

Safeguarding and Prevent Duty Policy & Procedure

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1. Scope

This procedure applies to Itec Training Solutions Holdings Group and all employees thereof. Throughout this policy, any references to “the Company”, means the Itec Training Solutions Holdings Group and its subsidiaries and associated companies.

We recognise our legal responsibilities in safeguarding all our learners, apprentices, employees and other customers, along with the promotion of wellbeing. Our safeguarding practices are an integral and fundamental part of this commitment. This policy applies to all employees (permanent, temporary, fixed term, agency, volunteers and self-employed or contracted arrangements), visitors, customers, apprentices, learners, suppliers and sub-contractors working in partnership with, or for the Company. It applies to all our functions, services, and employment practices and activities.

As a prime contractor, we will encourage and work with sub-contractors in relation to ensuring safe working practices and compliance with relevant safeguarding and prevent legislation.

2. Purpose

This policy associated procedures and guidance provides advice on dealing with Safeguarding to meet our legal responsibilities and requirements of the Safeguarding Vulnerable Groups Act 2006, amendments, and associated legislation. This policy also provides guidance on dealing with potential extremism and radicalisation issues in order to meet our legal responsibilities and requirements of the Counterterrorism and Security Act 2015 and Prevent Duty Guidance for England and Wales. The policy encompasses all groups equally, is non-discriminatory and has open and transparent processes.

In all aspects of our work, the needs and interests of vulnerable people will be placed above the needs and interests of all others. Hence, this policy and guidance will have priority over all other policies and procedures. The aim of the policy is to create and maintain a safe, healthy and supportive learning and working environment for our learners, customers, staff and visitors alike.

3. Key Principles

The key principles underpinning this Safeguarding policy and guidance rest on legislation and convention including; Human Rights Act 1998; Children Act 1989; Children Act 2004; Children and Social Work Act 2017; Education and Training (Welfare of Children) Act 2021, Protection of Freedoms Act 2012 (underpinning DBS and vetting), Mental Capacity Act 2005; Safeguarding Vulnerable Groups Act 2006, the Care Act 2014 (adult safeguarding England), Social Services and Well-being (Wales) Act 2014, Well-being of Future Generations (Wales) Act 2015 and the Counter-Terrorism and Security Act 2015 (Prevent duty). These principles are articulated in statutory guidance and policy documents such as the Prevent Duty Guidance for England and Wales, Working Together to Safeguard Children (England), Keeping Children Safe in Education (England), Keeping Learners Safe (Wales), Wales Safeguarding Procedures and associated practice guides (e.g. In Safe Hands), and the UN Convention on the Rights of the Child, to which the UK is a signatory. Definitions of ‘Children’ and ‘Vulnerable’ adults are outlined below.

4. Responsibilities

Directors and Senior Managers

It is the responsibility of Directors and Senior Managers to:

- ensure the Company has clear guidelines and policies in relation to safeguarding and prevent legislation in place and acted on where appropriate,
- take appropriate measures to ensure this policy is fully and effectively implemented,
- ensure that all staff are aware of this policy,
- ensure all staff are aware of when it is appropriate to refer concerns about learners or colleagues to the Safeguarding/Prevent Officer,
- ensure that appropriate resource is applied to prevent & safeguarding procedures,
- monitor and evaluate the provision of safeguarding & prevent,
- gain assurance that subcontractors comply with legislation and their obligations,
- provide advice and guidance as required.

Designated Safeguarding/Prevent Officers

It is the responsibility of Designated Officers to:

- ensure that safeguarding strategies are implemented across the Company,
- contribute to the development of safeguarding policies and procedures,
- keep up to date knowledge on changes and developments in legislation,
- ensure policies and procedures on safeguarding/prevent are reviewed at least annually,
- support training for relevant staff as required, including on this policy and procedure, training new staff on induction, ensuring yearly refresher training takes place and other training as required.
- ensure any concerns are shared with relevant external organisations, to minimise the risk of our learners becoming involved with terrorism and/or at risk of harm,
- make decisions on whether to refer to appropriate external organisations / authorities,
- make referrals to social services, police, Channel, Disclosure and Barring Service (DBS) and/or Education Workforce Council (EWC) using appropriate protocols,
- cooperate with any external investigation resulting from a referral,
- respond to new concerns that have been recorded and for triaging those concerns on the system, updating and maintaining records,
- provide Directors, Senior Management Team (SMT) and Sub-contractors with updates as required.

Safeguarding/Prevent Officers

It is the responsibility of Safeguarding/Prevent Officers to:

- contribute to the development of safeguarding policies and procedures,
- act as the first point of contact for staff on safeguarding & prevent matters and disclosures,
- collect information regarding referrals, respond to new concerns that have been recorded, triaging those concerns on the system, updating and maintaining records
- discuss information with the Designated Officer for the appropriate action to be taken,
- take direction and act on instructions given by the Designated Officer
- make referrals to third party organisations using appropriate protocols,
- cooperate with any external investigation resulting from a referral,
- promote and comply with all responsibilities as detailed in the all-staff section below.

All Staff

It is the responsibility of all our staff to:

- provide the highest possible standards of service to our customers and where it is part of their duties, provide appropriate advice impartially and act impartially in all aspects of service delivery,
- create and support an ethos that upholds the Company's mission, vision and values, to create an environment of respect, equality and diversity and inclusion,
- recognise the needs of learners with additional learning needs, where additional support maybe required in recognising signs and support needs,
- support a safe environment, where all learners feel supported and are aware of how to report concerns
- be committed to the implementation of and adhere to the policy and support the business in effectively implementing its key safeguarding and prevent procedures and strategies,
- undertake safeguarding and prevent training to have the skills to recognise those who may be vulnerable to harm, radicalisation, involved in violent or non-violent extremism, and to know the appropriate action to take if they have concerns,
- through agreed Company policies and procedures bring to the attention of the appropriate level of management any deficiency in the provision of service,
- report any concerns around harm, abuse, extremism or radicalisation via safeguarding reporting channels,
- report and remove any literature displayed around the Company that could cause offense or promote extremist views,
- support the development of learner understanding of the issues around safeguarding, wellbeing, extremism and radicalisation through activities,
- participate in engagement with local communities and external organisations as appropriate.

5. Recruitment

It is the responsibility of the HR Department to operate in line with the Company's Safeguarding and DBS Policies and as a minimum:

- Specify in advertisements that offers of employment are subject to reference checks, satisfactory DBS and in Wales EWC registration checks based on job role, and
- Based on job requirements, process and complete the EWC registration checks, enhanced DBS disclosures and basic disclosures and obtain references as required.

6. Regulated Activities

A **child** is anyone who has not yet reached their 18th birthday.

For the purpose of the Rehabilitation of Offenders Act (ROA) 1974 (Exceptions) Order 1975, the definition of 'working with children' under the Regulated activity relating to Children. The definition of regulated activity relating to children comprises of:

- (i) Unsupervised activities: teach, training, instruct, care for or supervise children, or provide advice / guidance on well-being, or drive a vehicle only for children.
- (ii) Work for a limited range of establishments ('specified places'), with opportunity for contact; for example, schools, children's homes, childcare premises. Not work by supervised volunteers.

Work under (i) or (ii) is regulated activity only if done regularly.

- (iii) Relevant personal care, for example washing or dressing; or health care by or supervised by a professional.

- (iv) Registered Child minding; and foster-carers

Regulated activity relating to **adults**

The definition identifies the activities which, if any adult requires them, lead to that adult being considered vulnerable at that time. This means that the focus is on the activities required by the adult and not on the setting in which the activity is received, nor on the personal characteristics or circumstances of the adult receiving the activities.

There is no requirement for a person to do the activities a certain number of times before they are engaging in regulated activity. There are six categories of people who will fall within the new definition of regulated activity (and so will anyone who provides day to day management or supervision of those people). A broad outline of these categories is set out below.

- (i) Providing health care by, or under the direction or supervision of, a regulated health care professional.
- (ii) Providing personal care made up of:
 - physical assistance with eating, drinking, toileting, washing, bathing, dressing, oral care or the care of skin, hair or nails for adults who can't carry this out themselves because of age, illness or disability,
 - prompting and then supervising with eating, drinking, toileting, washing, bathing, dressing, oral care or the care of skin, hair or nails for adults who can't decide to do this for themselves because of age, illness or disability,
 - training, instructing, providing advice or providing guidance on how to physically assist an adult with eating, drinking, toileting, washing, bathing, dressing, oral care or the care of skin, hair or nails for adults who can't carry this out themselves because age, illness or disability.
- (iii) Providing social work by a social care worker to an adult who is a client or potential client.
- (iv) Assisting an adult who can't manage themselves because of their age, illness or disability with the day-to-day running of their household relating to managing the adult's cash; paying the adult's bills; shopping.
- (v) Assistance in the conduct of an adult's own affairs, where:
 - a lasting power of attorney is created,
 - an enduring power of attorney is registered or applied for,
 - Court of Protection has made an order in relation to the making of decisions on the adult's behalf,
 - an independent mental health or mental capacity advocate is appointed,
 - independent advocacy services are provided,
 - a representative is appointed to receive benefits payments on the adult's behalf.
- (vi) Conveying adults to, from or between health care, personal care and/or social work services who can't convey themselves because of their age, illness or disability.
- (vii) Day to day management or supervision of anyone carrying out the above activities.

7. Risk Definitions

The risk to a vulnerable person is defined as intentional or non-intentional abuse which results (or could result) in 'significant harm' to the abused person. The term "Harm" is defined as:

- Ill treatment.
- The impairment of physical or mental health (including that suffered from seeing or hearing another person suffer ill treatment).
- The impairment of physical intellectual, emotional, social, or behavioural development (including that suffered from seeing or hearing another person suffer ill treatment).

"Ill treatment" includes sexual abuse, neglect, emotional abuse, and psychological abuse.

Actions or omissions that constitute abuse

Abuse may consist of a single act or repeated acts. It can be physical, verbal, psychological, financial or material. The abuse can be an act of neglect or an omission to act and the abuse may be the unintended consequence of a person's actions. It can and may occur, for example, when a vulnerable person is persuaded to enter into a financial or sexual transaction to which they have not consented or cannot consent to. Abuse can occur in any relationship but commonly is an abuse of power.

These are some of the most common types of abuse in relation to vulnerable people.

Neglect

The persistent or severe neglect of a vulnerable person, or the failure to protect them from exposure to any kind of danger, including cold, starvation, neglect of, or unresponsiveness to, a vulnerable person's basic emotional needs, or extreme failure to carry out important aspects of care, resulting in the significant impairment of their health or development, including non-organic failure to thrive.

Physical Abuse

The hitting, slapping, shaking, pushing, kicking, throwing, poisoning, misuse of medication, burning, scalding, drowning, suffocating, undue restraint, inappropriate sanctions or otherwise causing physical harm to a vulnerable person. Physical harm may also be caused when a parent or carer fabricates or induces illness in a vulnerable person who they are looking after.

Domestic Abuse

Domestic violence also known as domestic abuse is defined as: "An incident or a pattern of incidents of controlling, coercive, threatening behaviour, violence or abuse. It concerns people aged 16 or over who are or have been intimate partners or family members and it can happen regardless of a person's gender or sexuality". Domestic violence can include, but is not limited to, the following types of abuse: psychological, emotional, physical, sexual and financial. It also includes what is known as 'honour' based violence, female genital mutilation (FGM) and forced marriage. We have a [mandatory duty to report to police any known case of female genital mutilation](#) on a girl under the age of 18

Domestic violence affects people of every class, gender, wealth, geography, age, race, disability and sexuality. The violence can begin at any stage of the relationship and may continue after the relationship has ended. Domestic violence is a pattern of controlling and aggressive behaviour that is intentional and calculated to exercise power and control within a relationship.

Emotional or Psychological Abuse

The persistent emotional ill-treatment of a vulnerable person: such as to cause severe and persistent adverse effects, on the persons emotional, behavioural development or well-being. This includes threats of harm, abandonment and humiliation, verbal abuse, racial abuse, isolation and withdrawal from services or supportive networks. It may include not giving an individual opportunity to express their views, deliberately silencing them or 'making fun' of what they say or how they communicate. It may involve seeing or hearing the ill-treatment of another and include serious bullying (including cyber-bullying) causing individuals to feel frightened or in danger, or the exploitation or corruption of an individual.

Financial or Material Abuse

Includes theft, fraud, identify theft, pressure around wills, property or inheritance, misuse or misappropriation of benefits/allowances, fraudulent seizure of someone's material assets via power of attorney or eviction

Sexual Abuse / Harassment

Forced or unforced sexual acts with minors or vulnerable adults. Non-consensual sexual activity (physical contact or non-contact activities) with a vulnerable person whether the person is aware of what is happening. Physical contact, including penetrative or non-penetrative acts.

- Non-contact activities, such as involving vulnerable people in looking at, or in the production of, pornographic material or watching sexual activities.
- Grooming in preparation for abuse (including via the internet).
- Encouraging vulnerable people to behave in sexually inappropriate ways.
- 'Upskirting' is a form of sexual harassment and since April 2019 has been listed a criminal offence. Definition: upskirting is typically when a photograph is taken under a person's clothing without them knowing, for sexual gratification or to cause the victim humiliation, distress, or alarm.

Sexual violence and sexual harassment between peers in education (child on child abuse)

Sexual violence and sexual harassment can occur between two children of any age and sex. It can occur through a group of children sexually assaulting or sexually harassing a single child or group of children. Sexual violence and sexual harassment exist on a continuum and may overlap; they can occur online and face to face (both physically and verbally) and are never acceptable. Addressing inappropriate behaviour (even if it appears to be relatively innocuous) can be an important intervention that helps prevent problematic, abusive and/or violent behaviour in the future. Staff should be aware of, and respond appropriately to all reports and concerns, including those outside the education setting or online.

Discriminatory Abuse

Discriminatory abuse may manifest itself as any of the other categories of abuse previously stated. What is distinctive, however, is that discriminatory abuse is motivated by oppressive and discriminatory attitudes. Examples of discriminatory abuse may include disability - physical or learning disability, mental, ill-health or sensory impairment; race; gender; age; religion; cultural background; sexual orientation; political convictions; appearance. Discriminatory abuse may take the form of any other categories of abuse. The difference lies in that the abuse is motivated by discriminatory attitudes, feelings, or behaviour towards an individual.

Institutional Abuse

Institutional abuse includes the practice of an abusive regime or culture which destroys the dignity and respect to which every person is entitled. It is the mistreatment of people brought about by inadequate care or support, and poor practice that affects the whole setting. It occurs when the individual's wishes and needs are sacrificed for the smooth running of a group, service, or organisation.

Modern Slavery

Encompassing any type of slavery and / or human trafficking, forced labour and/or domestic servitude. Traffickers and slave masters use whatever means they have at their disposal to coerce, deceive, and force individuals into a life of abuse, servitude and inhumane treatment. This can include bonded labour, child slavery, early and forced marriage, forced labour, descent-based slavery, trafficking.

Contextual Safeguarding

Extra-familial harms take a variety of different forms and learners can be vulnerable to multiple harms, this includes factors outside the family home and may involve the wider neighbourhood, learning setting, areas where young people gather and online activity. This is called 'contextualised safeguarding' and it recognises that the risk of abuse and harm can lie in places beyond the boundaries of the home or residence. It also recognises that safeguarding involves more than individual vulnerabilities; it can involve groups and various social environments. This means that if you were to hear or see something of concern, relating to activities in the community away from the family home, you would need to report them.

Child Criminal Exploitation (CCE) and Child Sexual Exploitation (CSE)

CCE occurs where an individual or group takes advantage of an imbalance of power to coerce, control, manipulate or deceive a child or young person under the age of 18. The victim may have been criminally exploited even if the activity appears consensual. County Lines: A term used to describe organised criminal networks involved in illegal drugs. Young people can easily become trapped by this type of exploitation as gangs create drug debts and can threaten serious violence.

CSE occurs where an individual or group takes advantage of an imbalance of power to coerce, manipulate or deceive a child or young person under 18 into sexual activity in exchange for something the victim needs or wants, and/or for the financial advantage or increased status of the perpetrator or facilitator. The victim may have been sexually exploited even if the sexual activity appears consensual. CSE does not always involve physical contact; it can also occur through use of technology.

Radicalisation

Radicalisation is the process by which a person comes to support terrorism and forms of extremism that may lead to terrorism. Terrorism is an action that endangers or causes serious violence, damage or disruption and is intended to influence the government or to intimidate the public and is made with the intention of advancing a political, religious or ideological purpose.

All staff have a responsibility to create a safe environment in which learners can understand and discuss sensitive topics. Where there is a concern about a learner in respect of radicalisation this must be reported

8. Prevent Definitions

Prevent is one of 4 strands of the Government's counter terrorism strategy – CONTEST. The UK currently faces a range of terrorist threats. Terrorist groups who pose a threat to the UK seek to radicalise and recruit people to their cause. Therefore, early intervention is at the heart of Prevent which aims to divert people away from being drawn into terrorist activity. Prevent happens before any criminal activity takes place by recognising, supporting, and protecting people who might be susceptible to radicalisation. The national Prevent Duty confers mandatory duties and responsibilities on a range of public organisations, including Work Based Learning Providers, and seeks to:

- Respond to the ideological challenge of terrorism and aspects of extremism, and the threat we face from those who promote these views.
- Provide practical help to prevent people from being drawn into terrorism and violent extremism and ensure they are given appropriate advice and support.
- Work with a wide range of sectors where there are risks of radicalisation which needs to be addressed.

The following are commonly agreed definitions within the Prevent agenda:

- **An ideology** is a set of beliefs.
- **Radicalisation** is the process by which a person comes to support terrorism and forms of extremism that may lead to terrorism.
- **Safeguarding** is the process of protecting vulnerable people, whether from crime, other forms of abuse or from being drawn into terrorism-related activity.
- **Terrorism** is an action that endangers or causes serious violence, damage or disruption and is intended to influence the government or to intimidate the public and is made with the intention of advancing a political, religious or ideological purpose.
- **Vulnerability** describes factors and characteristics associated with being susceptible to radicalisation.
- **Extremism** is the promotion or advancement of an ideology based on violence, hatred or intolerance, that aims to:
 1. negate or destroy the fundamental rights and freedoms of others; or
 2. undermine, overturn or replace the UK's system of liberal parliamentary democracy and democratic rights; or
 3. intentionally create a permissive environment for others to achieve the results in (1) or (2).
- **British Values** are detailed within the Prevent Duty and include democracy, the rule of law, Individual and mutual respect and tolerance of different faiths and beliefs.

9. Reporting Procedures

Alleged or suspected abuse, harm or radicalisation of a vulnerable person where the disclosure is not against a member of staff

Member of staff taking the disclosure should:

- Not promise confidentiality but explain that you are obliged to pass this information on.
- Listen carefully and sympathetically.
- Clarify what has happened but try to ask as few questions as possible.
- Inform the Safeguarding/Prevent Officer of the disclosure immediately.
- Record the concern on the safeguarding system as soon as practicable.
- Complete all actions above within an hour of notification.
- There may be the immediate need to contact the Safeguarding/Prevent Officer prior to a record being made on the system.

Designated Safeguarding/Prevent Officer (DSO) will:

- Liaise with the informant as appropriate.
- Advise the Designated Safeguarding Lead of the concern/disclosure.
- Responded to new concerns that have been recorded and for updating and maintaining records on the system, including actions taken.
- Review the case with the Designated Officer and make recommendations as necessary.
- Complete all actions above within 2 hours of notification from the member of staff.

Where the Safeguarding/Prevent Officer is unavailable, the duties of that person in relation to Safeguarding will be undertaken by an alternative Safeguarding/Prevent Officer or Designated Safeguarding Lead.

Designated Safeguarding/Prevent Lead (DSL) will:

- Following initial contact from the Safeguarding/Prevent Officer decide on any holding action necessary.
- Review the information with the Safeguarding/Prevent Officer.
- Make the decision whether a potential safeguarding/prevent issue is present.
- Make or instruct relevant Safeguarding/Prevent Officer to make the necessary referral/s to external agencies.
- Responded to new concerns that have been recorded, triaging the concerns on the system, ensuring the accurate updating and maintaining records, including actions taken.
- Ensure that central records are kept of all communication and reporting occurrences on the Safeguarding system.

Where the Designated Safeguarding Lead for the area is unavailable, the duties of that person in relation to Safeguarding will be undertaken by another DSL or HR Director.

Low Level Concerns

The term 'Low-Level' concern is any concern that an individual working in or on behalf of the Company may have acted in a way that is not aligned with the standards or values of the company, including any behaviour which is inconsistent with or does not meet the expectations of the employee code of conduct, including inappropriate conduct outside of work. Concerns may arise through, for example a suspicion, complaint, disclosure made by a learner, parent, or other individual within or outside the organisation or as part of pre-employment vetting checks.

Sharing Low-Level concerns:

We recognise the importance of creating a culture of openness, trust and transparency to encourage all staff to share low-level concerns so that they can be addressed appropriately in a responsive and proportionate manner. We will ensure staff are clear about what appropriate behaviour is, empower staff to share any low-level concerns and will address unprofessional behaviour supporting the individual to correct it at an early stage.

Reporting and responding to concerns:

The concern might not be considered serious enough to meet the "harm threshold" whereby a referral to the designated officer at the local authority or police maybe required, however, they still require a response, and we recognise the importance of responding to and dealing with any concerns in a timely manner to safeguard the welfare of children and vulnerable adults.

- Low level concerns about a member of staff should be reported to a Designated or Lead Designated Safeguarding Officer, HR Manager or HR Director.
- Designated Safeguarding Officer will liaise with the HR Manager, or HR Director, around next steps, including any holding action necessary (e.g. temporarily removing learner from provision and / or temporarily removing a staff member from their job function pending review), the collection of evidence, including witness statement, CCTV footage (if available) and investigate where necessary to categorise the type of behaviour and determine any further action.
- Low level concerns that the Company feels may need further guidance may be referred to, in England Local Authority Designated Officer (LADO), in Wales Local Authority's Services Safeguarding Team for advice.
- Low level concerns that the Company feel they can deal with internally will be dealt with via the Company's usual disciplinary and investigation process.
- Allegations that meet the harm threshold will be referred to the in England LADO, in Wales Local Authority's Services Safeguarding Team for advice.

Records will be kept confidential, held securely in compliance with Data Protection Act (DPA) and UK General Data Protection Regulation (GDPR). Records will be reviewed so that potential patterns of concerning, problematic or inappropriate behaviour can be identified.

Where a pattern of such behaviour is identified, the Company will decide on a course of action, either through the internal disciplinary procedures or, where a pattern of behaviour moves from a concern to meeting the harms threshold, we will refer it to the designated officer at the local authority.

Alleged or suspected abuse, harm or radicalisation of a vulnerable person by a member of staff:

Member of staff taking the allegation should:

- Not promise confidentiality but explain that you are obliged to pass this information on.
- Listen carefully and sympathetically.
- Clarify what has happened but try to ask as few questions as possible.
- Inform the Designated Safeguarding/Prevent Officer of the disclosure immediately.
- Complete all actions above within an hour of notification.

Where the person taking the allegation is also the accused, they must immediately pass the allegation on to the Designated Safeguarding Officer to carry out the actions outlined above and then have no further contact with the person, until advised.

Designated Safeguarding/Prevent Officer (DSO) will:

- Liaise with the individual sharing the concern as appropriate.
- Advise the Lead Designated Officer and HR Manager or HR Director of the concern disclosed immediately.
- Record and maintain records of the concern securely and confidentially as soon as practicable. Ensure records are maintained, updated, including actions taken.
- Decide on any holding action, necessary. e.g. temporarily removing the learner from provision pending review.
- Review the case with the Lead Designated Officer and HR Manager, or HR Director, around next steps, including any further holding action, (e.g. temporarily removing a staff member from their job function pending review), determine any further action and make recommendations as necessary.
- Complete all actions above within 2 hours of notification from the member of staff.

Where the Designated Safeguarding/Prevent Officer is the subject of the allegation or unavailable, the duties of that person in relation to Safeguarding will be undertaken by the Lead Designated Safeguarding/Prevent Officer or HR Manager.

Decision Maker - Designated Safeguarding/Prevent Lead (DSL) / HR Manager or Director will:

- Following initial contact from the Designated Safeguarding/Prevent Officer review any holding action taken and / or recommend further holding action where necessary.
- Review the available information.
- Make the decision whether a potential Safeguarding/Prevent issue is present.
- Make the decision whether to suspend the employee on full pay pending investigation.
- HR Manager will appoint an investigation officer to investigate.
- Investigation officer to review the findings of the investigation with the HR Manager or HR Director.
- Identify whether the criteria for making a referral to the LADO, Local Authority's Services Safeguarding Team, DBS and/or EWC has been met.
- Determine next steps, which could include to deal with the matter under the Company's internal disciplinary procedure, make necessary referral/s to external agencies and /or reinstate the full employment status.

Where the Designated Safeguarding/Prevent Lead, HR Manager or HR Director is the subject of the allegation or unavailable, the duties of that person in relation to Safeguarding will be undertaken by an alternative Designated Safeguarding/Prevent Lead, HR Manager or HR Director.

HR Manager or HR Director will:

- Appoint an investigation officer or carry out an investigation.
- Provide guidance on any holding action, (e.g. temporarily removing a staff member from their job function pending review or suspend the member of staff on full pay pending the outcome of the investigation).
- Ensure a thorough impartial and objective investigation as timely as possible (even if the employee leaves employment) to gather sufficient evidence to decide whether the criteria for making a referral have been met.
- Notify relevant parties of anticipated timescales for investigation and advise of any reasons for delay and anticipated dates. Ensure processes are dealt with in accordance with the Company's Disciplinary Procedures

- If required, make the referral to the LADO, Local Authority's Services Safeguarding Team, DBS and/or EWC and liaise with these external regulatory bodies until a decision is made.
- Communicate external regulatory bodies decisions to relevant parties, including Directors.
- Ensure a central record is kept of all communication and reporting occurrences.

Where the HR Manager or HR Director is the subject of the allegation or unavailable, the duties of that person in relation to the above will be undertaken by a director.

If an employee is employed in a regulated or controlled job role and becomes barred under the DSB or EWC or other relevant regulatory body as a result of conduct inside or outside of their employment, this will be deemed as gross misconduct and dealt with in accordance with the company's disciplinary procedures which could result in the termination of employment.

10. Use of MyConcern in Recording and Case Management

The MyConcern safeguarding software is an electronic recording system which enables members of staff in the Company and other trusted users to record and update safeguarding concerns. The system allows Designated Safeguarding Lead (DSL) to case manage incidents, produce data reports and access all relevant data for the Company. Below is advice and guidance on the use of the system in an educational setting and complies with the statutory guidance.

User Management

The DSL is responsible for managing access to the system and ensuring that individuals are allocated appropriate user roles within MyConcern. When a member of staff leaves the establishment, it will be the responsibility of the HR Department to ensure that the relevant account has been deactivated.

Recording Concerns and Updates

When a staff member identifies a concern, it will be their responsibility to record that concern on the system as soon as practicable. The recording of the concern should not take precedence over any support that needs to be provided to a child, young person or vulnerable adult who may be at risk of harm. There may be an immediate need to contact the Designated Safeguarding Officer prior to a record being made on the system.

The person recording the concern should provide as much relevant information as possible, so that the DSO is able to make an informed assessment of the incident. Members of staff recording concerns should ensure that the information they provide is factual, non-judgemental and avoids assumptions.

Any relevant documentation and/or media files (e.g.: scanned documents, screenshots etc) should be uploaded to the concern at the time of recording. Designated Safeguarding Officers will ensure that concerns are updated as soon as possible if they have further, information relating to that incident.

Triaging Concerns: Designated Safeguarding Officer(s) and Designated Safeguarding Lead(s)

The Designated Safeguarding Officer is responsible for responding and assessing new concerns. The DSL should also ensure that each concern is associated to the correct learner(s). Any decisions or action taken by the DSO should be recorded as an update, so it appears in the chronology for that concern. The DSL is responsible for triaging concerns on the system and the relevant categories of concerns added to the record.

Managing the Concerns Dashboard

The DSO will be responsible for maintaining the 'Concerns Dashboard' for their nominated area of responsibility and ensuring that those concerns which are no longer active and require no further action are filed.

Managing Referrals

The DSO and DSL will ensure that any referrals to other agencies are recorded in the Referrals area under the Dashboards tab in the main navigation bar. This will ensure that the establishment has a full record of all agency referrals in the system. All relevant documentation relating to the referral process should be uploaded onto the system to facilitate secure storage and access to key documents when required.

Information Sharing

The DSO and DSL are responsible for ensuring that information sharing on the system is in line with the General Data Protection Regulation (GDPR) and the Data Protection Act 2018. Further guidance can be found in the HM Government Information Sharing Advice for Practitioners

DSO and LDS's can invite Trusted Users into individual concerns and profiles as a team member when they wish to share relevant information and should ensure that the rationale for doing so is recorded in the system. Members of staff from other agencies can be invited into concerns and profiles provided they have been created as a Trusted User. It will be the responsibility of the DSO and DSL to decide on the necessity for sharing that information in line with data protection principles.

MyConcern Users - Data Security

All users of My Concern must ensure the following is adhered to: -

- Users on the system will avoid re-using a password that they currently use or previously used.
- Users are always responsible for the security of their password and will not disclose it to any other person or allow any other person to use it.
- If a user's password is lost, stolen or otherwise compromised the password will be changed immediately and the HR department notified immediately.
- Use of the system will be in accordance with the GDPR, DPA 2018 and Company's ICT policies.
- Any non-user requests for information from the system should be directed to the HR Department.
- Users ensure no-one is able to see log-in details or any of the information recorded whilst in use.
- When using Wi-Fi users will ensure that access to the system is from secure wireless access points
- When users have finished using the system, they will make sure they have logged off.
- If it is suspected that any person has gained unauthorised access to the system, the HR Department must be notified immediately.
- Keep software updated by applying all updates immediately.

11. Policy Implementation

Leadership and Values

To create and maintain a Company ethos that upholds core values of shared responsibility and wellbeing for all learners, staff and visitors whilst promoting respect, equality, diversity and understanding. This will be achieved through:

- Promoting core values of respect, equality, diversity, inclusion, learner voice and participation.
- Building staff and learner understanding of safeguarding/prevent and confidence to deal with them through mandatory staff training, awareness and engagement activities.
- Actively working with the local safeguarding and prevent networks.
- Review and amend the Safeguarding Policy annually or earlier in response to changes in legislation or lessons learnt following incidents.
- Operate safe recruitment practices.
- A commitment to creating and maintaining a safe, healthy, and supportive learning and working environment for our learners, staff and visitors alike.
- Recognising that if we fail to challenge extremist views, we are failing to protect our learners from potential harm.
- Ensure appropriate ICT filters and monitoring processes in place.
- Ensuring Sub-contractors who deliver our provision comply with Safeguarding / Prevent legislation.
- Sharing information with third parties so that effective decisions can be made, and appropriate preventative action taken.
- Ensuring positive action is taken to respond to disclosures or suspicions of any form of abuse.

Raising Awareness

This will be achieved through:

- All new members of staff will receive safeguarding and prevent training as part of their induction programme, including training on the Safeguarding policy and procedures.
- Providing on-going adequate training to staff in relation to safeguarding and prevent.

- Raising awareness; provide updates and information to staff.
- Providing information advice and guidance to employees and learners where appropriate.
- Ensuring members of staff know the roles and responsibilities of the appointed people within the safeguarding Company structure.
- Ensuring staff are aware of the potential signs and indicators, including changes in behaviour, reporting concerns in line with the procedures.
- Ensuring safeguarding procedures are in place and staff know where the procedures are located.
- Ensuring staff awareness of the need for maintaining appropriate and professional boundaries in their relationships with vulnerable people, learner, parents, guardians and carers.

Teaching and Learning

To provide learning that promotes understanding and knowledge of wellbeing, safeguarding, prevent and British Values, through:

- Promoting and reinforcing shared values, creating safe space for free and open debate; and to listen and support the learner voice.
- Building the resilience of learners to challenge extreme narratives, undermining extremist ideology and supporting learner voice.
- Embedding equality, diversity and inclusion, wellbeing, and community cohesion in learning.
- Promoting wider skills development such as social and emotional aspects of learning.
- Using external programmes or groups where appropriate to support learning while ensuring that the input supports Company goals and values.
- Engaging all learners in playing a full and active role in wider engagement in society.

Learner Support

To ensure that staff take preventative and responsive steps, providing a safe, secure, and comfortable environment for learners, this will be achieved through:

- Strong, effective, and responsive learner support services.
- Anti-bullying ethos, challenging discriminatory behaviour, ensuring learner safety and that the Company is free from bullying, harassment, and discrimination.
- Recognising factors that may increase risk to a learner, i.e., vulnerability, special educational, disability and additional learning needs, disadvantage, or hardship.
- Ensuring that learners know how to access support in Company and/or via external community services.
- Supporting 'at risk' learners through safeguarding, counselling and signposting processes.
- Supporting learners with problem solving and repair of harm.
- Providing support for learners who may be at risk of radicalisation or harm, and appropriate sources of advice and guidance.
- Establishing and maintaining an ethos of a safe space, where learners feel secure and are encouraged to talk, and are listened to.
- Ensuring learners know that there are staff in the Company that they can approach if they are worried or in difficulty.

Managing Risks and Responding to Events

The Company will ensure that it monitors risks and is ready to deal appropriately with issues which arise through the following:

- Understanding the nature of threat from violent extremism and how this may impact directly and indirectly on the Company.
- Identifying, understanding and managing potential risks within the Company from external influences.
- Responding appropriately to events reported via local, national or international news that may impact on learners and communities.
- Minimise the potential for acts of violent or non-violent extremism within the Company.
- Ensuring measures are in place to respond appropriately to a threat or incident within the Company.
- Continuously developing effective ICT security and responsible user controls and policies.

11 Role of Safeguarding Boards

It is the duty of the local authority to make enquiries if it has reason to suspect that a child in its area is suffering, or likely to suffer significant harm, to enable it to decide whether it should take any action to safeguard or promote the child's welfare. This is referred to as the 'local authority's duty to investigate'. Each local authority has a Safeguarding Board covering its area (refer to appendix 1), which brings together representatives of the main agencies and professional responsible for helping to protect children from abuse.

Safeguarding Boards - Children

Safeguarding Children's Boards are required to:

- Protect children from abuse and neglect.
- Target policies and practice at those children who are suffering, or at risk of suffering significant harm.
- Ensure that effective policies and working practices are in place to protect children and that they are properly co-ordinated.
- Promote the welfare of all children.

The objective of a Local Safeguarding Children's Board is:

- To co-ordinate what is done by each person or body represented on the Board for the purposes of Safeguarding and promoting the welfare of children in the area of the authority, by which it is established.
- To ensure the effectiveness of what is done by each such person or body for those purposes. (Section 32(1); Children Act 2004).

Safeguarding Boards - Vulnerable Adults

The local authority also has a duty to develop and lead the implementation of multi-agency policies and procedures to protect vulnerable adults from abuse. They have robust procedures in place for dealing with incidents of abuse and to identify the next step forward in responding to the diversity of circumstances in which harm and exploitation occur to the at-risk group.

12. Information Sharing and GDPR

The General Data Protection Regulations (GDPR) May 2018 does not prevent, or limit, the sharing of information for the purposes of safeguarding or keeping children and young people safe, whether internally or externally. Information sharing helps to ensure that an individual receives the right services at the right time and prevents a need from becoming more acute and difficult to meet.

HM Government, Information Sharing non-statutory guidance (May 2024), states that that neither the GDPR 2018 or the Data Protection Act 2018 prevents or limits the sharing of information to keep children safe. Paragraph 77 sets out the "Special Category Personal Data," which allows sharing information even without consent, in some circumstances.

Responsibilities

- All staff have a duty to share information if there are concerns about a child's safety or welfare, information should be shared with the Safeguarding team in line with the procedures outlined above.
- Safeguarding / Designated Persons will make decisions about how much information to share, with whom and when.

Sharing Information with third parties

GDPR and Data Protection Act 2018 place duties on organisations and individuals to process personal information fairly and lawfully; they are not a barrier to sharing information, where the failure to do so would cause the safety or well-being of a child to be compromised. Similarly, human rights concerns, such as respecting the right to a private and family life would not prevent sharing where there are real safeguarding concerns.

We will follow the principles, as outlined in [HM Government Information Sharing non-statutory guidance \(May 2024\)](#) when making decisions in relation to sharing information with whom, how and when.

Consent

Wherever possible, consent will be sought, and we will be open and honest with the individual from the outset as to why, what, how and with whom, their information will be shared. Consent from the information subject is not necessarily needed to share their personal information. There may be some circumstances where it is not appropriate to seek consent, either because the individual cannot give consent, it is not reasonable to obtain consent, or because to gain consent would put a child or young person's safety or well-being at risk.

Relevant personal information can be shared lawfully if it is to keep a child or individual at risk safe from neglect or physical, emotional or mental harm, or if it is protecting their physical, mental, or emotional well-being. Where a decision to share information without consent is made, a record of what has been shared should be kept.

13. Associated Company Policies

This policy should be used in conjunction with the following policies and procedures:

- Equality & Diversity Policy.
- Health and Safety Policy.
- Whistleblowing Policy.
- Data Protection Policy.
- Acceptable ICT Use Policies.
- Employee Code of Conduct.
- Disciplinary Policy and Procedure.
- Bullying, Harassment & Respect at Work Policy.
- Grievance Procedure.
- Recruitment Policy.
- DBS Policy.
- Critical Incident procedures.

14. Appendix 1 Telephone contacts for Prevent and local safeguarding boards

Prevent Links

Wales	
Online Referral Form	All Wales Partners Prevent Referral Form
Prevent Manager Counter Terrorism Policing Wales	Jane Carter Phone: DD.01792 562783 EXT.52482 Mobile: 07979 833660 E-mail: jane.carter@south-wales.police.uk
Counter Terrorism Policing Wales	David Castree E-bost/Email: david.castree@gwent.police.uk Ffôn/Phone: 01633 642266 Symudol/Mobile: 07464653020

Safeguarding and Prevent Duty Policy & Procedure

England	
Online Referral Form	Online Referral Form for Reporting Extremism in the Education Sector
Regional Prevent Coordinators	Regional further education (FE) and higher education (HE) Prevent co-ordinators - GOV.UK
FE/HE Regional Prevent Co-Ordinator for London Counter-Extremism Division	Jennie Fisher (She / Her pronouns) Mobile: 07880 469 588 jennie.fisher@education.gov.uk

Safeguarding Children and Adult Boards – England

England		
County	Child referrals	Adult referrals
Islington	Tel: 0207 527 7400 https://www.islingtonscp.org.uk/are-you-worried-about-a-child	020 7527 2299 or email: access.Service@islington.gov.uk
Other areas	https://www.safecic.co.uk/scb-england	

Safeguarding Boards – Wales

Wales Safeguarding Procedures Including information on local safeguarding boards, Children and Adults Link - Safeguarding Wales		
Cardiff and Vale of Glamorgan Safeguarding Board Email: CardiffandValeLSCB@cardiff.gov.uk Website: www.cardiffandvalersb.co.uk		
County	Child referrals	Adult referrals
Cardiff	Tel 029 2053 6490 Out of Office Hours: Emergency Duty Team: 029 2078 8570	Tel: 029 2233 0888 Out of Hours: 02920 788570
Vale of Glamorgan / Barry	Tel 01446 725 202 Out of Office Hours: Emergency Duty Team 029 2078 8570	Tel: 01446 700111 Out of Hours: Emergency Duty 02920 788570
Southeast Wales Safeguarding Boards Email: sewsbadmin@caerphilly.gov.uk Website: https://www.gwentsafeguarding.org.uk		
County	Child referrals	Adult referrals
Newport	Tel: 01633 656656 After 5pm, on weekends and bank holidays contact Emergency Duty Team on 0800 328 4432.	Newport: Tel: 01633 656656 Out of Hours: Emergency Duty Tel: 0800 328 4432
Torfaen / Cwmbran	Tel: 01495 762200 After 5pm, on weekends and bank holidays contact Emergency Duty Team on 0800 328 4432.	Torfaen: Tel: 01495 762200 Out of Hours: Emergency Duty Tel: 0800 328 4432
Caerphilly / Blackwood	Tel: 0808 100 1727 After 5pm, on weekends and bank holidays contact Emergency Duty Team on 0800 328 4432.	Tel: 0808 100 2500 Out of Hours: Emergency Duty Tel: 0800 328 4432
Blaenau Gwent	Tel: 01495 315700 After 5pm, on weekends and bank holidays contact Emergency Duty Team on 0800 328 4432.	Tel: 01495 315700 Out of Hours: Emergency Duty Tel: 0800 328 4432
Monmouthshire / Abergavenny	Tel: Child Duty & Assessment Team: 01291 635 669 After 5pm, on weekends and bank holidays contact Emergency Duty Team on 0800 328 4432.	Monmouth/Usk/Raglan – 01600773041 Abergavenny – 01873 735885 Chepstow/Caldicot – 01291 635666 Out of Hours: Emergency Duty Tel: 0800 328 4432

Safeguarding and Prevent Duty Policy & Procedure

CWM TAF Safeguarding Board Tel: 01443 484 523 Email: ctmsafeguarding@rctcbc.gov.uk Website: www.cwmtafmorgannwgsafeguardingboard.co.uk		
County	Child referrals	Adult referrals
Rhondda Cynon Taff / Pontypridd	01443 425 006 Emergency Out of Hours: 01443 743 665	01443 425 003 Emergency Out of Hours: 01443 743 665
Merthyr Tydfil	01685 725 000 Emergency Out of Hours: 01443 743 665	01685 725 000 Emergency Out of Hours: 01443 743 665
Western Bay Safeguarding Board Tel: 01639 763021 Email: wbsb@npt.gov.uk Website: www.wbsb.co.uk		
County	Child referrals	Adult referrals
Neath Port Talbot	Tel: 01639 686802 Out of Hours Emergency Duty Team 01639 895455	Tel: 01639 686802 Out of Hours Emergency Duty Team 01639 895455
Swansea	Tel: 01792 635700 Out of Hours Emergency Duty Team: 01792 775501	Tel: 01792 636854 Out of Hours Emergency Duty Team: 01792 775501
Bridgend	01656 642279 Emergency Out of Hours: 01443 743 665	Tel: 01656 642477 Emergency Out of Hours: 01443 743 665
Mid and West Wales Safeguarding Board cysur@pembrokeshire.gov.uk for the Children Board cwmpas@pembrokeshire.gov.uk for the Adults Board Website: http://cysur.wales/home		
County	Child referrals	Adult referrals
Carmarthenshire	Tel: 01554 742322 Out of Hours Emergency Duty Team 0300 333 2222	IAA service on 0300 333 2222 Minicom on 01554 756741 SMS on 07892 345678
Ceredigion	Tel: 01545 574000 Out of Hours Emergency Duty Team Tel: 0845 6015392	Tel: 01545 574000 Out of Hours Emergency Duty Team Tel: 0845 6015392
Pembrokeshire	Tel: 01437 776444 Out of Hours Emergency Duty Team Tel: 0300 333 2222	Tel: 01437 776056 Out of Hours Emergency Duty Team Tel: 0300 333 2222
Powys	Tel: 01597 827666 Out of hours: 0845 054 4847	Tel: 0345 602 7050 Out of hours: 01597 825 275
North Wales Safeguarding Board Regional Administration Officer to the Safeguarding Board Email: regionalsafeguarding@denbighshire.gov.uk Tel: 01824 712903 Website: www.northwalessafeguardingboard.wales		
County	Child referrals	Adult referrals
Anglesey	01248 752 888 Out of hours: 01248 353 551	01248 750057 Out of hours: 01248 353551
Gwynedd	01758 704 455 Out of hours: 01248 353 551	Tel: 01766 772577 Out of Hours 01248 353551
Conwy	01492 575111 Out of Hours: 0300 1233079	0300 456 1111 Out of Hours 01492 515777
Denbighshire	01824 712200 Out of Hours: 0345 053 3116	0300 4561000 Out of Hours 0345 053 3116
Flintshire	01352 701 000 Out of Hours: 0345 053 3116	03000 858858 Out of Hours 0845 053 3116
Wrexham	01978 292 039 Out of Hours 0345 053 3116	01978 292066 Out of Hours 0345 053 3116