phone: 020 7525 0689 / 07943 076608

Note: For apprentices working outside Southwark, the DSL will locate the relevant local LADO and Social Care team. When an apprentice under 18 is working in a school, any allegation against a staff member that meets the 'harm threshold' must be reported to the LADO in the borough where the **school is located**, even if this differs from the BEI head office location.

External Helplines:

- Police (Emergency): 999
- Police (Non-Emergency): 101
- NSPCC Helpline: 0808 800 5000
- Anti-Terrorist Hotline: 0800 789 321

Appendix 2:

Online Safety Policy

Online Safety and Appropriate Use of IT Policy

Introduction

Bellevue Education International Ltd. understands its responsibility to educate its participants in relation to Online Safety issues. The organisation is committed to ensuring that the programme conducts its operations in such a way that participants are equipped with the appropriate skills, behaviours and critical thinking skills to enable them to remain safe and act legally when using the internet and related technologies in any context or circumstances.

Objectives

Policy Objectives:

- To protect the interests and safety of Bellevue Education International Ltd. learners
- To ensure that all employees and participants adhere to the IT usage rules to prevent any viewing or downloading of unsuitable material such as pornography, extremism, terrorism and anti - British web sites.
- To prevent unauthorised access to / loss of / sharing of personal information
- Prevent the risk of being subject to grooming by those with whom they make contact on the internet
- To ensure learners are aware of the risk of sharing / distribution of personal images without an individual's consent or knowledge including images of 'Upskirting' (Voyeurism Offences Act 2019)
- To protect learners from cyber bullying

Responsibilities

Bellevue Education International Ltd. strives to ensure that all participants are adequately safeguarded from potential security threats and misuse. It is critical therefore that all employees and participants comply with this policy and support its objectives.

The Designated Safeguarding officers Steven Wade and David Williams will ensure that policy and safe practices are embedded in operations and activities and that team members receive suitable CPD to enable them to carry out their Online Safety roles and responsibilities.

The designated officers will ensure that participants receive regular, meaningful Online Safety education. Such activities will be provided in the following ways:

- Educating all participants on the dangers of technologies that may be encountered; including cyber bullying, radicalisation and staff must be aware of reporting procedures and prevent duty.
- Making participants aware of where and how to seek help if they experience problems when using the internet and related technologies
- Encouraging participants to adopt safe and responsible use of ICT, the internet and mobile devices both within and outside work and the Apprenticeship programme
- Providing advice, guidance and information on safe, legal and acceptable internet use
- Detailing the effective and safe use of the internet in research, including the skills of: knowledge, location, retrieval and evaluation.

Company directors will ensure that the ICT infrastructure is safe and not open to misuse or attack.

Employees

All employees will receive Online Safety information through side by side training as part of their induction and will be provided with a copy of this policy. They are responsible for ensuring that all digital communications with participants are on a professional level only and that ICT usage and activities are monitored in activities including: classroom-based delivery, workshops and learning events.

Participants

All participants will receive Online Safety information, advice and guidance as part of their training with the use of side by side training modules.

It is crucial that participants understand the importance of reporting abuse, misuse or access to inappropriate materials and know how to do so. Specific guidance is therefore provided at induction and information of the contact details for designated officers is on their OneFile account.

Blogging & Social Networking

- Blogging is defined as writing a personal online journal that is frequently updated and intended for general public consumption. Social networking is defined as sharing your interests, information and emotions in an online forum with other employees. Common social networking sites include but are not limited to Facebook, YouTube, LinkedIn, Twitter and Bebo.

- Blogging by employees and participants, whether using the company's property and systems or personal computer systems, is subject to the terms and restrictions set out in this policy.
- Employees and participants should not under any circumstances use the company's systems to participate in any internet chat room, post messages on any internet message board or set up or log text or information on a blog for non-business-related reasons, even in their own time.
- Employees and participants should not, under any circumstances, use Bellevue Education International Ltd. systems to access or participate in any social networking sites for non-business-related reasons during work hours. However, subject to compliance with the terms of this policy on acceptable use, access may be granted to certain sites which individuals may be able to access for work or learning purposes. However, we reserve the right to block access to social networking sites from within the network if considered appropriate. If you accidentally connect to a social networking site outside of permitted periods, you must disconnect immediately. If you consider that you need to access such a site during break times for a business-related purpose, please contact your Manager to seek assistance.
- Employees and participants shall not engage, even in their own time, in any blogging or social networking that involves bullying, extremism views, anti-Britishness or harassment of, or making disparaging or derogatory comments about any employees or other participants or customers.

Internet

- Bellevue Education International Ltd. will ensure that the use of Internet derived materials by employees and participants complies with copyright law.
- Participants will be taught how to be critically aware of materials they may see or are shown and how to evaluate and validate information before accepting its accuracy.

Monitoring

- Bellevue Education International Ltd. reserves the right to routinely monitor all users for the purpose of ensuring that the organisation's rules are being complied with, investigating wrongful acts, or complying with any legal obligation.
- Any breach of this policy is likely to result in sanctions being applied or disciplinary action being taken. A serious breach of this policy may be considered

to amount to gross misconduct or dismissal.

- The following are non - exhaustive examples of the type of behaviour which may be regarded as gross misconduct:

1. Posting confidential company, client or supplier information online;
2. Any form of harassment, bullying, extremism grooming, radicalisation or discrimination against any of our employees, participants, workers, suppliers, clients or customers;
3. Making derogatory, damaging or offensive comments or statements about any of our employees, participants, workers, suppliers, clients or customers;
4. Online posting of personal data or information which you have obtained from Bellevue Education International Ltd. about another employee or worker, without their consent;
5. Any activity that may bring Bellevue Education International Ltd. into disrepute or damage or lower the company's reputation.

All employees and participants are encouraged to be vigilant and aware of potential illegal activity or misuse. The Safeguarding officer should be contacted immediately if any such activities may appear to be involved, including:

1. Child sex abuse images;
2. Adult material that potentially breaches the Obscene Publications Act;
3. Criminally racist material;
4. Other criminal conduct, activity or material

- Complaints of internet misuse by participants will be dealt with by the Safeguarding Officer and recorded as a Safeguarding issue;

- Complaints about employee's misuse must be referred to the Safeguarding Officer who will liaise with the Quality Manager to investigate fully.

Equality Impact Assessment

This policy has been assessed for its impact on equal opportunities and has been informed by the aim to eliminate all forms of discrimination in all strands of the equal opportunities legislation.

Additional information

This policy should be read in conjunction with:

- Safeguarding Policy
- Whistle Blowing Policy
- Bullying and Harassment Policy
- Safer Recruitment Policy
- Prevent Policy
- Prevent reporting procedure

Appendix 3: Safeguarding 16-18 Year Old Apprentices

(next page)

Risk Assessment Young Apprentice (16-18yr old)
Early Years Educator

Part A

Young Person Name	Date of Birth and Age	Job Title	Expected Working Hours	
Work Address	Brief Description of Duties	Line Managers Name	Line Managers Position	
Young Persons Back Ground			Yes	No
Has the young person been given detailed information and seen the work activity risk assessments that are associated with the type of work and situations they will be involved in, including the hazards associated with those activities?			☐	☐
Is the young person physically able and mature enough to understand the potential risks and what will be asked of them in relation to the work/situations they will encounter as part of the placement?			☐	☐

If no, give reason(s) and additional controls required:

Part B

Initial Assessment of Risk

Serial	Potential Risk	Yes	No	Control Measures	Arrangements agreed
1.	Has the young person been informed of the fire evacuation procedures?	☐	☐		
2.	Is the young person likely to be lifting or carrying beyond their capability? Eg lifting of babies	☐	☐		
3.	Are they likely to be exposed or come into contact with chemicals that are harmful to health?	☐	☐		
4.	If yes, has a COSHH risk assessment been carried out and viewed by the young person?	☐	☐		
5.	Are young people likely to work in noisy areas?	☐	☐		
6.	Are there potential trip hazards?	☐	☐		
7.	Are there any risks of scalds / burns eg when preparing bottles?	☐	☐		
8.	Are there work activities which carry a high level of risk due to their inherent hazards, such as working near water?	☐	☐		
9.	Are there situations which could put the person in danger of abuse or physical threats?	☐	☐		

Serial	Potential Risk	Yes	No	Control Measures	Arrangements agreed
10.	Are young persons likely to come into contact with blood, and/or bodily fluids? Eg nappy changing / attending to first aid/ accidents	☐	☐		
11.	Is the young person likely to come into contact with highly stressful situations? Eg: child immediate health issues, such as choking/ high temperatures/ child in significant distress/ breathing issues	☐	☐		
12.	Are there work activities which involve working at height or confined spaces?	☐	☐		
13.	Is there a raised risk of communicable diseases, such as common childhood illness? Eg: hand, foot & mouth/ chicken pox	☐	☐		
14.	Does the young person have any allergens to be aware of eg when cooking with the children / feeding them?	☐	☐		
15.	Are there any physical risks associated with the job from carrying / picking up children or working at floor level?	☐	☐		
16.	Is the young person at risk from exposure from being outside for long periods of time?	☐	☐		
17.	Are young persons likely to work with electrical equipment or electricity?	☐	☐		

Serial	Potential Risk	Yes	No	Control Measures	Arrangements agreed
18.	Are there any other hazards to which they may be exposed to? If yes, give details.	☐	☐		
19.	Has the young person been provided appropriate personal protective equipment for the hazards identified?	☐	☐		
20.	Has the young person been given clear guidelines of the use of mobile phones and safeguarding practices within the setting?	☐	☐		
21.	Has the young person got sufficient breaks to prevent fatigue and stress?	☐	☐		
22.	Where hazards are identified, has the young person been given appropriate information and training?	☐	☐		

Notes:

- It is important that the person being assessed for work experience is made aware of the above risks and how they are to be controlled. The person should not be pressured to go into a situation they do not feel comfortable with.
- The line manager will keep the situation under review and amend the arrangements as necessary.

Sign-off				
Head Teacher Name		Signature		Date

Line Manager Name		Signature		Date	
Declaration of Young Person					
I am aware of the hazards associated with the work activities I am to be involved in and will comply with the controls identified within this assessment and report any concerns I have to my appointed manager.					
Young Person Name		Signature		Date	

**Managers Risk Assessment and Review Record
For Young Persons**

Assessment No.	Date of Review	Reason for Review	Significant Changes	Signature
				Manager: Employee:
				Manager: Employee: