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1. Scope

This policy and procedure apply 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.

This policy applies to all employees (permanent, temporary, fixed term, agency, volunteers, self-employed or contracted arrangements), visitors, customers, apprentices, learners and others we work, in partnership with or for the Company. It applies to all our functions, services, and employment practices and activities.

We recognise our legal responsibilities in safeguarding all our learners, apprentices, other customers and employees, along with the promotion of wellbeing. Our safeguarding practices are an integral and fundamental part of this commitment. As a prime contractor, we will work with our subcontractors in relation to ensuring safe working practices and compliance with relevant safeguarding and prevent legislation.

2. Purpose

This policy alongside associated procedures and guidance provides advice on dealing with safeguarding to meet our legal responsibilities and requirements with relevant legislation, and associated 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 children, young people, learners, apprentices and adults at risk will be placed above the needs and interests of all others. The safety, welfare and wellbeing of children, young people, learners, apprentices and adults at risk will be prioritised in organisational decision-making and service delivery.

The aim of the policy is to create and maintain a safe, healthy and supportive learning and working environment for our learners, customers, employees and visitors alike.

3. Key Principles

The key principles underpinning this Safeguarding and Prevent Policy are derived from legislation and international conventions including the Human Rights Act 1998, Children Act 1989, Education Act 2002, Children Act 2004, Sexual Offences Act 2003, Mental Capacity Act 2005, Safeguarding Vulnerable Groups Act 2006, Equality Act 2010, Protection of Freedoms Act 2012, Care Act 2014 (England), Social Services and Well-being (Wales) Act 2014, Well-being of Future Generations (Wales) Act 2015, Counter-Terrorism and Security Act 2015, Children and Social Work Act 2017, Domestic Abuse Act 2021, and the Education and Training (Welfare of Children) Act 2021 and the Data Protection Act 2018 and UK GDPR principles.

These principles are reflected in statutory guidance and policy documents including the Prevent Duty Guidance, England and Wales (2023), Working Together to Safeguard Children 2023 (England), Keeping Children Safe in Education (England), Keeping Learners Safe (Wales), Working Together to Safeguard People (Wales), Wales Safeguarding Procedures and associated guidance, and the UN Convention on the Rights of the Child to which the United Kingdom is a signatory. Definitions of 'Child' and 'Adult at Risk' are outlined below.

This policy will be reviewed annually, or sooner where changes in legislation, statutory guidance, organisational learning or safeguarding practice require amendment.

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 and ensure staff are aware of this policy.
- Ensure staff are aware of when it is appropriate to refer concerns about learners or colleagues to a Senior DSL or DSL.
- Ensure that appropriate resource is applied to safeguarding and Prevent procedures and practices.
- Monitor and evaluate the provision of safeguarding and Prevent.
- Gain assurance that subcontractors comply with legislation and their obligations.
- Provide advice and guidance as required.

Senior Designated Safeguarding (Senior DSLs)

It is the responsibility of Senior DSL to:

- Promote a positive safeguarding culture and ensure safeguarding and Prevent strategies, policies and procedures are effectively implemented across the Company.
- Contribute to the development of safeguarding and Prevent policies and procedures and ensure review at least annually and following any significant legislative, regulatory or organisational change.
- Provide Directors, Senior Management Team (SMT) and subcontractors with updates as required.
- Keep up to date knowledge of changes and developments in legislation and guidance.
- Support safeguarding and Prevent training for relevant staff, including induction training, annual refresher training, guidance on this policy and procedure, and any additional training as required.

- Oversee the management of all safeguarding and Prevent concerns. Review, assess and triage safeguarding and Prevent concerns, ensuring appropriate action is taken in a timely manner.
- Determine when concerns meet the threshold for referral and make referrals to relevant statutory agencies and support services.
- Ensure appropriate referrals are made to, where appropriate, to Children's Services, Adult Services, Police, Channel, other relevant external support agencies, Disclosure and Barring Service (DBS), and/or the Education Workforce Council (EWC).
- Maintain accurate, confidential and secure safeguarding records and monitor the progress and outcomes of concerns and referrals.
- Liaise and cooperate with external agencies and authorised authorities, including participation in safeguarding investigations, assessments and multi-agency working.

Designated Safeguarding Officers (DSLs)

It is the responsibility of Designated Safeguarding Officers to:

- Promote a positive safeguarding culture, comply with all responsibilities in the all staff section below and raise awareness of safeguarding and Prevent responsibilities across the Company.
- Act as the first point of contact for staff on safeguarding and Prevent matters and disclosures.
- Review, assess and triage safeguarding and Prevent concerns, ensuring appropriate action is taken in a timely manner, and update and maintain safeguarding records.
- Discuss information with a Senior DSL, where required for the appropriate action to be taken.
- Take direction and act on instructions given by a Senior DSL.
- Determine when concerns meet the threshold for referral and make referrals to relevant statutory agencies and support services.
- Ensure and refer cases, where appropriate, to Children's Services, Adult Services, Police, Channel, and/or other relevant external support agencies.
- Maintain accurate, confidential and secure safeguarding records and monitor the progress and outcomes of concerns and referrals.
- Liaise and cooperate with external agencies and authorised authorities, including participation in safeguarding investigations, assessments and multi-agency working.

All Staff

It is the responsibility of all our staff to:

- Provide the highest possible standards of service to learners and customers and, where it forms part of their role, provide advice and support impartially.
- Create and support an environment that promotes our values, respect, equality, diversity, inclusion and the wellbeing of learners.
- Support a safe environment where learners feel valued, supported and understand how to raise concerns.

- Recognise signs and indicators of abuse, neglect, exploitation, harm, mental ill-health, radicalisation and other safeguarding risks.
- Be aware that some learners, including those with additional learning needs or other vulnerabilities, may require additional support and safeguarding consideration.
- Understand and comply with this policy and all related safeguarding and Prevent procedures, undertaking safeguarding and Prevent training, including induction and refresher training, as required.
- Report any safeguarding or Prevent concern immediately through the Company's reporting procedures.
- Seek advice and guidance from a DSL or Senior DSL whenever they are unsure how to respond to, record or report a concern.
- Where advised by Senior DSL, DSL refer cases, where appropriate, to Children's Services, Adult Services, Police, Channel, and/or other relevant external support agencies.
- Accurately record and maintain accurate, confidential and secure safeguarding concerns and disclosures in accordance with Company procedures.
- Liaise and cooperate with external agencies and authorised authorities.
- Maintain appropriate professional boundaries and always act in the best interests of learners.
- Bring to the attention of a Senior DSL or senior manager any concern regarding safeguarding practice, policy implementation or deficiencies in safeguarding or Prevent arrangements.
- Report any offensive, discriminatory, extremist or otherwise inappropriate material encountered within Company premises or through Company systems and communication channels.
- Support the development of learner understanding of safeguarding, online safety, wellbeing, equality, extremism and radicalisation through appropriate discussions and activities.

5. Recruitment

It is the responsibility of the HR Department to operate in line with the Company's Safeguarding, Recruitment and DBS policies and procedures and as a minimum.

- Specify in recruitment advertisements that offers of employment are subject to satisfactory pre-employment checks, including references, DBS checks and, where applicable, Education Workforce Council (EWC) registration checks.
- Undertake and verify all required pre-employment checks in accordance with legislation, statutory guidance and Company procedures, including identity, right to work, qualifications, references, DBS and EWC/professional registration checks, as applicable to the role.
- Ensure individuals engaged in regulated activity with children and/or adults at risk are subject to an Enhanced Disclosure and Barring Service (DBS) check, including checks against the relevant Barred List(s), where permitted by law.
- Ensure that, where required, individuals working in Wales hold and maintain appropriate Education Workforce Council (EWC) registration.

6. Regulated Activities

Children

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

Regulated activity relating to children includes certain types of work undertaken with children where an individual:

- Teaches, trains, instructs, cares for or supervises children,
- Provides advice or guidance relating to a child's wellbeing,
- Provides personal care or healthcare to a child, or
- Undertakes certain roles within specified educational, childcare or care settings.

Adults at risk

An adult at risk is a person aged 18 or over who has needs for care and support and is experiencing, or is at risk of, abuse, neglect or exploitation and may be unable to protect themselves from harm as a result of those needs or other personal circumstances.

For the purposes of this policy, adults at risk may include individuals who are vulnerable due to disability, physical or mental ill health, learning difficulties, age, substance misuse, domestic abuse, exploitation, trauma, social isolation or other circumstances that increase their risk of harm.

Regulated activity relating to **adults.**

Regulated activity relating to adults at risk is defined by the activities provided to the individual, rather than the setting in which they take place. Examples of regulated activity with adults at risk include:

- Providing healthcare,
- Providing personal care,
- Providing social work services,
- Assisting with the management of financial or personal affairs,
- Supporting day-to-day household activities where required due to illness, disability or age,
- Transporting adults to receive healthcare, personal care or social work services, and
- Supervising or managing individuals carrying out regulated activity.

Unlike regulated activity relating to children, there is no requirement for regulated activity relating to adults at risk to be carried out regularly before it becomes regulated activity.

7. Risk Definitions

The risk to a child, young person, learner, apprentice or adult at risk is defined as intentional or non-intentional abuse, neglect, exploitation or other circumstances that result in, or could result in, harm.

Harm is any action, behaviour or omission that results in, or has the potential to result in, abuse, neglect, exploitation, injury, ill treatment, or impairment of an individual's physical, mental, emotional, behavioural or social wellbeing.

Harm may arise from a single act, a series of acts, a failure to act, or exposure to the actions or behaviour of others.

Safeguarding concerns may arise where a child, young person, learner, apprentice or adult at risk is experiencing, or is at risk of, abuse, neglect, exploitation, harm, radicalisation or other circumstances that may adversely affect their safety, welfare, wellbeing or development.

Safeguarding concerns may occur in any setting, including within the home, family, workplace, education or training environment, community or online.

8. Types of Abuse, Harm, Exploitation and Safeguarding Risk

Abuse, neglect, exploitation and other safeguarding risks may arise from a single incident or a pattern of behaviour and may be perpetrated by individuals, groups or organisations known or unknown to the individual.

Abuse can occur in any relationship. It may occur where an individual is coerced, manipulated, controlled, exploited or persuaded into activities or behaviours to which they have not consented, are unable to consent, or do not fully understand.

Not all safeguarding concerns fall within a single category, and individuals may experience multiple forms of abuse, harm, exploitation or safeguarding risk simultaneously. The DSL team will consider the individual circumstances of each case and take appropriate action in accordance with this policy and relevant safeguarding procedures.

The following sections outline the most common forms of abuse, harm, exploitation and safeguarding risk that may affect children, young people, learners, apprentices and adults at risk. These include, but are not limited to:

Neglect

Neglect is the persistent failure to meet a child, young person or adult at risk's basic physical, emotional, educational or psychological needs, resulting in, or likely to result in, significant harm, impairment of health, wellbeing or development. Neglect may include a failure to provide adequate food, clothing, shelter, supervision, medical care, emotional support, protection from harm or appropriate access to education or training. Neglect may occur in isolation or alongside other forms of abuse, harm or exploitation.

Physical Abuse

Physical abuse is the deliberate use of physical force that causes, or is likely to cause, injury, pain, suffering or harm to a child, young person or adult at risk. It may involve hitting, slapping, shaking, pushing, kicking, throwing, poisoning, misuse of medication, burning, scalding, drowning, suffocating, inappropriate restraint, inappropriate sanctions or otherwise causing physical harm. Physical abuse may also occur when illness is fabricated, exaggerated or deliberately induced. Physical abuse may occur in isolation or alongside other forms of abuse, harm or exploitation.

Emotional or Psychological Abuse

Emotional or psychological abuse is the persistent emotional ill-treatment of a child, young person or adult at risk that causes, or is likely to cause, significant harm to their emotional wellbeing, mental health, development, self-esteem or sense of self-worth. It may include:

- Threats, intimidation, humiliation or degradation.
- Verbal, discriminatory or racist abuse.
- Controlling, coercive or manipulative behaviour.
- Isolation from family, friends, services or support networks.
- Preventing an individual from expressing their views, deliberately silencing them or ridiculing the way they communicate.
- Seeing or hearing the abuse or ill-treatment of another person.
- Serious bullying, including cyber-bullying.
- Exploitation, corruption or emotional manipulation.

Emotional or psychological abuse may occur in isolation or alongside other forms of abuse, harm or exploitation.

Sexual Abuse and Sexual Harassment

Sexual abuse involves forcing, coercing, manipulating or enticing a child, young person or adult at risk to take part in sexual activities, whether or not they are aware of what is happening and regardless of whether physical contact takes place. Sexual abuse may include:

- Rape, sexual assault or sexual violence.
- Penetrative or non-penetrative sexual acts.
- Causing or encouraging an individual to engage in sexual activity,
- involving an individual in the production, viewing or sharing of sexual or pornographic images or material.
- Sexual exploitation.
- Grooming for the purpose of sexual abuse, including online grooming.
- Indecent exposure or voyeurism.
- Coercing, manipulating or pressuring an individual into sexual activity.

Sexual harassment is unwanted conduct of a sexual nature that violates a person's dignity or creates an intimidating, hostile, degrading, humiliating or offensive environment. Sexual harassment may occur in person or online and can include sexual comments, remarks, jokes, gestures, unwanted attention, sharing sexual images, or other inappropriate sexual behaviour.

Upskirting is a form of sexual harassment and a criminal offence. It involves taking a photograph or recording beneath a person's clothing without their knowledge or consent, for the purpose of sexual gratification or to cause humiliation, distress or alarm.

Sexual abuse and sexual harassment may occur in isolation or alongside other forms of abuse, harm or exploitation.

Domestic Abuse

Domestic abuse is any incident or pattern of controlling, coercive, threatening, violent or abusive behaviour between individuals aged 16 or over who are, or have been, intimate partners or family members, regardless of gender, sex, sexual orientation, ethnicity, religion, disability or background. Domestic abuse can include, but is not limited to:

- Psychological or emotional abuse.
- Physical abuse.
- Sexual abuse.
- Financial or economic abuse.
- Coercive or controlling behaviour.
- Technological or online abuse.
- Stalking and harassment.

Domestic abuse can affect anyone and may occur within current or former relationships. It is often characterised by a pattern of behaviours used to gain, maintain or exercise power and control over another person.

Domestic abuse may also affect children and young people who witness, experience or are exposed to abusive behaviour within their home or family environment.

Domestic abuse may also include so-called 'honour'-based abuse, forced marriage and female genital mutilation (FGM).

Forced marriage is a marriage conducted without the full and free consent of one or both parties and where pressure, coercion, threats or abuse are used to force an individual into marriage.

FGM comprises procedures involving the partial or total removal of the external female genitalia, or other injury to the female genital organs for non-medical reasons. FGM is illegal and is a form of child abuse and violence against women and girls.

The Company recognises its mandatory duty to report to the police any known case of FGM involving a girl under the age of 18, in accordance with statutory requirements.

Domestic abuse forced marriage and FGM may occur in isolation or alongside other forms of abuse, harm or exploitation.

Child-on-Child Abuse

Child-on-child abuse occurs when a child or young person is subjected to abuse, harm or exploitation by another child or young person. It can occur inside or outside of education and training settings and can take place face-to-face, online, or through a combination of both. Child-on-child abuse is unacceptable and will be taken seriously.

Child-on-child abuse can affect any child or young person and may cause significant harm. Abuse can occur between children and young people of any age and sex. It can be perpetrated by an individual or group of children or young people towards another child or young person, or a group of children or young people.

Staff should recognise that even behaviour which may appear minor can be harmful and should not be dismissed as part of growing up, banter, or simply having a laugh. Early intervention and addressing inappropriate behaviour, even where it appears relatively minor, can be important in preventing problematic, abusive, harmful and/or violent behaviour from escalating.

Staff must be aware of and respond appropriately to all reports, disclosures and concerns relating to child-on-child abuse, including behaviour that occurs online or outside of the education, training or work environment.

Child-on-child abuse may include, but is not limited to:

- Bullying, including cyberbullying, prejudice-based and discriminatory bullying,
- Physical abuse, such as hitting, kicking, shaking, biting or other forms of violence,
- Harmful sexual behaviour, sexual violence, sexual harassment and upskirting,
- Online abuse,
- Sharing of consensual and non-consensual nude or semi-nude images and/or videos,
- Initiation or hazing-type violence and rituals,
- Coercive or controlling behaviour, and
- Behaviour linked to exploitation, gangs or serious violence.

The Company will ensure that all reports of child-on-child abuse are taken seriously, recorded, assessed and managed appropriately in accordance with safeguarding and learner behaviour procedures, recognising the needs, rights and safety of all children and young people involved.

Child Sexual Exploitation (CSE)

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 and may occur online through the use of

technology, including the creation, sharing or exchange of sexual images or videos and online coercion or grooming.

Child Criminal Exploitation (CCE)

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 into criminal activity. The victim may have been criminally exploited even if the activity appears consensual. Criminal exploitation may involve children being used to transport, store or supply drugs, weapons, money or other illegal items, commit theft or violence, or participate in other criminal activity for the benefit of others, including organised criminal groups. Children and young people may be subjected to threats, violence, intimidation, debt bondage or other forms of coercion and control.

County Lines is a form of criminal exploitation involving organised criminal networks transporting and selling drugs using dedicated mobile phone lines. Children and young people can become trapped through grooming, coercion, violence, threats or the creation of drug debts.

Cuckooing is a form of exploitation whereby offenders take control of a person's home and use it to facilitate criminal activity, often targeting vulnerable children, young people and adults at risk.

Online Safety

Children, young people and adults at risk may be exposed to abuse, harm or exploitation through their use of the internet, social media, online gaming, messaging platforms and other digital technologies.

Online risks may include online grooming, exploitation, cyberbullying, harassment, sharing of nude or semi-nude images, exposure to harmful or extremist content, fraud, coercive or controlling behaviour, and other forms of online abuse. Online safety concerns may occur in isolation or alongside other forms of abuse, harm or exploitation.

The Company recognises that online harm can occur between strangers, adults and children, or between peers, and that abuse experienced online can have a significant impact offline.

Financial or Material Abuse

Financial or material abuse involves the unauthorised, improper or unlawful use of a child, young person or adult at risk's money, property, assets, benefits or financial resources. It may include theft, fraud, identity theft, scams, financial exploitation, pressure relating to wills, property or inheritance, misuse of benefits or funds, misuse of legal authority such as a power of attorney, or unlawful use of a person's property or possessions. Financial or material abuse may occur in isolation or alongside other forms of abuse, harm or exploitation.

Discriminatory Abuse

Discriminatory abuse occurs when an individual is treated unfairly, harassed, victimised, excluded or subjected to abuse because of their age, disability, race, ethnicity, nationality, religion or belief, sex, gender reassignment, sexual orientation, cultural background or other actual or perceived characteristic.

Discriminatory abuse may take the form of physical, sexual, emotional, psychological, financial or other forms of abuse. What distinguishes discriminatory abuse is that the behaviour is motivated by prejudice, discrimination, intolerance, stereotyping or hostility towards an individual's actual or perceived characteristics.

Discriminatory abuse may occur in isolation or alongside other forms of abuse, harm or exploitation.

Institutional Abuse

Institutional abuse occurs when the practices, policies, procedures or culture of an organisation or service result in poor standards of care, neglect, harm, discrimination or a loss of dignity, choice, rights and independence. It may occur when the needs of the organisation are placed above the needs and wellbeing of the individual. Institutional abuse may occur in isolation or alongside other forms of abuse, harm or exploitation.

Modern Slavery and Human Trafficking

Modern slavery is an umbrella term used to describe offences involving the exploitation of individuals for personal or commercial gain. It includes slavery, servitude, forced or compulsory labour, human trafficking, debt bondage, domestic servitude, criminal exploitation, sexual exploitation, child exploitation and other forms of exploitation.

Human trafficking occurs when a person is recruited, transported, transferred, harboured or received for the purpose of exploitation. Exploitation may take many forms, including forced labour, domestic servitude, sexual exploitation, criminal exploitation, forced marriage or other practices similar to slavery.

Children and young people may be particularly vulnerable to modern slavery and trafficking and may be exploited through county lines activity, child criminal exploitation, child sexual exploitation, forced labour or other forms of abuse. A child cannot consent to their own exploitation.

Perpetrators may use coercion, deception, threats, intimidation, violence, abuse of power or vulnerability, or debt bondage to control victims and facilitate exploitation.

Modern slavery and human trafficking may occur in isolation or alongside other forms of abuse, harm or exploitation.

Contextual Safeguarding

Contextual safeguarding recognises that children, young people and adults at risk may experience abuse, harm or exploitation outside their family home, care setting or immediate relationships. Risks can arise in a range of environments, including educational and training settings, public spaces, local communities, peer groups and online. Learners may be vulnerable to multiple forms of extra-familial harm, including child criminal exploitation, child sexual exploitation, serious violence, county lines activity, domestic abuse, online abuse and other forms of exploitation or abuse.

Contextual safeguarding recognises that the risk of harm may be influenced by the social and environmental contexts in which individuals live, learn, work and spend their time. Safeguarding therefore extends beyond individual vulnerabilities and includes consideration of relationships, peer groups, community influences, workplace environments and online activity.

Staff must remain alert to concerns arising within the wider community, training environment or online and report any safeguarding concerns in accordance with this policy. Contextual safeguarding concerns may occur in isolation or alongside other forms of abuse, harm or exploitation.

Mental Health and Wellbeing

Mental health concerns can affect children, young people, learners, apprentices and adults at risk and may have a significant impact on their wellbeing, relationships, engagement in learning or work, and ability to keep themselves safe. The Company recognises that mental health problems, in some cases, may be an indicator of abuse, neglect, exploitation, trauma or other safeguarding concerns. Mental health concerns may include, but are not limited to, anxiety, depression, low mood, emotional distress, eating disorders, self-harm, suicidal thoughts, suicidal behaviours or other significant changes in emotional wellbeing.

Self-harm is any behaviour where an individual intentionally causes harm to themselves as a way of coping with emotional distress, difficult experiences or overwhelming feelings. Self-harm may include, but is not limited to, cutting, burning, scratching, self-poisoning or other forms of self-injury.

Suicidal thoughts or suicidal ideation refer to thoughts, feelings or intentions about ending one's own life. These may range from fleeting thoughts of self-harm or suicide to the development of specific plans or actions. Any disclosure, indication or concern relating to suicidal thoughts, suicide risk or self-harm will be taken seriously and responded to in accordance with safeguarding procedures.

The Company recognises that children, young people, learners, apprentices and adults at risk may be vulnerable to mental health difficulties as a result of personal circumstances, adverse childhood experiences, trauma, abuse, neglect, exploitation, discrimination, social isolation, financial pressures or other factors affecting their wellbeing. All staff have a responsibility to remain alert to signs that an individual's mental health or wellbeing may be deteriorating and to report concerns in accordance with this policy. Mental health concerns, self-harm and suicidal ideation may occur in isolation or alongside other forms of abuse, harm or exploitation.

Radicalisation and Extremism

Radicalisation is the process by which an individual comes to support extremist ideologies, groups or activities that may lead to terrorism or other forms of harmful extremism.

Extremism is the promotion or advancement of an ideology based on violence, hatred or intolerance that aims to:

- Negate or destroy the fundamental rights and freedoms of others, or
- Undermine, overturn or replace the UK's system of liberal parliamentary democracy and democratic rights, or
- Intentionally create a permissive environment for others to achieve these outcomes.

Terrorism is the use or threat of serious violence, damage or disruption intended to influence a government or intimidate the public for the purpose of advancing a political, religious, racial or ideological cause.

The Company recognises that children, young people and adults at risk may be vulnerable to radicalisation through direct contact, social influences or online activity.

All staff have a responsibility to create a safe and inclusive environment in which learners can discuss sensitive issues, challenge harmful narratives and develop resilience to extremist influences. Any concerns that a learner may be vulnerable to radicalisation or extremism must be reported immediately in accordance with safeguarding procedures.

Radicalisation may occur in isolation or alongside other forms of abuse, harm or exploitation.

9. Recognising Indicators of Harm, Abuse and Exploitation

All staff should be alert to signs that a learner, apprentice, child, young person or adult at risk may be experiencing abuse, neglect, exploitation, mental health difficulties or other safeguarding concerns. Indicators may include, but are not limited to:

- Unexplained injuries or frequent accidents.
- Significant changes in behaviour, mood or presentation.
- Increased anxiety, fearfulness, distress or withdrawal.
- Poor attendance, disengagement from learning, work or training, or unexplained absences.
- Repeated episodes of going missing or becoming uncontactable.
- Unexplained gifts, money, clothing or expensive items.
- Possession of multiple mobile phones or unexplained devices.
- Association with older individuals or concerning peer groups.
- Unexplained travel or movement outside the local area.
- Signs of coercion, intimidation, threats or controlling behaviour.
- Substance misuse or involvement in criminal activity.
- Sexualised behaviour inappropriate to age or development.
- Changes in online activity or online relationships.

- Deterioration in physical or mental wellbeing.
- Self-harm, expressions of hopelessness, or indications of suicidal thoughts.
- Concerns relating to neglect, self-neglect or unmet care and support needs.
- Any other behaviour or circumstance that causes concern for a person's safety, wellbeing or welfare.

Indicators of Radicalisation and Extremism

Early indicators of vulnerability to radicalisation or extremism may include:

- Expressing support for extremist ideologies, causes or organisations.
- Advocating violence or expressing intolerant views towards individuals or groups because of their faith, culture, race, gender, sexual orientation or other protected characteristics.
- Making comments about attending extremist events or associating with extremist groups.
- Possessing, accessing or sharing extremist material, literature, images, symbols, artwork or online content.
- Secretive behaviour relating to online activity, including accessing or sharing extremist content through social media, forums or messaging platforms.
- Significant changes in behaviour, beliefs, appearance or peer associations that cause concern.

These indicators do not necessarily confirm abuse, harm, exploitation or radicalisation and should always be considered in the context of the individual's circumstances. A single indicator may not in itself be evidence of abuse, harm, exploitation or radicalisation. However, patterns of behaviour, multiple indicators or significant changes should be explored and reported in accordance with safeguarding procedures, with advice sought from a Senior DSL or DSL where appropriate.

Staff should remain professionally curious and consider:

- What they have seen,
- What the learner has said,
- Any changes in behaviour, presentation or wellbeing,
- Information shared by others, and
- How the individual interacts with and responds to those around them.

10. Prevent Duty

Prevent is one of the four strands of the UK Government's counter-terrorism strategy, CONTEST. Prevent aims to stop people from becoming terrorists or supporting terrorism by recognising, supporting and protecting those who may be susceptible to radicalisation. The Prevent Duty:

- Places a statutory responsibility on specified authorities, including education and training providers, to have due regard to the need to prevent people from being drawn into terrorism.
- Seeks to respond to the ideological causes of terrorism and extremism.
- Provides support to individuals who may be susceptible to radicalisation.
- Safeguards learners from extremist influences and terrorist ideology.

- Promotes effective partnership working with relevant agencies to identify, assess and address concerns relating to radicalisation and extremism.

For the purposes of this policy:

- Radicalisation is the process through which a person comes to support terrorism or forms of extremism that may lead to terrorism. [gov.uk]
- Vulnerability refers to factors or circumstances that may make an individual more susceptible to radicalisation or extremist influence.
- British Values are democracy, the rule of law, individual liberty, mutual respect, and tolerance of those with different faiths and beliefs.

All staff have a responsibility to remain alert to concerns relating to radicalisation and extremism, to promote a culture of respect and inclusion, and to report any concerns in accordance with the Company's safeguarding and Prevent procedures.

11. Reporting Procedures

Alleged or suspected abuse, harm, exploitation and/or safeguarding risk

Any member of staff who receives a disclosure, witnesses a concern, or becomes aware of information suggesting that a learner, apprentice, child, young person or adult at risk is, or may be, at risk of abuse, neglect, harm, exploitation or radicalisation (where the concern does not relate to a member of staff) must:

- Remain calm, listen carefully and sympathetically, and take the concern seriously.
- Not promise confidentiality and explain that the information will need to be shared with appropriate safeguarding team members.
- Clarify what has happened, without asking leading questions or attempting to investigate the matter.
- Reassure the individual that they have done the right thing by sharing their concern.
- Record the concern on MyConcern as soon as reasonably practicable.
- Ensure the record is factual, accurate, objective and completed promptly.
- Contact a Senior DSL or DSL immediately where there is an immediate risk of harm to the individual or others.

Where there is an immediate risk of harm or danger, staff must take appropriate safeguarding action without delay. Recording concerns on MyConcern must not delay any action required to protect an individual.

Senior DSL/DSL Responsibilities

Upon receiving a safeguarding concern, the Senior DSL or DSL will:

- Review and assess the information and determine whether safeguarding, Prevent or welfare concerns are present.
- Review the quality and clarity of records, triage the concern, ensure concerns are appropriately categorised and obtain additional information where required.
- Liaise with the member of staff who raised the concern, where required.

- Consider and recommend any immediate safeguarding measures required.
- Determine whether consultation with, or referral to, external agencies is required.
- Make, or direct an appropriate member of staff to make, referrals to external agencies and support services, where necessary.
- Ensure that all actions, decisions, referrals and outcomes are accurately recorded within MyConcern.
- Maintain oversight of safeguarding records and case management, ensuring records are updated promptly and accurately.
- Ensure that central safeguarding records remain current and that all safeguarding incidents and actions are appropriately recorded within MyConcern.

Where the allocated DSL is unavailable, another DSL, the HR Director or another authorised safeguarding lead will undertake these responsibilities.

Low Level Concerns

Definition of a Low Level Concern

A low level concern is any concern, no matter how small, that an individual working in or on behalf of the Company may have acted in a manner that is inconsistent with the standards expected of them, the Company's Code of Conduct, safeguarding expectations, professional standards or Company values, including conduct outside of work.

Concerns may arise through a suspicion, complaint, disclosure by a learner, parent, employee or third party, information received from external agencies, or concerns identified through recruitment, vetting or employment processes.

Reporting 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. Staff should be clear about the standards of behaviour expected of them and are encouraged to share any low level concerns.

Managing Low Level Concerns

- A review of the reported concern will be undertaken by a Senior DSL, HR Manager or HR Director who will determine any immediate action, including any safeguarding measures or holding actions considered necessary pending review.
- HR Manager or HR Director will appoint the appropriate person to investigate and review the matter.
- This may include, but is not limited to, gathering relevant information and evidence, such as witness statements, records or CCTV footage (where available), to establish the facts, categorise the behaviour, determine whether the matter remains a low level concern or meets the harm threshold, and make recommendations regarding next steps and/or further action.

- Senior DSL, HR Manager or HR Director may seek advice from the Local Authority Designated Officer (LADO) in England or the relevant Local Authority safeguarding team in Wales where appropriate.
- Records will be kept confidential, held securely and processed in accordance with the Data Protection Act 2018, UK GDPR and the Company's data protection procedures.

If it is determined that the concern is not considered serious enough to meet the "harm threshold" whereby a referral to the designated officer at the local authority or police may be required, the concern will still require an appropriate response, which may include addressing unprofessional behaviour and supporting the individual to correct it at an early stage, through the Company's disciplinary or capability procedures, where appropriate.

We recognise the importance of responding to and dealing with any concerns in a timely manner to safeguard the welfare of children and adults at risk.

Allegations that meet the harm threshold will be referred to the relevant Local Authority Designated Officer (LADO) in England or the relevant Local Authority safeguarding service in Wales for advice and guidance.

Records of low level concerns will be reviewed periodically to identify any patterns of concerning, problematic or inappropriate behaviour and to ensure that appropriate action is taken where necessary.

Where a pattern of such behaviour is identified, the Company will decide on a course of action, either through addressing unprofessional behaviour and supporting the individual to correct it at an early stage, through the Company's disciplinary or capability procedures, or, where a pattern of behaviour progresses to meet the harm threshold, by referring the matter to the appropriate local authority safeguarding service.

Allegations Against Staff, Volunteers and Contractors: Meeting the Harm Threshold

An allegation meets the harm threshold where a member of staff, volunteer or contractor has:

- Behaved in a way that has harmed, or may have harmed, a child, young person or adult at risk,
- Possibly committed a criminal offence against or related to a child, young person or adult at risk,
- Behaved towards a child, young person or adult at risk in a way that indicates they may pose a risk of harm, or
- Behaved in a way that may make them unsuitable to work with children or adults at risk.

Such allegations will be managed in accordance with relevant statutory guidance and safeguarding procedures, and, where appropriate, the Company's disciplinary or capability procedures. Referrals will be made to the appropriate safeguarding authorities where required.

Any member of staff receiving an allegation must

- Remain calm and listen carefully.
- Take the concern seriously.
- Not promise confidentiality and explain that the information will need to be shared appropriately.
- Clarify the information without asking leading questions or conducting an investigation.
- Immediately notify a DSL, Senior DSL or HR Manager.
- Create an accurate written record as soon as possible.

Where the person receiving the allegation is also the subject of the allegation, they must immediately pass the matter to a DSL, Senior DSL or HR Manager to carry out the actions outlined above, refrain from further contact with the individual where appropriate, and have no further involvement in the management of the allegation.

Senior DSL/DSL Responsibilities

- Upon receiving an allegation, liaise with the individual raising the concern where appropriate.
- Notify the HR Manager or HR Director immediately.
- Ensure the concern is recorded securely, accurately and confidentially.
- Assess any immediate safeguarding risks and recommend appropriate safeguarding measures.
- Work with HR to determine whether the allegation may meet the harm threshold.
- Seek advice from external safeguarding agencies where required.

HR Manager or HR Director Responsibilities

- Review available information with a Senior DSL.
- Recommend any immediate employment or safeguarding measures, including any holding actions, pending further review.
- Appoint an appropriate investigation officer or carry out an investigation where required.
- Ensure investigations are conducted fairly, impartially, objectively and without unreasonable delay, including where the individual has left employment.
- Maintain communication with relevant parties throughout the process, as required.
- Ensure accurate records are maintained.

Appointed Investigating Officer Responsibilities

- Review all available information and evidence.
- Conduct enquiries in accordance with the Company's procedures.
- Consider any safeguarding, Prevent or employment implications.
- Provide findings and recommendations to a Senior DSL, HR Manager or HR Director.
- Complete investigations as promptly as possible, keeping relevant parties informed of anticipated timescales and any delays throughout the process.

Following receipt of the investigation findings, the HR Manager or HR Director, in consultation with a Senior DSL where appropriate, will:

- Determine whether the allegation is substantiated, unsubstantiated, unfounded, false or malicious.
- Determine whether the criteria for referral to the Police, Local Authority, DBS, EWC or other relevant agencies has been met.
- Determine any further safeguarding action required.
- Determine the appropriate outcome, including whether the matter should be managed through the Company's disciplinary or capability procedures, and whether any temporary restrictions or safeguarding measures should be removed or remain in place.
- Make any required referrals to external agencies and cooperate with any resulting investigations, assessments or enquiries.
- Ensure matters are managed in accordance with the Company's disciplinary, capability and safeguarding procedures.

Where the DSL, Senior DSL, HR Manager or HR Director is the subject of the allegation or is unavailable, the responsibilities will be undertaken by an alternative Senior Manager, HR Manager, HR Director or another appropriate Senior Manager or Director who is not subject to the allegations.

Record Keeping and Confidentiality

All concerns, allegations, decisions and actions will be recorded promptly, held securely and confidentially, processed in accordance with the Data Protection Act 2018 and UK GDPR requirements, retained in accordance with the Company's retention procedures, and reviewed periodically by the HR Department to identify any patterns of concerning behaviour and ensure appropriate action is taken.

Referrals to External Agencies

Where appropriate, referrals may be made to Police, Children's Services, Adult Services, Local Authority Designated Officer (LADO) (England), relevant Local Authority safeguarding services (Wales), Disclosure and Barring Service (DBS), Education Workforce Council (EWC) and/or other relevant regulatory or safeguarding bodies.

Regulated Activity

Where an employee undertaking a regulated activity role becomes barred by the Disclosure and Barring Service (DBS), Education Workforce Council (EWC) or another relevant regulatory body, the matter may be treated as gross misconduct and managed in accordance with the Company's disciplinary procedures, which may result in termination of employment.

12. Use of MyConcern in Recording and Case Management

MyConcern is the Company's secure electronic safeguarding recording and case management system. It enables staff to record safeguarding concerns and allows the Senior DSL and DSLs to manage cases, monitor safeguarding activity, maintain safeguarding records and produce reports to support effective safeguarding oversight.

The Company will ensure that the use of MyConcern complies with safeguarding, data protection and information sharing requirements, including the UK GDPR, Data Protection Act 2018 and relevant safeguarding guidance.

User Management

Senior DSLs are responsible for overseeing access to MyConcern and ensuring that individuals are assigned appropriate user permissions in accordance with their role and responsibilities. Supported by the HR Department and system administrators will ensure that user access is reviewed regularly and that accounts are amended, suspended or removed promptly when staff leave the Company or no longer require access to the system.

Recording Concerns and Updates

Where a member of staff identifies a safeguarding concern, they must record the concern on MyConcern as soon as reasonably practicable. The recording of a concern must not take precedence over the immediate safety and wellbeing of a child, young person, learner, apprentice or adult at risk.

Where an individual is believed to be at immediate risk of harm, staff must contact a Senior DSL or DSL without delay and take any necessary action to safeguard the individual. Recording the concern on MyConcern must not delay immediate safeguarding action.

When recording concerns, staff should provide as much relevant information as possible to enable an informed assessment to be made. Records must be factual, accurate, contemporaneous, objective and non-judgemental. Staff should clearly distinguish between fact, observation, professional opinion and information provided by others.

Any relevant documentation, screenshots, photographs, correspondence or other supporting evidence should be uploaded to MyConcern at the time of recording wherever possible. Concerns must be updated promptly when further information becomes available.

Triaging Concerns, (Senior DSLs and DSLs)

Senior DSL or a DSL is responsible for reviewing, assessing and responding to safeguarding concerns recorded on MyConcern. They will ensure that,

- Concerns are linked to the correct learner, child, young person or adult at risk,
- Appropriate safeguarding categories are applied,
- Decisions, actions and rationale are recorded,

- Safeguarding records are maintained accurately, and
- All actions are reflected within the chronology of the concern.

Managing the Concerns Dashboard

Senior DSL and DSLs are responsible for maintaining the Concerns Dashboard within their area of responsibility and ensuring that concerns are reviewed regularly.

Concerns that no longer require active intervention will be appropriately closed in accordance with safeguarding record keeping requirements, while ensuring that a complete safeguarding history is retained.

Managing Referrals

Senior DSL or DSL will ensure that all referrals to external agencies, including Children's Services, Adult Services, the Police, Prevent, health services and other safeguarding partners, are recorded within MyConcern.

All relevant documents relating to referrals, consultations, agency communications, outcomes and actions taken must be retained within the system to ensure a complete safeguarding chronology and secure storage of records.

Information Sharing

Senior DSLs and DSLs are responsible for ensuring that information sharing through MyConcern is lawful, necessary, proportionate and in accordance with the UK GDPR, Data Protection Act 2018 and the Company's safeguarding procedures.

Where safeguarding information is shared, the Senior DSL or DSL will ensure that the rationale for the information sharing decision is recorded within the system.

Authorised users may be granted access to specific concerns or learner profiles where there is a legitimate safeguarding need to do so. Access will only be granted to trusted users who require the information to fulfil their safeguarding responsibilities.

Any requests for safeguarding information, including requests from external agencies, must be referred to the Senior DSL or DSL and managed in accordance with safeguarding, data protection and information-sharing procedures.

MyConcern Users - Data Security

All users of MyConcern must ensure the following is adhered to:

- Use a strong and unique password and not reuse passwords used for other systems.
- Maintain the confidentiality of their password and not share login credentials with any other person.
- Immediately change their password if it is suspected to be compromised and notify a Senior DSL as a system administrator.
- Ensure their use of the system complies with UK GDPR, the Data Protection Act 2018 and Company ICT policies.

- Ensure that unauthorised individuals cannot view safeguarding records or login credentials.
- Access the system only through secure devices, networks and wireless connections.
- Log out of the system when it is no longer in use.
- Immediately report any actual or suspected unauthorised access, information security incident or data breach to a DSL and appropriate manager.
- Comply with all Company information security, confidentiality and data protection requirements.

Failure to comply with these requirements may result in disciplinary action and, where appropriate, referral under safeguarding, data protection or regulatory procedures.

13. Policy Implementation

Governance and Leadership

The Company is committed to maintaining effective safeguarding and Prevent arrangements across all areas of its activity.

- Board has overall accountability for safeguarding and Prevent. Operational responsibility is delegated to the HR Director, Senior DSLs and DSLs.
- HR Director and Senior DSLs provide safeguarding updates, reports and assurance to senior leaders and the Board.
- safeguarding arrangements are monitored through audits, assurance processes, Senior DSL meetings and reporting mechanisms.
- Safeguarding policies, procedures and practices will be reviewed regularly and, as a minimum, annually, or sooner where changes in legislation, statutory guidance, organisational learning or emerging risks require amendment.
- Ensure safer recruitment and selection procedures are maintained.
- Ensure effective ICT acceptable use, filtering and monitoring arrangements are in place to support online safety.
- Subcontractors and delivery partners are required to comply with safeguarding and Prevent requirements.

Values

The Company will promote and maintain a culture where safeguarding is everyone's responsibility and where all learners feel safe and supported. To achieve this, the Company will:

- Promote respect, equality, diversity, inclusion, learner voice and participation.
- Maintain a safe and supportive environment.
- Ensure safeguarding, wellbeing and learner welfare remain central to decision making.
- Work collaboratively with safeguarding partners, local authorities, Prevent partners and other relevant agencies.
- Foster an environment where concerns are raised, listened to and acted upon appropriately.

Training and Raising Awareness

The Company will ensure that staff, learners and relevant stakeholders understand safeguarding, Prevent and their respective responsibilities. This will be achieved through:

- Safeguarding and Prevent training for all new staff as part of induction.
- Yearly safeguarding and Prevent refresher training, providing updates on safeguarding guidance, information and emerging risks as appropriate.
- Ensuring staff understand their safeguarding responsibilities and the role of Senior DSLs and DSLs.
- Supporting staff to recognise signs and indicators of abuse, neglect, exploitation, mental health concerns, radicalisation and other safeguarding risks.
- Ensuring safeguarding procedures are accessible, understood and consistently applied.
- Promoting professional boundaries and appropriate conduct in relationships with all learners, apprentices, children, young people, adults at risk, parents, carers and colleagues.
- Providing information, advice and guidance to employees on safeguarding, wellbeing and support services.

Learning, Development and Learner Awareness

The Company will promote learning that develops learners' understanding of safeguarding, wellbeing, Prevent, online safety and British Values. This will be achieved through:

- Promoting and reinforcing shared values, creating safe spaces for free and open debate, and to listen and support the learner voice.
- Supporting learners to develop resilience, critical thinking skills and the confidence to challenge harmful influences, extremist narratives and misinformation.
- Embedding safeguarding, equality, diversity, inclusion, wellbeing and community cohesion within their learning.
- Using external speakers appropriately to enhance learning and awareness.
- Encouraging learners to play a full and active role in their communities.
- Promoting learner understanding of safeguarding, abuse, exploitation, online safety, mental health, wellbeing, Prevent and how to seek support.
- Supporting learners to understand how to recognise concerns, report concerns and access help within the Company or through external services.

Learner Support

The Company will take proactive and responsive measures to provide a safe, supportive and inclusive environment in which learners can thrive and achieve their potential. This will be achieved through:

- Ensuring learners know who they can speak to if they are worried, in difficulty or require support.
- Ensuring learners can access appropriate advice, guidance, support and signposting services.

- Maintaining an environment where learners feel safe, valued, listened to and able to raise concerns.
- Supporting learners who may be at risk of abuse, neglect, exploitation, radicalisation, self-harm or other safeguarding concerns.
- Providing safeguarding interventions, welfare support, referrals and multi-agency support where appropriate.
- Recognising and responding appropriately to factors that may increase an individual's vulnerability or risk of harm.
- Supporting learners with additional learning needs, disabilities, educational needs, mental health difficulties or other vulnerabilities.
- Supporting learners experiencing mental health difficulties, self-harm or suicidal thoughts through appropriate safeguarding and support arrangements.
- Working with parents, carers, support agencies and external professionals, where appropriate, to promote learner safety, wellbeing and positive outcomes.

Risk Management and Safeguarding Response

The Company will take a proactive approach to identifying, managing and responding to safeguarding and Prevent risks. The Company will:

- Identify, assess and manage safeguarding and Prevent risks.
- Monitor emerging local, regional and national safeguarding risks and trends.
- Understand risks relating to abuse, neglect, exploitation, online safety, serious violence, mental health concerns, radicalisation and extremism.
- Share information appropriately, lawfully and proportionately to support safeguarding decision making and protect individuals from harm.
- Respond promptly and appropriately to safeguarding concerns, disclosures, allegations and incidents.
- Work collaboratively with relevant agencies and partners where safeguarding concerns arise.
- Respond appropriately to local, national and international events that may impact learners, staff or local communities.
- Review safeguarding incidents and lessons learned to strengthen practice and improve systems.
- Ensure appropriate arrangements are in place to manage emergencies, serious incidents and significant safeguarding risks.

14. Multi-Agency Safeguarding Arrangements

Local authorities have statutory responsibilities to safeguard children and protect adults at risk. Where there is reasonable cause to suspect that a child, young person or adult at risk is experiencing, or is at risk of, abuse, neglect or harm, enquiries may be undertaken and action taken, where appropriate, to safeguard the individual and support their welfare, wellbeing and protection from harm.

The Company will work cooperatively with local safeguarding arrangements, safeguarding partners, safeguarding boards and other relevant agencies to support the protection of children, young people and adults at risk.

Safeguarding Arrangements for Children

In Wales, Regional Safeguarding Children Boards coordinate multi-agency arrangements to safeguard and promote the wellbeing of children and young people within their area.

In England, safeguarding responsibilities are coordinated through local safeguarding partnerships in accordance with Working Together to Safeguard Children (England). Safeguarding partners work together to coordinate local safeguarding services, identify and respond to safeguarding concerns, and improve outcomes for children and young people.
The purpose of local safeguarding arrangements is to:

- Protect children and young people from abuse, neglect, harm and exploitation.
- Promote their welfare and wellbeing.
- Improve multi-agency working and information sharing.
- Ensure safeguarding practice is effective and coordinated.
- Learn from safeguarding reviews and improve practice across agencies.

Safeguarding Arrangements for Adults at Risk

Local authorities have a statutory responsibility to work with partner agencies to protect adults at risk from abuse, neglect, harm and exploitation.

In Wales, Regional Safeguarding Adult Boards are responsible for coordinating and ensuring the effectiveness of multi-agency arrangements to safeguard adults at risk. In England, local authorities lead multi-agency adult safeguarding arrangements in partnership with relevant organisations, including health services, police and other safeguarding partners.

The purpose of safeguarding arrangements for adults at risk is to,

- Prevent abuse, neglect, exploitation and harm.
- Support adults at risk to achieve their wellbeing outcomes.
- Coordinate effective multi-agency responses.
- Promote safeguarding awareness and best practice.
- Ensure that concerns are investigated and managed appropriately.

The Company will cooperate with safeguarding boards, safeguarding partners, local authorities, the police, health services and other relevant agencies in accordance with statutory safeguarding responsibilities and information-sharing requirements.

15. Information Sharing and GDPR

Effective information sharing is essential to safeguarding and promoting the welfare of children, young people, learners, apprentices and adults at risk. The UK General Data Protection Regulation (GDPR), Data Protection Act 2018, human rights legislation and common law duties of confidentiality are not barriers to the lawful sharing of information where there are safeguarding concerns. Rather, they provide

a framework to ensure that personal information is shared appropriately, lawfully, proportionately and securely.

In England, the Company will have regard to the Department for Education's Information Sharing to Safeguard Children and Young People statutory guidance, the Information Sharing Duty under section 16LA of the Children Act 2004 and Working Together to Safeguard Children. In Wales, the Company will follow Welsh Government guidance Working Together to Safeguard People, Information Sharing to Safeguard Children and associated Safeguarding Wales procedures. Information should be shared whenever doing so may assist in safeguarding or promoting the welfare of a child, young person or adult at risk.

Safeguarding information sharing decisions must be necessary, proportionate, relevant, adequate, accurate, timely and secure. Staff must ensure that an appropriate lawful basis for sharing information has been identified and recorded where required.

Responsibilities

All staff must promptly share safeguarding concerns and relevant information with the Senior DSL, DSL or member of the safeguarding team. Information should be shared wherever it may assist in safeguarding or promoting the welfare of a child, young person or adult at risk, even where concerns are emerging and statutory intervention thresholds have not been met.

The Senior DSL, DSL or suitably trained member of the safeguarding team will consider the relevance, necessity, proportionality and lawful basis for information sharing and will determine what information should be shared, with whom, when and for what purpose.

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 place a child, young person or adult at risk at increased risk of harm, abuse, neglect or exploitation. Similarly, human rights considerations, including the right to respect for private and family life, will not prevent lawful information sharing where there are genuine safeguarding concerns.

We will follow the statutory principles and guidance when making decisions in relation to sharing information with whom, how and when.

Information may be shared where necessary and proportionate to prevent abuse, neglect, exploitation, harm, or to protect the welfare of a child, young person or an adult at risk. Information relating to parents, carers, family members or other individuals connected to a child, young person or adult at risk may also be shared where it is relevant to safeguarding or promoting welfare.

Where information is shared, or a decision is made not to share information, the rationale for the decision will be recorded. Records should include what information was shared, with whom, when, the lawful basis for sharing (where appropriate), and the reasons for the decision.

Information sharing decisions will always be made on a case by case basis, taking account of the individual's circumstances, the nature and level of risk, the need to safeguard and promote welfare, and the relevant legal and regulatory requirements applicable in England and Wales.

Consent

Where appropriate, individuals will be informed about how their information may be used and shared. Consent will be sought where required or appropriate; however, safeguarding concerns may justify the sharing of information without consent where there is a lawful basis to do so.

Consent from the information subject is not always required to share personal information. There may be circumstances where it is not appropriate to seek consent, either because the individual cannot give consent, it is not reasonable or practicable to obtain consent, or because seeking consent would place a child, young person or adult at risk at increased risk of harm.

Relevant personal information may be shared lawfully, with or without consent, where there is an appropriate legal basis to do so, including where sharing is necessary to safeguard a child, young person or adult at risk from abuse, neglect, harm or exploitation.

16. Associated Company Policies

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

- Online Safety Policy.
- Equality & Diversity Policy.
- Health and Safety Policy.
- Weapons and Dangerous Items Policy.
- Whistleblowing Policy.
- Data Protection Policy.
- Acceptable ICT Use Policies.
- MyConcern Guide.
- Employee Code of Conduct.
- Disciplinary Policy and Procedure.
- Bullying, Harassment & Respect at Work Policy.
- Grievance Procedure.
- Recruitment Policy.
- DBS Policy.
- Critical Incident Procedures.
- Emergency Response Procedures.
- Learner Behaviour and Discipline Policy.
- Managing Challenging Behaviours.
- Learner risk assessment, including YOS learners.
- Guest and Community Speakers Policy and Procedure.

17. Appendix 1: Prevent, Local Authorities and Local Safeguarding Boards

Prevent Links

Wales	
Online Referral Form	All Wales Partners Prevent Referral Form

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

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	https://www.islington.gov.uk/social-care-and-health/abuse 020 7527 2299
Other areas	https://www.safecic.co.uk/scb-england	https://www.safecic.co.uk/sab-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 03000 133 133. Out of Office Hours: Emergency Duty Team: 029 2078 8570	Tel: 029 2233 0888 Out of Hours: 02920 788570
Vale of Glamorgan / Barry	0808 281 6727 and press option 3 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:** sewscbadmin@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.	Tel: 01873 735492 Out of Hours: Emergency Duty Tel: 0800 328 4432
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
Bridgend	01656 642320 Emergency Out of Hours: 01443 743 665	Tel: 01656 642477 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

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	Tel: 0300 333 2222 Minicom on 01554 756741 SMS on 07892 345678
Ceredigion	Tel: 01545 574000 Out of Hours Tel: 0300 4563554	Tel: 01545 574000 Out of Hours 0300 4563554
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: 01597 827666 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 0300 1233079
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