



Authorised for issue:	Author: Lindsey Baldwin Author Position: Safeguarding Manager	Approver: Graham Hill Approver Position: Head of Innovation, Quality and Inspection Signature: 
Purpose:	The purpose of this policy and its associated documents is to provide guidance on procedures we should adopt in the event that we have been informed or suspect an individual or group may be experiencing, or be at risk of, harm or exploitation.	
Audience:	Our employees and anyone working on behalf of Babcock, within our training capabilities. This policy must also be shared with our learners, employers and those representing Babcock through sub-contracted provision.	
Scope:	Welfare & Safeguarding applies to all areas that deliver or support training within Babcock Engineering & Training Services and our representatives, based in the UK and covered by UK laws and legislation (including those for Scotland, Wales and Northern Ireland where legislation may have been devolved), this includes our duty of care in England & Wales to commit to the government's Prevent Strategy and Safeguarding Vulnerable Individuals for Scotland. We also commit to promoting British Values in England and Wales and Shared Values in Scotland, part of the government's counter terrorism strategy – CONTEST.	
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Further information:	Refer to All together different site on Connect Operating Procedure for Safeguarding Learners (OP197) Further information is included at the end of this policy (Legal References and Compliance)	

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Organisation positioning statement

Babcock believes that it is **always** unacceptable for anyone to experience abuse of any kind and recognises its responsibility to safeguard the welfare and wellbeing of all learners or associates, including our employees. This organisation is committed to providing a safe and secure world for everyone by promoting the safety and welfare of individuals and groups and expects all employees, our representatives, learners and employer partners to share this commitment.

We recognise that:

- The welfare of the learner is paramount
- All learners, irrespective of, but not limited to; their age, disability, race, religion or belief, sex, sexual orientation, gender reassignment, marriage or civil partnership, pregnancy and maternity have the right to equal protection from all types of harm or abuse
- Working in partnership with learners and with other agencies is essential in promoting a safe learning environment (both physical and online)
- We work in environments where children and adults could be at risk, especially online or in early years and health and social care sectors, which are particularly vulnerable

The purpose of the policy and its associated documents are to:

- Provide protection for learners
- Provide employees, and those representing Babcock, with guidance on procedures they should adopt in the event that they have been informed or suspect a learner or associate may be experiencing, or be at risk of, harm (refer to OP197)

The policy applies to all Engineering & Training Services employees, and anyone working on behalf of Babcock, within our training capabilities.

We will seek to safeguard all learners by:

- Valuing them, listening to them, and respecting them
- Adopting safeguarding guidelines through procedures and a code of conduct for employees and representatives
- Recruiting employees safely
- Ensuring learners are working and learning in a safe environment including physical and online
- Sharing information about concerns with agencies who need it, and involving learners and their parents/carers appropriately
- Ensuring data security is compliant with Babcock policy and legislative regulations
- Working with employers to promote a safe working environment and support for apprentices

We are also committed to reviewing our policy and practices at least annually.





1. Policy

Our provision complies with UK laws and legislation (including those for Scotland, Wales and Northern Ireland where legislation may have been devolved. The term ‘child’ means anyone under the age of 18 and the term ‘adult at risk’ (previously ‘vulnerable adult’) means a person who has been or may be in need of community care services by reason of mental or other disability, age or illness; or who is/may be unable to take care of themselves, unable to protect themselves against harm, exploitation, or may be deemed vulnerable to radicalisation. This may be a temporary or permanent state.

This policy also aligns our compliance to the UK Government’s Prevent strategy including our duty of care in England & Wales to commit to the government’s Prevent Strategy and Safeguarding Vulnerable Individual for Scotland. We also commit to promoting British Values in England and Wales and Shared Values in Scotland, part of the government’s counter terrorism strategy – CONTEST. and our more detailed Policy (C1144) should be read and adhered to in conjunction.

While the definitions of a child and adult at risk give the rationale for legislative intervention, it is important to note that a person may be deemed at higher risk of a safeguarding issue affecting them due to other factors. Babcock understands that a number of situations may render a person ‘at risk’, such as:

- A victim of historical or current bullying, including cyber-bullying or harassment
- Being a victim of domestic violence and abuse, including relationship, family, parent and elder abuse
- Being stalked or a victim of revenge porn
- Experience of historical or current abuse or trauma
- A young adult living away from home or in temporary accommodation
- Having migrant or refugee status
- Living in an alcohol or drug-misusing environment
- Drug or alcohol misuse themselves
- Being homeless
- Coping with debt
- Living in an area of high crime
- Gang related coercion or gang crime
- Those likely to face hate crime
- Elderly or young people who themselves may have caring issues or have responsibilities for caring
- Being under a social services care order, past or present, including being fostered
- Being in receipt of any form of health care, welfare service in order to support their need to live independently or receiving a service due to their age or disability
- Living in residential accommodation such as a care home or sheltered housing
- Someone receiving domiciliary care in their own home
- An expectant or nursing mother living in residential care
- Children in nursery/early years care
- Those with a background in offending / person under supervision of probation service
- Those with learning difficulties, including poor numeracy and literacy skill, or those with specific learning needs such as for Dyslexia, Dyscalculia, Dyspraxia & Dysgraphia
- People with a diagnosed autistic spectrum disorder, including Asperger syndrome or ADHD
- Those with physical disabilities (seen or unseen) including impairments or critical/severe illness
- People with mental health illness, condition or support needs
- People with age related frailty



- Those with dementia or early onset Alzheimer's
- Unsupportive home or work environment
- People with English as their second language
- Social issues, such as poverty, deprived environment, poor diet, disillusionment or long term unemployment
- Someone who's experienced a lack of schooling, nurturing, mentoring or support
- Being part of an under-represented group, discriminated or suffering abuse or hate

We recognise and embrace our duty of care, applying a personalised approach to reflect the specific situations of individuals and ensuring approach to identifying and reducing risk. We recognise that we are not experts in the range of potential scenarios that safeguarding issues can present nor in the personal circumstances that may make individuals vulnerable/at risk. In response, our policy focusses on identification of risk and appropriate referral to support agencies and organisations, in line with detailed procedures (OP197) and underpinned by appropriate pastoral care, information, advice and guidance provision (matrix standard).

Babcock believes that our workplace and our learners' workplaces should provide a caring, positive, safe and stimulating environment which promotes the social, physical and moral development of the individual.

It is important that people are protected from all forms of abuse or potential harm. Abuse can take many forms and may include, but not limited to:

- Sexual - inappropriate behaviour, abusive relationship, unwanted sexual harassment, peer on peer which may be standalone or part of a broader pattern of abuse
- Up skirting
- Physical, financial or emotional abuse or neglect
- Female genital mutilation (FGM) - full or partial
- Exploitation - financial, sexual, forced marriage, forced labour through modern slavery and/or human trafficking and domestic servitude
- Grooming - for a sexual, criminal or radicalisation intent
- Domestic violence
- Bullying - including cyber bullying and harassment
- Internet/cyber-crime - financial extortion, data theft, hacking, online child pornography
- Victimisation
- Self-harm or harming of others
- Criminalisation, including that involving county lines exploitation
- Unsafe or potentially unsafe environment or activities
- Unsuitable housing/homelessness/immigration issues

All complaints, allegations or suspicions will be taken seriously, will be recorded and will lead to appropriate action, and, where appropriate, signposting to specialist external organisations.



With the increasing threats to individuals, the UK and other countries through radicalisation, hate crime and or extremist activities, safeguarding extends itself to include awareness that children, young people and adults are at risk of being coerced into committing criminal activities, including extremism or terrorism and County Lines / gang activity.

At Babcock, we want to promote and continue to facilitate the exchange of opinion and ideas and enable debate as well as learning. We have no wish to limit or otherwise interfere with the free flow of ideas, but recognise the importance of balancing the need to preserve national security whilst protecting civil liberties and rights. Although it is vital that we must protect academic freedom, it is a long-established principle that Babcock also has a duty of care to their learners.

To support the government's Prevent strategy (applicable and mandatory for our training delivery in England, Wales and Scotland), Babcock have documented an associate policy (C1144) that fully details our commitment and practices. We will respond to these issues and signpost potential concerns accordingly. It is important to stress that the Channel Programme referral process is not about criminalising a learner but rather about intervening before a learner may commit an act which does criminalise them.

2. Policy aims

The aims of this Learner Welfare & Safeguarding Policy are to:

- Support the individual's development in ways that will foster security, confidence and independence
- Raise the awareness of employees, representatives, learners and our employer partners of the need to safeguard children, young people and adults at risk and of their responsibilities in identifying and reporting possible cases of abuse, bullying or harassment, of any nature, and in identifying those that may be in need
- Source and provide the most appropriate information, advice and guidance on a wide range of welfare topics or issues to help employees, learners and employers remove barriers to learning
- Provide a systematic means of monitoring those known or thought to be at risk of harm or vulnerable to grooming including extremist radicalisation
- Emphasise the need for good levels of communication between all employees, our representatives, our learners and their employers
- Support the structured procedure that must be followed by all employees and our representatives in cases of suspected or known abuse, neglect, bullying or harassment (including cyber) to any child or adult at risk
- Develop and promote effective working relationships with other agencies, particularly Local Child or Adult Services and Safeguarding Boards, CQC, educational inspection bodies (Ofsted (England), ETI (Northern Ireland), Education Scotland, Estyn (Wales)) the Police (PSNI), and, where applicable, consultation with other external agencies to include Channel Coordinators for Prevent concerns in England, Wales and Scotland



- Ensure that all adults in our employment who have access to children and adults at risk have been checked, trained and continually monitored to meet current safeguarding legislation with regard to their suitability in line with our Safer Recruitment Policy
- Continually observe the requirements of the Modern Slavery Act 2015 (The Modern Slavery Act 2015 (Power of arrest: Code of Practice) Order (Northern Ireland) 2016. Additionally, through our learner recruitment and employer apprenticeship agreement processes, we can assure learners are not subject to or at risk of modern slavery or human trafficking issues

3. Record Keeping

- Staff will record any safeguarding or welfare concerns that they have about a learner, in writing on CPOMs (My Concern: Network Rail), alerting relevant Designated Persons without delay. Records will be completed within 24 hours of the incident/event. Logs will be factual, without opinion and in the learners own words where appropriate.
- Safeguarding or welfare concerns are maintained separately from other learner records and kept in accordance with General Data Protection Regulations (GDPR) and are retained centrally and securely by the DSL. Safeguarding records are shared with staff on a 'need to know' basis only.
- Our record keeping procedures are in line with Government guidance.

4. Disclosure and confidentiality

Babcock recognises that all matters relating to any Health & Safety, Equality or Welfare and Safeguarding matter is highly confidential.

Confidentiality is an important principle that enables people to feel safe in sharing their concerns and to ask for help. However, the right to confidentiality is not absolute as sharing relevant information with the right people at the right time is vital to good safeguarding practice. Confidentiality does not mean 'keeping a secret' either and the learner/individual needs to be aware that as we hold a duty of care you will need to share the detail of an issue with your local DP for Safeguarding and to have a documented record of it (C199).

Babcock refer to [Information sharing advice practitioners safeguarding services HM GOV](#) and disclose information about a child, individual or group to other Babcock employees, their learner's employer, or and where relevant, to an external organisation, on a 'need to know' basis only. We understand we have a professional responsibility to share information with other agencies in order to safeguard children, young people and adults at risk, and this may take precedence in terms of disclosure and confidentiality. This includes providing information to the Disclosure and Barring Service / Secretary of State in England, nidirect (Northern Ireland) or Disclosure Scotland should a member of staff have displayed behaviours which may indicate they are a risk to children and adults at risk.



If an employee or individual associated with Babcock believes an individual or group is in danger of being abused or harmed and they are unable to protect themselves, or there is risk of abuse of harming themselves or others, prior consent is not required, as our aim is to protect an individual/group wherever possible.

Barring exceptions noted above and in our Operating Procedure (OP197), in adult cases, where the learner is competent to make decisions, the learner's consent for us to discuss their issue with another person or organisation, of their choosing, must be sought. Consent can be taken as a verbal agreement between Babcock and the learner but this consent must be recorded into the Diary of Issues record (C199), CPOMS system or a Learner Consent Form is completed, if required by the contract.

If anyone believes someone is in immediate or imminent danger of harming themselves or others:

- **Call 999:** make urgent referrals by calling the emergency services if someone is in imminent danger of harming themselves or others or if urgent medical help is required
- **Call 101:** to talk to your local police officer, get crime prevention advice, or report a crime that does not need an emergency response
- **Call 111:** to get medical help fast but it's not a 999 emergency. You think you/someone needs to go to A&E or need another NHS urgent care service or you don't know who to call or you don't have a GP to call

5. Safe recruitment and selection of employees

Babcock will ensure that:

- Safeguarding considerations are incorporated into every stage of the recruitment process. Refer to our Safer Recruitment Policy (C073) which covers this in more detail.
- Individual's working in regulated activity will have any criminal convictions checked on appointment, as appropriate to the job role, via Enhanced DBS / Barred list Disclosure, nidirect (Northern Ireland) or Disclosure Scotland.
- Overseas checks will be conducted where indicated.

6. Induction and training

Babcock will ensure that:

- At induction all staff complete [mandatory training](#) on Security, Health & Safety, Equality, Diversity & Inclusion and Welfare & Safeguarding, including Prevent Duty and Promotion of British Values policies (Prevent in England, Scotland and Wales. British Values in England and Wales and Shared Values in Scotland).



- Initial training and ongoing training is achieved by online learning and by utilising our UK-wide network of trained Designated Persons for Safeguarding to deliver suitable training to our programme delivery teams in their local area.
- Operational delivery teams are given the confidence to support learners and employers, building an understanding of welfare and safeguarding issues and how to deal with them, developing their understanding of the signs and indicators of abuse, neglect, bullying and/or harassment, or radicalisation, and have the competence and confidence to have meaningful conversations and educate learners and their employers appropriately during enrolment and induction period and by the provision of ongoing subject awareness and discussion throughout their programme
- Employees will receive refresher training at least every three years and/or following the introduction of new procedures and or legislation

7. Online Learning

- Babcock use a range of online learning tools and the use of these within all curriculum has been accelerated as an impact of Covid-19 from March 2020. The principles and practice within this policy remain relevant to all delivery regardless of mode.

8. Safeguarding Learners with SEND

- Babcock acknowledges that learners with special educational needs and disabilities (SEND) can face additional safeguarding challenges due to increased vulnerabilities either socially, emotionally or due to communication challenges.
- All learners with SEND will be supported to ensure their voice is heard and acted on when required.
- Members of staff are encouraged to be aware that learners with SEND can be disproportionately impacted by safeguarding concerns such as bullying.

9. Responsibilities

9.1 Senior management and strategic leadership

Babcock recognises that senior managers have a crucial role to play in embedding and ensuring compliance with our Welfare & Safeguarding Policy. Babcock already expects the highest standards of professional conduct and attitude across all that we do.

Success of this policy will be achieved by:

- Communication of policy by senior management to employees, embedding the principles of safeguarding across the organisation



- Senior managers are responsible for delivery and audit mechanisms, sanctioning the processes and procedures that underpin this policy and ensure commitment and engagement across the organisation
- Sharing this policy and those related to it, with our learners and employers, soliciting their joint commitment to safeguarding learners in return
- Maintaining a team of Designated Persons for Safeguarding and ensuring their training, education and ongoing awareness of current risks and measures is appropriate
- Ensuring appropriate resources and technologies are available to ensure resources promote safeguarding processes and support the prevention of abuse
- Educating employers on providing their apprentices with clear policies that prohibits the use of sharing of illegal materials and/or the endorsement of extremist speakers. Any evidence of sharing of illegal materials and/or the endorsement of extremist speakers will be seen as a disciplinary and possibly criminal offence
- Babcock recognises and is committed to its responsibility to work with other professionals and agencies in line with statutory guidance.
- Ensuring recruitment and selection processes are compliant including DBS/clearance checks being conducted, as appropriate to the role
- Ensuring training records are up-to-date and available to audit

9.2 Designated Safeguarding Lead (DSL)

The Designated Safeguarding Lead takes lead responsibility for safeguarding (including online safety). The DSL ensures:

- Babcock have welfare & safeguarding policy and process which are fit for purpose with all legislative requirements upheld
- Safeguarding activity is recorded and shared with senior leaders
- Ensures appropriately trained staff are in place to manage safeguarding process and all staff have access to information, advice and guidance (IAG) / training and on-going CPD on matters relating to safeguarding learners

Deputies are trained to the same standard as the Designated Safeguarding Lead. The activities of the DSL can be delegated to appropriately trained deputies, the ultimate lead responsibility for safeguarding remains with the Designated Safeguarding Lead, this lead responsibility is not delegated.



9.3 Single Point of Contact (SPOC)

Designated Safeguarding Lead (DSL) & Central Single Point of Contact	Lindsey Baldwin (Safeguarding Manager) Lindsey.Baldwin@babcockinternational.com 07801 988211
Deputy DSL	Graham Hill (Head of Innovation, Quality and Inspection) Graham.Hill1@babcockinternational.com 07971 802721

The SPOC is responsible for the day to day implementation of safeguarding (including Prevent) policy and process. The SPOC will:

- Manage the day-to-day implementation of Babcock safeguarding policy and process
- Keep all welfare & safeguarding policy and process documents up to date and in line with national best practice bench marks and legislation
- Be the key conduit for external information on matters relating to safeguarding to be highlighted and implemented within Babcock
- Create and deliver timely training to Designated Persons and the wider business where required
- Ensure teams maintain accurate safeguarding logs on CPOMS (with due regard to the sensitive nature of such logs) including the production of analysis and reports from the stored information
- Ensure a register for DBS checks is in place and accurate CPD and training logs for all DSL / SPOC & DPs are maintained (this is a joint responsibility in line with HR protocols)
- Complete an annual Prevent risk register and manage any subsequent improvement plan
- Refer cases of suspected abuse to the relevant ‘three Safeguarding Partners’ as required and act as a point of contact with the three Safeguarding Partners
- Refer cases to the Channel programme where there is a radicalisation concern as required
- Support staff who make referrals.
- Manage ongoing enquiries in line with national and devolved legislations.
- As required, liaise with the “case manager” and the designated officer(s) at the local authority for child protection concerns in cases which concern a staff member
- Liaise with staff on matters of safety and safeguarding (including online and digital safety)
- Act as a source of support, advice and expertise for all staff



9.4 Local managers/appointed Designated Person (DP) for Safeguarding

Local managers/appointed DP responsibilities for the delivery of this policy include:

- Offering learner-facing staff, and their line managers, guidance on procedure and how to support a learner with an equality, welfare or safeguarding issue; taking the lead for suggesting or agreeing the correct signposting of medium or high risk issues
- Utilising and promoting the use of the IAG support sites list and customer Employee Assistance Programmes, as applicable
- Knowing/networking with local authority safeguarding agencies such as Safeguarding Partners
- Consulting with the SPOC on any proposed external referrals or those relating to an internal HR issue, or potential HR issue
- Informing Babcock's Single Point of Contact immediately for any Prevent-type concerns or potential concerns
- Ensuring CPOMS system contains the initial detail and IAG/support given, consent status and risk evaluation; the DP would then manage the recording of any further IAG/signposting and issue notes; following up all open issues until a recorded outcome is known, including confirmation date of closure; providing a reflection including areas for improvement and indicate if the issue would make a good case study for CPD activity
- Regularly attending the DP Networking Calls; sharing updates with the team thereafter
- Informing the AS Safeguarding team of national and local projects/initiatives
- Making good use of the resources found within the [All together different](#) site, rolling out planned awareness training or arranging bite size learning activities
- Promoting the completion of the EDI and Safeguarding Training Logs to capture up to date training activity

9.5 Learner-facing employees

Success of this policy will be achieved by:

- Sharing this policy with learners and their employers at induction and during refresher conversations. Gaining their joint commitment to ensuring equality and welfare & safeguarding is embedded in the workplace and that their own responsibilities for eliminating cases of workplace abuse, such as bullying or harassment of learners, risk assessments and managing health and safety accidents/incidents, and identifying those learners that may be at risk of exploitation are understood and reported to us
- Enquiring as to the learner's welfare at all engagement opportunities and during progress reviews
- Sourcing, providing and signposting the learner to the most appropriate information, advice and guidance on a wide range of equality or welfare topics or issues, consulting with their DP for Safeguarding for advice if unsure of how to address an issue



- Adhering to the processes with regard to referring or monitoring an individual if there are concerns about possible abuse or an individual in need
- Recording all actual or potential cases of equality, welfare or safeguarding issues, either witnessed or raised and reporting them immediately to their local DP for Safeguarding

9.6 Any employee

Success of this policy will be achieved by:

- Being empowered to ensure own levels of training, knowledge of policies and procedures is appropriate and current
- Making good use of the resources available for learning and ensuring own training records are up-to-date and available to audit
- Full compliance of data security policies and legislation, especially with regards storage and protection of data

10. Raising a concern

Babcock operates a detailed process to support the management of any concerns.

- The Safeguarding Learners Operating Procedure (OP197) is mostly triggered by:
 - Proactive recognition of an issue or potential issue concerning a learner, an associate or group, or
 - Reactive, as the learner or their associate discloses an issue directly to you
- Issues can also be raised from many other sources and scenarios, including:
 - An observation of a safeguarding issue taking place within the working practices of an employer's setting – your action is to stop the activity immediately, and inform the individual of your concerns, ask them to remove themselves from the area and advise them you will inform their senior manager immediately. Take any actions to secure the safety of the child or adult at risk – this may involve staying with them until a responsible adult can be located. Inform your DP for Safeguarding immediately. However, also be mindful of differences between poor practice and a safeguarding issue and apply your response appropriately
 - A learner or their associate reports unsafe practices or safeguarding issues to you about and within their working environment – advise the learner to follow their employer's reporting or whistle blowing procedures in the first instance. Offer to support the learner in speaking to the appropriate senior team members. Report the incident to your DP for Safeguarding who will offer additional guidance and signposting for the learner, and will monitor appropriately. The DP may also need to consult with senior management to invoke external referral processes
 - A parent contacts you to report a concern about their child or at risk adult – ensure you listen and record the details as per a learner reporting a concern



to you. Ensure you have contact details for the parent as you must report the issue to your local Designated Person for Safeguarding who will then decide the appropriate course of action, and if a referral outside the organisation is applicable the SPOC will then liaise and consult with the parent, if appropriate

- A learner or their representative, such as a parent, carer, colleague or supervisor, may feel uncomfortable disclosing an issue to you – offer to signpost the individual to the local DP for Safeguarding whom they can contact for advice and support
- A learner displays signs of being radicalised by discussing concerning online information or becomes withdrawn / fixated on a topic. Other learners could raise concerns about on-line abuse or sexual misconduct in the workplace

All records, such as Diary of Issues reports (C199), correspondence about an issue, and referral letters, will be electronic, and kept on the CPOMS system. There must not be any record printed or stored on a hard drive or storage device.

11. Contextual safeguarding

All staff should be aware that safeguarding incidents and/or behaviours can be associated with factors outside the education setting or workplace and/or can occur between learners outside of these environments. All staff, but especially the Designated Safeguarding Lead (and deputies) should consider whether learners are at risk of abuse or exploitation in situations outside in a wider context. These additional harms take a variety of different forms and learners can be vulnerable to multiple harms including (but not limited to) sexual exploitation, criminal exploitation, and serious youth violence. Additional information regarding contextual safeguarding is available here: <https://contextualsafeguarding.org.uk/>

12. Providing support

Babcock recognises that an individual who has been or is being abused or witnesses abuse may find it difficult to develop and maintain a sense of self-worth, that in these circumstances they may feel helpless and humiliated and they may feel self-blame.

Babcock can provide a comprehensive list of external agencies and protection services who are in a position to provide expertise on a variety of equality, welfare and safeguarding issues.

13. Ensuring the safety of staff and learners whilst residing at an academy or hotel

Babcock takes its responsibilities for ensuring the safety of both staff and learners seriously. We verify throughout the learning programme that our staff and learners do feel safe and are appropriately safeguarded from harm or abuse.



Some of our own staff and young/adult learners are required to use academy accommodation or hotels whilst on their programme and our policy is to eliminate risks as much as possible. There are robust local procedures for safeguarding in place which should be adhered to at all times.

This includes but is not limited to:

- Safeguarding contact numbers being available for learners 24/7
- Contract specific learner rules
- Hotel meetings, welcome letters and independent feedback surveys
- Learner voice forums
- Site risk assessments and external speaker checklists
- Safeguarding contacts on site in hotels / residential provision
- Safeguarding risk assessments
- Welfare checks during learning sessions reviewing evening's events
- Be Safe Cards for learners with key information upon them

14. Supporting employees

We recognise that employees who have become involved with a person or persons who has suffered harm, or appears to be likely to suffer harm, may find the situation stressful and upsetting.

Babcock will support such employees by providing an opportunity to talk through their anxieties with their line manager, Designated Person or their HR consultant, or they can seek further support as appropriate through the [CiC Employee Assistance Programme](#). We also have a range of mental health support resources for our employees.

15. Allegations against employees

All allegations against members of staff should be reported directly to the DSL and HR Business Partner / Employee Relations Advisor who will follow procedures and assess the allegation and make the decision of if it meets a threshold of significant risk or not. At this point the allegation may be progressed internally or referred to outside agencies to include the LADO, Police or other appropriate agencies. For allegations that do meet the risk threshold the DSL and HR will create a formal plan and contact and assist the appropriate external agencies throughout any investigations.

Low level concerns can be internal investigations where behaviours do not meet the threshold for investigation by external agency, they go against the code of conduct or behaviour that causes others to feel uneasy. The Managing Investigations guidance notes (C1251) aims to provide a framework to assist Designated Persons for Safeguarding (DP), within the training-related businesses, to carry out any safeguarding investigation which involves allegations made against an employee of Babcock. Accurate records in the form of 'hearing notes' (C1252) will be maintained and shared appropriately. The Company's HR



Disciplinary and Grievance procedures for managing allegations against employees must also be strictly adhered to.

The Allegations against employees procedures should be used in all cases where a member of staff either goes against the Babcock code of conduct or has behaved in one or more of the following ways:-

- Behaved in a way that has harmed or may have harmed a learner
- Possibly committed a criminal offence against a learner
- Behaves towards a learner in a way that indicates he/she would pose a risk of harm to the learner now or in the future
- Behaves in a way that indicates they may not be suitable to work directly with learners

If an allegation is made against the DSL, this must be passed directly to the deputy DSL and HR. The process as above will then be applied.

16. Abuse/harm directed towards employees

Babcock will not tolerate abuse or harm that is directed towards an employee. Any instance should be reported to HR immediately and records kept following the Diary of Issues process.

17. Prevention, managing risks and responding to events

Babcock recognises that we play a significant part in the prevention of harm to children and individuals by providing them with good lines of communication with trusted adults and an ethos of protection.

All Babcock staff must comply fully with our policies on Health & Safety, Equality, Diversity & Inclusion, Social Media, Code of Conduct, IT Security and Information Assurance and all those stated herein on page 17.

Babcock will therefore:

- Establish and maintain an ethos where individuals feel secure and are encouraged to talk and are always listened to
- Ensure that all individuals know there is an adult whom they can approach if they are worried or in difficulty
- Equip individuals with the knowledge and skills they need to stay safe from harm and to know to whom they should turn for help
- Educate individuals about the risk of the internet and social networking providing easy access and communication of inflammatory material, sophisticated propaganda, along with the potential for cyber bullying and grooming
- Prohibit the use or sharing of illegal materials and/or the endorsement of extremist speakers. Such behaviour will be seen as a disciplinary and possibly criminal offence



To ensure that Babcock monitors risks and is ready to deal appropriately with issues which arise; we will do this by:

- Not hosting or allowing its premises or equipment to be used by extreme groups and will seek to prevent the distribution of extreme literature through our systems. Our Safeguarding_Site and Sub Contracted Providers Assessment (C1111) is in place to identify and address potential and current threat levels at all training sites where our learners learn and/or reside. This assessment is reviewed at least annually or if changes to risk management occur
- Understanding the nature of the threat from violent extremism and how this may impact directly or indirectly on everybody within Babcock and those on programme with us
- Understanding and managing potential risks within Babcock and from external influences
- Responding appropriately to events in local, national or international news that may impact on employees and learner communities
- Ensuring measures are in place to minimise the potential for acts of violent extremism within all Babcock sites and that business continuity arrangements are in place and known
- Ensuring plans are in place to respond appropriately to a threat or incident
- Supporting employers to develop effective processes to embed responsible user policies in relation to IT
- Ensuring Babcock's legal responsibility to forbid the promotion of partisan/discriminatory political views in the teaching, learning and assessment of any subject. We must take such steps as are reasonably practicable to secure that where political issues are brought to the attention of learners, they are offered a balanced presentation of opposing views. Promotion of any organisations linked to violent extremism is contrary to the values of Babcock shall constitute misconduct
- Understanding and managing potential risks from external influences, a robust checking process for all proposed, and previously unknown, external speakers/guests visiting Babcock sites to talk to learners is in place. The Safeguarding_ External Speakers_Guests Checklists and Consent Form (C1112) is completed in these instances and records kept and maintained locally

18. Code of conduct

Babcock recognise their employees are in a **position of trust** and as such have strict ethics on conduct based on the protection of themselves and their learners. This Code helps all staff to understand what behaviour is and is not acceptable, It is equally applicable to all forms of delivery, both face to face and online. Therefore:

- All Babcock employees should set examples of behaviour and conduct which can be adopted by learners and stand up to scrutiny. We must therefore avoid using inappropriate or offensive language at all times and on all mediums; demonstrate high standards of conduct in order to encourage our learners to do the same; and must also



avoid any action that may put themselves at risk of allegations of physical, abusive or unprofessional conduct

- Individual employees should not socialise with learners regardless of age and should not promote individual relationships either in person or on learning / social media. It is, though, considered that organised and sanctioned social events (such as works function, award ceremonies, sanctioned group sports event etc.) are accepted upon management authorisation
- Employees are expected to work with all learners, irrespective of their demeanor / ability / characteristic and should never attempt to refuse to do so, expectations and clear boundaries should be set for behavior management
- **Whilst a learner is on programme with Babcock, personal or intimate relations must not occur between employee/learner, regardless of age**
- We fully support freedom of speech. However, promoting prejudiced, extremist or criminal views will not be tolerated and may lead to disciplinary action
- Employees must adhere to Babcock Social Media policy, and in addition to this policy, either during or out of working hours, employees must not initiate, follow, or approve to be a 'friend' of individual learners whilst on programme, on any social/community networking, chat, blog sites. An exception is where use of authorised Babcock or employer electronic forums warrant and promote communication. All communication, including appearance, environment, the use of backgrounds and imagery must adhere to the guidance in this policy. Separate documents are in place for the use of WhatsApp web for learner engagement on group courses and use of LinkedIn for professional networking would be acceptable ensuring its use aligns to the purpose of developing learner/apprentice career progression and or achievements.
- Cyber bullying includes any form of electronic communication (text, online or emails etc.) which can be construed as inappropriate and any breach will be taken seriously and may lead to disciplinary action. This applies to all learning and social environments
- Employees must disclose any gifts of any value by following Land Sector: Anti-Bribery and Corruption (AB&C) Policy and Guidance and completing the Gifts and Hospitality register
- Employees should not get emotionally or personally involved in a learner's issue but keep relationship at a professional level at all times, keeping a record of any issue verbatim and recording / reporting safety / welfare concerns via the CPOMS system
- Physical / emergency intervention should only be applied if there is a risk to an employee, the learner or other people
- Employees must adhere to Babcock Health and Safety policy at all times, including the non-transportation of learners in company/employee cars without the permission of management (unless in an emergency to prevent a welfare or safeguarding issue occurring) and completing regular display screen equipment Risk Assessments when working remotely
- All business activities and/or learner or client visits (online or face to face) must be conducted on business premises / permitted platforms and in no circumstances should employees or learners/clients conduct business activities in private residences / private



social media platforms. The only exception to this is where Health and Social Care learners are required to be assessed in a customer's home and in this instance each visit must be carried out in line with Health and Safety policies and the qualification's standard practices.

- Learners are responsible for the safe keeping and taking of prescribed medication, however, whilst under our supervision in a residential setting, we, along with their employer, have a duty of care to ensure an appropriate risk assessment is in place. Babcock employees, who have been made aware of a potential condition affecting a learner and with the required consent and training may administer treatment only in an emergency.
- Employees must also adhere to Babcock Corporate Policy on other aspects of Code of Conduct, Health & Safety, HR, IT Security and Data Protection policies.
- All employees need to recognise that failure to meet these standards of behaviour and conduct may result in disciplinary action, including dismissal.
- The recreational taking of or involvement in controlled drugs is illegal and cases involving drugs may lead to disciplinary action and/or Police involvement. Alcohol may not be consumed during working hours. Where a manager reasonably suspects that a member of staff is unfit for work due to alcohol or drugs, they will require the member of staff to leave work immediately. Staff will not be permitted to return until they are fit for work. Such occurrences will be investigated upon the members of staff return to work and may result in disciplinary action.

19. Monitoring & review

The central secure CPOMS system collates all Diary of Issues information to enable centralised logging and to enable review and statistical analysis at a national level. Redacted information may also be used to monitor issues raised and review actions taken.

The management team will be responsible for the monitoring and periodic review of the Health & Safety and Welfare and Safeguarding Policy, its procedures and related policies and procedures and records to ensure the requirements of company and current legislation are being met.



20. Legal references and compliance

UK including England

- General Data Protection Regulation (GDPR) and Data Protection Act 2018
- Equality Act 2010
- Working Together to Safeguard Children 2018
- Keeping Children Safe in Education 2021
- Mandatory reporting of FGM (Oct 2015) and the Children and Social Work Act 2017
- Children Act 2004 and subsequent Amendments
- Children and Families Act 2014
- Every Child Matters: Change for Children, 2009
- The Safeguarding Vulnerable Groups Act 2006 and Amendments
- Information sharing - Advice for practitioners providing safeguarding services to children, young people, parents and carers - HM GOV (July 2018)
- Modern Slavery Act 2015
- UK Government Counter-Terrorism and Security Act 2015
- UK Government Prevent Strategy
- The Prevent duty in further education and skills providers (England/Wales and Scotland)
- Sexual violence and sexual harassment between children in schools and colleges

Wales

- Working Together to Safeguard People 2018
- Keeping Learners Safe 2015
- The Wales Safeguarding Procedures
- All Wales Child Protection Procedures 2008 (Wales)
- Social Services and Well-being (Wales) Act 2014
- In Safe Hands – The Role of Care and Social Services Inspectorate (Wales)

Northern Ireland

- Cooperating to Safeguard Children and Young People in Northern Ireland 2017
- Safeguarding Board Act (Northern Ireland) 2011
- Safeguarding Vulnerable Groups - Disclosure and Barring Service
- Safeguarding Children Board (Northern Ireland)
- The Modern Slavery Act 2015 (Power of arrest: Code of Practice) Order (Northern Ireland) 2016



Scotland

- [Protecting Vulnerable Groups Scheme \(Scotland\)](#)
- [Disclosure Scotland](#)
- Safeguarding Children Board (Scotland)
- [National guidance for child protection in Scotland 2021](#)
- [Getting it right for every child \(GIRFEC\)](#)
- [Revised Prevent duty guidance: for Scotland \(April 2021\)](#)