

## Safeguarding and Prevent Policy

## Key Contacts

### **Concerns and general guidance**

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#### **Deputy Designated Safeguarding Officer**

Katie Read

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#### **Deputy Designated Safeguarding Officer**

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### **Emergencies and out of business hours contacts**

If there is an immediate risk of harm or other emergency you should call 999 and speak to the emergency services. For non-emergency calls you can contact the Police on 101 or for medical concerns the NHS on 111.

**Samaritans:** 116123 – for support with many forms of emotional distress

(For non-emergencies: [jo@samaritans.org](mailto:jo@samaritans.org))

**Papyrus:** 0900 068 4141 or text 07860 039967 - Suicide Prevention advice:

**Mind:** 020 8519 2122 - [info@mind.org.uk](mailto:info@mind.org.uk) - Advice and support around mental health

Or text 'shout' to 85258 a free, confidential, anonymous text support service.

**NSPCC Helpline:** 0808 800 5000 – [help@nspcc.org.uk](mailto:help@nspcc.org.uk) advice for anyone who has concerns about the welfare of a child or young person

**Anti-terrorist hotline:** 0800 789 321 – for concerns about possible terrorist activity

### **Report online material promoting terrorism or extremism**

Report illegal or harmful information, pictures or videos you've found on the internet. You can make your report anonymously. <https://www.gov.uk/report-terrorism>

### **[Details of other External Support Organisations](#)**

## 1. Safeguarding Statement

Kaplan Financial UK (Kaplan) is committed to safeguarding all learners that undertake learning with us. We believe that all 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.

Kaplan will take every reasonable step to ensure that all learners are kept safe and secure so that they can learn and thrive. All suspicions and allegations of abuse will be taken seriously and responded to swiftly and appropriately as per our policy and internal procedures.

Kaplan recognises that safeguarding against radicalisation and extremism is no different to safeguarding against other risks that individuals may face. This policy also incorporates protecting individuals from being radicalised or exposed to extremist views. Kaplan's application of the Prevent Duty recognises that this applies to all individuals.

We enable our staff and those who work with us to make informed and confident decisions regarding safeguarding. We expect all delivery and management staff, including board members, directors and partners and subcontractors, to have read, understood and to adhere to this policy and related procedures.

We will provide adequate and up to date training to all learner facing staff and their managers to ensure that they are able to identify the signs of abuse and know how to deal with their own suspicions, reports of concerns from others and reports of abuse from people directly affected. Records of safeguarding and Prevent incidents will be periodically reviewed in the interests of recognising trends and priorities, and to inform the need for further staff training.

We fully recognise the importance of academic freedom and the right to preserve freedom of speech for all our employees, learners and visiting speakers. However, we will balance this with our obligations towards the Prevent Duty.

## 2. Safeguarding Definitions

### ***Safeguarding***

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.

Safeguarding is more than having background check policies and procedures in place. It means having a culture of vigilance where all staff 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 the learner for them to succeed.

### ***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) as a result of either their social or personal situation.

### ***Harm***

Harm can be caused in a number of ways and take different forms, including:

- Sexual abuse – for example, trying to get someone to take part in sexual activity by using force, threats or bullying. Sexual activity requires both consent to be given and also an understanding of what is being consented to. 'Grooming' occurs when a person uses an emotional bond to gain the trust of a child or vulnerable adult in order to sexually abuse or exploit them, or to trade them (trafficking)
- Radicalisation - the process by which a person comes to support terrorism and extremist ideologies associated with terrorist groups
- Neglect – for example, not caring for yourself or someone you are responsible for. This could include not washing regularly, not eating, or having unsafe living conditions
- Physical abuse – for example, hitting another person or deliberately cutting yourself
- Psychological abuse – for example, saying things which could hurt someone else or which could make them feel vulnerable, alone or isolated. Making threats, trying to control another person, or humiliating someone can be psychological harm. Psychological harm can include bullying in person or online, including 'revenge porn'.

- Financial abuse - for example, unreasonable or excessive borrowing or stealing money or other items. Also, trying to pressure someone else into giving you money or other items because they feel sorry for you.

### 3. Safeguarding learners and staff

Kaplan will:

- Maintain thorough knowledge of safeguarding matters
- Ensure this policy and accompanying procedures and guidance are regularly reviewed for compliance with relevant legislation
- Provide points of contact for anyone needing to report a safeguarding concern
- Act on reported concerns as appropriate. This may include making a referral to an external agency
- Monitor the effectiveness and implementation of this policy
- Promote a culture which promotes safeguarding, reducing the potential for harm to be caused or threatened
- Collate summaries of safeguarding concerns raised and outcomes, where known
- Introduce learners to their rights and responsibilities with regard to safeguarding and Prevent through their induction
- Develop and reinforce learners' awareness of safeguarding risks and how to protect themselves
- Ensure all learner facing staff, including those at partners and subcontractors, undertake suitable training commensurate with their role in the organisation
- All learner facing staff will receive appropriate training as part of their induction
- Review this policy on an annual basis to ensure it covers any changes in legislation and remains suitable for the needs of the organisation
- Ensure the Designated Safeguarding Officer meets with key safeguarding staff on a regular basis to discuss safeguarding and Prevent issues and processes, identify and address themes and standardise practice
- Review the effectiveness of the Safeguarding and Prevent policy in terms of learner awareness and understanding through discussions, surveys, observations and review of safeguarding records.

## 4. Safeguarding Roles and Responsibilities

The following roles ensure that Kaplan meets its responsibilities effectively.

### ***All learner facing staff***

Will be responsible for completing all directed training and familiarising themselves with Kaplan's Safeguarding and Prevent Policy and 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 about a learner. Concerns should be reported at the very first opportunity and within 2 hours.

### ***The External (Non-Executive) Assurance Board***

Has the responsibility to review, challenge and advise on Kaplan's safeguarding policy and procedures.

### ***Apprenticeship Leadership Team***

Are responsible for ensuring that all necessary staff understand safeguarding and have received appropriate training and development and that the staff recruitment and selection procedure is followed at all times. They will ensure appropriate systems are in place including internet filtering and monitoring systems and that their effectiveness is regularly reviewed. They will ensure that safeguarding is given a high priority across the business.

### ***Human Resources and Designated Safeguarding Officer***

Are responsible for ensuring that safer recruitment practice is embedded and implemented across Kaplan and that the supporting records of any background checks are accurately maintained.

### ***Properties & Facilities Management and Student Experience***

Are responsible for ensuring that all training rooms, communal areas, facilities and equipment comply with legislative health and safety standards. They will ensure that access and egress to Kaplan centres is appropriately controlled to support the security and safety of all learners, visitors and contractors.

### ***IT Department***

Is responsible for ensuring that policies pay due regard to the safeguarding and Prevent Duty and that suitable filtering and firewalls are in place to prevent learners, and visitors accessing extremist or illegal websites and material. This will take account of the Department for Education's [filtering and monitoring standards](#) and include:

- identify and assign roles and responsibilities to manage filtering and monitoring systems
- review filtering and monitoring provision at least annually
- block harmful and inappropriate content without unreasonably impacting teaching and learning
- have effective monitoring strategies in place that meet their safeguarding needs

### ***Senior Safeguarding Officer (SSO)***

The SSO is responsible for the implementation of the Safeguarding and Prevent Policy and Kaplan's commitment to safeguarding staff and learners, through delegation where appropriate. They will be responsible for ensuring that the safeguarding processes and procedures are robust and consistently applied and that Kaplan fulfils its legal duties. The role is held by the Head of Quality and Compliance.

### ***Designated Safeguarding Officer (DSO)***

The DSO will deputise for the SSO in their absence. The role is held by the Quality Development and Improvement Manager. They are responsible for:

- Policy and process review
- Maintaining an up-to-date knowledge of current safeguarding and Prevent practice and issues
- Ensuring sufficient staff training and CPD to uphold an effective level of safeguarding provision
- Ensuring that records are maintained of all concerns raised
- Creating and maintaining a network of relevant support and referral agencies
- Periodically reporting on the concerns raised in relation to Safeguarding

### ***Deputy Designated Safeguarding Officers (DDSO)***

The Deputy Designated Safeguarding Officers will deputise for the DSO in their absence and support as required with the implementation of the Policy, staff training and other responsibilities.

### ***Safeguarding Representatives (SR)***

SR can be contacted for informal advice and guidance with general queries or specific concerns. A full list of the SRs will be maintained on the intranet and these roles will be held by a selection of Team Managers and other specifically nominated staff from within Kaplan. It is not intended that SRs deal with high-level concerns but they can be consulted where there is uncertainty about whether it is a safeguarding matter or where initial guidance is required on the potential best course of action. A SR will escalate any concern if necessary. As part of their responsibilities they will:

- Monitor the dedicated Kaplan safeguarding email inbox
- Provide a first response to any incidents, disclosures or concerns
- Participate in the review of processes and procedures
- Provide updates and training to their delivery teams

## 5. Underpinning Policies

The Safeguarding & Prevent policy is underpinned by the below policies:

- Background Checks
- Code of Business Conduct
- Dignity at Work
- Equality, Diversity & Inclusion
- Health & Safety
- IT Acceptable Use
- Referrals to Disclosure and Barring Service
- Referrals to Disclosure Scotland
- Recruitment and Selection
- Student Code of Conduct
- Whistleblowing

## 6. Safer Recruitment and Induction

Kaplan will comply with best practice in the recruitment and training of its staff, in line with legislative requirements. Staff will undergo the appropriate pre-employment checks including Disclosure and Barring Service (DBS) where required and applicable for their role. Full reference checks will be completed and they will undertake mandatory safeguarding training appropriate to their role. All required staff, identified by their role, will receive an appropriate induction, including safeguarding and Prevent training.

All staff, including those who are not learner facing, will be required to read a condensed version of Keeping Children Safe in Education - Part One. This will be included in their Kaplan induction activities:

[KCSIE \(Annex A\) Essential Information for all Staff](#)



## 7. Identifying Indicators of Harm

Staff will receive appropriate training to be able to recognise the signs of harm and to respond effectively where an individual makes a disclosure to them. Staff should also be aware of the measures to take if there is a suspicion that a member of staff is involved in the harm of another individual.

Whilst it is recognised that no list of signs can be exhaustive, some potential indicators are listed below.

There may be a combination of these or they may be identified in isolation.

- Bruises and injuries with which the explanation given seems inconsistent
- Possible indicators of neglect, such as inadequate clothing, poor growth, hunger, poor hygiene
- Possible indicators of emotional harm, such as excessive dependence, attention seeking, self-harm
- Possible indicators of sexual harm, such as signs of bruises, scratches, bite mark, or behavioural signs such as precocity, withdrawal or inappropriate sexual behaviour
- Agitated or anxious behaviour
- Excessive nervousness
- Inappropriate or improper clothing
- Unhygienic or unkempt appearance
- Signs of discomfort or pain
- Frequent and increased absences
- Uncharacteristic changes in appearance, behaviour or their course performance
- Reluctant to go home or leave delivery locations

## 8. Categories of Potential Safeguarding Concerns

Action may be needed to protect our learners from many types of different safeguarding concerns. A number of these are shown below although this is not an exhaustive list. There could be additional issues that pose a risk to our learners.

### ***Mental Health***

Mental health includes emotional, psychological, and social well-being. It affects how a person thinks, feels, and acts. It affects how they handle stress, relate to others, and make choices. Mental health issues such as depression and anxiety may leave the individual vulnerable to self-harm and suicidal thoughts as well as other safeguarding risks.

### ***Sexual violence, harassment and abuse***

**Sexual violence:** the general term used to describe any kind of unwanted sexual act or activity, including rape, sexual assault, sexual abuse, and many others.

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**Sexual harassment:** unwanted behaviour of a sexual nature that makes someone feel distressed, intimidated or humiliated. It can take lots of different forms. It can include or be called sexualised bullying.

**Sexual abuse:** forcing or enticing a child or young person to take part in sexual activities, not necessarily involving a high level of violence, whether or not the child is aware of what is happening. Sexual abuse can take place online, and technology can be used to facilitate offline abuse. Sexual abuse is not solely perpetrated by adult males. Females can also be abusers as can other children. The sexual abuse of children by other children is a specific safeguarding issue in education and all staff should be aware of it. This is also known as **child on child** or **peer on peer** abuse.

### ***Bullying (including cyberbullying)***

Behaviour by an individual or group, repeated over time, that intentionally hurts another individual or group either physically or emotionally.

### ***Radicalisation or extremism***

**Radicalisation:** The process by which a person comes to support terrorism and extremist ideologies associated with terrorist groups

**Extremism:** This is vocal or active opposition to fundamental British values:

- Democracy
- The rule of law
- Individual liberty
- Mutual respect for and tolerance of those with different faiths and beliefs and for those without faith

Also included in the definition of extremism are calls for the death of members of our armed forces, whether in this country or overseas.

### ***Incels (involuntarily celibate)***

An incel is a member of an online subculture of people who define themselves as unable to get a romantic or sexual partner despite desiring one. Incel discussion forums are often characterised by resentment and hatred, misogyny, self-pity, self-loathing, a sense of entitlement to sex, racism, and the endorsement of violence against women and sexually active people.

There has been a large rise in the number of young men referred to the government's Prevent scheme over the women-hating "incel" ideology.

### ***Antisemitism***

Antisemitism is a certain perception of Jews, which may be expressed as hatred toward Jews. Rhetorical and physical manifestations of antisemitism are directed toward Jewish or non-Jewish individuals and/or their property, toward Jewish community institutions and religious facilities.

### ***Racism***

Racism is the belief that groups of humans possess different behavioural traits corresponding to physical appearance and can be divided based on the superiority of one race over another. It may also mean prejudice, discrimination, or antagonism directed against other people because they are of a different ethnicity.

### ***Domestic Abuse***

Domestic abuse can encompass a wide range of behaviours and may be a single incident or a pattern of incidents. That abuse can be, but is not limited to, psychological, physical, sexual, financial or emotional. Children can be victims of domestic abuse. They may see, hear, or experience the effects of abuse at home and/or suffer domestic abuse in their own intimate relationships (teenage relationship abuse). All of which can have a detrimental and long-term impact on their health, well-being, development, and ability to learn.

### ***Drugs***

The misuse of drugs such as alcohol, tobacco, illegal drugs, medicines, new psychoactive substances (legal highs) and volatile substances. This can also include where illegal drugs are transported from one area to another, often across police and local authority boundaries (although not exclusively), usually by children or vulnerable people who are coerced into it by gangs, referred to as 'County Lines'. The 'County Line' is the mobile phone line used to take the orders of drugs.

### ***Fabricated or Induced Illness***

The fabrication of signs and symptoms in others including that of past medical history, falsification of hospital charts and records and specimens of bodily fluids. May also include falsification of letters and documents, and induction of illness by a variety of means.

### ***Faith Abuse***

Forms of child abuse linked to faith or belief. Examples of this include spirit possession, demons/the devil acting through children, the evil eye or djinns (known in some Islamic faith contexts) and dakini (in Hindu context) and ritual or multiple murders where the killing of children is believed to bring supernatural benefits or the use of their body parts is believed to produce 'magical' remedies.

### ***Upskirting***

Upskirting is a term used to describe the act of taking a sexually intrusive photograph up someone's skirt or other clothing without their permission. It is usually performed in a public place, such as on public transport or in a nightclub, among crowds of people, making it harder to spot people taking the photos. The practice can cause humiliation, distress or alarm. Offenders face up to 2 years in jail, with the most serious being put on the sex offenders register.

### ***Stalking***

Stalking can be defined as persistent and unwanted attention that makes someone feel pestered and harassed. It includes behaviour that happens two or more times, directed at or towards another person, which causes them to feel alarmed or distressed or to fear that violence might be used against you. Social media and the internet are often used for stalking and harassment, and 'cyber-stalking' or online threats can be just as intimidating. The effect of such behaviour is to curtail a victim's freedom, leaving them feeling that they constantly have to be careful, causing significant alarm, harassment or distress to the victim.

### ***Forced Marriage***

A forced marriage is one entered into without the full and free consent of one or both parties and where violence, threats or any other form of coercion is used to cause a person to enter into a marriage. Threats can be physical or emotional and psychological. A lack of full and free consent can be where a person does not consent or where they cannot consent (if they have learning disabilities, for example). Nevertheless, some perpetrators use perceived cultural practices to coerce a person into marriage.

### ***Gangs (and Youth Violence)***

Crime and violence are a core part of the identity of gangs, although delinquent peer groups can also lead to increased behaviour and youth offending. Although some group gatherings can lead to increased antisocial behaviour and youth offending, these activities should not be confused with serious violence in a gang, which can also include knife crime.

### ***Female Genital Mutilation***

FGM comprises all procedures involving the partial or total removal of the female external genitalia or other injury to the female genital organs for non-medical reasons. FGM is illegal in the UK and it is also illegal to remove a child to another country for the purposes of performing FGM.

### ***Teenage Relationship Abuse***

May include emotional abuse (e.g. name calling, insults, isolation from friends, controlling what you wear and where you go, constant checking up), physical abuse (hitting, punching, pushing, biting, kicking, using weapons), sexual abuse (forcing sex, unwanted kissing or touching, being made to watch pornography against will, pressure to not use contraception) or financial abuse (taking/controlling money, coercion to buy the abuser things, forcing the abused to work or not work. See also the section on sexual violence and harassment.

### ***Sexting***

The exchange of self-generated sexually explicit images, through mobile picture messages or webcams over the internet.

### ***Child Sexual Exploitation***

This occurs in situations and relationships in which young people receive something as a result of engaging in sexual activities. See also the section on sexual violence and harassment.

### ***Trafficking***

The recruitment, transportation, transfer, harbouring or receipt of persons, by means of threat or use of force or other forms of coercion, of abduction, of fraud, of deception, of the abuse of power or of position of vulnerability or of the giving or receiving of payments or benefits to achieve consent of a person having control over another person, for the purpose of exploitation.

## **9. The Prevent Duty**

The threat to the UK from international terrorism is substantial. The terrorist threats that we now face are more diverse than ever before, dispersed across a wider geographical area and often in countries without effective governance. We therefore face an unpredictable situation. Whilst it remains rare for learners to become involved in extremist activity, any learner can be exposed to extremist influences or prejudiced views, including via the internet, from an early age. Early intervention is a preferable way of tackling extremism.

Kaplan must have due regard to the need to prevent people from being drawn into terrorism. This is referred to as 'The Prevent Duty'. As part of Kaplan's commitment to safeguarding and the promotion of British values, we will ensure that all staff have the confidence to recognise the signs that a learner or colleague is at risk of radicalisation.

Kaplan recognises that its responsibility to the Prevent Duty is not limited to children, young people and vulnerable adults, or to those learning through Government funded programmes but that all learners and staff fall within the remit of this aspect of the Safeguarding & Prevent Policy.

## 10.Prevent Definitions

### ***Radicalisation***

The process by which a person comes to support terrorism and extremist ideologies associated with terrorist groups.

### ***Extremism***

This is vocal or active opposition to fundamental British values, including:

- Democracy
- The rule of law
- Individual liberty
- Mutual respect for and tolerance of those with different faiths and beliefs and for those without faith

Also included in the definition of extremism are calls for the death of members of our armed forces, whether in this country or overseas.

## 11.Preventing Extremism

Kaplan will:

- Raise awareness to all learners of the threat from violent extremist groups and the risks, and Kaplan's responsibility to minimise this in their organisation
- Help learners to understand the positive contribution they can make to empower themselves to create communities that are more resilient to extremism, and protect the wellbeing of particular learners or groups who may be vulnerable to being drawn into violent extremist activity
- Provide advice on managing risks and responding to incidents
- Promote fundamental British values at every opportunity throughout programmes and other activities
- Challenge segregation, promoting cohesion and building learner resilience with the aim of our learners and staff contributing actively to wider society
- Operate a clear and consistent anti-bullying approach that challenges harassment and discrimination and enables learners and staff to feel safe and support
- Provide support, advice and guidance for learners and staff who may be at risk. This may include referral to the Police and local authority as part of the Government's Prevent strategy and the process by which multi agency support is provided to individuals who are at risk of being drawn into terrorism
- Ensure that staff, learners and employers are aware of their roles and responsibilities in preventing radicalisation and extremism

- Kaplan will carry out an annual risk assessment in relation to the Prevent Duty with the aim of evaluating where and how learners or staff may be at risk of being drawn into terrorism. This will include reviewing policies relating to student conduct, IT systems and security, health and safety and diversity and inclusion. An action plan will be maintained and monitored to address any areas requiring improvement.
- Kaplan will ensure that there is a shared understanding amongst staff and learners as to the risks posed within the training environment by extremist's behaviour by raising awareness through training and information sharing
- Take steps to mitigate the risk posed to individuals vulnerable to extremism where it is identified
- Prevent referrals will be made to the local authority or police with consideration to the risk of radicalisation or extremism. All such referrals will ultimately be made by the SSO or DSO.

## 12. Identifying Indicators of Radicalisation

Potential signs of radicalisation include:

- An individual's views become increasingly extreme regarding another section of society or government policy
- An individual is observed downloading, viewing or sharing extremist propaganda from the web
- An individual becoming withdrawn and focused on one ideology
- An individual becoming increasingly intolerant of more moderate views
- An individual may change their appearance, their health may suffer (including mental health) and they may become isolated from family, friends, peers or social groups
- An individual expresses a desire/intent to take part in or support extremist activity

## 13. External Speakers and Events

In order to comply with the Prevent Duty Kaplan will ensure that any external speaker's views being expressed, or likely to be expressed, do not constitute extremist views that risk drawing people into terrorism or are shared by terrorist groups.

It is the responsibility of the host to ensure that the external speaker's content, planned to be delivered either verbally, by presentation or other methods is reviewed prior to the event to check that it is suitable and that it will not promote extremist views in any way.

An external speakers [booking form](#) should be completed by the host and this will be reviewed by the DSO. Where a potential risk is identified the DSO will seek further information from the host to ensure a balance of Kaplan's legal duties in terms of both ensuring freedom of speech and also protecting learner and staff welfare. Where the DSO is in any doubt that the risk cannot be fully mitigated Kaplan will exercise caution and the event will not be allowed to proceed.

We fully recognise the importance of academic freedom and the right to preserve freedom of speech for all our employees, learners and visiting speakers. However, we will balance this with our obligations towards the Prevent Duty.

## **14.Guidelines to follow when receiving a disclosure**

It is essential that all victims are reassured that they are being taken seriously, regardless of how long it has taken them to come forward, and that they will be supported and kept safe. Abuse that occurs online or outside of the learning environment should not be downplayed and should be treated equally seriously. A victim should never be given the impression that they are creating a problem by reporting the abuse. Nor should a victim ever be made to feel ashamed for making a report. It is important to explain that the law is in place to protect young people and vulnerable adults rather than criminalise them, and this should be explained in such a way that avoids alarming or distressing them.

In order to ensure any disclosure is dealt with effectively, the 5 Rs should be considered and followed.

### ***Recognise***

The ability to recognise behaviour that may indicate abuse is of fundamental importance. Signs and symptoms of abuse of young people or vulnerable adults may include direct disclosure. All relevant staff will be trained to understand signs of possible abuse and know how, where and to whom to report concerns.

### ***Respond***

An appropriate response is vital. No report or concern about possible abuse should ever be ignored and they should ensure:

- They do not lead or probe with questions
- Remain calm and demonstrate interest and concern while investigating
- Tell the learner that you may need to disclose information to others to ensure any risk to them or others is minimised and do not agree to any off the record disclosures
- Reassure them that they have done the correct thing in reporting their concerns and that it will be dealt with in a sensitive and appropriate way, ensuring any information is suitably restricted
- Record any disclosures on the [Safeguarding Report Form](#)

### ***Report***

All safeguarding and Prevent concerns should be reported at the very first opportunity and within 2 hours where any delay increases the risk. Once concerns have been reported, responsibility for taking any further action resides with the SR, DDSO and DSO dealing with the report.



### **Record**

DSO and DDSOs will be trained to ensure disclosures, incidents or concerns and the subsequent investigation and assessment are accurately recorded, updated and monitored through the approved systems and document formats. The Information will be stored securely, confidentially and only accessible to those who need access to support with the concern.

### **Refer**

The decision to refer lies with the DSO or DDSO dealing with the disclosure, having gathered and examined all relevant information. Under normal circumstances investigations will not be completed by SRs or any other staff. Investigations may involve questioning colleagues, learners, employers, carers, parents, delivery staff and the complainant, as relevant and necessary. DSO and DDSO will have access to organisations and websites in order to seek guidance including local safeguarding boards threshold documents and a directory of relevant support agencies. The DSO or DDSO dealing with the disclosure will decide what action to take, liaising with the SSO where necessary.

## **15.Safeguarding and Prevent Procedure**

**In the event of an emergency, including a threat to life, always call the emergency services on 999**

Receiving, reporting and responding to safeguarding and Prevent incidents by staff will follow the same procedure. Please refer to the reporting [process](#).

**Any suspicion, allegation or actual abuse of a learner by a member of Kaplan staff or its subcontractors** must be reported immediately and directly to either the SSO or DSO. In their absence it should be reported to another member of the Apprenticeship Leadership Team, who will then take the lead with the investigation and subsequent actions, supported by a DDSO

Where Kaplan or one of its subcontractors refer a safeguarding concern related to sexual violence to Local Authority children's social care/adult social care and/or the police, or an allegation of abuse is made against any member of staff to the SSO or DSO, Kaplan will also inform the Education and Skills Funding Agency as soon as practicable, providing a high-level summary of the nature of the incident. Where the concern relates to a member of Kaplan staff, Human Resources will be included in the subsequent investigation.

### **Confidentiality**

Although an individual may insist information is kept confidential, concerns still need to be reported. The safety of the learner, staff or other person will always take precedence to any confidentiality concerns. All information received will always be dealt with sensitively and only shared further where there is a need to prevent and protect anyone from harm.

Once the DSO or DDSO has been made aware of a situation, they need to ascertain whether the learner is at risk of actual or potential harm or abuse or whether there are sufficient grounds to suspect abuse or potential radicalisation. Following this, the DSO or DDSO may decide that further action is necessary and will refer it on to an external agency or that the situation can be monitored within Kaplan.

In the event of a decision being made to escalate a Prevent concern externally, this should only be carried out by the SSO or DSO. In their absence, a DDSO will make a member of the Apprenticeship Leadership Team aware of the concern and complete any agreed referral.

## **16. Policy Review**

Kaplan will review this policy annually as a minimum in-line with any regulatory requirements.

## A. Safeguarding Process

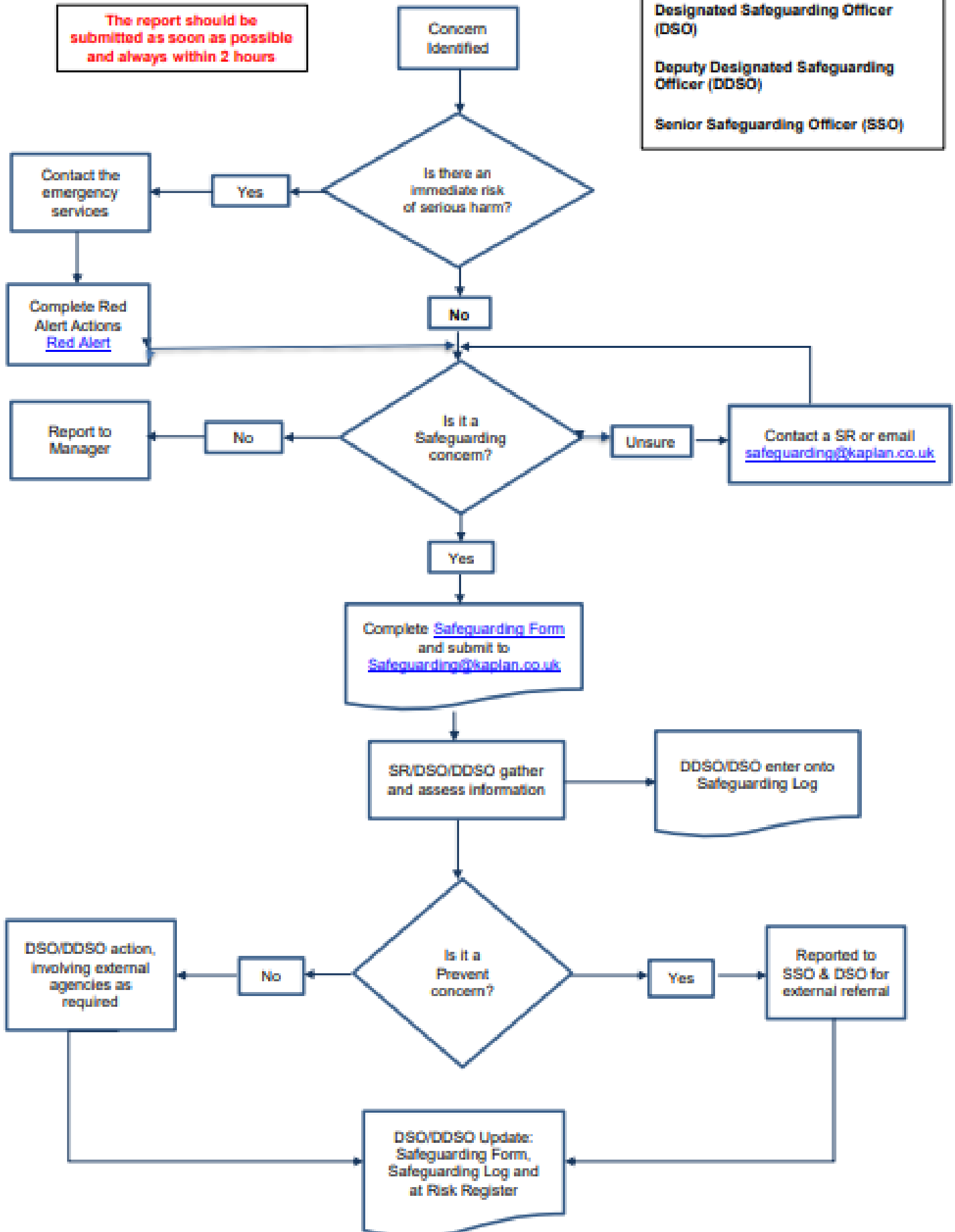
The report should be submitted as soon as possible and always within 2 hours

Safeguarding Representative (SR)

Designated Safeguarding Officer (DSO)

Deputy Designated Safeguarding Officer (DDSO)

Senior Safeguarding Officer (SSO)



## B. Safeguarding Training Requirements

| Role  | Requirement   | Timeline                        |
|---|---|---------------------------------|
| Senior Safeguarding Officer   | L3 Designated Safeguarding Officer  | Prior to taking on role DSO     |
| Designated Safeguarding Officer (DSO)   | L3 Designated Safeguarding Officer  | Prior to taking on role DSO     |
| Deputy Designated Safeguarding Officer (DDSO)   | L3 Designated Safeguarding Officer  | Prior to taking on role of DDSO |
| Safeguarding Representatives (SR)   | Safeguarding and Prevent training modules<br>SR internal training session | Prior to taking on role of SR   |
| Apprenticeship Delivery Staff   | Safeguarding and Prevent training modules                                 | Within 1 month of appointment   |
| Faculty Tutors  | Safeguarding and Prevent training modules                                 | Within 1 month of appointment   |
| Kaplan Support Staff involved with the recruitment, induction or other student support activities | Safeguarding and Prevent training modules                                 | Within 1 month of appointment   |
| All staff   | KCSIE (Annex A) Essential Information for all Staff                       | During induction period         |

It is the responsibility of managers to ensure their staff have completed the relevant training requirement and that evidence of this can be provided.

In addition to the mandatory training requirement, all staff will receive periodic updates appropriate to their role.

## C. External Support Organisations

### External Support Organisations

| For Help With...             | Organisation  | Website  | Contact Details   |
|------------------------------|---|--|---|
| <b>Autism</b>                | National Autistic Society                               | autism.org.uk  | 020 7833 2299   |
| <b>Bereavement</b>           | Cruse Bereavement Care                                  | cruse.org.uk   | 0808 808 1677*  |
| <b>Blind Support</b>         | Royal National Institute of Blind People                | rnib.org.uk  | 0303 123 9999   |
| <b>Bullying</b>              | Bullying UK (Family Lives)                              | bullying.co.uk   | 0808 800 2222   |
|                              | Kidscape  | kidscape.co.uk   | 020 7823 5430   |
| <b>Carers</b>                | Carers Trust  | carers.org.uk  | 0300 772 9600   |
| <b>Childhood Abuse</b>       | The National Association for People Abused in Childhood | napac.org.uk   | 0808 801 0331   |
| <b>Child Exploitation</b>    | Child Exploitation & Online Protection Command          | ceop.police.uk   | <a href="https://www.ceop.police.uk/ceop-reporting">https://www.ceop.police.uk/ceop-reporting</a> |
| <b>Deaf Support</b>          | British Deaf Association                                | bda.org.uk   | 020 7697 4140   |
| <b>Domestic Abuse</b>        | Refuge  | refuge.org.uk  | 0808 2000 247*  |
| <b>Drugs</b>                 | Talk to Frank   | talktofrank.com  | 0300 123 6600   |
| <b>Employment</b>            | Job Centre Plus   | gov.uk/find-a-job  | 0800 169 0310   |
|                              | ACAS  | acas.org.uk  | 0300 123 1100   |
| <b>FGM</b>                   | Equality Now  | equalitynow.org  | 07445 699 371   |
| <b>Financial Issues</b>      | Money Helper  | moneyhelper.org.uk                                       | 0800 011 3797   |
| <b>Forced Marriage</b>       | Plan International (UK)                                 | plan-uk.org  | 0300 777 9777   |
| <b>Housing Issues</b>        | Shelter   | england.shelter.org.uk                                   | 0808 800 4444*  |
| <b>Internet Safety</b>       | Think U Know?   | thinkuknow.co.uk   | 0370 496 7622   |
|                              | Harmful online challenges and online hoaxes             | <a href="http://www.gov.uk">www.gov.uk</a>               | <a href="http://www.gov.uk">www.gov.uk</a>  |
|                              | UK Safer Internet Centre                                | saferinternet.org.uk                                     | 0344 800 2382   |
| <b>Learning Difficulties</b> | Respond   | respond.org.uk   | 020 7383 0700   |
| <b>Legal Issues</b>          | Citizens Advice Bureau                                  | citizensadvice.org.uk                                    | 0800 144 8848*  |
| <b>Mental Health</b>         | Mind  | mind.org.uk  | 0300 123 3393   |
|                              | Campaign Against Living Miserably                       | thecalmzone.net  | 0800 58 58 58*  |
|                              | <u>Give us a Shout</u>                                  | <a href="http://giveusashout.org/">giveusashout.org/</a> | Text Shout to 85258   |
| <b>Parental Support</b>      | Family Lives  | familylives.org.uk                                       | 0808 800 2222*  |

| For Help With...                       | Organisation                              | Website  | Contact Details  |
|--|---|--|--|
| Personal Safety                        | The Suzy Lamplugh Trust                   | suzylamplugh.org   | 0808 802 0300*   |
| Racism                                 | Stand Against Racism & Inequality         | sariweb.org.uk   | 0117 942 0060  |
| Relationships                          | Relate                                    | relate.org.uk  | 0300 003 2324  |
| Revenge Porn                           | Safer Internet                            | <a href="http://saferinternet.org.uk">saferinternet.org.uk</a> | 0345 6000 459  |
| Self-Harm                              | Self-Harm UK                              | selfharm.co.uk   | <a href="mailto:info@selfharm.co.uk">info@selfharm.co.uk</a> |
| Sexual Abuse                           | The Survivors Trust                       | thesurvivorstrust.org  | 0808 801 0818*   |
|  | Rape Crisis                               | rapecrisis.org.uk  | 0808 802 9999*   |
| Sexuality                              | Stonewall                                 | stonewall.org.uk   | 0800 050 2020*   |
| Suicide prevention Support (under 35s) | Papyrus                                   | www.papyrus-uk.org   | 0800 068 4141  |
| Victim Support                         | Victim Support UK                         | victimsupport.org.uk   | 0808 168 9111*   |
| Under 25 Support                       | The Mix - Essential support for under 25s | themix.org.uk  | 0808 808 4994  |