



## **The Bauer Academy Safeguarding Policy**

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This policy is for all academy employees and our learners, it outlines our vital responsibilities in creating a safe learning environment. It also links to our Prevent Risk Assessment/Action plan, Online Learning Safeguarding Policy and our Online Safeguarding Guide for the delivery team and learners, please refer to these for further guidance.

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## 1. Our commitment

All Bauer Academy employees have a critical part to play in keeping our apprentices and all learners safe. We recognise our duty of care in safeguarding and promoting welfare for each and every learner and nothing is of greater importance to our organisation.

Our Safeguarding policy is applicable to all Bauer Academy employees, apprentices, other learners, contractors, visitors and guests working for or in conjunction with The Bauer Academy.

The roles and responsibilities of Bauer Academy employees in implementing the policy and procedures are set out clearly during their induction process. Updated and amended procedures are reviewed and reinforced in training sessions, team meetings and via email communications.

## 2. Scope of policy

This policy covers safeguarding both children (defined as anyone under the age of 18) and adults or vulnerable adults who may be at risk.

Our policy applies to all our delivery, whether Apprenticeships, other publicly funded programmes, or other training and is inclusive of specific safeguarding areas as defined by law.

This Safeguarding policy also aligns with our Prevent Risk Assessment and Action Plan in line with the Government's Prevent strategy.

## 3. Safeguarding Team and contact details:

The Bauer Academy Safeguarding Team monitor the designated safeguarding email and telephone line during normal office hours Monday to Thursday (9.30am to 6.00pm) and Friday (9.30am to 5.00pm). The Bauer Academy's safeguarding team is Heidi Walker who is the Designated Safeguarding Lead (DSL), Michelle Mackay, Designated Safeguarding Officer (DSO) and Paula Whitelock, Designated Safeguarding Officer (DSO) and Prevent lead.

**The Bauer Academy Safeguarding Team can be contacted by emailing [safeguarding@baueracademy.co.uk](mailto:safeguarding@baueracademy.co.uk) or telephoning 0203 227 4013.**

#### 4. Definitions

***Safeguarding is the protection of children and adults/vulnerable adults who may be at risk from abuse and neglect, promoting health and development, ensuring safety and care and ensuring optimum opportunity.***

##### **4.1 Keeping Children Safe in Education (KSCIE 2022)**

Sexual abuse: involves forcing or enticing a child or young person to take part in sexual activities, not necessarily involving violence, whether or not the child is aware of what is happening. The activities may involve physical contact, including assault for example rape, kissing, rubbing, and touching outside of clothing. They may also include non-contact activities, such as involving children in looking at, or in the production of, sexual images, watching sexual activities, encouraging children to behave in sexually inappropriate ways, or grooming a child in preparation for abuse. Sexual abuse can take place online, and technology can be used to facilitate offline abuse. Sexual abuse is not solely perpetrated by adult males. Women can also commit acts of sexual abuse, as can other children.

Safeguarding and promoting the welfare of children is everyone's responsibility. This means that they should consider, at all times, what is in the best interests of the child. All academy employees have a role to play in identifying concerns and taking prompt action. Safeguarding and promoting the welfare of children is defined under KSCIE as

- protecting children from maltreatment
- child sexual exploitation/sexual harassment
- preventing the impairment of children's mental and physical health or development
- ensuring that children grow up in circumstances consistent with the provision of safe and effective care
- taking action to enable all children to have the best outcomes. This includes a wide range of potential risks which we will be vigilant for and seek to identify:

Although currently, the government statutory guidance KSCIE 2022 relates to children we recognise that this may apply to adults, vulnerable adults who may be at risk.

##### **4.2 Sexting/online abuse**

Sexting is the illegal sharing of sexual messages and/or a naked or semi-naked images, video or text messages with another person. The term sexting stands for a combination of sex and texting.

- Sexting is the act of sending sexual text messages

- Sexting can happen through messaging on mobile phones or other messages services/social media sites
- People of any age group can sext but young adults are most likely to use this method

Children and young people may consent to sending a nude image of themselves but they can also be forced or coerced into sharing images by their peers or adults online. Once the image has been shared they have no control over how other people might use the imagery.

- If shared with peers it may lead to bullying and isolation
- Perpetrators of abuse may circulate the nude images more widely
- Images may be used to blackmail the child
- Images may be used to groom them for further sexual abuse
- If a child or young person originally shares the image consensually, they have no control over how other people might use it.

It's a criminal offence to create or share explicit images of a child, even if the person doing it is a child.

Whilst sexting is mainly linked to children and young people it is something we are mindful of with adult safeguarding, particularly adults who may be at risk. All Bauer Academy employees are aware of the varying forms of sexting and online abuse and have completed internal training on sexual abuse and harassment.

### **4.3 Adults, vulnerable adults who may be at risk**

We also have a duty of care for adults or vulnerable adults who may be at risk, which includes protecting their health, well-being and human rights, enabling them to live safely, free from abuse and neglect.

We should all be vigilant to the potential risks related to safeguarding, including the examples below:

- Abuse (physical, emotional, financial, institutional, sexual, organisational)
- Self-neglect or self-harm
- Bullying and cyber bullying
- Domestic abuse
- Substance misuse
- Female genital mutilation (FGM)
- Gender-based violence
- Radicalisation
- Trafficking/Modern Slavery
- Sexting, Sexual Violence and Sexual Harassment

- Teenage relationship abuse
- Mental health concerns

Additionally, an adult or vulnerable adult at risk is defined as being at risk of abuse or neglect because of their need for support, they may live in sheltered housing, be in receipt of welfare, be in supported living/residential accommodation, or be under supervision/probation service.

We also recognise that a person may be deemed as at higher risk of a safeguarding issue affecting them due to other factors, such as:

- Poor numeracy or literacy skills, or a specific learning need or needs
- Unsupportive home environment
- English not a first language
- Unsupportive employer
- From an under-represented group
- Acting as carer for another family member
- Background in offending
- Disability or social need

Sexting and Online abuse (children, adults and adults that may be at risk)

## **5. Roles & Responsibilities**

Bauer Academy's Senior Management Team (SMT) are accountable for the execution of this policy supported by the Bauer Academy Governance Board. Safeguarding is regularly reviewed at the quarterly Governance Board, reviewing any incidents, training or concerns raised.

Bauer Academy's Designated Safeguarding Lead (DSL) is responsible for providing the SMT with updates on Safeguarding, Prevent and Welfare concerns, and reporting any incidents relating to Safeguarding. The DSL is also accountable for:

- Ensuring that checks are carried out on all prospective employees (see section 7)
- Ensuring that employees are fully trained in Safeguarding procedure to the appropriate level, defined by learner facing/non-learner facing (for example central operations team)
- Maintaining contact details for Local Safeguarding Boards and regular contact with Regional Prevent Co-ordinators

- Recording any safeguarding issues using the Safeguarding log and reporting these to Bauer Academy's Director, and Education Director in real-time
- Carrying out investigations into Safeguarding and welfare concerns and liaising with external bodies such as a Safeguarding Boards when appropriate
- Maintaining their own continuous professional development (CPD) and ensuring that they are up to date with relevant safeguarding legislation, so that their role is fulfilled competently
- Storage of all records relating to Safeguarding, including Single Central Records for employees and Safeguarding logs, in line with GDPR legislation
- Ensuring that relevant checks are made on the safeguarding arrangements of employers that the Bauer Academy work with. This includes working with the client team to ensure we are capturing, assessing and filing details of any safeguarding policies and procedures they have in place.

#### **5.1 Bauer Academy's delivery team are responsible for:**

- Checking safety and welfare with all learners at each intervention, ensuring that learners complete all safety-related learning activities within their programme, for example online Prevent training and providing them with our Online Safeguarding Guide for learners and Information and Guidance (IAG) printed or digital cards
- Ensuring they are compliant with our safeguarding policy and procedures; this also includes the Bauer Academy online safeguarding guide for the delivery team
- Reporting any safeguarding issues or concerns immediately to the DSL/ DSO through the designated email or phone line. A 'quick guide to safeguarding' has been created as an easy reference for this process, based on the 5 Rs (recognition, respond, report, record, refer).
- Ensuring Risk Assessments are carried out for face-to-face delivery or offsite activities

#### **All of Bauer Academy's employees are responsible for:**

- Being vigilant of the signs of neglect or abuse amongst learners
- Being aware of the Bauer Academy safeguarding reporting procedures
- Reporting any concerns or disclosures immediately to the DSL/or Designated Safeguarding Officers or by using the Safeguarding helpline and/or email

## 5.2 Bauer Academy learners are responsible for:

- Being vigilant and aware of their surroundings including any signs or indicators of a potential safeguarding concern not just for themselves but also their peers.
- Treat their peers, staff and any other individual with respect, kindness and consideration.
- Learners must not engage in any form of discriminatory behaviour, bullying or harassment as this will not be tolerated
- Learners are responsible for safeguarding their personal information and the information of others. They should not share personal details, such as contact information or addresses, without permission. They must also respect the confidentiality of others and not share sensitive or private information without proper consent
- Learners are responsible for reporting any safeguarding concerns immediately to their programme lead or directly to the Bauer Academy Safeguarding Team.

## 6. How to report concerns

### 6.1 For learners

Any concerns about yourself or other learners should in the first instance be flagged to your Programme Lead. If you would prefer not to do so, you can contact our Safeguarding helpline and/or email address.

During normal working hours (Monday-Thursday 9.30 am to 6.00 pm and Friday 9.30am to 5.00pm), you should expect a reply within 30 minutes. Outside of these times we provide an automated voice message that will direct you to other external support providers.

Learners that are concerned about the behaviour of any Academy staff are encouraged to report this on [redflag@baueracademy.co.uk](mailto:redflag@baueracademy.co.uk)

Learners are reminded of the safeguarding contact details and redflag email at each workshop, within their learner handbook, and the digital or printed Information and Guidance card that is provided to all learners at enrolment.

### 6.2 For employees

**If you have concerns about a learner**, please report your concern by contacting our DSL or DSO via the Safeguarding helpline and/or email.

**If you have concerns about an employee of Bauer Academy**, or suspect them of any wrong-doing, you should also report this, in confidence, using the Safeguarding helpline and/or email.

During normal working hours (Monday-Thursday 9.30 am to 6.00 pm. Friday 9.30am to 5pm), you should expect a reply within 30 minutes. If you do not receive a reply, please flag this to the DSL/ DSO, or The Bauer Academy's Education Director. Allegations will be managed by the DSL and Bauer Academy's Director/Education Director, in consultation with Bauer Media's HR team and following their grievance procedures as laid out in the Bauer Media Staff handbook.

External contacts for local or regional safeguarding boards (adults and children) are stored centrally for easy access Appendix iii

## 7. Safe recruitment

Our tutors and staff are industry experts, and we expect them to display and exemplify our Bauer Academy Values and Culture Code throughout their career with Bauer Academy. We look for demonstration of and an affinity with our Values and Culture code throughout the recruitment process. In addition, during recruitment of all staff we will ensure that:

- There is a rigorous interview process with specific questions relating to safeguarding. All employees who are in contact with learners as part of their duties will be interviewed by the Academy Director or Education Director in this regard
- Applicant's identity and claims to academic or vocational qualifications will be verified by the hiring manager
- Gaps in employment will be queried and clarified by the hiring manager
- References will be taken up by direct contact with referees by the hiring manager
- Evidence of the date of birth and address of the applicant will be obtained by the hiring manager
- Bauer Media recruitment guidelines including probation period/review and identity checks will be followed by the hiring manager

The Bauer Academy's DSL will decide which level of DBS check is appropriate for a particular role and whether barred list checks are necessary. **We will include this information on the relevant job advertisement.**

Any offer of appointment will be made subject to a satisfactory DBS check, right to work, references and qualification checks. In the instance that the outcome of a DBS check has not been received prior to learner contact, a risk assessment will be carried out by the DSL and any contact with learners will be supervised by a person whose DBS outcome has been approved.

Information provided in a DBS report will be kept confidential and shared only on a need-to-know basis. We recognize that job applicants and employees need to feel confident that information about any



convictions will not be disclosed unless there is a specific reason to do so. Having a criminal record would not necessarily preclude an individual from working at Bauer Academy and the decision as to whether a person with a criminal record should be appointed, or an offer of employment withdrawn or terminated will be taken after thorough examination of the outcome of any DBS check by the DSL and Bauer Academy's Director/Education Director. In this instance, we will thoroughly explore a conviction and its relevance to the role.

We request that all employees of Bauer Academy tell us about any information related to their DBS clearance. Failure to do so would be seen as a breach of trust and will lead to disciplinary procedures or dismissal in line with Bauer Media's disciplinary policy.

We will ensure that DBS clearance is sought for all of our delivery team every 2 years and for all other Bauer Academy employees, every 3 years.

A Single Central Record (SCR) will be held for all staff employed by The Bauer Academy and this will be updated on an ongoing basis. This will include CV, DBS check, GDPR, Prevent and Safeguarding training.

#### **Post Appointment:**

All staff will take part in an induction programme which will vary dependent on the nature of the role. All inductions will be documented with an induction checklist, completed within 60 days of the job commencing. The purpose of this will be to:

- Provide awareness and explanations of relevant policies and procedures
- Provide support for the role in which they have been engaged
- Provide opportunities for a new employee to ask questions or discuss concerns relating to their role or responsibilities
- Enable individual line managers and colleagues to recognise any concerns about the person's ability or suitability from the outset and address them if deemed appropriate in line with Bauer Media's H.R. policies and procedures
- Ensure that individuals are aware of reporting concerns and who the Designated Persons for Safeguarding are
- Ensure that individuals are aware of other relevant policies and procedures, e.g. Prevent, Safeguarding online policy/guide, Equality & Diversity
- Identify additional development and learning opportunities for employees

## **8. Training and CPD for Bauer Academy employees**

Our DSL and DSOs hold a formal Safeguarding qualification and undertake regular (at least annual) CPD events to refresh their knowledge.

All Bauer Academy employees will undertake online level 2 Safeguarding training course and complete an online assessment as part of their induction, certificates of completion are held centrally in our SCR system.

All Bauer Academy employees will complete our internal training on safeguarding and how to report a safeguarding concern.

The training received will be continually reviewed by Bauer Academy's DSL and Director to ensure that it is up to date. Aligning with the Government's Counter Terrorism and Security Act of 2015, all employees will undertake Prevent online training and an online assessment.

### **8.1 Training and Educating Sub-contractors/Guest Speakers**

In line with Bauer Academy's our sub-contracting and guest speaker policies, all sub-contractors and guest speakers will be provided with the appropriate training and guidance in relation to safeguarding alongside the due diligence checks that will be carried out in relation to their processes and procedures.

## **9. Bauer Academy code of conduct for employees**

The focus of your relationship with any learner must always remain professional. To ensure that this is the case, in addition to the rules and guidelines set out in the Bauer Media staff handbook, Bauer Academy employees are strictly prohibited from:

- Befriending learners on social media sites
- Distributing personal telephone numbers or personal email addresses
- Inviting learners into your home
- Lending money or other items to learners
- Visiting learners at home or transporting learners to and from locations (this includes travelling in a car with a learner driving)
- Using sarcasm, insults or belittling/marginalizing comments towards learners
- Using any form of sexual innuendo
- Developing personal or intimate relationships with learners
- Providing learners with alcohol, tobacco products or any form of drug or medication or assisting learners in obtaining these
- Taking illegal drugs or drinking alcohol during contact with learners
- Engaging in inappropriate physical activity or horse play

In addition, Bauer Academy employees must be mindful of the following:

You will naturally build rapport with learners but always maintain professional boundaries. Be respectful of all young and vulnerable learners. Listen to their concerns and sign post them to support. Uphold confidentiality when required by the situation, but do not promise to keep secrets or ask others to do so.

Avoid spending time alone with learners in a closed environment.

Be careful when giving learners advice and instead focus support around information and guidance (IAG).

If you feel unsafe in a situation with a learner, inform the DSL/ DSO, your line manager and leave the premises.

### **9.1 Academy code of conduct for learners**

Appendix iv provides a simple code of conduct for learners to help them stay safe and get the most out of their learning journey during their training with Bauer Academy. We provide our learners with information and guidance on how to stay safe online.

## **10. Future plans**

Bauer Academy operates a hybrid delivery model of online/face-to-face learning.

We plan to maintain and enhance our Safeguarding provision through our ongoing working group – Project Atom. This group meets on a monthly basis and ensures that Bauer Academy remains focused on and committed to the Safeguarding and welfare of its learners and employees. An output of Project Atom is that we will continue to develop content and materials to educate learners on our Safeguarding policies and practices – for example additional e-learning modules on our digital training portal Open eLMS.

We have key contact information for Regional Safeguarding Boards in our key training locations and have worked hard to foster good relationships with regional Prevent co-ordinators, who regularly carry out Bauer Academy staff training.

Safeguarding will remain a key aspect of both informal walk-throughs and formal observations carried out by Bauer Academy's Head of Quality and the SMT as part of Bauer Academy's Quality Planner. These observations will feed into our SAR (self-assessment review) and QIP (quality improvement plan).

As well as carrying out our own risk assessments for any face-to-face delivery, in addition we work closely with employers to understand their own health and safety policies and practices. These are recorded and maintained in a central information file that can be accessed by the DSL/DSOs and delivery team.

## **11 Associated policies**

- The Keeping Children Safe in Education 2022 & Part 1 Statutory Guidance (KCSIE)
- Central Record (UK) of Local Children/Adult Safeguarding Boards
- Bauer Academy Prevent Policy & Risk Assessment
- Bauer Academy Safer Recruitment Policy
- Bauer Academy online Safeguarding Guide for Learners and Delivery Team
- Bauer Academy Quick Guide to Safeguarding
- Bauer Academy Code of Conduct
- Bauer Academy Risk Assessments (in line with Health & Safety)
- Bauer Academy Safeguarding/Welfare referral log