

Policy Document ●●●

Safeguarding & Prevent

Introduction

Reed Business School believe that all students 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.

We have a commitment to ensuring that all students are offered the information, advice and support they need to stay safe and be able to actively participate in their education and training.

Reed Business School recognises their responsibility to safeguard students by protecting them against sources of radicalisation and from being exposed to extremist views.

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Purpose of the policy

To define our approach towards safeguarding and the Prevent duty, to define the terminology, to explain our responsibilities under this policy and to describe what will be done if any concerns are raised.

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 means having a culture of vigilance where all staff know their responsibilities and act accordingly and all students 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 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.

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

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

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

- 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.

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.

Prevent duty

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.

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 staff, the police, and local authorities.
- Co-ordination through existing multi-agency forums.

As part of this duty Reed Business School, we 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.

Radicalism

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

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

British values

The five British values are:

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

Extremism

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.
- Staff 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.

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.

The Higher Education (Freedom of Speech) Act 2023

This new law is likely to come into effect for the academic year 2024/25.

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

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, staff training, and clearer processes. The goal is to keep people safe, enhancing our national security and reducing the risk to the public from terrorism by the protection of public venues.

It will place a requirement on those responsible for certain locations to consider the threat from terrorism and implement appropriate and proportionate mitigation measures.

Legal responsibilities

Reed Business School recognises it has a duty of care to all its apprentices and 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 2022.

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

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

Reed Business School also recognise the wider indications of abuse and neglect as outlined by the statutory guidance document – Keeping Children Safe in Education – September 2022. 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

Reed Business School recognises that:

- The welfare of the student is paramount.
- All students, 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 an student to experience abuse of any kind and recognises its responsibility to safeguard the welfare of all apprentices and learners by commitment to practice that protects them.
- Working in partnership with students 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 business school approach in place to address it. This follows a recent review by Ofsted 'Review of Sexual Abuse in Schools and Colleges' 2021).

Our commitment to safeguarding

Reed Business School will:

- Provide co-members, associates, employers, and other stakeholders with guidance on procedures they should adopt to minimise the risk of harm to students and, 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 students, 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.
- 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 Reed Business School students, including identifying and responding to their needs.
- This policy will be shared with all co-members, associates, students, apprentices, 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 our procedures and policies.
- Will identify at least one Designated Safeguarding Lead with the responsibility for overseeing the implementation of this policy.
- The Designated Safeguarding Lead will monitor and review this policy in accordance with changes in legislation and guidance on the protection of children and vulnerable adults.
- Appoint safeguarding officers and ensure the safeguarding officers 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 safe recruitment process.
- The recruitment process for employees including tutors and learning coaches will include a thorough level 3 screening process through Reed Screening and a Standard DBS (Disclosure and Baring Service) Check.
- Ensure a safe and secure environment including site security. This includes a robust CCTV monitoring system, security gates and perimeter walls, keypad locked student accommodation, screening of visitors and deliveries, staff and tutors wearing photo identity badges, signing in procedures for staff and visitors on site (including visitor and contractor badges).

Our commitment to training and implementing safeguarding and Prevent

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

Reed Business School is committed to:

- Training in safeguarding and Prevent is conducted for all students as part of their induction process to promote their own personal health, well-being and safety including their safety online.
- 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
- Staff is 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 apprentices.
- Has an appropriately trained safeguarding team and at least one designated safeguarding lead and training is updated on a regular basis.
- Co-members and associates have read and understand Part One and Annex A of Keeping Children Safe in Education 2022.
- 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 a bi-monthly 'At Risk' meeting.

Promoting the safeguarding and Prevent policy

Reed Business School will publish and promote the following:

- A confidential email address where all safeguarding and/or Prevent concerns can be reported by students, co-members, associates, employers, and other stakeholders.
- The contact details for Reed Business School safeguarding officers on all email signatures to students, employers, and other stakeholders.
- The contact details for Reed Business School safeguarding officers on the website and associated materials and visuals displayed throughout Reed Business School and throughout the accommodation.
- To all employers their responsibilities and how to identify potential concerns and possible warning signs.
- This policy is shared with students via the wellbeing team, the Student Voice channel, and in the resources in our E-portfolio system which is used in the delivery of learning for apprentices.
- This policy is available to all employers, students, and the public via the Reed Business School website.

Procedure for raising, recording and investigating concerns

- If a co-member or associate receives a disclosure from an apprentice or learner, or notices signs or symptoms of abuse or harm, the following procedure must be followed:
- 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?'
- Do not force the apprentice or learner to repeat what he/she said in front of another person.
- Do not begin an investigation.
- Report immediately to a Designated Safeguarding Lead (Designated Safeguarding Officer) safeguarding.reed@reedbusinessschool.co.uk to log the concern about an apprentice's or learner's safety and welfare using the learner's words as far as possible.

Low level concerns

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

- Is inconsistent with the staff 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 Officer must log concerns, raised directly and/or via the confidential email address, or
- By using the 'RBS Safeguarding & Prevent Referral Reporting Form' noting whether the incident is a Low-Level Concern, External Referral, or Police and/or Channel Referral.
- External Referrals or Police and/or Channel Referrals must be reported to the Designated Safeguarding Lead (DSO) immediately.
- The Designated Safeguarding Officer 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 by RBS 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 at bi-monthly safeguarding team meetings.
- The Designated Safeguarding Lead is responsible for ensuring that the appropriate action has been taken.
- 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.
- The Designated Safeguarding Lead presents a formal report to the Governance Advisory Board at regular governance meetings:
 - To provide an update on safeguarding incidents outstanding from the last meeting
 - To report on safeguarding incidents during the last two months
 - To share with the Board a summary of any reportable incidents
 - To highlight any learning points and the response from Reed Business School.
 - To share a summary of the development activity which has either happened during the period or has been planned to happen in the future.

Online safety and security

Reed Business School recognises the importance of online safety, and that students are aware of all the risks.

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.

Terms & Conditions

www.reedbusinessschool.co.uk/terms-and-conditions

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