



# Safeguarding & Prevent Policy & Procedure

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## Introduction

The “Company” and “We” relates to Instructus and its subsidiary company CQM Training and Consultancy Ltd.

This policy statement relates to the Company’s overall approach and policy to the management of Safeguarding & Prevent in relation to its learners. It sets out our approach to preventing and reducing harm to learners of our services, when they are in contact with anyone employed by the Company and associates/contractors in relevant positions.

This policy also applies to our governing body.

Safeguarding is an all-encompassing term used to describe many aspects of keeping people safe, which includes (but is not limited to):

- Health, safety and wellbeing, including learner’s mental health
- Bullying, harassment and discrimination including racial abuse and sexual abuse/harassment whether that be face-to-face or online
- Self-harm
- Domestic violence
- Safety from sexual exploitation, female genital mutilation and forced marriage
- Alcohol, drug and substance misuse
- Financial exploitation
- E Safety, including all forms of electronic communication
- Child protection
- Protection of adults at risk
- Child protection
- Protecting learners from radicalisation and extremism
- The security and safety of the place of learning, including online environments

It is the responsibility of all employees to understand their role in supporting safeguarding across all aspects of provision and for familiarising themselves with the appropriate procedures and other policies that support this overarching document:

- Health & Safety
- Data Protection & UK GDPR
- Communications, Systems & Technology

The government Counterterrorism and Security Act 2015 places a duty upon all education providers to have regard to the need to prevent people from being drawn into terrorism. This Prevent Duty forms part of the wider governments CONTEST counter terrorism strategy:

- Prevent terrorism – stop people becoming terrorists
- Pursue terrorism – disrupt and stop terror attacks
- Protect against terrorism – strengthen UK protection
- Prepare to deal with terrorism – mitigate impact of attacks that can’t be stopped

## Policy Scope

The policy aims to:

- Promote and prioritise safety and wellbeing of our learners
- Provide assurance that the Company takes reasonable steps to manage risks
- Ensure that everyone understands their roles and responsibilities in respect of Safeguarding and Prevent and is provided with the necessary information, training and support on Safeguarding and Prevent matters
- Actively avoid the employment of individuals in work with children and/or vulnerable adults where they have been barred by the Disclosure and Barring Service (DBS) or are deemed by the Company to pose an unacceptable risk to vulnerable group’s

- Ensure that appropriate action is taken in the event of any allegations or suspicions regarding harm from contact with anyone employed by the Company and its associates/contractors in relevant positions, regardless of where the harm has taken place
- Adopt a culture of respect, free from bullying or harassment
- Protect learners from radicalisation and extremism

The Safeguarding & Prevent Policy also seeks to manage effectively the risks associated with activities and events through its departments by:

- Completing a risk assessment process which involves identifying risks and means of reducing or eliminating these
- Implementing the required actions identified by the risk assessment process and reviewing the effectiveness of these on a regular basis
- Ensuring that the appropriate DBS or basic disclosure checks are conducted, depending on eligibility, for any individuals starting or moving into work which involves working with children and/or vulnerable adults
- Requiring new employees and individuals involved in working with children and/or vulnerable adults to familiarise themselves with the content of this policy and the associated Code of Practice outlined in **Appendix A**
- Requiring new employees to familiarise themselves with policy procedure

The Company has a responsibility to ensure:

- We have undertaken training in the Prevent Duty as identified by leaders and managers
- We are all aware of when it is appropriate to refer concerns about learners or colleagues to the Designated Safeguarding Officers
- To exemplify British values of “democracy, the rule of law, individual liberty and mutual respect and tolerance for those with different faiths and beliefs” into our practice

## Definitions

Radicalisation – is a process by which an individual or group comes to adopt increasingly extreme political, social, or religious ideals and aspirations that reject or undermine the status quo.

Terrorism – an act of terror/ violence based on a political objective, whether that means the politics of nationalism, ethnicity, religion, ideology or social class.

Extremism – an ideology that is far outside the mainstream attitudes of society, including, vocal or active opposition to fundamental British values, including democracy, the rule of law, individual liberty and mutual respect and tolerance of different faiths and beliefs. This also includes calls for the death of members of the British armed forces.

The Safeguarding & Prevent Policy should be used as the basis of each department’s approach to prevent and reduce harm to children and vulnerable adults.

## Process

### Legislation and Guidance

In drawing up this policy, consideration has been given to the following pieces of legislation and statutory guidance:

- The Children Act 1989
- The Safeguarding Vulnerable Groups Act 2006
- Keeping Children Safe in Education 2018
- Working Together to Safeguard Children 2018
- Prevent Duty guidance for England and Wales

Additionally, the following should be considered when applying this policy:

- GDPR and Data Protection Act 2018
- Information Sharing: Guide for Practitioners 2018
- Sexual Violence and Sexual Harassment Between Children in Schools and Colleges 2018

The safeguarding efforts of the Company are supported by the following core strands of activity (where relevant):

#### Promotion

- We will communicate this policy to all employees during their induction and any changes/updates will be communicated by email/at Business Update Meetings (as appropriate)
- We will make this policy available on our website for all webpage visitors to view
- We will make learners aware of this policy, during their programme induction (usually day 1 on programme)

#### Safe learning/environment

- We will provide a safe and suitable environment in which to learn, including online. This forms part of the scoping exercise carried out prior to the start of learning, ensuring that there are appropriate facilities for training delivery and further Health & Safety vetting of the employer
- We will ensure links to video conferencing will only be made available to learners by email
- We will ensure monitoring the continued safety of our learners through quarterly progress reviews
- We will adopt a culture of respect, free from bullying or harassment

#### Safe recruitment/training

- We will comply with best practice in the recruitment and training of our employees, in line with legislative requirements. Employees will undergo the appropriate identity pre-employment checks such as Right to Work in the UK and DBS checks for their role where applicable. As part of induction, employees will undertake Safeguarding and Prevent Duty training appropriate to their role
- Where delivery is through an employer or a subcontractor, the Company will complete due diligence to decide whether DBS checks are appropriate for delivery employees (usually where the delivery is through a third-party subcontractor and not the employer)
- Where employees are required to undertake a DBS check for their role, they will be signed up to the annual update service
- The Company will ensure that safeguarding updates/training will be undertaken on at least an annual basis by existing employees

#### Safeguarding Participants

- The Company has a legal obligation to protect young people and vulnerable adults from abuse. We have appropriately trained safeguarding officers who are supported by the Senior Management Team. Any disclosures made to the Safeguarding Officers will be dealt with quickly, sensitively, and appropriately. All staff will be trained in the appropriate response to a disclosure and the correct procedure for dealing with concerns about a participant. Employees will work with learners to proactively protect them from abuse and neglect and prevent them from being placed in an abusive situation.

#### Preventing people from being drawn into terrorism

- The Company has certain duties enshrined within the Counter Terrorism and Security Act 2015. All employees are aware of their Prevent duties and we have robust processes in place to respond to concerns about participants and staff members.
- Employees undertake training on the Prevent Duty during their induction and on an annual basis.
- Fundamental British Values are introduced to learners in their induction and revisited throughout their programmes so that learners develop an understanding and appreciation of British Values

#### Links with external agencies

- We will work with appropriate external agencies to address safeguarding concerns. These can include Local Safeguarding Children Boards, the Local Authority Designated Officer, the Multi Agency Safeguarding Hub and other professions to ensure a comprehensive safeguarding network is in place. Advice will be taken from professionals within these organisations as appropriate.

- We will work proactively with the regional Prevent coordinator and where appropriate, the local steering group and Channel panel. Refer to **Appendix B** for Prevent coordinator contact details.

**Key Responsibilities**

- The Senior Management Team: will be responsible for ensuring that all employees understand safeguarding and the Prevent Duty and where appropriate to the role, have received suitable training and development and that the employee recruitment and selection procedure is followed at all times. They will ensure that safeguarding is given high priority within their teams and that Fundamental British Values are embedded within the curriculum
- The Designated Safeguarding Officer (DSO): will be responsible for handling any reported safeguarding concerns and where appropriate, reporting those concerns to other, suitable agencies. Refer to **Appendix B** for DSO details.
- All employees: will have a responsibility for completing their training where relevant to their role and with familiarising themselves with the Safeguarding & Prevent Policy and any other related safeguarding procedures. They are also responsible for ensuring they understand their own role in the promotion of safeguarding and the appropriate action to be taken should they receive a disclosure or have concerns. Refer to **Appendix C** for the reporting process.
- All Board members will have a responsibility to read and understand this policy and how it impacts their responsibility in their role. They are required to sign below.

If you are a Trustee or Non-employee of Instructus, please sign below electronically. This will then be filed on our central filing system.

Name:		Date:	
Signature:			

**Related Policies**

- CQM Malpractice - Maladministration Policy
- Retention Policy
- Risk Management Policy

## Appendix A - Staff Code of Conduct

When working with learners, employees and associates are expected to take into account the guidance below in the way that they conduct themselves.

- Consider the wellbeing and safety of learners in advance through proper planning and development of safe methods of working
- Wherever possible, work in an open environment where learners can be seen by others
- Avoid unnecessary physical contact
- Avoid taking a learner alone in a car on journeys, however short
- Set expectations of the standards of behaviour required from learners and encourage them to accept responsibility for their own performance and behaviour
- Ask learners to take reasonable steps to ensure their own safety and that of others, and to report any inappropriate behaviour they experience/witness or any concerns that they may have
- Avoid showing favouritism towards a particular learner
- Report any safeguarding concerns (including those associated with Radicalisation & Extremism) to the **Designated Safeguarding Officer**, refer to **Appendix B** for contact details
- Follow the procedure for accident reporting, for the site that you are working on
- Avoid personal relationships with learners
- It is not appropriate for employees to have a physically or emotionally intimate relationship with a young person under the age of 18. Particular attention is drawn to the provisions of the Sexual Offences Act 2003 which created a new criminal offence of abuse of “a position of trust”
- Employees and associates should remember that inappropriate behaviour can also occur over the telephone, email, social media or internet
- Only Company official social media should be used for engaging with the wider community. Inappropriate or abusive comments should be removed swiftly, and abusive individuals blocked/reported to the social media concerned. Wherever possible, communication should be only public pages and avoid colloquial language/abbreviations which may be misinterpreted (e.g. LOL)
- Do not make suggestive or inappropriate remarks to learners, even in fun, as this could be misinterpreted
- Undertake training available to you to support you in your work with participants, including training in Safeguarding & Prevent
- First aid treatment should be given with more than one adult present unless a delay would be life-threatening
- Do not take learners to your home
- Maintain confidentiality about sensitive information unless legal disclosure is required
- Where it is necessary for employees and associates to take photographs or video images of learners, written consent must be obtained (from parents/guardians in the case of children) before these images are taken in order to comply with the Data Protection Act 1998. Personal details and photos which clearly identify an individual must only be published where he/she (or his/her parent/guardian) has given specific agreement. Subjects should be suitably dressed in photographs (e.g. when taking place in a sporting activity).

## Appendix B – Policy Procedure

The Company's Designated Safeguarding Officers are:

- Dawn Hughes – [dawn.hughes@cqmltd.co.uk](mailto:dawn.hughes@cqmltd.co.uk) / 07779 626588
- Richard Everitt – [Richard.everitt@cqmltd.co.uk](mailto:Richard.everitt@cqmltd.co.uk) / 07865 565759 (Deputy)

Links with external agencies:

East Midlands Regional Prevent Coordinator is:

- Sam Slack - [Sam.slack@education.gov.uk](mailto:Sam.slack@education.gov.uk) / 07384 452156

## Appendix C - Procedure for employees dealing with Safeguarding and Prevent concerns

### 1. Recognition

Signs of abuse can be difficult to spot, as can a learner trying to find the right language to tell you about a concern. If you have any concerns over the welfare of the learner from what you have seen, heard, discussed with the learner or you have noticed changes in their behaviour which cause you safeguarding concerns, you must report it to the designated person. You do not personally have to believe the concerns in order to raise them, any concerns raised should be taken seriously.

### 2. Response

No report or concerns about possible abuse should be ignored. Your main role here is to listen and record with no judgements or leading questions; use open question to gather factual details – when it took place, who said what, what happened. You must stay calm and not let the learner know if you feel panicked or shocked. Do not make any promises about what will happen next, but only that you will pass it onto the designated person, and that we will do everything we can to help. It is good practice to show support and reassurance but be mindful to maintain a situation where you do not put yourself at risk. It would also be useful to have information regarding current agency support – i.e. have the police already been informed, is the person receiving local authority or medical support.

### 3. Record

Ensure you record notes of the incident or disclosure as close to the time as possible. The notes should be dated and signed where possible. The notes should detail what you saw/heard or what was discussed with an individual, the names of those involved and the time, location and what action you took.

**For CQM employees only:** use the link to complete the Safeguarding form – [Safeguarding Concern](#)  
For all other employees, please make notes and report to the Company's Designated Safeguarding Officer as soon as possible.

### 4. Report

Report the concerns to the Designated Safeguarding Officers, ensuring you have recorded all details as above. This communication can be face to face, via email, or phone call followed up by email. All communication and documents will remain confidential between the designated person and individual that has reported it, unless the designated person deems it appropriate to take further action and involve other agencies.

### 5. Referral

The Designated Safeguarding Officers will then take the decision of what course of action should be taken. Only the designated person should be taking the decision to make referrals outside of the organisation.