

Policy Document ●●●

# Safeguarding & Prevent

# Introduction

Reed Business School and Reed Learning is part of The Reed Group. Reed Business School is an established tuition provider delivering professional accountancy training and Reed Learning is dedicated to delivering high quality training and professional development. Reed Business School and Reed Learning are committed to ensuring a safe and supportive environment for learners, co-members and visitors. We have a commitment to ensuring that all learners are offered the information, advice and support they need to stay safe and be able to actively participate in their education and training.

As part of the Reed Group, Reed Business School and Reed Learning believe that all learners have an equal right to protection from abuse, regardless of their age, race, religion, ability, gender, language, background, or sexual identity and consider the welfare of the young person or vulnerable adult as paramount.

## Document Control

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Signed:



## Purpose of the Policy

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To define the approach both Reed Business School and Reed Learning have towards Safeguarding Children, Adults with care or support needs and the Prevent duty, to define the terminology, to explain our responsibilities under this policy and to establish guidance and procedures in relation to activities or areas of perceived risk including how to report and deal with a cause for concern. The purpose of this policy is to ensure that everyone connected with Reed Business School and Reed Learning, including co-members and sub-contractors, understand how we safeguard learners, including those at risk of radicalisation and potentially becoming involved in terrorist activities.

## Objectives

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The objective of the Safeguarding and Prevent Policy is to provide an environment where:

- The welfare of the learner is paramount.
- All learners, regardless of age, disability, gender, racial heritage, religious belief, sexual orientation or identity, have the right to equal protection from all types of harm or abuse.
- The learning environment is safe and fundamental British values are promoted.
- Co-members, learners and stakeholders understand safeguarding which then enables them to fulfil their statutory obligations; they are aware of their roles and responsibilities in preventing radicalisation and extremism.
- Support, advice and guidance are provided for learners and co-members who may be at risk of radicalisation. This may include referral to Channel, the process by which multi-agency support is provided to individuals who are at risk of being drawn into terrorism.

## For the purposes of this Policy the definitions are as follows:

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**Learners:** any person registered to study with either Reed Business School or Reed Learning

**Co-members:** any person employed by Reed Business School or Reed Learning

**Contractors:** any person undertaking work for Reed Business School or Reed Learning under the terms of a contract for services who is not employed by either Reed Business School or Reed Learning.

## Safeguarding

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The term 'safeguarding' describes the broader preventive and precautionary approach to planning and procedures that are necessary to be in place to protect children, young people, and vulnerable adults from any potential harm. It is directed by various legislation and statutory duties including Keeping Children Safe in Education (KCSIE 2023).

Safeguarding means having a culture of vigilance where all co-members know their responsibilities and act accordingly and all learners are aware of what they can expect and what to do if they have concerns. It is about providing a deep commitment to place the learner at the centre of our concerns and to build policies, practices, and procedures around them, so they feel safe.

Safeguarding is everyone's responsibility. Safeguarding applies if a child or an adult with care and support needs, is experiencing or at risk of abuse and neglect.

Safeguarding and Child Protection are **not** the same.

- Safeguarding is what we do for all children and young people to keep them safe whilst in our care.
- Child Protection describes the actions specifically for those young people who are at risk of serious harm or have been seriously harmed.

### The following six key principles underpin all adult safeguarding:

- **Empowerment:** people being supported and encouraged to make their own decisions and give informed consent
- **Prevention:** it is better to act before harm occurs
- **Proportionality:** the least intrusive response appropriate to the risk presented
- **Protection:** support and representation for those in greatest need
- **Partnership:** local solutions through services working with their communities – communities have a part to play in preventing, detecting and reporting neglect and abuse
- **Accountability:** accountability and transparency in safeguarding practice

### At Risk

**Child:** Anyone under the age of 18 is defined as a child.

**Vulnerable Adult:** A person who is aged 18 years of age or over is defined as vulnerable if they are at risk of harm, abuse, or manipulation (including radicalisation) because of either their social or personal situation.

**Adult at risk:** An adult at risk is 'any person who is aged 18 years or over and at risk of abuse or neglect because of their needs for care and support' (Care Act 2014 [England]). The Care Act 2014 provides a legal framework for how local authorities and other parts of the health and care system should protect adults at risk of abuse or neglect.

- Adult at risk of harm: - is a person aged 18 or over, whose exposure to harm through abuse, exploitation or neglect may be increased by their:
  - Personal characteristics which may include, but are not limited to, age, disability, special educational needs, illness, mental or physical frailty or impairment of, or disturbance in, the functioning of the mind or brain. and/or
  - Life circumstances which may include, but are not limited to, isolation, socio-economic factors, and environmental living conditions.
- Adult in need of protection: - is a person aged 18 or over, whose exposure to harm through abuse, exploitation or neglect may be increased by their:
  - Personal characteristics AND/OR
  - Life circumstances AND
  - Who is unable to protect their own well-being, property, assets, rights, or other interests; AND
  - Where the action or inaction of another person or persons is causing, or is likely to cause, him/her to be harmed.

## Harm

- Conduct which causes physical harm.
- Conduct which causes psychological harm (for example by causing fear, alarm, or distress).
- Unlawful conduct which appropriates or adversely affects property, rights, or interests (for example theft, fraud, embezzlement, or extortion).
- Conduct which causes self-harm.

## Abuse

Everyone has the right to live in safety, free from abuse and neglect. Abuse is a form of maltreatment. Somebody may abuse or neglect a child or vulnerable adult by inflicting harm, or by failing to act to prevent harm. Harm can include ill treatment that is not physical as well as the impact of witnessing ill treatment of others. This can be particularly relevant, for example, in relation to the impact on children of all forms of domestic abuse. Children may be abused in a family or in an institutional or community setting by those known to them or, more rarely, by others. Child sexual exploitation is a form of child sexual abuse.

Abuse can take place wholly online, or technology may be used to facilitate offline abuse. Children may be abused by an adult or adults, or another child or children. Abuse can be emotional, physical, sexual, or financial.

- The abuser can be a partner, ex-partner, family member, community leader or member, a friend, someone at work or a stranger.
- It can happen to anyone: an adult or a child, female or male.
- It can happen at home or in a public place like a community centre, school, or work.
- It can be in person, or through technology and online.

### Other forms of abuse associated with adults at risk include:

- **Financial Abuse** – this could include:  
Undue pressure, duress, threat or undue influence put on the person in connection with loans, wills, property, inheritance or financial transactions, theft of money or possessions or misuse of benefits.
- **Discriminatory Abuse** – this could include:  
Unequal treatment based on age, disability, gender reassignment, marriage and civil partnership, pregnancy and maternity, race, religion and belief, sex or sexual orientation (known as ‘protected characteristics’ under the Equality Act 2010)
- **Institutional abuse** – this could include:  
Not offering choice or promoting independence, failure to respond to abuse appropriately or abusive and disrespectful attitudes towards people using the service.

### Child criminal exploitation

As set out in the Serious Violence Strategy, published by the Home Office, 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 any criminal activity (a) in exchange for something the victim needs or wants, and/or (b) for the financial or other advantage of the perpetrator or facilitator and/or (c) through violence or the threat of violence. The victim may have been criminally exploited even if the activity appears consensual. Child criminal exploitation does not always involve physical contact; it can also occur using technology.

### Child-on-child abuse

Child on Child or Peer-on-peer child abuse is a term used to describe children abusing other children. Definition of child-on-child abuse: Inappropriate behaviours between children that are abusive in nature including physical, sexual, or emotional abuse, exploitation, sexual harassment, all forms of bullying, coercive control, hazing/initiation rituals between children and young people, both on and offline (including that which is within intimate personal relationships. Adapted from:

[Keeping children safe in education - GOV.UK \(www.gov.uk\)](https://www.gov.uk/government/consultations/keeping-children-safe-in-education)

We should remember that child-on-child abuse is harmful to both the perpetrator and the victim. Children or young people who harm others may have additional or complex needs (e.g., significant disruption in their lives, exposure to domestic abuse, witnessing or suffering abuse, educational under-achievement, or being involved in crime). Adults might have also experienced this abuse as children.

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

- bullying (including cyberbullying, prejudice-based and discriminatory bullying)
- abuse in intimate personal relationships between children (sometimes known as ‘teenage relationship abuse’)
- physical abuse which can include hitting, kicking, shaking, biting, hair pulling, or otherwise causing physical harm
- sexual violence, such as rape, assault by penetration and sexual assault
- sexual harassment, such as sexual comments, remarks, jokes and online sexual harassment

- causing someone to engage in sexual activity without consent, such as forcing someone to strip, touch themselves sexually, or to engage in sexual activity with a third party
- consensual and non-consensual sharing of nude and semi-nude images and/or videos (also known as sexting or youth produced sexual imagery)
- upskirting which typically involves taking a picture under a person's clothing without their permission, with the intention of viewing their genitals or buttocks to obtain sexual gratification, or cause the victim humiliation, distress, or alarm, and
- initiation/hazing type violence and rituals (this could include activities involving harassment, abuse or humiliation used as a way of initiating a person into a group and may also include an online element).

### Modern slavery

Encompasses slavery, human trafficking, forced labour and 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.

The effects of abuse are wide-ranging and will vary according to the type of abuse and duration, but can include:

- behavioural problems
- mental health problems
- educational problems
- relationship problems
- drug and alcohol problems
- self-harm
- suicide
- in extreme cases, death following abuse.

### Cyberflashing

Cyberflashing involves sending obscene pictures to strangers online, often done through Bluetooth or AirDrop transfers between devices. The practice typically involves offenders sending an unsolicited sexual image to people via social media or dating apps but can also be over data sharing services such as Bluetooth and Airdrop. Cyberflashing will become a new criminal offence with perpetrators facing up to two years in prison under new laws to be introduced by the UK Government.

### Neglect

Failure to provide medical or physical care, access to a doctor or other services, or denying someone medication, food or heating, privacy or dignity, self-neglect.

Signs to look out for:

- Not having their basic needs met, such as adequate food or heating
- Not being provided with adequate information about their rights or entitlements, or being misinformed
- The adult at risk not receiving appropriate care, which would protect them from harm.

## Female genital mutilation (FGM)

Female genital mutilation (FGM) comprises all procedures that involve partial or total removal of the external female genitalia, or other injury to the female genital organs for non-medical reasons. The practice of FGM is recognised internationally as a violation of the human rights of girls and women. Where it is discovered that an act of FGM appears to have been carried out on a girl who is aged under 18, they should personally report it to the police.

Mandatory reporting of female genital mutilation: procedural information  
– GOV.UK ([www.gov.uk](http://www.gov.uk))

Female Genital Mutilation - Prevent & Protect | NSPCC

## Recognising abuse

To identify cases of children, young people or adults who may need help or protection, co-members should be aware of the signs of neglect and abuse. When concerned about the welfare of a child, young person or adult, co-members should always act in their best interest. Young people who regularly go missing from work and home may be at risk of sexual exploitation and abuse and must be viewed as a safeguarding concern.

Child abuse can and does occur both within a child/young person's/adult's family and in institutional or community settings. It is acknowledged that some individuals seek to use childcare and community organisations to gain access to children, or vulnerable adults.

## Physical signs that may indicate that a child or vulnerable adult is being or has been abused:

- Unexplained or suspicious injuries, particularly if such an injury is unlikely to have occurred accidentally
- An injury for which the child's or adult's explanation appears inconsistent
- Bruising/burns/cigarette burns/fractures which are unexplainable
- Genital injuries/infections/bleeding or discomfort
- Sudden speech disorders, delayed development, failure to grow
- Constant hunger, stealing food, frequently dirty or smelly
- Untreated medical conditions or lack of treatment for illness or injury

## A behavioural sign that may indicate a child or adult has been abused or is being abused:

- Inappropriate sexual awareness or sexually explicit behaviour
- The child appears distrustful of adults
- Unexplained changes in behaviour
- Concerning behaviour
- Aggressive behaviour or severe temper outburst
- Running away, not wanting to go home
- Cover up clothing to hide injuries



- Flinching when approached, fear of adults, fear of men or women
- Depression, low mood, self-harm, eating disorders
- Sexualised language, play, drawings or knowledge
- Nightmares, bed wetting
- Behaving increasingly secretly, possessing unexplained amounts of money, gifts
- Drug and alcohol abuse, suicide
- Excessive lack of confidence, need for approval, attention or affection
- Missing classes, appointments, being continually late
- Difficulty forming relationships, no friends

The recognition of abuse is not easy, and it is not the place of co-members to make such a judgement. However, it is their responsibility to act on concerns to safeguard the welfare of the child/ vulnerable adult.

### How to respond to signs or suspicions of abuse

All Reed Business School and Reed Learning co-members should report any concerns to a member of their Safeguarding Team.

### The following '5R' process **MUST** be followed by all co-members:

- **Recognise** the signs of abuse.
- **Respond** and react accordingly
- **Record** the facts of the disclosure
- **Report** the disclosure to the Designated Safeguarding Lead (or Deputy Safeguarding Officer) immediately.
- **Refer** to the emergency services or social services or through the Channel process in situations where an individual may be at risk of immediate harm – and ensure that the information is reported to the Designated Safeguarding Lead (or Deputy Safeguarding Officer) immediately.

### How to respond to a child/young person or adult telling you about abuse

There are some basic principles in reacting to suspicions, allegations, and/or disclosures of abuse.

#### What to do:

- stay calm
- listen, hear and believe
- ask open ended questions for clarification only
- give the child/young person/adult time to say what they want
- reassure and explain that they have done the right thing in telling.
- explain that only those people who need to know will be informed

- act immediately in accordance with the procedure in this policy
- record in writing what was said as soon as possible
- report to the Designated Safeguarding Officer or a member of the safeguarding team
- record the events in a 'safeguarding concerns report'
- consider their immediate safety

#### **What not to do:**

- do not over-react. It is extremely unlikely that the child/young person/adult is in immediate danger
- do not probe for more information, questioning the child/young person/adult may affect how their disclosure is received later
- do not make assumptions, paraphrase and do not offer alternative explanations
- do not promise confidentiality to keep secrets or that everything will be ok (it might not)
- do not try to deal with it yourself
- do not make negative comments about the alleged abuser
- do not 'gossip' or disclose any information with colleagues about what has been said to you
- do not make the child/young person/adult repeat the story unnecessarily

## **Neurodiversity**

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Neurodiversity is a term used to describe a range of neurological differences including:

- Dyslexia
- Dyspraxia (also called Developmental Coordination Disorder, or DCD)
- Dyscalculia
- Attention Deficit Hyperactivity Disorder (ADHD)
- Autism Spectrum Condition (ASC).

Neurodivergent children and young people may need an adapted and more individually tailored approach to keep them safe. Neurodivergent children and young people can be more vulnerable to abuse, self-harm, mental health issues, substance abuse, self-neglect or radicalisation. A child or young person might be more vulnerable or at risk of harm due to communication difficulties, struggling with a sense of identity, feeling socially isolated, tendency to hyperfocus on specific topics or limited understanding of risk.

## Prevent Duty and Channel

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The Prevent Duty requires all education providers 'to have due regard to the need to prevent people from being drawn into terrorism'. This includes safeguarding children, young people and adult learners from extremist ideologies and radicalisation.

Prevent operates in a pre-criminal space, providing support and re-direction to vulnerable individuals at risk of being groomed into terrorist activities before any crimes are committed. Radicalisation could be comparable to other forms of harm and abuse. It is therefore considered a safeguarding issue and thought of alongside the wider safeguarding agenda.

### Contest

Contest is the Government's Counter Terrorism Strategy. The aim of the strategy is 'to reduce the risk from international terrorism, so that people can go about their lives freely and with confidence.' CONTEST' consists of four 'P' workstreams:

- **Prevent:** to stop people becoming terrorists or supporting terrorism.
- **Pursue:** to stop terrorist attacks.
- **Protect:** to strengthen our protection against a terrorist attack.
- **Prepare:** to mitigate the impact of a terrorist attack.

Channel is an early intervention process which will gather information as to determine whether there is a specific risk of radicalisation and whether the threat is malicious.

The local authority Prevent coordinator and the police Channel coordinator will identify the type of support required and refer to a Multi-Agency Channel Panel. As part of the Prevent duty it's important that we show we are working in partnership with the local authority.

To comply with the Prevent duty, further education independent training providers must show evidence of:

- productive co-operation, with local Prevent co-members, the police, and local authorities.
- co-ordination through existing multi-agency forums.

As part of this duty Reed Business School and Reed Learning agree to contact and build partnerships with these bodies in our region:

- Local authority Prevent lead
- Local authority Prevent education officer
- [HE/FE Regional Prevent coordinators](#)
- Local authority children or adult services
- Safeguarding children partnership
- Local policing team

## County Lines

As set out in the Serious Violence Strategy, published by the Home Office, a term used to describe gangs and organised criminal networks involved in exporting illegal drugs into one or more importing areas within the UK, using dedicated mobile phone lines or other form of 'deal line'. They are likely to exploit children and vulnerable adults to move and store the drugs and money, and they will often use coercion, intimidation, violence (including sexual violence) and weapons.

## Radicalisation

Radicalisation is the process through which an individual or group develops extreme political, social, or religious beliefs.

## Extremism in the United Kingdom

The government's definition of extremism:

Vocal or active opposition to our fundamental values, including democracy, the rule of law, individual liberty and the mutual respect and tolerance of different faiths and beliefs. We also regard calls for the death of members of our armed forces as extremist.

Extremism is a political term which determines the activities that are not in accordance with norms of the state, are fully intolerant toward others, reject democracy as a means of governance and the way of problem solving and reject the existing social order. Violent extremism is when a person or group uses fear, terror, or violence to try and achieve change.

Extremist influences could include, but are not limited to:

- Family members having direct contact or involvement with extremist or terrorist groups.
- Members of an education or community setting promoting an extremist ideology.
- Peers promoting an extremist ideology or sharing extremist material.
- Access or exposure to online extremist material via social media or the internet - for example, propaganda including pictures, videos, blogs, and fake news.
- Exposure to extremist, terrorist, or other violent activity in overseas settings.
- Access or exposure to extremist leaflets, magazines or stickering.
- Exposure to extremist groups hosting marches, protests, or stalls.

## Risk Factors

Push and pull factors can make a child, young person, or adult learner at risk of extremism or radicalisation. Often there are several risk factors present that, seen together, can cause concerns.

### Push factors

Push factors may include a child, young person or adult learner feeling:

- Isolated
- They do not belong
- They have no purpose
- Low self-esteem
- Their aspirations are unmet
- Anger or frustration
- A sense of injustice
- Confused about life or the world
- Real or perceived personal grievances

### Pull factors

Pull factors could include an extremist or terrorist group, organisation or individual:

- Offering a sense of community and a support network
- Promising fulfilment or excitement
- Making the child, young person or adult learner feel special and part of a wider mission.
- Offering a very narrow, manipulated version of an identity that often supports stereotypical gender norms.
- Offering inaccurate answers or falsehoods to grievances
- Encouraging conspiracy theories
- Promoting an 'us vs. them' mentality
- Blaming specific communities for grievances
- Encouraging the use of hatred and violent actions to get justice.
- Encouraging ideas of supremacy

Extremist influences could include, but are not limited to:

- Family members having direct contact or involvement with extremist or terrorist groups.
- Members of an education or community setting promoting an extremist ideology.
- Peers promoting an extremist ideology or sharing extremist material.
- Access or exposure to online extremist material via social media or the internet - for example, propaganda including pictures, videos, blogs, and fake news.
- Exposure to extremist, terrorist, or other violent activity in overseas settings.
- Access or exposure to extremist leaflets, magazines or stickering.
- Exposure to extremist groups hosting marches, protests, or stalls.

## British Values

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The five British Values are:

- Democracy
- Rule of law
- Individual liberty
- Mutual respect
- Tolerance

## The Higher Education (Freedom of Speech) Act 2023

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Higher Education (Freedom of Speech) Act 2023 is up to date with all changes known to be in force on or before 01 July 2024. This Act will protect the lawful freedom of speech and require universities, colleges, and students' unions in England to take steps to ensure lawful freedom of speech on campus. This doesn't include unlawful speech, such as harassing others or inciting violence or terrorism.

Under the Act, universities and higher education institutions won't be allowed to silence people who raise complaints of sexual misconduct, abuse, harassment or bullying by using non-disclosure agreements.

## Martyn's Law Terrorism (Protection of Property) Bill 2023

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The draft Terrorism Protection of Premises Bill, also known as 'Martyn's Law' is expected to become law in 2024. Known as 'Martyn's Law' in recognition of the campaign led by the mother of one of the victims of the Manchester Arena bombings, it would require those responsible for publicly accessible venues to take steps to reduce the threat to the public from terrorist attacks – increasing national security and personal safety.

The Bill will require certain venues to fulfil necessary but proportionate steps according to their capacity to mitigate the impact of a terrorist attack and reduce harm. The duties that premises will have will depend on the size of the venue. Martyn's Law is currently a bill going through parliament and aims to ensure that parties who run public premises are prepared, ready to respond and know what to do in the event of an attack. Better protection will be delivered through enhanced security systems, co-member training, and clearer processes.

## Legal Responsibilities

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Reed Business School and Reed Learning recognises it has a duty of care to all its learners, specifically legal responsibilities to those under 18 years, and those who are adults at risk.

### The key pieces of legislation that inform safeguarding policies are:

- General Data Protection Regulations (GDPR) 2018
- The Care Act 2014
- Children Act 2004
- Working Together to Safeguard Children 2018
- Prevent 2018
- Modern Slavery Act 2015
- The Higher Education (Freedom of Speech) Act 2023

We also recognise the wider indications of abuse and neglect as outlined by the statutory guidance document – Keeping Children Safe in Education – September 2023.

The Data Protection Act 2018 and GDPR do not prevent, or limit, the sharing of information for the purposes of keeping children and vulnerable adults safe. Fears about sharing information must not be allowed to stand in the way of the need to promote the welfare and protect the safety of children and adults at risk.

## Our responsibilities under this policy

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Reed Business School and Reed Learning take the responsibility to safeguard learners very seriously. We do not tolerate any form of bullying or harassment (includes cyber or social media bullying), learners should always feel safe whilst attending learning in person or online and should not feel threatened by the environment or by other people in it.

Reed Business School and Reed Learning also recognise the wider indications of abuse and neglect as outlined by the statutory guidance document – Keeping Children Safe in Education – September 2023. These indications include, but are not limited to:-

- Child Sexual Exploitation (CSE)
- Child Criminal Exploitation (CCE)
- Bullying including cyberbullying.
- Domestic Violence
- Physical abuse
- Emotional abuse
- Neglect
- Fabricated or Induced Illness
- Faith Based Abuse
- Forced Marriage
- Gangs and Youth Violence
- Private Fostering
- County Lines
- Female Genital Mutilation (FGM)
- Racist, disability and homophobic or transphobic abuse
- Gender based violence/violence against women and girls (VAWG)
- Preventing Radicalisation
- Sexual abuse
- Sexual violence

- Sexual harassment
- Rape
- Peer on peer abuse
- Groping
- Sexting and sharing 'nudes/semi nudes.
- Up Skirting
- Stalking
- Spiking
- Teenage Relationship Abuse
- Trafficking and modern-day slavery
- Mental Health and wellbeing
- Breast Ironing
- Honour Based Violence
- Drugs
- Cuckooing
- Serious Violence

## Our principles

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Both Reed Business School and Reed Learning recognises that:

- The welfare of the learner is paramount.
- All learners, regardless of age, disability, gender, racial heritage, religious belief, sexual orientation, or identity, have the right to equal protection from all types of harm or abuse.
- It is always unacceptable for a learner to experience abuse of any kind and recognises its responsibility to safeguard the welfare of all learners by commitment to practice that protects them.
- Working in partnership with learners and with other agencies is essential in promoting a safe learning environment.
- Sexual harassment has become 'normalised' for children and young people. We assume that sexual harassment, online sexual abuse, and sexual violence are happening and even though there are no specific reports, we have put a whole organisational approach in place to address it. This follows a review by Ofsted 'Review of Sexual Abuse in Schools and Colleges' 2021).

## Our Commitment to Safeguarding

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Reed Business School and Reed Learning will:

- Provide co-members, associates, employers, and other stakeholders with guidance on procedures they should adopt to minimise the risk of harm to learners, if they suspect an individual may be experiencing or be at risk of harm, to offer guidance on appropriate action (including update briefings on safeguarding issues including the Prevent strategy).
- It creates an ethos which upholds core values of shared responsibility and wellbeing for all learners, co-members, associates, and visitors promoting respect, equality and diversity and understanding.



- To maintain an ongoing action plan for the management of safeguarding and Prevent within Reed Business School and Reed Learning.
- Work closely with local and statutory agencies to understand the local issues and will inform stakeholders appropriately on risks posed via numerous sources.
- Work together with our three safeguarding partners (Local authority, Clinical Commissioning Group and Chief of Police for our LA area) to safeguard and promote the welfare of learners, including identifying and responding to their needs.
- This policy will be shared with all co-members, associates, learners, and employers.
- Operate a zero tolerance of abuse and any other harmful behaviour.
- Put systems in place, and well promoted, easily understood and easily accessible for learners to confidently report abuse, knowing their concerns will be treated seriously, and knowing they can safely express their views and give feedback.
- Share information about concerns with agencies who need to know and involve all stakeholders appropriately.
- Ensure that the Disclosure and Barring Service, in accordance with their guidelines, runs checks on all co-members and associates with responsibility for children and where necessary those deemed "at risk".
- Make all new co-members and associates aware of procedures and policies.
- Will identify at least one Designated Safeguarding Lead (DSL) for Reed Business School, Magdalena Robinson, and at least one Designated Safeguarding Lead (DSL) for Reed Learning, Emma Taylor, with the responsibility for overseeing the implementation of this policy.
- The Designated Safeguarding Leads for Reed Business School and Reed Learning will monitor and review this policy in accordance with changes in legislation and guidance on the protection of children and vulnerable adults.
- Appoint Deputy Safeguarding Leads or Safeguarding officers for Reed Business School and Reed Learning and ensure all appointed Safeguarding team members are trained in relevant safeguarding procedures and competent in fulfilling their duties, to enable any concerns to be reported in accordance with our procedures.
- Review our policy and good practice towards safeguarding and Prevent at least annually.
- Recruit co-members and associates safely through an effective safer recruitment process.
- The recruitment process for Reed Business School employees including tutors and learning coaches, will include a thorough level 3 screening process through Reed Screening and a DBS (Disclosure and Baring Service) Check. Reed Business School and Reed Learning will ensure all DBS certificates are renewed regularly for best practice and DBS checks carried out every three years.
- Reed Business School will ensure a safe and secure environment including on site security. This includes a robust CCTV monitoring system, security gates and perimeter walls, keypad locked student accommodation, screening of visitors and deliveries, co-members and tutors wearing photo identity badges, signing in procedures for co-members and visitors on site (including visitor and contractor badges).

## Our Commitment to Training and Implementing Safeguarding and Prevent

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The training and sharing of information are recognised as an integral part of promoting safeguarding and Prevent to ensure all co-members, associates, learners, employers, and other stakeholders have a clearly developed understanding of relevant issues.

Reed Business School and Reed Learning are committed to ensuring:

- Safeguarding and Prevent information and relevant training are shared with learners as part of their induction process to promote their own personal health, well-being and safety including their safety online.
- Co-Member training commences at induction and ensures all co-members are fully aware of their responsibilities for safeguarding learners and responding to and reporting abuse or neglect of young or vulnerable adults.
- All other co-members must undertake Safeguarding Training on a yearly basis.
- The Designated Safeguarding Leads for Reed Business School and Reed Learning will complete appropriate DSL training, which should be updated at least every 2 years.
- All co-members and associates have mandatory training in safeguarding and Prevent to ensure that disclosures made are dealt with quickly, sensitively, and appropriately. This includes, but is not limited to, on-line safeguarding training resources incorporating tests and understanding of their role and how to act upon the following safeguarding practices.
  - Recognition
  - Response
  - Reporting
  - Recording
  - Referral
- Co-members are aware of the Channel Referral process as this forms part of their training in Prevent.
- This will include training for co-members and associates in how to exemplify and promoting of British Values to all learners.
- Co-members and associates have read and understand Part One and Annex A of Keeping Children Safe in Education 2023.
- Refresher training and updates for all co-members and associates are carried out annually, unless legislation dictates sooner, and any updates or safeguarding issues are discussed at regular safeguarding team meetings.
- An effective process in place to review and manage all safeguarding reports and concerns including regular safeguarding team meetings.

## Promoting the Safeguarding and Prevent Policy

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Reed Business School and Reed Learning will publish and promote the following:

- A confidential email address where all safeguarding and/or Prevent concerns can be reported by learners, co-members, associates, employers, and other stakeholders.
- The contact details for Reed Business School or Reed Learning safeguarding officers on all email signatures to learners, employers, and other stakeholders.
- The contact details for Reed Business School and Reed Learning safeguarding officers on the website. Associated materials and visuals displayed throughout Reed Business School in the Manor and throughout the accommodation.
- To communicate to all employers their responsibilities and how to identify potential concerns and possible warning signs.
- This policy is shared with learners during the induction process and onboarding activities.
- This policy is available to all employers, learners, and the public via the Reed Business School and Reed Learning website.

## Procedure for Raising, Recording, and Investigating concerns

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- It is the duty of anyone who works with children/young people/ adults to report and record disclosure of abuse or any other safeguarding concern.
- It is not for co-members to decide whether a suspicion or allegation is true. All suspicions or allegations must be taken seriously and dealt with accordingly to this procedure. If the disclosure is made by a parent/guardian/carer, you should follow the same procedure and refer them to the Designated Safeguarding Lead (DSL).
- No member of co-members should give a learner their personal phone numbers, email address or home address or have a social media link with a learner.

If a co-member or associate receives a disclosure from a learner, or notices signs or symptoms of abuse or harm, the following procedure must be followed:

- The priority is to ensure that the learner is not in any immediate danger.
- Designated co-members will seek medical attention if the learner is suffering from a serious injury.
- Listen carefully to what is said.
- Make notes as soon as possible writing down exactly what was said using the individual's own words as far as possible. All notes must be timed, dated, and signed.
- Ask open questions such as: 'Tell me what happened?'; or 'Please explain what you mean when you say.....?'

- Do not ask questions which may be considered to suggest what might have happened, or who has perpetrated the abuse, e.g. 'Did your partner hit you?'
- The learner may be asked to repeat the disclosure they have made. Every effort will be made to communicate with the learner in a way that is appropriate to their age, understanding and preference. This is especially important for learners with a disability or those whose preferred language is not English.
- Report immediately to the Designated Safeguarding Lead (DSL) to log the concern about a learner's safety and welfare using the learner's words as far as possible.
- Individual co-members should never deal with abuse disclosures in isolation and should always refer to a Designated Safeguarding Officer with responsibility for child/adult protection.
- The Designated Safeguarding Officer will make an initial assessment of the allegation; consult with the co-members involved and other designated co-members as appropriate.
- The decision whether to report suspected abuse to Social Services or the Police will be made collectively by the Safeguarding Team.
- The learner will be spoken to and if relevant asked if there are younger children or any other adults who might also be at risk.
- A written account will be made of the disclosure and the context, and the learner may be asked to sign it.
- If the learner wishes to take the allegation forward, the Designated Safeguarding Lead should support the learner in contacting Social Services, the Police or the NSPCC. When a learner is not sure about taking the allegation forward, the Designated Safeguarding Lead can, without necessarily identifying the person in question, discuss concerns with Social Services or the Police, so that an informed decision can be reached.
- Following consultation, the Designated Safeguarding Lead ask for the learner's views, if they can understand the significance and consequences of a referral to Social Services or the Police (or Forced Marriage Unit or Counter-Terrorism Team).
- All concerns, discussions, decisions made and reasons for those decisions will be recorded. Written records will be kept confidential and in accordance with the Data Protection Act/GDPR. However, where the police are involved, and a crime has been committed then such records may need to be disclosed.
- There may be instances where more than one member of the designated co-members will be involved in a particular disclosure. On occasion, they may work collaboratively to deal with a case.
- Reported concerns will be discussed and followed up during safeguarding meetings.
- The Designated Safeguarding Lead will liaise with the mental health first aider, and where available the Mental Health Support Team, where safeguarding concerns are linked to mental health.

## Confidentiality

The safety and well-being of the child or adult at risk is paramount. Co-members may have access to confidential information about learners to undertake their everyday responsibilities. In some circumstances, co-members may be provided with highly sensitive or private information. They should never use confidential or personal information about a learner or his/her family for their own or others' advantage. Information must never be used to intimidate, humiliate, or embarrass a learner.

- The Designated Safeguarding Lead (or Safeguarding Officers) will disclose personal information about a learner to other employees on a need-to-know basis only.
- All co-members must be aware that they have a professional responsibility to share information with other agencies to safeguard children/young people and adults at risk, in consultation with the Designated Safeguarding Lead (or Safeguarding Officers).
- All safeguarding records are subject to the Freedom of Information Act and the Data Protection Act. If there is any doubt as to the rights of any party to access information, Reed Business School or Reed Learning may seek legal advice prior to releasing any information.
- All co-members must be aware that they cannot promise a child, young person or adult at risk confidentiality, which might compromise the safety or well-being of the learner, or that of another.

## Whistleblowing

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All co-members should feel able to raise concerns through the Whistleblowing procedure about poor or unsafe practice and potential failures in Reed Business School or Reed Learning's safeguarding regime and know that such concerns will be taken seriously.

### **Allegations of abuse made against members of Reed Business School, Reed Learning co-members or an employer.**

Any allegation made against a member of co-members, employer or another learner will be treated seriously and investigated immediately. The Designated Safeguarding Lead will report to the Senior Leadership Team or Directors and appropriate action will be taken.

### **Low Level Concerns**

A low-level concern is any concern that an adult has acted in a way that:

- Is inconsistent with the co-members code of conduct, including inappropriate conduct outside of work.
- Does not meet the allegations threshold or is not considered serious enough to refer to the local authority designated officer (LADO).
- Low-level concerns should be reported to the Designated Safeguarding Lead or a deputy. If there are concerns about a Designated Safeguarding Lead, these should be reported to the principal or member of the senior management team.

## Procedure

- The Designated Safeguarding Lead must log concerns, raised directly and/or via the confidential email address.
- External Referrals or Police and/or Channel Referrals must be reported to the Designated Safeguarding Lead (DSO) immediately.
- The Designated Safeguarding Lead must record on the log the action(s) taken against each incident and who is responsible for completion.
- Written records and referrals of safeguarding concerns will be maintained centrally. All personal data will be processed in accordance with the requirements of the Data Protection Act 2018, the General Data Protection Regulation (GDPR) and Data Protection Policy.
- All incidents are monitored and reviewed during safeguarding team meetings.
- The Designated Safeguarding Lead is responsible for ensuring that the appropriate action has been taken.

## Online Safety and Security

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Information Technology (IT) plays an important role in the everyday lives of children, young people and adult and is now an essential resource to support learning and teaching. Reed Business School and Reed Learning recognises the importance of online safety, and that learners are aware of all the risks.

IT covers several resources including web-based and distance learning. Technologies are currently used both inside and out of the learning environment. Examples of these include websites, virtual Learning Environments (VLE), Mobile/smartphones with text, video and/or web functionality, social networking websites, chat rooms, email and instant messaging, social networking websites and video/music broadcasting.

To ensure that learners are protected against unnecessary risks, all co-members must ensure learners are not accessing inappropriate material, discourage raw image searches when working with young people and always observe copyright laws. The Online Safety Act 2023 (the Act) is a new set of laws that protects children and adults online. It puts a range of new duties on social media companies and search services, making them more responsible for their users' safety on their platforms.

## IT Filtering and Monitoring

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Filtering and monitoring are both important parts of safeguarding learners and co-members from potentially harmful and inappropriate online material. To aid effective safeguarding of learners Reed Business School and Reed Learning employs the following technologies and processes:

- Reed Business School and Reed Learning procured filtering and monitoring systems and effectiveness of provision is reviewed with IT support to meet the needs of our settings.
- Internet and email monitoring solution activity is monitored and recorded in line with the relevant UK law
- Internet access is controlled through an appropriate web filtering service
- Co-members and learners are made aware that email and internet activity can be monitored and explored further if required
- If learners or co-members discover an unsuitable site, the incident should be reported immediately to a member of co-members or a member of the management team
- Co-members understand their responsibilities, know how to follow policies processes and procedures and report concerns
- Learners and co-members are not permitted to download programs or files on centre-based IT facilities
- If there are any issues that are related to viruses or anti-virus software, then the Reed IT Team should be informed immediately.
- Filtering and monitoring reports are monitored, and safeguarding concerns reported to the DSL

### Online radicalisation

Children, young people, and adult learners are at risk of accessing inappropriate and harmful extremist content online. This could include downloading or sharing terrorist material, which could be a criminal act.

The internet and social media make spreading divisive and hateful narratives to millions of people easy. Extremist and terrorist groups and organisations use social media (for example, apps, forums, blogs, chat rooms) to identify and target vulnerable individuals.

You do not need to be an online expert to understand when a child, young person or adult learner is at risk of harm. You should deal with harmful online behaviour in the same way as offline activity.

### Concerns that a child or young person is being radicalised online

Any child, young person or adult learner who uses the internet can be at risk of online abuse.

If you're concerned that a child, young person, or adult learner is vulnerable to radicalisation online, you should follow your normal safeguarding procedures.

Radicalisation is like grooming. Whether this happens online or offline, you should treat it in the same way.

## Safeguarding Contact Information

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### Reed Business School

Designated Safeguarding Lead (DSL)	Magdalena Robinson	01608 674224
Safeguarding Officer	Desiree Rooker	01608 674224
Safeguarding Officer	Adele Morley	01608 674224
Prevent Officer	Desiree Rooker	01608 674224
Mental Health First Aider	Sam Dean	01608 674224
Out of hours Night Porter	Phil Edwards	07977 582326
E-mail to raise concerns	<a href="mailto:safeguarding.reed@reedbusinessschool.co.uk">safeguarding.reed@reedbusinessschool.co.uk</a>	

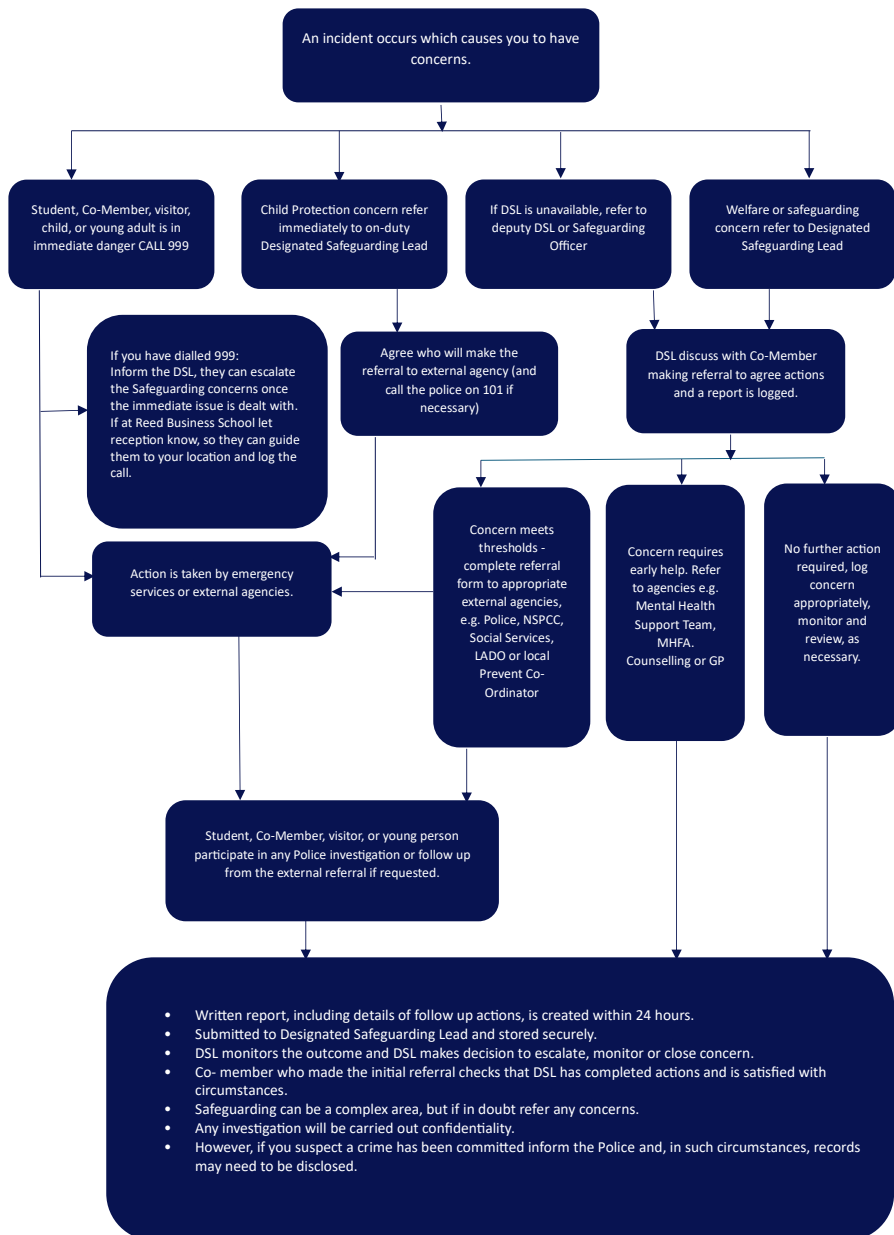
### Reed Learning

Designated Safeguarding Lead (DSL)	Emma Taylor	07541 682964 020 7932 2760
Deputy Safeguarding Officer	Naomi Metcalfe	020 7932 2760
Prevent Officer	Emma Taylor	07541 682964 020 7932 2760
E-mail to raise concerns	<a href="mailto:safeguarding.reed@reedbusinessschool.co.uk">safeguarding.reed@reedbusinessschool.co.uk</a>	

**If you are in immediate danger or a life-threatening emergency, you should call 999.**



## Appendix – Reporting a Safeguarding Incident Flowchart



Terms & Conditions

[www.reedbusinessschool.co.uk/terms-and-conditions](http://www.reedbusinessschool.co.uk/terms-and-conditions)

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