

POLICY & PROCEDURES

Safeguarding and Prevent Policy

POLICY OVERVIEW & INTENT

Policy No	KASG001	Version	V5
Policy Owner	Sarah Oates	Date Last Reviewed	February 2024

POLICY AIMS

Kingdom Academy is committed to practices that protect young people and adults at risk from abuse, exploitation, bullying neglect and self-harm in relation to all its training provision.

Our commitments

- We promote the welfare of all learners to help keep them safe
- We are committed to ensuring all practices protects every learner
- We will protect learners from radicalisation and extremism by responding quickly where learners maybe vulnerable to these issues
- We will provide learners and staff with regular updates and training on Safeguarding and Prevent issues
- We will ensure all safeguarding and prevent concerns are responded to and documented accordingly
- We will help support staff to recognise signs of safeguarding issues such as abuse and be confident in making referrals
- We commit to maintaining a Safeguarding Log of all incidents for monitoring and auditing purposes
- We commit to developing a Prevent Strategy and Risk register
- Promote fundamental British Values, including freedom of Speech, rights to be safe and listened to, by creating an environment that encourages every learner to raise concerns
- Work with employers to build their understanding of a commitment to the principles of safeguarding and Prevent duty

This policy aims to make clear the responsibility KA has to

- protect and prevent learners from radicalisation and extremism in response to the Prevent Duty requirements.
- KA ensures all staff and delivery partners recognise and accept their responsibility to develop the awareness of the risks and issues involved in safeguarding and are clear on how to identify and report any incidents.
- work with local safeguarding organisations, such as local authorities, Channel, Prevent coordinators, the Police and other community & referral groups to ensure the safeguarding of all learners.
- The policy is reinforced with the Safeguarding & Prevent reporting and referral procedure which details reporting procedures to follow, signs for recognising abused or at-risk learners and incident forms.

The Purpose of this Policy

This policy represents a whole organisation approach to ensure we have effective procedures for keeping young people, learners, and vulnerable adults safe from abuse, neglect, and exploitation. It will help identify learners who are at risk of and/or likely to suffer significant harm are identified, and appropriate action is taken. The accompanying appendices exist to support the policy and ensure safer recruitment practice for engaging staff and includes reporting incidents of sexual violence and/or harassment. Through the implementation of this policy KA will

- afford protection for all learners and staff of Kingdom Academy;
- enable staff to safeguard and promote the welfare of individuals; and
- promote a culture which makes our organisation a safe environment in which to learn.

Kingdom Academy recognises that the welfare of its learners is paramount. We take our safeguarding responsibilities seriously. Kingdom Academy will safeguard and promote the welfare of all individuals (staff and learners) in its care.

SCOPE

This policy applies to all staff and associates. This policy does not form part of any employee's contract of employment or of any contract that we have with any member of staff who is not an employee, and we may amend it at any time. This policy applies to all learners who are undertaking an apprenticeship funded by the ESFA where Functional Skills is a requirement however extends to any learner on any programme where KA may be able to support and enable a culture of Safeguarding.

CONTEXT

This policy has been developed in accordance with the principles established by the Children Acts, other relevant Acts and related guidance. This includes:

- [Education and Training \(Welfare of Children\) Act 2021](#)
- [Keeping children safe in education 2024](#)
- [Working together to safeguard children: A guide to inter-agency working to safeguard and promote the welfare of children](#)
- [What to do if you worried a child is being abused](#)
- [Prevent Duty Guidance](#)

DEFINITIONS OF SAFEGUARDING

Safeguarding is defined in 'Working Together to Safeguard Children' as: protecting children from maltreatment, preventing impairment of children's health or development, ensuring that children grow up in circumstances consistent with the provision of safe and effective care, taking action to enable all children to have the best outcomes. Learners are defined as children and young people aged under 18 years and may be in 'full time' education, traineeship, or an apprenticeship. It also applies to learners who stay in residential accommodation as part of their training such as block release for apprentices. Vulnerable adults include anyone aged 18 years or above who is or may need community care services by reason of disability, age, or

illness; and is or may be unable to take care of unable to protect him or herself against significant harm or exploitation. Promoting welfare is defined as:

- protecting individuals from maltreatment
- preventing impairment of health or development
- promoting the safety and well-being of learners and protecting those who may be at risk of harm and abuse

We will take all reasonable measures to ensure that all welfare, well-being, and risk of harm concerns are dealt with appropriately and sensitively. Where there are concerns, we will take action with the necessary agencies to address those concerns, working to agreed local policies and procedures in full partnership with other local agencies. The procedure for recording, monitoring, and reporting concerns is detailed later in this policy. Throughout all Safeguarding procedures we will uphold the principles of the Care Act 2014.

- **Empowerment** People being supported and encouraged to make their own decisions and 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.

All learners have the right to be safeguarded from harm or exploitation whatever their;

- race, religion, first language or ethnicity
- gender or sexuality
- age
- health or disability
- political or immigration status

We will endeavour to safeguard everyone by:

- valuing them, listening to, and respecting them
- involving them in decisions which affect them;
- making sure all staff are aware of and committed to the safeguarding policy;
- sharing information about concerns with agencies who need to know, and involving individuals and their parents/carers appropriately;
- recruiting staff safely, ensuring all necessary checks are made;
- providing effective management through induction, support and training;
- ensuring staff and volunteers understand about 'whistle blowing';
- dealing appropriately with allegations/concerns about staff.

Safeguarding action may be needed to protect learners from:

- neglect
- physical, sexual, or emotional abuse
- bullying, including online bullying and prejudice-based bullying
- racist, disability, homophobic or transphobic abuse
- gender-based violence, or violence against women and girls
- radicalisation or extremist behaviour
- sexual exploitation and trafficking
- the impact of new technologies on sexual behaviour, for example 'sexting' and accessing pornography
- relationship abuse
- substance misuse

- issues that may be specific to a local area or population, for example gang activity and violence
- domestic violence
- female genital mutilation
- forced marriage
- fabricated or induced illness
- poor parenting
- Any other issues that pose a risk to young people and adults at risk Safeguarding also relates to broader aspects of care and education, including:
 - learners' health and safety and well-being, including their mental health
 - meeting the needs of learners who have special educational needs or disabilities
 - meeting the needs of learners with medical conditions
 - providing first aid
 - emotional well-being
 - online safety and associated issues
- appropriate arrangements to ensure learners' security, considering the local context
- Sexual Harassment

Definitions of Sexual Harassment

- Making sexual jokes
- comments, or gestures
- Spreading sexual rumours (in person, by text, or social media)
- Posting sexual comments, pictures, or videos
- Taking or sending sexual pictures or videos
- Asking someone for naked pictures of themselves ("nudes")
- Asking for sex or offering to have sex Touching or grabbing someone in a sexual way

POLICY & PROCEDURE

ROLES AND RESPONSIBILITIES

Designated Safeguarding Lead

- Jo Rawnsley – Senior Tutor - jo.rawnsley@kingdom-academy.co.uk - 07985 382624

Deputy Designated Safeguarding Lead

- Sarah Oates – Head of Quality - sarah.oates@kingdom-academy.co.uk – 07586632694

General Email Contact: safeguarding@kingdom-academy.co.uk

Governance

The Director of Service takes overall responsibility for Safeguarding & Prevent and supports the DSL & DDSL in ensuring the appropriate measures are in place for all safeguarding relating responsibilities. The DSL and DDSL meet monthly as part of the safeguarding governance with a set agenda to discuss all safeguarding and Prevent matters. Sarah Oates is a member of the Senior Management Team and provides monthly reports on all safeguarding and Prevent matters to the Senior Management Team and the Guidance Advisory Board Meetings.

It is the responsibility of the DSL to:

- Investigate, improve, monitor, and review relevant company policies and procedures.
- Act on referrals
- Make decisions about referrals to the relevant authorities
- Endeavour to keep up to date with all Child/Vulnerable Adult Protection legislation.
- Collect all necessary data and ensure it is kept strictly confidential and protected by password access, stored under lock and key.
- Determine if an internal investigation is required and liaise with relevant authorities/support groups
- Identify & signpost to organisations for support where characteristics of exploitation, extremism, bullying, abuse, or grooming has been recognised
- Liaise with the Directors ensure all necessary support and guidance is available as appropriate
- Conduct risk assessment meetings with Under 18s as identified
- Conduct risk assessment for new staff awaiting DBS
- Conduct Safeguarding Induction sessions for all new staff

It is the responsibility of the DDSL to

- Undertake all above responsibilities in the absence of the DSL
- Provide monthly reports to the Senior Management Team and regular reports for the Guidance Advisory Boards
- Ensure the organisation is compliant with all Safeguarding and Prevent legislation

It is the responsibility of all Staff/Associates to:

- Seek urgent medical or Police assistance if needed.
- Show concern and refer on any learner who needs support.
- Not offer or promise confidentiality, but to record the facts without 'leading'.
- Offer support and security and not to react emotionally.
Make a record of their concerns, and refer into the DSL
- Not discuss concerns or disclosures with anyone unless guided by the DSL
- Tell the learner that the record will be made, and the DSL informed.
- Understand that protocols may require that they have no further involvement but will be given feedback.
- Get personal confidential support if required.
- Understand the risks of bullying, grooming, abuse, exploitation, extremism, and online safety and how to support learners in keeping themselves safe

STAFF RECRUITMENT, INDUCTION AND TRAINING

Recruitment

- KA has a responsibility to ensure all staff and associates that work with learners, and all young people and or adults at risk in training have been checked through the Disclosure and Barring Service and appropriate background checks which is conducted through Kingdom Service Group Safer

Recruitment processes. Where a DBS is not in place prior to the start date a risk assessment will be conducted as to working practices to limit safeguarding risks to learners. Where a DBS raises concerns or is not successful an employment offer would be retracted as per the terms of agreement of the employment offer.

- Suitable monitoring is in place in all documents and process to prevent unsuitable people from being recruited and having the opportunity to harm learners or place them at risk.
- All staff involved in recruitment are mandated to undertake [Education and Training Foundation's \(Future Learn\) Safeguarding and Safer Recruitment](#) module, and Hiring Managers need to check for any safeguarding risks such as gaps in CV, and ask suitable questions at interview to test knowledge and understanding of safeguarding and make clear the safeguarding requirements and checks.
- All staff will be entered onto the Single Central record to monitor DBS status, reference checks, ID requests and safeguarding training completion

Induction

- The policy is promoted during staff induction and further promoted with the mandatory requirement for all staff and associates to undertake the [Education and Training Foundation's \(Future Learn\) Safeguarding in the FE and Training](#) module.
- All staff are mandated to complete [Education Training and Foundation's \(Future Learn\) Prevent](#) for Further Education and Training module to create awareness of the risks and signs of radicalising influences. The Designated Safeguarding Lead (DSL) will be qualified to the required level.
- Staff then arrange to meet with the DSL to discuss internal processes for safeguarding, and must be completed within 2 weeks of starting with Kingdom Academy

Ongoing Training

- KA ensures staff and associates have adequate training on all aspects of safeguarding including but not limited to internet & social media safety, bullying, grooming & abuse, Prevent, exploitation and extremism. DSL/DDSL will arrange annual training sessions for all staff for safeguarding and prevent, as well as provide appropriate updates and training at staff meetings
- All staff will be required to complete the EFT Safeguarding and EFT Prevent every 2 years, this will be monitored by the DSL through the Single Central Record
Designated Safeguarding Lead must have Level 3 Safeguarding Qualification in place which is renewed every two years.

External Guest/Speakers

Any guests tutors or speakers that are external to Kingdom Academy and would come into contact with learners including remotely must have a risk assessment conducted prior to the visit and a supporting members of staff at the relevant workshop/meeting.

ONLINE LEARNING

At KA we recognise that online learning environments can be challenging for both tutors and learners. Safeguarding the wellbeing and welfare of all learners is paramount, including safeguarding in a digital space.

Digital safeguarding is about the prevention and protection from harm in the online environment. KA aim to create safe spaces through the implementation of effective policies and procedures, technical solutions and advice and support for managing incidents.

A safe space is an environment in which everyone can feel confident that they will not be exposed to harm, discrimination, criticism, or harassment.

Online risks include contact, conduct, content risks.

- Contact risks arise from meeting strangers, threats to privacy
- Conduct risks arise from potentially harmful behaviours online, over sharing personal information or discriminatory/harassing behaviours
- Content risks arise from inappropriate materials and harmful communications hate speech/radicalisation
- Commerce risks arise from inappropriate advertising, phishing, and financial scams

To minimise online risks, we have adopted the following procedures. All staff are required to go through safer recruitment checks regardless of role.

Safeguarding in workshops

Delivery of on-line classes must only be delivered via a suitably secure platform and teaching and learning software. Currently the default platform is Microsoft TEAMS. Everyone delivering remote education must be aware that the Staff Behaviour Policy applies to online learning.

All staff are confident and know how to apply controls relating to learner interactions, including the use of cameras, microphones and break out rooms. Settings are considered before and event to limit potential harm.

All session must include regular breaks and ensure the health and safety of all participants.

Good housekeeping at the start of all online classes will help to create safe online spaces.

Housekeeping guidance

- *Cameras on for engagement
- Location should be suitable, blurring backgrounds if appropriate
- Suitable clothing to be always worn
- Microphones should be on mute
- Learners must respect each other in break out rooms and in all discussions
- Learners must respect confidentiality and commit not to share personal or sensitive information
- The tutor must always ensure appropriate use of language in all online spaces
- Learners must 'be in the room' and turn off distractions such as phones and emails
- Time keeping – learners must return from breaks on time
- Consent will be sought if sessions are to be recorded
- Cameras should be switched off when the register is taken via a screenshot
- Learners should be informed that if they have any concerns or need additional support, they should privately message the tutor via the private chat facility

*NB if previously agreed cameras can be switched off in certain circumstances

In the event of any concerns whilst delivering an online session, for example a learner not returning to a session after a comfort break the safeguarding policy should be followed. An email should be sent immediately to the learner, cc'ing their line manager. In the event the learner does not return an email should be sent at the next break or available opportunity to the Organisation's Apprenticeship lead. KA's DSL should be informed as per the Safeguarding Policy.

Safeguarding in Reviews

Support and mentoring are provided in a structured way through all reviews/tutorials and progress reviews. The safeguarding policy applies. Any concerns raised should be done through the usual reporting of a concern

to the DSL. Additionally, in all reviews a conversation must be had about the learner's health, safety, and wellbeing to ensure that learners have an increased feeling of safety.

Promotion of Safeguarding & Prevent News and information

- A regular newsletter for Safeguarding and Prevent is issued to all staff
- Safeguarding and Prevent are permanent agenda items on all team meetings.
- Lunch and Learn webinars are hosted throughout the year to help education learners and staff on various areas of Safeguarding and Prevent such as Suicide Awareness and British Values
- A Safeguarding Workbook is issued to all learners on apprenticeship programmes to develop learners understanding of safeguarding and prevent issues and processes
- KA will use of social media wherever possible to promote key messages and updates to help educate learners and staff on how to keep safe

Signs of successful safeguarding arrangements

In settings that have effective safeguarding arrangements, there will be evidence that learners are protected and feel safe. Those who can communicate know how to complain and understand the process for doing so. There is a strong, robust, and proactive response from those working with learners that reduces the risk of harm or actual harm to them. Those working with them know and understand the indicators that may suggest that a vulnerable adult or indeed any learner is suffering or is at risk of suffering abuse, neglect or harm and they take the appropriate and necessary action in accordance with local procedures and statutory guidance. Through this Policy and Procedure, we will ensure all the above. KA have put in place effective procedures that everyone within the organisation is informed and educated upon. The procedure of reporting Safeguarding and Prevent issues is included in this policy

Our procedure for recording Safeguarding concerns

- The procedure ensures written records are made in an appropriate and timely way and are held securely. Those records are shared appropriately and, where necessary, with consent.
- Any safeguarding concerns, no matter from whom, (learner, apprentice, employee, associate) are shared immediately with the DSL who will conduct an informal risk assessment. Where the concern is about suspected harm or risk of harm the referral will be made to the local authority for the area where the learner lives.
- A record of all concerns and referrals is retained and any agreed action following the referral is recorded. Where necessary, action will be taken promptly to protect the learner from further harm. When there are issues concerning sexual exploitation, radicalisation or extremism, additional advice and support must be sought from the DSL. Learners will be supported, protected, and informed appropriately about the action the DSL is taking to share their concerns.
- All learners under 18 are identified at enrolment and details sent to the DSL & DDSL to arrange a meeting and conduct a risk assessment for that learners, risk assessment is shared with the appropriate ATC/Tutor

Prevent concerns

When assessing concerns, the DSL will avoid assumptions and will make evidence-based judgements. Exploration and context are key to assessing concerns and risks. In assessing concerns and risks the DSO will consider the level of risk as set out in the [DfE Guidance Managing risk of radicalisation](#) in your educational setting.

The levels of risk are:

- low risk
- at risk
- medium risk
- high risk

Prevent referrals If after considering the concern and risks, a Prevent referral is required. The DSL will ensure the following guidance is adhered to [Making a referral to Prevent](#). The DSL will consult with the Prevent Coordinator for the NE and Yorkshire region (as KA HO is in Leeds), prior to any Prevent referrals being made. The referral form will be completed accurately and robustly.

Whilst not a legal requirement, the DSL will, if appropriate, make the person aware if a Prevent referral is to be made and where possible seek consent.

Information will be sought before making a Prevent referral to ensure that it's robust, informed and made with good intention. External partners can then provide the right support to people who may be at risk of radicalisation.

The DSL will, for information purposes, network with all national Prevent Coordinators to receive their newsletters and attend any relevant training/conferences. Information will be disseminated to the KA Team quarterly and at regular Team Meetings

Useful contact numbers.

- National police Prevent line on 0800 011 3764

Useful information links

- [Prevent Coordinators](#)
- [ACT](#)

Allegations Against Members of Staff

- We recognise that it is possible for staff to behave in a way that might cause harm to learners and takes seriously any allegation received. Such allegations should be referred immediately to the DSL who will contact the Director of Service and HR to agree further action to be taken in respect of the learner and staff member.
- In the event of allegations of abuse being made is against the DSL then staff are advised that allegations should be reported directly to the Director of Service and HR. Once the initial investigation has been completed, should it be evident that the allegation against a member of staff is credible, as well as following the company disciplinary policy the company has a duty to report the incident to [LADO](#) and the [ESFA](#) for learners on the, about incidents and referrals.
- All staff should feel able to raise concerns about poor or unsafe practice and such concerns will always be taken seriously by the Senior Management Team.
- All members of staff are made aware of the whistleblowing procedure and that it is a disciplinary offence not to report concerns about the conduct of a colleague that could place a learner at risk.
- Members of staff can also access the NSPCC whistleblowing helpline if they do not feel able to raise concerns regarding learner protection failures internally. Staff can call: 0808 800 5000.
- Further Guidance can be found at 4.1.b "Keeping Children Safe in Education" (DfE statutory guidance for schools and colleges) 2023.

Allegations Against Learners

Kingdom Academy recognises that young people are capable of abusing their peers. Peer on peer abuse can take many forms, including (but not limited to) bullying, cyberbullying, hazing (initiation type violence), sexualised bullying and violence and sexting. KA is mindful that some potential issues may be affected by the gender, age, ability and culture of those involved.

We will ensure that appropriate curriculum time is dedicated to enable learners to develop an awareness and understanding of abusive behaviour and to ensure that young people recognise warning signs and sources of support both within company and externally.

Learners who have experienced peer on peer abuse will be supported by: (

- Offering them an immediate opportunity to discuss the experience with a member of staff of their choice. Being advised to keep a record of concerns as evidence and discussions regarding how to respond to concerns and build resilience, if appropriate.
- Providing reassurance and continuous support.
- Working with the wider community and local/national organisations to provide further or specialist advice and guidance.

Learners who are alleged to have abused other learners will be helped by:

- Discussing what happened, establishing the specific concern and the need for behaviour to change.
- Informing employers to help change the attitude and behaviour of the individual. Providing appropriate education and support.
- Speaking with police or other local services (such as early help or children's specialist services) as appropriate.

KA will follow the LSCB procedures (www.lscb.co.uk) for supporting learners who are at risk of harm as a result of their own behaviour.

Guidance can be found at 4.1.b "Keeping Children Safe in Education" (DfE statutory guidance for schools and colleges) 2023.

HOW THE POLICY WILL BE MONITORED

KAs Safeguarding & Prevent policy and procedures are reviewed annually through the self - assessment and quality improvement plan. Deep Dives are conducted annually to check the procedures are being followed by all staff.

KA is committed to the following;


- reviewing our own processes and procedures against best practice guides and assess risk to ensure their process works effectively and responds efficiently in recording incidents
- Completing risk assessments for Prevent requirements on all centres and on employer's premises
- Undertake annual training on safeguarding & Prevent to raise awareness of keep informed of up-to-date legislation and issues
- Maintains a Single Central Record (SCR) of all staff qualifications, safeguarding training and Disclosure and Barring Service (DBS) checks
- Ensure all staff have completed Prevent awareness sessions module as a minimum

POLICY AND PROCEDURE - APPENDICES & REVIEW

Related Documents

- Prevent Strategy
- Staff behaviour policy
- On-line safety policy
- Data Protection policy
- Remote learning protocol
- Team Handbook - IT and Communications Policy

Version Control

VERSION	Approved by	Signature	Revision Date	Summary of Change	Author
5	Sarah Oates		23 rd February 2024	Additional Information added to extend information on Allegations against staff/learners and updates of general contact details	Sarah Oates

APPENDIX A – THE REFERRAL PROCESS

Activity	Action	Documents & Information
Safeguarding concern is disclosed or observed by a member of staff	<ul style="list-style-type: none"> If the learner is any immediate danger please contact 999 in the first instance 	NA
	<ul style="list-style-type: none"> If there is urgent timebound concerns please call the Designated Safeguarding Lead or Deputy Safeguarding Lead 	Designated Safeguarding Lead <ul style="list-style-type: none"> Jo Rawnsley – Senior Tutor - jo.rawnsley@kingdom-academy.co.uk - 07985 382624 Deputy Designated Safeguarding Lead <ul style="list-style-type: none"> Sarah Oates – Head of Quality - sarah.oates@kingdom-academy.co.uk

		academy.co.uk – 07586632694 General Email Contact: safeguarding@kingdom-academy.co.uk
	<ul style="list-style-type: none"> • If no immediate concerns please complete a referral form and email to Safeguarding@kingdom-academy.co.uk 	
Full Investigation to be conducted by the DSL/DDSL	<ul style="list-style-type: none"> • Contact the learner and / or member of staff for an initial discussion and obtain any further information • Refer to Safeguarding Policy or other documents such as KCIE • If appropriate contact relevant authorities • Add incident to the Safeguarding log and file referral form • Ensure any follow up action is in place • Close referral when all actions and concerns are completed 	
Review of Investigation	<ul style="list-style-type: none"> • Designated Safeguarding Lead will evaluate the safeguarding incident record to ascertain if any further action is to be taken, refer to other agencies or ESFA If required. 	ESFA via the Contact Form: Education and Skills Funding Agency (ESFA) enquiry form –