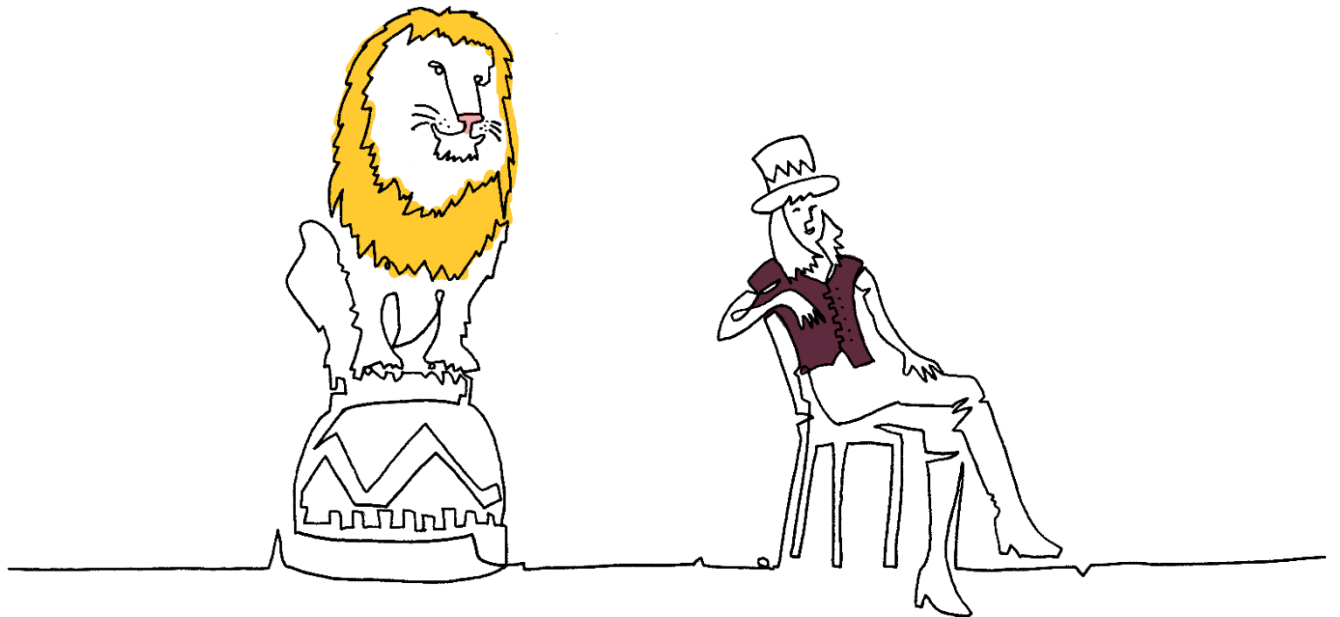




**Future Talent  
Learning**

**SAFEGUARDING, PREVENT AND  
SAFER RECRUITMENT POLICY**



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Section	Amendments made	Page	Date
Policy Statement	Prevent Statutory Duty added	4	September 23
Current personnel in role	Updated to reflect staffing changes	4	September 23
IT Usage and online conversations	Filtering and monitoring updated in accordance with KCSIE 2023	5	September 23
Appendix B – Recognising concerns – Definitions and Indicators of Abuse	Under age marriage added due to change in UK Law and in accordance with KCSIE 2023	9	September 23
Appendix D – FTL Prevent and British Values Policy	Updated to replace “vulnerability” with “susceptibility” in accordance with KCSIE 2023 update.	13-14	September 23
	Added reference to Prevent Risk Assessment	14	September 23
Appendix F – Safeguarding Reporting Procedure	Updated steps taken by Safeguarding Team and Coaches in respect of the procedure once a concern has been reported.	18-19	January 24
Policy Statement	Reference to amended Prevent Statutory Duty in 2023 added.	5	September 24
Appendix A – Safeguarding Concern Form	Word form replaced with electronic, MS Form and link to form added to Appendix.	7	September 24
Appendix B – RECOGNISING CONCERNS – Definitions and indicators of Abuse	Changed to read “Definitions and indicators of Abuse, Neglect and Exploitation” in line with KCSIE update 2024.	8	September 24
Appendix B – RECOGNISING CONCERNS – Definitions and indicators of Abuse	Bullet point added to list of “Recognising Concerns – Indicators of Abuse” - Unexplainable and/or persistent absences from education - in line with KCSIE 2024	10	September 24
Appendix D – FTL Prevent and British Values Policy	Additional training added to “Staff Training” section.	14	September 24
Appendix F – Safeguarding Reporting Procedure	Amended to reflect changes in reporting via an MS Form, replacing the previous Word version.	19-20	September 24
Policy Statement	Updates made to Accountability and Reporting and Personnel to reflect changes in process and staffing.	4	September 25
Policy Statement	Included a line to reflect sharing of a safeguarding concern with a learner’s employer, where necessary.	4	September 25
Appendix B -	Link to DFE guidance on Preventing and Tackling Bullying added	8	September 25
	Recognising Concerns – added section on Online Safety	11	September 25
Appendix C	Line added to confirm staff involved in recruitment and background checks have undertaken Safer Recruitment training	13	September 25
Appendix D -	Update to Online Monitoring	15	September 25
Appendix F – Safeguarding Reporting Procedure	Minor changes in administrative steps taken by Safeguarding Team and amendments made to reflect up to date Rota.	20	September 25

# Policy Statement

Future Talent Learning is strongly committed to practices that protect adults at risk from abuse, neglect or significant harm. We have specifically omitted references to 'young people' in this policy as our learning programmes are only applicable for adult learners and we, therefore, do not have any 'young people' on programme. Should this situation change, we will amend this policy accordingly.

Staff, leaders and governors recognise and accept their statutory responsibility (as set out in the Apprenticeships, Skills, Children and Learning Act 2009 and Keeping Children Safe in Education (KCSIE) 2025) to develop awareness of the risks and issues involved in safeguarding and their duties to safeguard and promote the welfare of its learners. As part of this, FTL staff are expected to exercise professional curiosity so that concerns are identified and acted on at the earliest opportunity.

We seek to declare at every onboarding meeting that we must all (staff and learners) have zero tolerance for abuse, bullying, neglect and violence. We also recognise that we have a responsibility to protect staff from unfounded allegations of abuse. Future Talent Learning is committed to working with the Multi Agency Safeguarding Hubs (MASH).

In accordance with the Prevent statutory duty, introduced through the Counter-Terrorism and Security Act 2015 and updated in December 2023, this policy also incorporates the organisation's Prevent and British Values Policy (see Appendix D).

## Definitions

For the purposes of this policy and procedure, an 'adult at risk' previously known as a 'vulnerable adult' is defined as any person 18 years or over who is or appears to be eligible for assistance by reason of mental ill health, physical or learning disability, illness or age-related frailty and/or; may be unable to take care of him/herself or unable to protect him/herself against significant harm or exploitation. Please see our Policy Statement for the reason we have not referred to 'young people'.

## Accountability and Responsibility

Overall responsibility for Safeguarding rests with the Designated Safeguarding Lead for day-to-day activity. Safeguarding Officers will provide general advice and training, monitor and manage concerns, allegations or disclosures, and liaise with safeguarding agencies. The Safeguarding Lead will support the Safeguarding Officers with their duties and Lead Coaches will work in parallel to ensure that the reporting staff member(s) are appropriately supported but will also respect confidentiality and disclosure. The Safeguarding Team will keep records of concerns raised in line with privacy and data protection rules for reporting purposes. The Designated Safeguarding Lead will report to the Senior Leadership Team and Governance Board on a regular basis with details of any significant concerns and reporting statistics.

## Current personnel in role (The Safeguarding Team)

**Designated Safeguarding Lead:** Sarah Burgess (Deputy Head of Quality)

**Designated Safeguarding Officers:** Cat Thomson (Lead Coach) and Lorna Parkhouse (Senior Development Coach), Tom Sammarco (Head of Quality)

**Safeguarding Governor:** Karen Kelly

## How we will achieve commitment to the policy and ensure the protection of apprentices

Future Talent Learning has a duty to promote safeguarding issues and measures to staff to ensure that they:

- Recognise concerns as they are identified (see Appendix B).
- Report concerns to the Safeguarding Team using the procedure set out in Appendix F on the same day.
- Refer to appropriate authorities on the same day.
- Record incidents to facilitate investigations.
- Respond to requests for information and involvement in case reviews.
- Continue to learn by being open to sector best practice and embed improvements to our approaches and processes

## We will achieve this by:

- Providing our new staff with safeguarding training during their induction period
- Providing all staff with regular training in relation to all areas covered in this policy (including Prevent and British Values), reporting and recognising concerns as part of Team Meetings and Standardisation Meetings so that staff are confident to deal with these areas in accordance with this policy
- Conducting spot checks during reviews to ensure our safeguarding code of behaviour is being

Date of creation: 07.05.2021

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Date of next review: 2 September 2026

Policy owner: Sarah Burgess

Policy approved by: Ewen Haldane

demonstrated by our staff

- Conducting learner interviews during our quality review process to ensure learners know how to obtain support as outlined in this policy and using the results of these interviews to direct our training to staff and our employer partners
- Reporting a Safeguarding summary and Prevent risks to the FTL Apprenticeship Board on a quarterly basis.

### **Our commitment to staff training**

Future Talent Learning commits to providing a mandatory Safeguarding training course at least once every 2 years for the Safeguarding Team and for any other staff who this might apply to. The Safeguarding Lead will also be responsible for cascading learning and updating all other staff about best practice on a regular basis. This might involve peer to peer instruction or recommending that staff observe online courses as needed.

We will inform and provide training for all employees (including apprenticeship coaches and assessors) about their rights and responsibilities in terms of our safeguarding policy when they first join the company. We commit to taking seriously and investigating any complaints or concerns of staff, learners, employers or other stakeholders.

A series of regular briefing sessions will be held for staff on safeguarding issues. These will be repeated as necessary. Staff with learner contact have also received Online Safety training and will receive annual refresher training on Safeguarding matters including processes and procedures. Staff are required to read and sign to confirm understanding of the Safeguarding, Prevent and British Values Policy. Safeguarding information is also included in induction programmes for new Future Talent Learning joiners, and this includes reading Part One of KCSIE 2025. Training is provided for team managers on this policy. FTL staff who have an involvement in the recruitment and onboarding process of apprentices will receive specialist training.

### **IT Usage and Online Conversations**

All online conversations between apprentice learners and coaches or other Future Talent Learning staff should take place within the FTL approved systems. These are defined as Outlook Teams and Circle. Learners are discouraged from using Aptem's messaging platform.

Email communication is carried out via the staff member's official Future Talent Learning email which may be monitored from time to time by the Designated Safeguarding Lead or other senior Future Talent Learning staff. Should issues arise relating to cyber bullying, online content and messages, these will be reported immediately to the Designated Safeguarding Lead and suitable action taken.

During all virtual learning sessions, Coaches and/or moderators are always present to monitor online group chat functions and break out rooms. It is not possible for learners to private message each other during online sessions. They may private message the FTL member of staff directly should they need to do so.

Circle is a chat function set up by Future Talent Learning to enable learners to communicate with each other within their allocated study groups. Groups are moderated by an FTL staff member who can remove messages posted. Within the platform, learners are reminded to be responsible and respectful and the FTL Safeguarding Team contact information is provided within the chat groups.

### **Staff Recruiting and Vetting**

The recruiting and vetting of administration and delivery staff is to be carried out in accordance with Appendix C (DBS & Safer Recruitment Policy & Procedure).

### **Safeguarding Code of Behaviour**

This section applies to all members of staff.

You must **not**:

- Spend excessive amounts of time alone with learners away from others.
- Make unnecessary physical contact with learners.
- Take learners alone in a car, however short the journey, unless absolutely unavoidable.
- Meet learners outside the work or learning environment
- Start an investigation or question anyone after a concern, allegation or disclosure has been raised. This is the job of the authorities.
- Show favouritism of any learner, nor should they issue or threaten any form of physical punishment.
- Staff should never (even in fun) –
  - Initiate or engage in sexually provocative conversation or activity.
  - Allow the use of inappropriate language to go unchallenged.
  - Do things of a personal nature for learners that they can do themselves.
  - Allow any allegations made by a learner go without being reported and addressed.

- Trivialise or exaggerate learner abuse issues.
- Make promises to keep any disclosure confidential from relevant authorities.

**You must:**

- Respect learners' rights to privacy and encourage them to feel comfortable enough to report attitudes or behaviour that they do not like.
- Act with discretion with regards to their personal relationships.
- Be aware of the procedures for reporting concerns, allegations or disclosures, and should familiarise yourself with the contact details of the Safeguarding Team.
- If a member of staff finds themselves the subject of inappropriate affection or attention from a learner they **should** make the Designated Safeguarding Lead aware of this, who may refer the matter to another member of the Safeguarding Team.
- If a member of staff has any concerns relating to the welfare of a learner, be it concerns about actions/behaviours of another staff member or concerns based on any conversation with the learner (particularly where an allegation has been made), they should report this to the Safeguarding Team using the procedure as set out in Appendix F.

**In addition to the Code of Behaviour, all staff must adhere to the Staff Code of Conduct Policy which can be found on FTL internal HR system.**

### **Procedure for Responding to a Concern, Allegation or Disclosure**

- Do not make promises about confidentiality.
- Explain to the person **at the outset** that you will need to report the concern, allegation or disclosure and share the information with the Safeguarding Team.
- The member of staff who has concerns about possible abuse, neglect or exploitation must contact the Safeguarding Team using the procedure as set out in Appendix F as soon as possible for advice and support.
- If the complainant is the learner concerned, questions should be kept to a minimum and leading questions should be avoided.

It is also worth noting that any reports or concerns raised with the Designated Safeguarding Lead may also be referred to a Safeguarding Officer (and vice versa) or advice sought from the Safeguarding Governor.

We may, in addition, where deemed necessary, share a safeguarding concern with a learner's employer where a risk is posed to the safety of the learner or to others.

### **Getting Support and/or Guidance**

Our learners are informed of our safeguarding procedure during enrolment and are provided with relevant contact details for the Safeguarding Team. Appendix E is available to view in our Learner Handbook to which all learners have access and within the first component in the learner's Learning Plan.

We also have contact details for support organisations which learners can access via the Learner Handbook and through auto-replies to the Safeguarding Team inbox. Where appropriate and required, Learners will be specifically signposted to organisations who can offer support and guidance.



Signed  
**Chief Learning Officer**  
22<sup>nd</sup> September 2025

# Appendix A

## Safeguarding Concern Form

The Safeguarding Concern Form can be accessed by clicking the link below:

<https://forms.office.com/e/vjkABh2v3M>

A copy of the form will be received by the Safeguarding Team at [safeguarding@futuretalentlearning.com](mailto:safeguarding@futuretalentlearning.com) and reviewed within 2 hours of receipt.

## Appendix B

### RECOGNISING CONCERNS – Definitions and indicators of Abuse, Neglect and Exploitation

**Physical Abuse** may involve hitting, shaking, throwing, poisoning, burning or scalding, drowning, suffocating, or otherwise causing physical harm. Physical harm may also be caused when a parent or carer fabricates the symptoms of, or deliberately induces illness in a person.

**Emotional Abuse** Emotional abuse is the persistent emotional maltreatment of a person such as to cause severe and persistent adverse effects on the person's emotional development. It may involve conveying to the person that they are worthless or unloved, inadequate, or valued only insofar as they meet the needs of another person. It may feature age or developmentally inappropriate expectations being imposed on a person. These may include interactions that are beyond the person's developmental capability, as well as overprotection and limitation of exploration and learning, or preventing the person participating in normal social interaction. It may involve serious bullying causing individuals frequently to feel frightened or in danger, or exploitation or corruption. Some level of emotional abuse is involved in all types of maltreatment, though it may occur alone.

**Sexual Abuse** Sexual abuse involves forcing a person to take part in sexual activities, including prostitution, whether or not the person is aware of what is happening. The activities may involve physical contact, including penetrative (e.g. rape, buggery or oral sex) or non-penetrative acts. They may include non-contact activities, such as involving children in looking at, or in the production of, pornographic materials or watching sexual activities, or encouraging children to behave in sexually inappropriate ways.

**Neglect or Act of Omission** Neglect is the persistent failure to meet a child's or adult at risk's basic physical and/or psychological needs, likely to result in the serious impairment of the individual's health or development. Neglect may occur during pregnancy as a result of maternal substance abuse. Once a child is born, neglect may involve a parent or carer failing to provide adequate food and clothing, shelter including exclusion from home or abandonment, failing to protect a child or adult at risk from physical and emotional harm or danger, failure to ensure adequate supervision including the use of inadequate care-takers, or the failure to ensure access to appropriate medical care or treatment. It may also include neglect of, or unresponsiveness to, a person's basic emotional needs.

**Financial Abuse** misappropriation of an individual's funds, benefits, savings etc or any other action that is against the person's best interests, for example:

- Theft of money, possessions, property or other material goods.
- Misuse of money.
- Fraud or extortion of material assets.
- Persuading an adult at risk to enter into a detrimental financial agreement.

**Discriminatory Abuse** this is usually motivated by discriminatory and oppressive attitudes towards race gender, culture background, religion physical and/or sensory impairment, sexual orientation and age.

**Institutional Abuse, Neglect and Poor Practice** this may take the form of isolated incidents of poor or unsatisfactory professional practice at one end of the spectrum, through to persuasive ill treatment or gross misconduct.

**Domestic Violence** all forms of abuse can be experienced in a family setting by a partner, family member, or with someone with whom there is a relationship. Domestic abuse can encompass a wide range of behaviours and may be a single incident or a pattern of incidents. That abuse can be, but is not limited to, psychological, physical, sexual, financial or emotional.

**Modern Slavery** this is the use of individuals working for little or no wages.

**Forced Marriage/Honour based violence** this is a marriage conducted without the valid consent of one or both parties and where duress is a factor. An honour killing or shame killing is the murder of a member of a family, due to the belief that the victim has brought shame or dishonour upon the family, or has violated the principles of a community or a religion, usually for reasons such as refusing to enter an arranged marriage, being in a relationship that is disapproved by their family, having sex outside marriage, becoming the victim of rape, dressing in ways which are deemed inappropriate, engaging in non-heterosexual relations or renouncing a faith.

**Under Age Marriage** – this is an additional type of forced marriage. It is illegal to do anything to make someone marry before they turn 18, even if there is no pressure or abuse involved.

**Female Genital Mutilation** Female genital mutilation (FGM) is a procedure where the female genitals are deliberately cut, injured or changed, but where there's no medical reason for this to be done. It is also known as "female circumcision" or "cutting", and by other terms such as sunna, gudniin, halalays, tahur, megrez and khitan, among others. FGM is usually carried out on young girls between infancy and the age of 15, most commonly before puberty starts. It is illegal in the UK and is child abuse. It's very painful and can seriously harm the health of women and girls. It can also cause long-term problems with sex, childbirth and mental health.

**Self-Neglect** this is a condition affecting behaviour, where the individual refuses to attend to their personal care and hygiene, their environment or even refusal of care offered to them.

**Substance misuse** refers to illegal drugs, alcohol, solvents and the misuse of prescription and over the counter medications, the consumption of which is either dependent use, or use associated with having harmful effects on the individual, other members of their family or the community.

**Cyber Bullying** the use of technology such as mobile phones and the internet to bully other people.

**Vulnerability to violent extremism** concerns about people being susceptible to violent radicalisation or being affected by radicalisation of others.

## **RECOGNISING CONCERNS - Indicators of Abuse, neglect and exploitation**

Indications that a person may be experiencing abuse could include the following:

- Unexplained or suspicious injuries such as bruising, cuts or burns, particularly if situated in a part of the body not normally prone to such injuries. Bruises that reflect hand marks or fingertips could indicate pinching or slapping, cigarette burns and scalds would also be a concern.
- An injury for which the explanation seems inconsistent.
- The person describes what appears to be an abusive act involving him or her.
- Someone else expresses concern about the welfare of another person.
- Unexplained changes in behaviour e.g. becoming very quiet, withdrawn or having severe temper outburst.
- Inappropriate sexual awareness.
- Engaging in sexually explicit behaviour.
- Discomfort when walking or sitting down.
- Distrust of adults, particularly those with whom a close relationship would normally be expected.
- Has difficulty making friends.
- Is prevented from socialising with other people.
- Displays variations in eating patterns including overeating and loss of appetite.
- Loses weight for no apparent reason.

- Becomes increasingly dirty and unkempt.
- Unexplainable and/or persistent absences from education

This list is not exhaustive and the presence of one or more of the indicators is not proof that abuse is actually taking place or has taken place.

## RECOGNISING CONCERNS – Bullying

### ‘Bullying’ is an abuse issue.

Bullying is deliberately hurtful behaviour, usually repeated over a period of time, where it is difficult for those being bullied to defend themselves. Anyone can be a target for bullying, sometimes victims are singled out for being overweight, physically small, having a disability, being shy and/or sensitive or belonging to a different race, faith or culture. Bullying can and does occur anywhere there is inadequate supervision.

### Bullying may include:

- Physical including hitting, kicking and theft.
- Verbal including name calling, teasing, racist or homophobic taunts, threats and graffiti.
- Emotional including tormenting, ridiculing, humiliating and ignoring.
- Sexual including unwanted physical contact or abusive comments.
- Cyber bullying e.g. e-mail, social media, text messaging etc.

Bullying can cause a considerable amount of stress. It can affect health and development and in extreme cases it can cause significant harm including self-harm.

### The following action should be taken to help the victim and prevent bullying:

- All signs of bullying should be taken seriously.
- The victim should be encouraged to share their concerns.
- The victim should be helped to speak out and tell the person in charge or someone in authority.
- All allegations should be investigated and action taken to ensure the victim is safe. The victim and bully(ies) should be spoken to separately.
- Employees should reassure the victim that they can be trusted and will help them, but do not promise not to tell anyone else.
- Records should be kept of what is said.

### The following action should be taken towards the bully(ies):

- The situation should be explained to the bully(ies).
- An effort should be made to get the bully(ies) to understand the consequences of their behaviour.
- An apology to the victim should be sought.
- Any items belonging to the victim should be returned.
- Encouragement to the bully(ies) to change their behaviour should be offered.
- If considered appropriate, meetings should be held to report on progress.
- All appropriate employees should be informed of action taken.
- A written record of action taken should be kept.

DFE Guidance on preventing and tackling bullying, including Cyber bullying can be found here: [Preventing bullying - GOV.UK](#)

## RECOGNISING CONCERNS - Online Safety

Keeping learners safe online needs a whole-organisation approach. The way we use technology in education is changing quickly, with AI tools, apps, and different learning platforms becoming a normal part of teaching and learning. As technology develops, new risks can appear too. Using frameworks like the **4 Cs of online safety** (Content, Contact, Conduct, and Commerce) helps us spot and respond to the kinds of risks learners might face when working online.

As described in, *Keeping Children Safe in Education (KCSIE)* the four main categories of risk are:

- Content: exposure to harmful or illegal material (e.g. pornography, racism, self-harm, extremism, conspiracy theories, misinformation and disinformation).
- Contact: dangerous interactions with others (e.g. grooming, exploitation, peer pressure, misleading advertising).
- Conduct: harmful online behaviour (e.g. cyberbullying, sharing explicit images, non-consensual image distribution).

- Commerce: financial risks (e.g. gambling, scams, phishing, inappropriate advertising).

As part of initial tasks, we ensure learners are informed about keeping safe online and this is periodically checked within our quality review process. Our staff are given training annually and steps to mitigate any risks associated with platforms provided by Future Talent Learning for the delivery of programmes are taken.

## Appendix C

### DBS (Disclosure and Barring Service) & Safer Recruitment Policy and Procedure

The Disclosure and Barring Service (DBS) helps employers make safer recruitment decisions and prevent unsuitable people from working with at risk groups/adults, through its criminal record checking and barring functions. As an organisation using the DBS to help assess the suitability of applicants for positions of trust, Future Talent Learning complies with the DBS Code of Practice regarding Disclosure Information.

Having a criminal record will not necessarily bar you from working at Future Talent Learning. This will depend on the nature of the position and the circumstances and background of your offences.

This policy outlines the use of Disclosure and Barring Service (DBS) checks at Future Talent Learning and also contains the Recruitment of Ex-Offenders Policy.

#### Recruitment of Ex-Offenders Policy

Future Talent Learning is committed to the fair treatment of our staff, potential staff or users of our services, regardless of age, disability, gender, marriage or civil partnerships, pregnancy and maternity, race, religion or belief, sex or offending background.

We actively promote inclusiveness and equal opportunity for all with the right mix of talent, skills and potential and welcome applications from a wide range of candidates, including those with criminal records. We select all candidates for interview based on their skills, qualifications and experience.

An application for a criminal record check is only submitted to DBS after a risk assessment has indicated that one is both proportionate and relevant to the position concerned, making reference to the Protection of Freedoms Act 2012. For those positions where a criminal record check is identified as necessary, all application forms, job adverts and recruitment briefs will contain a statement that an application for a DBS certificate will be submitted in the event of the individual being offered the position.

#### DBS Procedure

##### What is a DBS check?

The DBS check searches an individual's details against criminal records and other sources, including the Police National Computer. The check may reveal convictions, cautions, reprimands and warnings.

The DBS check will either confirm that the individual doesn't have a criminal record, or it will list any relevant convictions, cautions, reprimands, warnings and, if applicable, whether the individual has been barred from working with at-risk groups.

It should be stressed that, whilst DBS checks are vital in the consideration of appropriate recruitment of staff with access to potential at risk groups/adults, they are just one in a range of pre-employment checks which must be carried out in order to assess the suitability of candidates. Other checks include thoroughly confirming identities, qualifications, taking up references and examining employment histories on application forms. Additional searches include checking applicant's social media profiles and this information is requested within FTL's Job Application Form and the need for this is explained to candidates when the Application Form is provided together with a copy of Part 1 of KCSIE for candidates to read. On-going monitoring and supervision is also vital alongside clear safeguarding policies and procedures. At least one member of FTL staff involved in recruitment and responsible for carrying out the aforementioned checks, will have undertaken Safer Recruitment Training.

##### Who is required to have a DBS Check to basic level?

- All members of staff who have 10 or more hours of direct contact with learners per month (i.e., Coaches, programme team, IQAs, Lead Coaches, enrolment coaches, auditors, event facilitators etc.). Direct contact includes contact via email, Microsoft Teams, telephone, face-to-face, the LMS and so on.
- All members of staff who process personal data for learners.

### **DBS Check Procedure**

All candidates who are offered a position with Future Talent Learning that fall in line with the above, will be subject to a DBS check which will be initiated and maintained by the Designated Safeguarding Lead or other personnel as may be nominated by the Designated Safeguarding Lead. The candidate will be required to complete a DBS application online with DDC and arrange an online meeting with a nominated Future Talent Learning document checker for their proof of address and identification to be verified. Future Talent Learning will pay the cost of the DBS check. All offers of employment are made subject to obtaining a satisfactory DBS check (and future re-checks) if the post dictates. This must be received before the candidate/member of staff can commence unsupervised contact with learners.

### **Outcome of the disclosure**

The disclosure results are reviewed by the Head of People and if any content on the disclosure requires further investigation, the member of staff/candidate will be required to make the disclosure document available for review. All information will be kept confidential.

The information contained within the disclosure should be considered as well as considering time elapsed since the offence occurred, the circumstances relating to the offence. Offences of particular concern would be violent, sexual and drug related offences. If the discussion with the applicant is deemed as satisfactory and the convictions are not serious or deemed to be contradictory to work within Future Talent Learning then the DBS check will be confirmed as satisfactory and their appointment confirmed.

If the information contained within the disclosure is deemed as serious and contradictory to work within Future Talent Learning, the offer of employment will be withdrawn. If the applicant disputes the information then they will need to appeal to the DBS and a decision will be made on any new information provided.

Once the outcome of the check has been established, if satisfactory, a record confirming this outcome is kept on file. Disclosure information received by Future Talent Learning is securely stored and is only available to those who need to have access to the information in the course of their duties. No paper disclosures are kept and no photocopies are taken and disclosure information is never kept on personnel files.

# Appendix D

## Future Talent Learning Prevent and British Values Policy

Future Talent Learning has a legal responsibility to safeguard and promote the welfare of all their learners and to ensure that they operate within the law. The Prevent Duty is a Government strategy that was introduced to safeguard communities against the threat of extremism, radicalisation and terrorism, and for the promotion of British Values. Section 26 of the Counter Terrorism and Security Act 2015 places a duty on educational establishments to have “due regard to the needs to prevent people from being drawn into terrorism”. This is not about preventing apprentices from having political and religious views or concerns but supporting them to use or act on their views and concerns in a non-extremist way.

People can be drawn into violence or they can be exposed to the messages of extremist groups by many means. These can include family members or friends, direct contact with members groups and organisations or, increasingly, through the internet. This can put a person at risk of being drawn into criminal activity and has the potential to cause significant harm.

### Promoting and gaining commitment to this policy (staff and learners)

Future Talent Learning seek to gain the commitment and promote this policy (learners and staff) by way of the following:

- Making this policy known to all staff during their induction period with Future Talent Learning. Not only will we make this policy known, but we will also provide training on the importance of Prevent and British Values.
- Providing ongoing training to Coaches and relevant staff about how Prevent and British Values can be embedded with learners during their on-programme learning.
- Coaches making this policy known to all learners at the outset of their programmes of learning as well as explaining the key points and importance of the concepts within this policy during this period.
- Coaches embedding the principles of this policy throughout reviews and learning events.

### Staff Training

Future Talent Learning will encourage all staff and learners to promote a positive ethos throughout the learning environment and to challenge extremist narratives. Future Talent Learning will provide all staff with learner contact training in Prevent both upon induction and with refreshers annually, including completion of the Home Office Prevent Duty Awareness.

In addition, the Designated Safeguarding Lead has completed both the Home Office Prevent Referrals and Channel/Prevent Multi Agency Panel courses.

Further staff training includes information on how to build up the resilience of learners and employees to extreme narratives, how to understand e-safety, including social media, how to be aware of online risks such as grooming and also how to identify and recognise signs of susceptibility and early warning signs.

Signs of susceptibilities might include:

- Loneliness or isolation
- Changes to a family situation/family tensions
- Poverty
- Political grievances
- Crime/anti-social behaviour
- Progressive changes in behaviour – such as significantly changing their appearance, changing peer/friendship groups
- Argumentative and unwilling to listen
- Unwilling to engage with those of different race, religion, gender etc
- Accessing extremist material or possession of violent extremist literature, showing sympathy to extremist groups
- Use of inappropriate language
- The expression of extremist views
- Advocating violent actions and means
- Association with known extremists
- Seeking to recruit others to an ideology.

Future Talent Learning commits to covering the Prevent / British Values agenda (defined as democracy, rule of law, individual liberty and mutual respect and tolerance of different religions) in their apprenticeship programmes of learning. These topics are built into and explored throughout the learner induction as well as throughout our apprenticeship curriculum. This includes explaining what this is during learner onboarding and reinforcing it at various key points throughout the programmes.

### **Employer Responsibility**

We encourage our employer partners to;

- Be alert to any changes in behaviour that may give cause for concern.
- Advise Future Talent Learning of any concerns regarding your learner to allow us to investigate any issues further.

### **Future Talent Learning Responsibility**

- Allow the Safeguarding Team and any other relevant staff to complete training on their Prevent Duty as outlined above.
- Ensure all relevant staff coming in contact with apprentices directly undergo DBS (Disclosure and Barring Service) checks (see Appendix C)
- To provide learners with information so they know how to protect themselves from extremist views contrary to British values
- Future Talent Learning will work proactively with other agencies where concerns relating to Prevent are raised, e.g. via Channel
- Manage and maintain a Prevent risk assessment process to identify and minimise risks through action planning. The risk assessment is reviewed as a minimum annually with the action plan updated quarterly.

### **Online Monitoring**

We will encourage the majority of online interactions (e.g. between coach and learner) to take place within FTL approved systems. These conversations may be monitored or stored. This will primarily be for assessment and learning purposes but also to ensure that no concerns are flagged around the Prevent agenda.

Our email system filters specific language which may link to inappropriate conversations around radicalisation and extremism. The DSL is notified of filtered emails and these are recorded in a securely stored spreadsheet detailing the nature of the email and the recipient.

### **What is Channel?**

Channel is an early intervention multi-agency process designed to safeguard susceptible people from being drawn into violent extremist or terrorist behaviour. Channel works in a similar way to existing safeguarding partnerships aimed at protecting susceptible people. It is a supportive approach and operates in the pre-criminal space. The programme uses a multi-agency approach to protect susceptible people by:

- Identifying individuals at risk
- Assessing the nature and extent of the risk
- Developing the most appropriate support plan for the individuals concerned

### **Reporting Concerns**

Future Talent Learning commits to signposting clearly in the induction materials and throughout the programme what to do if a learner wishes to self-refer and/or if an employer, coach or other learner is worried or concerned about someone else on one of our learning programmes. In this case, they are advised to contact their coach immediately who will pass the concern on to the Safeguarding Team using the process as set out in the Safeguarding, Prevent & Safer Recruitment Policy. Once we have investigated concerns, the Safeguarding Team will determine the most appropriate course of action in consultation with the learner's employer and may refer to local authority safeguarding teams or the police for consideration for the Channel programme.

# Appendix E

## Keeping safe: The Importance of Safeguarding at work

### All organisations have a duty of care for their people

This is a vocational apprenticeship programme. As such, learning is intended to be practical and experiential and to happen not just *while* you're at work, but *through* the work that you do.

The word 'safeguarding' is most often associated with protecting society's most vulnerable from harm and abuse, whether that's an elderly person in a care home or children and young adults at school. And, rightly, there is a range of law and regulation which provides specific rules and guidance for workplaces with these particular needs. But safeguarding is also a much wider, all-encompassing term that covers the measures that are used to protect people's health, wellbeing and human rights, and to keep them safe from harm, whatever the context.

When it comes to the world of work, all organisations have a duty of care for their people, whether that's through an employment relationship or in their non-contractual dealings with them. According to the UK's Advisory, Conciliation and Arbitration Service (ACAS), this means we must do "all we reasonably can to support people's health, safety and wellbeing." This includes:

- making sure the working environment is safe
- protecting staff from discrimination
- carrying out risk assessments
- having the right policies and procedures in place
- making sure that people are trained to support and benefit from these policies and procedures.

And it's not just a question of *physical* safety – making sure those trip hazards are identified or electrical appliances are tested regularly, crucial though these things are. The UK's Health and Safety Executive (HSE), the body responsible for health and safety enforcement, is clear, for example, that **workplace stress** is a hazard like any other, and needs to be monitored and managed accordingly. Looking after people's *mental and emotional wellbeing* is central to effective safeguarding.

Here at Future Talent Learning, it's a responsibility we take very seriously, as our Safeguarding and Prevent Policy attests. We also believe it's important that the people with whom we work have the information they need to understand what we mean by safeguarding and to be equipped to play a role in keeping workplaces safe from harm and workplace relationships healthy. Debates about bullying and harassment at work help to encapsulate this approach.

### Bullying and harassment at work

It's a sobering statistic that ACAS receives more than 20,000 calls to its bullying and harassment helpline each year. Workplaces and working relationships can be blighted by inappropriate behaviours, and it's incumbent upon employers – and their employees – to work in partnership to address these often tricky and emotive issues. And that can be less than straightforward.

Bullying and harassment can often be hard to recognise; what one person might call 'banter' could be perceived as unwarranted and offensive by others. People on the receiving end may not complain because they fear being seen as overreacting or that their concerns will not be taken seriously. Others may be unclear about how to make a complaint, or what might happen if they do.

That's why it's important that companies have clear policies and procedures which are communicated effectively and that they create safe cultures where people feel able to raise concerns and can expect to have those concerns taken seriously and investigated properly – without consequence.

It also means being clear about what is (and is not) considered to be acceptable behaviour. It may be obvious that things such as inappropriate physical contact, unwelcome verbal comments, offensive emails or unpleasant comments on social media should all be taboo. But we might not always consider more insidious examples, such as overbearing supervision, denying someone training or promotion opportunities or making threats about job security. Yet the effects are likely to be the same.

## The Equality Act 2010 – and beyond

The law provides a helping hand here. [The Equality Act 2010](#) defines workplace harassment as:

Unwanted conduct related to a relevant protected characteristic, which has the purpose or effect of violating an individual's dignity or creating an intimidating, hostile, degrading, humiliating or offensive environment for that individual.

That means that harassment is unlawful if it is because of, or related to, one of the Act's **protected characteristics**. These are:

- age
- sex
- disability
- gender (including gender reassignment)
- marriage and civil partnership
- pregnancy and maternity
- race
- religion or belief
- sexual orientation

Under the Act, inappropriate behaviours such as sexual harassment, using racist language or taunting a disabled colleague are clearly against the law. Employees can complain of behaviour either targeted at them or that they find offensive, even if it is not directed at them or do not personally possess a relevant characteristic themselves. The Act offers significant protection and employers falling foul of it are rightly penalised.

We would do well, though, not just to think about bullying and harassment in these strict legal terms. Two more general definitions can help us to frame our approach and response, whether or not protected characteristics are involved:

**ACAS** defines bullying as:

Offensive, intimidating, malicious or insulting behaviour, an abuse or misuse of power through means that undermine, humiliate, denigrate or injure the recipient.

**Citizen's Advice** defines harassment as:

...unwanted or unwelcome behaviour which is meant to or has the effect of either:

- violating your dignity, or
- creating an intimidating, hostile, degrading, humiliating or offensive environment.

The phrase "dignity at work" is increasingly being used as an umbrella term for the rules and protocols that prevent people being badly treated when working. It's a positive term that appeals to the human in all of us and speaks to the wider role that safeguarding can and should play in workplace cultures.

The poet, Khalil Gibran, wrote that "safeguarding the rights of others is the most noble and beautiful end of a human being". If workplaces are to provide the physical and psychological safety, we need to do our work to the best of our abilities and potential, we all need to be mindful of the effects – for good or ill – of the words and behaviours of ourselves and others.

Everyone has a responsibility for fostering workplace cultures in which safety – in every sense of the word – is paramount. Safeguarding is not a nice-to-have that's encapsulated in a policy and never considered again. It's an essential underpinning for work and workplaces that inspire, enable and empower.

### **Future Talent Learning's procedure for responding to a concern, allegation or disclosure**

If you are aware, or have been made aware, of a safeguarding concern, allegation or disclosure, please follow the following procedure:

- Do not make promises about confidentiality – any concerns will need to be reported to the Safeguarding Team.
- Explain to the person at the outset that you will need to report the concern, allegation or disclosure and share the information with the **Safeguarding Lead or Team**.
- If anyone has concerns about possible abuse or neglect, they must contact the Safeguarding Team as soon as possible for advice and support.
- If the complainant is the person at risk, questions should be kept to a minimum and leading questions should be avoided.
- For your information, the details of the Future Talent Learning Safeguarding Team are detailed below. Please do make contact using the details below should you have any safeguarding concerns during your time on programme.
- Should you wish to self-refer any safeguarding concerns, please use the details below to do so.

### **Future Talent Learning Safeguarding Team details:**

**Email:** [safeguarding@futuretalentlearning.com](mailto:safeguarding@futuretalentlearning.com)

**Designated Safeguarding Lead Name:** Sarah Burgess

# Appendix F

## Safeguarding Reporting Procedure

### Route 1 - Safeguarding concern alerted to an FTL team member

#### STEP 1

Safeguarding concern is alerted to FTL Team Member

#### STEP 2

FTL Team Member completes the [Safeguarding Concern Form](#)

#### STEP 3

FTL Team Member completes the form and submits. This is received at the [safeguarding@futuretalentlearning.com](mailto:safeguarding@futuretalentlearning.com) inbox. FTL Team Members should not share any details of the safeguarding concern with anyone other than the Safeguarding Team Members (not even to their Line Manager – though they can say that “a safeguarding concern has been raised to the Safeguarding Team”).

#### STEP 4

The on-duty Safeguarding Team Member will access the form and the Safeguarding Reporting Register which is automatically populated once a concern is received, categorise the email to their name, review the form within 2 hours and respond.

#### STEP 5

The Safeguarding Team Member will add a RAG status will be assigned to the concern to reflect the risk associated. This will inform how often ongoing contact with the learner should be made, whilst they are on the Safeguarding Reporting Register.

#### STEP 6

The on-duty Safeguarding Team Member will take action as appropriate and detail the action being taken in the Safeguarding Reporting Register. This may include contacting the learner, reporting to our Designated Safeguarding Lead or Safeguarding Board Member or contacting Local Safeguarding Agencies.

#### STEP 7

Completed forms should not be shared and further details should not be shared with FTL Team Members. The FTL Team Member just needs to be informed whether ongoing or resolved. The Safeguarding Team will review all reported concerns and progress as part of their regular Safeguarding Team Meetings. RAG risk status will be discussed and moved up or down the scale accordingly with concerns being marked as resolved once the staff member and Safeguarding Officer is satisfied that there is no longer a concern. Safeguarding concerns may be reopened if there is a further cause for concern in future.

## Route 2: Safeguarding concern reported directly to the Safeguarding Team

**NB – this route should be used if you are a learner with a concern relating to an FTL team member.**

### STEP 1

Safeguarding concern is reported directly to the Safeguarding Team via email or telephone call (this would normally be the on-duty team member).

If sent by email, on-duty Safeguarding Team Member will categorise the email to their name, review the email and take steps to contact the reporter immediately if further information is needed.

### STEP 2

FTL Safeguarding Team Member completes the [Safeguarding Concern Form](#) which is then received at [safeguarding@futuretalentlearning.com](mailto:safeguarding@futuretalentlearning.com).

### STEP 3

The on-duty Safeguarding Team Member will access the form and the Safeguarding Reporting Register which is automatically populated once a concern is received, categorise the email to their name, review the form within 2 hours and respond. .

### STEP 4

The Safeguarding Team Member will add a RAG status will be assigned to the concern to reflect the risk associated. This will inform how often ongoing contact with the learner should be made, whilst they are on the Safeguarding Reporting Register.

### STEP 5

The Safeguarding Team Member will take action as appropriate and detail the action being taken in the Safeguarding Reporting Register. This may include contacting the learner, reporting to our Designated Safeguarding Lead or Safeguarding Board Member or contacting Local Safeguarding Agencies.

### STEP 6

Completed forms should not be shared and further details should not be shared with the person reporting (unless the person reporting is the learner). The Safeguarding Team will review all reported concerns and progress as part of their regular Safeguarding Team Meetings. RAG risk status will be discussed and moved up or down the scale accordingly with concerns being marked as resolved once the staff member and Safeguarding Officer is satisfied that there is no longer a concern. Safeguarding concerns may be reopened if there is a further cause for concern in future.

## On-duty Safeguarding Team Rota

<b>Monday</b>	Cat Thomson (Designated Safeguarding Officer)
<b>Tuesday</b>	Lorna Parkhouse (Designated Safeguarding Officer)
<b>Wednesday</b>	Tom Sammarco (Designated Safeguarding Officer)
<b>Thursday</b>	Sarah Burgess (Designated Safeguarding Lead)
<b>Friday</b>	Sarah Burgess* (Designated Safeguarding Lead) *please email your concern as normal and then call/message Sarah on 0780 188 3334 to notify her

**NB** this may be subject to change for sickness, holiday or work demand. Please check the Safeguarding Calendar in Outlook for the most up-to-date information.

