

Tab 1

Policy Name	26-27 Updates
BEI Apprenticeship Prevent Policy 2627	Additional text: 1.1 Terrorism (Protection of Premises) Act 2025 (Martyn's Law) In line with the Terrorism (Protection of Premises) Act 2025, Bellevue Education International maintains public protection procedures including evacuation, invacuation, lockdown, and communication plans to ensure the safety of all individuals on-site. 6. Vulnerabilities and Radicalisation: Staff and Employers should be alert to potential indicators, including but not limited to the following <i>terminology and risks identified: Update references to nude and semi-nude images to the following terminology: self-generated intimate images and/or videos (including those generated using AI/deepfakes) and Child on Child abuse: Expanded section to explicitly include harassment (threats of harm with a weapon or serious physical assault)]</i> -Self-generated intimate images and/or videos (including AI-generated/deepfakes). -Child-on-child abuse involving harassment and violence.
BEI Apprenticeships Prevent Risk Reg	Update to guidance in appendices: Revised Prevent duty guidance for England and Wales and Channel duty guidance: Protecting people susceptible to radicalisation (October 2025) Prevent duty guidance: England and Wales (2023) - GOV.UK Channel duty guidance: protecting people susceptible to radicalisation (accessible) - GOV.UK Oct 2025
BEI Apprenticeships: Safeguarding Apprentices Policy 2627	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 position between childhood and adulthood in a professional workplace. Safeguarding for this group must balance the statutory protection of 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 exploitation, 'county lines,' and workplace-specific harassment. • The Prevent Duty: Monitoring for vulnerabilities to radicalisation, which can impact young people navigate new social and professional circles. • Professional Boundaries: Maintaining clear staff-apprentice relationships that support the apprentice's growing independence while strictly adhering to the Code of Conduct and positions of trust.

	• Safe Working Environments: Ensuring employers provide enhanced supervisory assessments tailored to the apprentice's age and relative lack of experience in the work environment.
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1. Introduction

Fair and valid processes:-

- This includes an explicit commitment to equality, diversity and inclusion, with reasonable adjustments and access arrangements identified and put in place for EPA.

2. Definitions

- **DWP:** Department for Work and Pensions: government department responsible for apprenticeship funding, policy and oversight (previously the Education and Skills Funding Agency (ESFA), then the Department for Education (DfE), before responsibility transferred to DWP on 1 April 2026). - (replaces ESFA)

3. Our Process

- Ensure all staff are briefed during induction and have access to regular training, and personnel maintain contact with consultants and the DSL maintain contact with Local Social Care Departments as appropriate to ensure guidelines meet nationally agreed recommendations.
- Review policies and procedures annually for accuracy and update regularly, noting changes.
- Require all staff to keep an updated CPD log, including safeguarding updates.
- Define malpractice and maladministration (e.g. plagiarism, falsified evidence, assistance) and set out a clear reporting route, investigation process and recording requirement, in line with EPAO and awarding organisation policy. - See our plagiarism policy
- Where any delivery is subcontracted, apply a due-diligence and ongoing quality assurance process for subcontracted provision, in line with DfE requirements.

4. Procedure

Overall accountability for apprenticeship quality assurance, and for safeguarding (Designated Safeguarding Lead), will be assigned to Steve Wade & Sam Selby within the Apprenticeship Leadership Team.

4.3 Enrolment

- Confirm understanding and record off-the-job training hour requirements. These will include minimum hours required for each course as well as governance practices that include evidence and reconcile hours within our digital apprenticeship platform.

4.5 Pre-Gateway: 6 months

d) Confirm and record that end-point assessment is conducted independently of teaching and mentoring staff, with any conflicts of interest (e.g. family or line-management relationships between assessor and apprentice) identified and managed before Gateway.

4.8 Complaints and Appeals

Provide apprentices and employers with a defined route to appeal an assessment decision, including a formal complaint, including timescales for acknowledgement and resolution, and escalation to EPAO or DfE where relevant. - See our complaints policy

BV Apprenticeships Complaints Policy	Added: Depending on the nature of the complaint, it may be appropriate to go straight to step 3 of the complaints process and we reserve the right to maintain this flexibility. Changed: Panel Hearing to Independent Person hearing Updated No. complaints 25-26: 0 Changed contact from ESFA to DfE
BEI Continuity Plan 2627	DfE Contact Details (was previously details for ESFA) DfE Contact Details (was previously details for ESFA)
BEI CPD 2627	Identifying CPD Needs 9. All staff are required to undertake mandatory annual training in safeguarding and the Prevent strategy which will be logged as part of their core CPD. CPD Provision • meet identified individual, team or national development priorities (including DfE requirements) All staff are required to maintain an updated, verifiable CPD log. This must include explicit details of mandatory annual safeguarding and Prevent training updates. This log is subject to review during monthly supervisions with the Quality Assurance Manager.

BEI Subcontracting 2627	ESFA has been changed to DWP throughout the document. 2. Selection and Due Diligence • Require evidence that subcontractor staff working directly with apprentices hold DBS checks in line with BEI Ltd's safeguarding policy. • Complete and retain a conflict-of-interest declaration for each subcontracting arrangement confirming there is no shared ownership, staffing, or financial relationship between the subcontractor that has not been disclosed and managed. • Due diligence findings and subcontractor approval will be signed off by a named individual within BEI Ltd's Apprenticeship Leadership Team before any contract is issued. 4. Quality Assurance • Provide apprentices and employers with a clear route to raise concerns or comments about subcontractor's delivery, in line with BEI Ltd's Quality Assurance Policy compliance procedure. 6. Reporting and Declaration BEI Ltd will: • Declare all subcontracting arrangements in the DWP Subcontractor Declaration twice annually (by 31 October and 30 June), as required. Nil returns are mandatory if no subcontracting takes place. Regulatory Compliance Note Note: As of July 2026, the 2026/27 apprenticeship funding rules contain significant updates to subcontracting. This policy must be verified and updated in line with the final ratified 2026/27 ESFA funding rules.
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BV Apprenticeships Code of Conduct	Changed the Title to Apprenticeships and Adult Learners Code of Conduct 1.A Added a commitment to identifying and removing barriers to learning, ensuring ta for apprentices with SEND and those from disadvantaged backgrounds to support their 1.A & 5.B Integrated explicit references to Fundamental British Values, including dem of law, individual liberty, mutual respect, and tolerance, to ensure these principles und respectful behavior and professional conduct. 4.A Expanded the Appropriate Use of Technology section to include robust digital E-safety policies, which explicitly prohibit cyberbullying and the sharing of inappropriate content. 4.A Added a specific clause on academic integrity regarding the use of AI, prohibiting unauthorised use of generative AI tools to draft assignments, while outlining the requirement for acknowledgment when usage is permitted. 6 Enhanced the "Consequences of Misconduct" section by introducing a formal, transparent process, allowing apprentices to submit written appeals regarding disciplinary decisions during working days. 7 Strengthened the safeguarding policy by explicitly linking our practices to the Prevent strategy, naming Steven Wade as the Designated Safeguarding Lead (DSL) to provide a clear point of accountability. 8 Updated the governance of this code to mandate an annual review cycle, ensuring the code remains consistently aligned with Bellevue Education International Ltd's values and the Further Education and Skills Inspection Toolkit.
BV Apprenticeship EDI statement	Adopted and adapted BEI EDI statement 2627 - adapted to put apprentices front and center. Changes to include apprenticeship provision/ apprentices before pupils/ remove references to school and instead to school community/ refer teaching to apprentices, rather than pupils
BV Apprenticeship H&S Policy	Significant changes - all associated with apprenticeships must read as new processes being implemented in relation to onboarding and H&S Committee/ Governance from Sept 2023. Appendices. This version also acknowledges that apprentices need to have H&S applied to all learners as well as employees and that they are learning in a range of BEI and non-BEI environments.

BV Apprenticeship Whistleblowing Policy	Sexual Harassment Reporting: A new category for wrongdoing has been added: "the harasser has occurred, is occurring or is likely to occur" (Section 4j).¹ Self-Reporting Clarification: A new section on "Concerns about your own conduct" has been added. It clarifies that reporting your own mistakes is a contractual duty of disclosure, not whistleblowing, and therefore does not carry the same protections.¹ Right to be Accompanied: A new "Meetings" section (Section 9) has been added, giving the employee the right to be accompanied by a colleague or union representative to any meetings regarding a grievance or disciplinary concern.¹ Safeguarding (Apprentice-to-Apprentice): A new clause (Section 11.3) has been added, directing staff to report safeguarding concerns about another apprentice to the Course Coordinator or Apprenticeship Lead.¹ A number of administrative & Contact Changes to note on final page: Includes DSL name and email + change of address for BEI & Removal of ESFA

Tab 2

Outstanding Policies to update:-

- ☐ Complaints procedure
- ☐ Continuity plan
- ☒ ~~CPD (Dev to do)~~
- ☐ EDI statement
- ☐ Health and safety
- ☐ Code of conduct
- ☒ ~~Subcontracting (Dev to do)~~
- ☐ Whistleblowing