

Brighter Horizons Training and Development

Policy document – Safeguarding

Safeguarding learners, children and young people. Vulnerable adult's protection policy.

1. Introduction:

Brighter Horizons Training and is fully committed to promoting children's, young people's and adults' (including vulnerable adults) rights, notably their right to be protected from harm, abuse, radicalisation and exploitation and to be involved in any decisions that directly affect them. Brighter Horizons Training aims to ensure that all children, young people and adults are protected and kept safe from harm while they are with staff in this organisation in line with the Children Act 1989 and the Children Act 2004. This applies to staff we employ, delegates and apprentices we support through courses/programmes and those who we may come into contact with through such training programmes (for example apprentices on placements).

We also comply with the Government's policy on Safeguarding vulnerable adults from abuse or other types of exploitation, whilst supporting individuals in maintaining control over their lives and in making informed choices without coercion.

We also comply with Keeping Children Safe in Education policy, the statutory guidance for schools and colleges (2021 and 2025).

In order to achieve this Brighter Horizons Training will:

- Establish and maintain an environment where young people and vulnerable adults feel secure, are encouraged to talk, and are listened to.
- Ensure that young people and vulnerable adults are supervised/supported during their time on Brighter Horizons Training premises and whilst engaging in online learning.
- Establish a safe environment in which young people and vulnerable adults can learn and develop.
- Promote the policy through for example mandatory induction programmes, policy implementation, training and presentations.
- Support young people and vulnerable adults in accordance with their agreed protection plan.
- Promote the welfare of children (U18) a appropriate policies, procedures, staff training, safe culture, and reporting arrangements.

2. Recruitment of staff:

Brighter Horizons Training will:

- Ensure that all staff involved in recruitment, training and supervision, are aware of this policy and have received appropriate training and support to ensure its full implementation and are kept up to date with legislation changes.

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- Ensure all staff receive safeguarding training as part of induction, as committed through this policy.
- Ensure our staff are carefully selected, screened, trained and supervised, practicing safer recruitment in checking the suitability of staff to work with children, young people and vulnerable adults.
- Ensure that all successful applicants appointed into positions dealing with children, young people or vulnerable adults will be DBS checked at enhanced level with a requirement that all DBS checks will be clear. Should information be received regarding a potential or actual member of staff's suitability to work with children, young people or adults, legislation will denote whether their employment can commence or not, however if there is any doubt the LADO will be consulted.
- All staff to be enrolled on the annual DBS refresher service - these will be checked by HR annually at appraisals.
- Ensure that employers we engage with regards to apprenticeships sign our commitment statement which includes a statement about their safeguarding practice.
- Adhere to safer recruitment processes: DBS checks, verifying identity and qualifications, references, barred-list checks, and interview procedures with safeguarding focus.
- Keep safer recruitment updated: incorporate new links/resources and ensure staff involved are trained
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3. Training:

Successful applicants joining our company will receive induction training, which will give an overview of the organisation and ensure they know its purpose, values, services and structure. Relevant training and support will be provided on an ongoing basis and will cover information about their role, and opportunities for practicing skills needed for work. Training on specific areas such as health and safety procedures, identifying and reporting safeguarding issues, and confidentiality is mandatory and will be given as a priority to all new staff and volunteers and will be regularly reviewed. CPD sessions will be communicated to staff to raise awareness and communicate up to date legislation and a standing agenda item in team meetings will continue to ensure the company's commitment to safeguarding understood and the policy adhered to. Staff will complete refresher training at least every 2 years.

4. Staff supervision:

All staff will have a designated supervisor and/or manager who will provide regular feedback and support. Every member of staff will attend at least two formal staff reviews each year where their performance, skills, motivation and expectations will be discussed. The reviews will be recorded and copies made available to the member of staff.

5. Designated safeguarding lead:

Brighter Horizons Training will:

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- Ensure we have a **designated person responsible for the protection of children, young people (this includes apprentices under 18 years of age) and vulnerable adults** and who has received appropriate training and support for this role – this person is Sam Page Head of Education and Quality The Director, Antonia Ogden - Meade, has overall responsibility for safeguarding across the Company.
- Ensure a **Designated Safeguarding Lead** is appointed, trained, and accessible to staff and learners, maintaining clarity on responsibilities for reporting, liaison, and record-keeping.
- Ensure that the designated children, young people and vulnerable adults protection person understands their responsibility to refer any child, young person or vulnerable adult with protection concerns to the statutory agencies (i.e. police and/or social work);
- Ensure young people and vulnerable adults know who the designated person for children, young people and vulnerable adult's protection is and that there are adults in the centre whom they can approach if they are worried; and
- Ensure every member of staff, including temporary and contracted staff, knows the name of the designated person responsible for children, young people and vulnerable adult's protection and the role of the designated person.
- Ensure the DSL is accessible to staff and learners.
- DSL to complete ongoing technical updates to staff organisation and governance structures - Quarterly safeguarding meetings and updates in the team meetings.

6. Obligations:

Brighter Horizons Training will:

- Raise awareness of all staff regarding protection issues and equipping young people and vulnerable adults with the skills needed to keep them safe through training, induction, appraisals and dissemination of information through social media;
- Raise awareness of the procedures for identifying and reporting cases, or suspected cases, of any safeguarding issues and have this as a standing agenda item for monthly staff meetings.
- Ensure that all staff understand their responsibilities in being alert to the signs of any safeguarding issues and responsibility for referring any concerns to the designated person responsible for children, young people and vulnerable adults – this includes the management of concerns relating to apprentices and concerns relating to placements.
- Ensure staff are able to link this policy with associated policies including policies on prevent, behaviour and conduct, recruitment and retention, social media etc.
- Make all staff aware of the procedures to follow where an allegation is made against a member of staff or person associated to the company.
- Make all staff aware of the procedures to follow where an allegation is made by an apprentice in relation to people outside of the company (for example within their family, work place or social network).

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- Ensure that all staff and associates understand their legal and moral obligations to protect children, young people (this includes apprentices under 18 years of age) and vulnerable adults, in regard to safeguarding.
- Ensure that all staff and associates understand their responsibility to work to the standards and procedures detailed in the organisation's Safeguarding Policy.
- Ensure that all staff understand their obligations to report care or protection concerns about a staff member or subcontractor's conduct towards a child, young person (this includes apprentices under 18 years of age) or vulnerable adults to the organisation's designated person for safeguarding.
- Ensure that all procedures relating to the conduct of staff are implemented in a consistent and equitable manner.
- Ensure that all staff undertake refresher training every 2 years as per guidelines
- Provide opportunities for all staff (paid and unpaid) to develop their skills and knowledge particularly in relation to the care and protection of children, young people and vulnerable adults; and
- Ensure that staff and associates endeavour to keep up to date with national developments relating to the care and protection of children, young people and vulnerable adults.
- Ensure that all employees align terminology around SEND—replace “autism spectrum disorder” with just “autism” per updated Code of Practice

7. Procedures for responding to concerns about safeguarding:

The following notice is displayed in the training centre and included in all inductions:

If you are concerned and see or suspect a safeguarding issue of a child, young person (this includes apprentices under 18 years of age) or vulnerable adult or have a safeguarding issue yourself whilst working with, attending training with or completing an apprenticeship with Brighter Horizons Training please alert our Head of Quality and Education/Designated Safeguarding Lead, Sam Page. She, with the support of Brighter Horizons Training Director will investigate the concerns fully, ensure correct documentation is completed and concerns are reported to the correct authority. **Sam Page can be contacted on 07471100985** or if she is not available, **Antonia Ogden-Meade can be contacted on 07980586622**

- All concerns must be clearly documented and retained securely and confidentially adhering to GDPR.

8. Disclosure / confidentiality:

If a child / young person / vulnerable adult confides that a safeguarding issue has taken place staff are advised to remain calm and in control but not to delay taking action. Staff must listen carefully to what has been said. Allow the child / young person / vulnerable adult to speak at their own pace and ask questions only for clarification. In keeping with the company's training and with related guidance, staff **should not:**

- Ask questions that suggest a particular answer
- Promise to keep it a secret

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- Ask leading questions

Staff **should** ensure that:

- The disclosure is recorded fully
- That the disclosure is made entirely in the person's own words (the words of the disclosing party)
- The relevant staff members or agencies are informed. Sam Page and Antonia Ogden-Meade must ALWAYS be involved in action planning and decision making where any concerns or disclosures are received.

Staff should then reassure the child / young person / vulnerable adult that 'they did the right thing' in telling someone and explain what will happen next making it clear that the information will need to be shared with other professionals (only those essential to the process) to make sure the issue is dealt with accordingly.

At the first opportunity available, staff should share the information with the Designated safeguarding person, Sam Page who will liaise directly with the company's Director Antonia Ogden-Meade who will need to liaise with the relevant authorities (including for example the local authority, LADO, social services or the police, if applicable).

Any information disclosed from the child / young person / vulnerable adult is to be treated as confidential and only to be shared with the member of staff's line manager and the designated safeguarding officer or company's Director. It is important to note that many of the apprentices supported by the company are under 18 years of age and qualify as 'young people' for the sake of this policy.

9. Managing sensitive information:

As soon as possible after the disclosing conversation, staff must make a note of what was said, using the child / young person / vulnerable adult's own words and their response. The date, time, any names that were involved or mentioned, who this information was passed on to, should be noted and the record signed and dated.

If a serious allegation is made against any member of the Company, that individual will be suspended immediately until the investigation is concluded. The individual will be excluded from any Brighter Horizons Training premises and the Board will be notified. An internal investigation will be led by a nominated Board member and following the investigation, LADO/other agencies will be notified accordingly if appropriate.

In all situations, including those in which the cause of concern arises from a disclosure made in confidence, the details of an allegation, or reported incident, will be recorded and held on file, regardless of whether or not the concerns have been shared with a statutory protection agency.

An accurate note shall be made of the date and time of the incident or disclosure, the parties involved, what was said or done and by whom, any action taken to investigate the matter, any further action taken

Any records will be stored securely and shared only with those who need to know about the incident or allegation.

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10. Rights and confidentiality:

If a complaint is made against a member of the Company, they will be made aware of their rights under Brighter Horizons Training's disciplinary procedures.

Both the alleged parties and the child / young person / vulnerable adult who is thought to have been involved in a safeguarding issue, have the right to confidentiality under the Data Protection Act 1998 and also any possible criminal investigation could be compromised through inappropriate information being released.

11. IT usage:

All staff and learners working with Brighter Horizons Training are required to adhere to the company's policy on IT usage, access and the storage of information. In our staff induction and our learner onboarding process we provide E-safety training. IT access is for professional usage only and the social media policy and staff handbook specify how usage is restricted and monitored. Inappropriate use of the IT system (hard and software) will result in disciplinary action for staff or a breach in contract for learners which may result in termination of their programme. Issues which constitute a safeguarding concern should be reported immediately to the Designated Safeguarding Lead (Sam Page).

BHT to have robust, regularly reviewed online-safety measures (filtering and monitoring systems)

Expand risk scope: include dis/misinformation, conspiracy theories, and risks from generative AI

12. Inappropriate material:

In the event that a member of staff becomes aware of inappropriate material on display whilst visiting other sites, they will be required to report it to the Head of Education and Quality /Designated Safeguarding Lead or Director who can then investigate.

Depending on the nature of the inappropriate material, referral to another agency maybe appropriate but at the least, they will the raise the issue with the employer and record the outcome. Should this present any onward safeguarding concerns, the company's designated safeguarding officer will take appropriate action with the support of appropriate agencies (which may include Ofsted, Police, Local Authority/LADO, ESFA etc).

13. Disclosing criminal convictions:

If a member of staff discloses a criminal conviction, this will be discussed with the designated safeguarding officer, as outlined in this policy. The Designated Safeguarding Officer will work with external agencies where appropriate to ascertain whether staff are suitable to work with children, young people or vulnerable adults.

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If a learner, who may be commencing training with Brighter Horizons Training discloses any criminal convictions that may have an impact on safeguarding other learners or children who they may come into contact with during their programme, this information will need to be discussed with the designated safeguarding person, as soon as possible. In some instances, the learner may be unable to join the programme until a further investigation can be undertaken, or until a suitable waiver has been received from Ofsted. Legislative requirements regarding suitability will always be followed and are discussed at initial meetings with employers and potential apprentice candidates. After investigation, the designated safeguarding person will contact the learner to communicate the outcome of the investigation. If a learner is recruited for a specific job opportunity, the prospective employer will be the final decision maker.

14. Lone working/home working:

Where the conditions of service delivery or its associated tasks require staff to work alone, both the individual staff member and management have a duty to assess and reduce the risks which lone working presents. Please refer to the lone working policy for more details.

'Lone working' refers to situations where staff in the course of their duties work alone in the community, in the homes of individuals or in their own home or may be the only staff member present in an office or other establishment's outside of Brighter Horizons' premises.

Risk assessments must be conducted prior to working alone, where all risks are assessed by:

- The Environment
- The nature of the task
- The individuals concerned
- History - any previous incidents in a similar situation and,
- Any other special circumstance's

Where there is any reasonable doubt about the safety of a lone worker in a given situation, consideration should be given to sending a second worker or making other arrangements to complete the task.

Staff should be fully briefed in relation to risk as well as the task itself. Plans for responding to individual service users who present a known risk should be regularly reviewed and discussed with the staff team. Checking-in and fall-back arrangements must be in place and a device, such as a mobile phone, should be provided to do so. The management is responsible for agreeing and facilitating these arrangements, which should be tailored to the operating conditions affecting the team.

Staff working from their own homes should take every reasonable precaution to ensure that their address and telephone number remain confidential. There should be regular contact with their line manager or another designated person if working at home for extended periods, and an appropriate reporting-in system should be used if making visits from home.

Should an incident occur, the designated contact person should be informed, and the incident reporting procedure should be followed.

15. The Prevent duty:

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The National Prevent Strategy is part of the Government's counter terrorism strategy. It addresses all forms of terrorism and is designed to tackle the problem at its roots, preventing people from supporting or becoming involved in terrorism.

Prevent has three clear objectives:

- Challenging the ideology that supports terrorism and those who promote it.
- Protecting vulnerable individuals to prevent people from being drawn into terrorism and ensure that they are given appropriate advice and support.
- Supporting sectors and institutions where there are risks of radicalisation

Brighter Horizons Training has due regard to the need to prevent people from being drawn into terrorism. We have a responsibility to safeguard our employees and protect apprentices against all forms of harm. Staff will ensure that they are mindful of changes in behaviour that could indicate if any young person or vulnerable adult and their family are involved or being influenced in radicalisation.

While it remains extremely rare for people to become involved in terrorist activity, there is a risk that young people can be exposed to extremist influence or prejudiced views at an early age.

The Company has a duty to help others understand the Prevent Strategy and recognise if someone may be involved or is supporting terrorism and help them to take action and choose a different path for their lives. We have a duty to ensure apprentices and employers are resilient to extreme narratives and are protected from radicalising influences. Staff will act responsively to ensure the safety of all young people and vulnerable adults is paramount and to report any concerns immediately to the Designated Safeguarding Lead. This is delivered in our induction and discussed in our practice throughout our programmes to ensure it is embedded in practice and routinely promoted.

Signs of susceptibility may include:

Loneliness or isolation

Changes to a family situation/family tensions

Poverty

Political grievances

Crime/anti-social behaviour

Possible warning signs may include:

Progressive changes in behaviour - such as significantly changing appearance, changing peer/friendship groups

Argumentative and unwilling to listen

Unwilling to engage with those of different race, religion, gender etc

Accessing extremist material, showing sympathy to extremist views or behaviour



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You can call the national police ACT early support line [0800 011 3764](tel:0800 011 3764), in confidence, to share your concerns with our specially trained officers. The Support Line is open 9:00am – 5:00pm every day.

If it's an emergency, please call [999](tel:999).

Anyone who is referred to Prevent is assessed by the local authority and other partners, including the police, to see if they're suitable for [Channel](#), Prevent's specialist support scheme.

Channel is a voluntary, confidential, early intervention programme that supports people who may be at risk of being drawn into terrorism.

To help determine if someone is suitable for support through Channel, a Channel panel is chaired by the local authority, who meet with police, health professionals and other partners to discuss the person you are worried about, and decide on what tailored package of support can be offered to them.

If Channel support isn't deemed appropriate – for example, if the person is at risk of harm but they aren't being radicalised – they may be signposted to other safeguarding services for help.

16. Reporting Concerns:

If you are worried or concerned about someone such as a colleague or an apprentice, please contact our Safeguarding Team immediately on **07471100985 / 07980586622**. All concerns are immediately brought to the attention of our DSL and Director, logged in our safeguarding log and investigation, actions, notifications and outcomes recorded accordingly.

West Sussex Safeguarding adults board:- 03302 228400 to speak with a social care practitioner in the Safeguarding Adults Hub.

[West Sussex Safeguarding adults Guidance for Professionals](#)



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West Sussex safeguarding Children Partnership:- Call the Integrated Front Door (IFD) on 01403 229900 (weekdays 9am – 5pm)
The out of office hours (5pm – 8am weekdays) and 24-hour emergency number on weekends and bank holidays is 0330 222 6664.

If you experience difficulty, having tried the 0330 number, please ring 07711 769657, this will connect you to the duty Social Worker. Please note that this mobile number cannot accept text messages

If a child is in immediate danger or left alone, you should call the police or an ambulance at 999.

Child line:- 08001111

East Sussex Safeguarding children partnership:-

SPOA - (1st Point of Contact for all referrals East Sussex) Telephone: 01323 464222

Email: 0-19.SPOA@eastsussex.gov.uk

MASH WEST of East Sussex 01323 747373

MASH EAST of East Sussex 01424 724144

SPoA Out of hours:

Telephone: **01273 335 906** or **01273 335 905**

Contact our Emergency Duty Service (EDS) with serious concerns that cannot wait until the next working day.

EDS operates Monday to Thursday 5pm to 8.30am and
Fridays, weekends and bank holidays, 4.30pm to 8.30am.

Out of hours:-

CHILDREN'S Emergency Duty Service (EDS) 01273 335905 or 01273 335906
ADULT Social Care 0345 6080191 select menu option 2

You can also contact the EDS by email at
EDS.OfficersChildren@eastsussex.gov.uk.

17. Role of the DSL:

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Manage Referrals:

- Refer cases of suspected abuse to local authority children's social care.
- Refer cases to the Channel programme where there is a radicalisation concern.
- Support staff making referrals.

Work with Others:

- Act as a point of contact with safeguarding partners.
- Liaise with the headteacher/principal and relevant staff to inform them of issues, especially ongoing enquiries under section 47 of the Children Act 1989.
- Liaise with the "case manager" and LADO (Local Authority Designated Officer) for allegations against staff.

Information Sharing and Record Keeping:

- Ensure child protection records are kept confidential, secure, and up to date.
- Maintain clear, accurate, and timely records of concerns and actions taken.
- Share records appropriately with other agencies when required.

Raise Awareness:

- Ensure the training provider's safeguarding policies are known, understood, and used appropriately.

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- Provide safeguarding updates to staff at least annually (more frequently if needed).
- Help ensure BHT's policies are publicly available and reviewed regularly.

Training and Support:

- Undergo updated safeguarding training every two years (and refresh knowledge regularly).
- Ensure all staff receive appropriate safeguarding training and understand their responsibilities.
- Support staff in recognising signs of abuse and neglect and in making appropriate referrals.

Child Protection Files:

- Ensure files are transferred securely and in a timely manner when a child moves settings.
- Maintain continuity of safeguarding information during transitions between providers.

Online Safety Oversight:

- Lead on child protection concerns related to online safety.
- Support implementation of appropriate filtering and monitoring systems.

Availability:

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- Be available during hours of operation to discuss safeguarding concerns (either in person or via phone).

This policy was devised by

Mobius Partners Limited T/A Brighter Horizons Training

Date	By Whom	Summary of Update	Date to be reviewed
Sept 21	Jenny Rollinson	• Devised & implemented	Sept 2022
February 2022	CJ Silverlock	• Personnel updates	February 2023
Jul 2022	CJ Silverlock	• Section 9 reworded for staff allegation	Jul 23
Jul 23, 2023	CJ Silverlock	• Added in Refresher training	JUL 2024
Jul, 2024	Sam Page	• Checked numbers	JUL 2025
Jul 2025	Sam Page	• Addition of DSL role / Updated KCSIE amendments 2025 - online safety / SEND terminology / Safer recruitment identity checks	July 2026
Sept 2025	Sam Page	• DBS for staff to be added to the annual refresher service- inform all staff that they are required to register for this service with the DBS team. This will be monitored by HR and refresher numbers recorded on the Directory matrix	Sept 2026