

SAFEGUARDING POLICY

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Version Control

Version	Date	Editor	Comments
V1.0	05/03/2024	Katie Fowler	
V2.0	12/10/2024	Katie Fowler and Lucy Brighton	
V3.0	01.09.2026	Lucy Brighton	Rewrite in alignment with KCSIE 2026

Summary of Changes

Page number	Change
All	Full rewrite of Safeguarding including prevent to reflect the new systems in place, processes for reporting concerns and the expansion of the safeguarding team.
	KCSIE 2026

Policy Review Schedule	Safeguarding policy reviewed annually and immediately following any significant legislative, regulatory or organisational change.
Next Review Date	September 2027

Aims

This policy aims to outline to all LearnTech staff, learners and service users the policies and procedures relating to safeguarding and Prevent. It aims to demonstrate the effectiveness of how safeguarding and Prevent are understood and deployed within LearnTech to ensure the protection and benefit to those which these statutes are there to serve.

Objectives

This policy will:

- Define 'abuse' in the following groups:
 - Children
 - Adults
- Define 'Safeguarding'
- Define 'Prevent'
- Explain staff responsibilities around safeguarding, prevent and digital safety.
- Set out the commitment of LearnTech to support all service users in identifying and responding to any safeguarding concerns.
- Advise of action to be taken and processes to follow.
- Advise on how impact of this policy will be measured and monitored.

Policy Statement

This organisation is committed to safeguarding and promoting the welfare of all apprentices, including children, young people, and adults at risk. We recognise our statutory duties under the Children Act 1989/2004, Education

Act 2002, Keeping Children Safe in Education, Working Together to Safeguard Children, the Care Act 2014, and the Counter Terrorism and Security Act 2015 (Prevent Duty).

Safeguarding is everyone's responsibility. All staff, subcontractors, employers, and partners must create an environment where apprentices feel safe, respected, and able to disclose concerns.

The purpose of this policy is:

- To protect children, young people and adults (including vulnerable adults) within LearnTech's scope of responsibility from harm. This includes the children of adults who use our services.
- To provide staff and volunteers, as well as children and young people and their families, with the overarching principles that guide our approach to child protection.
- To demonstrate that LearnTech's organisational vision and values has safeguarding and wellbeing at the core of their ethos, and this is reflected in all business activities.

Introduction

LearnTech believes that:

Nobody should experience abuse of any kind and that the company has a responsibility to promote the welfare of all children, young people and vulnerable adults, to keep them safe and to practise in a way that protects them.

LearnTech recognises that:

- The welfare of children, young people and vulnerable adults is paramount in all the work the company does, and the decisions made.
- Working in partnership with children, young people, their parents, carers and other agencies is essential in promoting young people's welfare.
- All people, regardless of age, disability, gender identity and/or reassignment, race, religion or belief, sex, or sexual orientation have equal right to protection from all types of harm or abuse.
- Some people are additionally vulnerable because of the impact of previous experiences, their level of dependency, communication needs or other issues.
- Extra safeguards may be needed to keep people who are additionally vulnerable safe from abuse.

Find out more about:

- [Safeguarding children from Black, Asian and minoritised ethnic communities](#)
- [Safeguarding d/Deaf and disabled children and young people](#)
- [Safeguarding LGBTQ+ children and young people](#)
- [Safeguarding children with special educational needs and disabilities \(SEND\)](#)

LearnTech will seek to keep young people and adults safe by:

- Valuing, listening to and respecting everyone.

- Appointing a Designated Safeguarding Lead for children, young people and adults, a Deputy and a Lead Board Member for safeguarding
- Adopting safeguarding best practice through policies, procedures and code of conduct for staff and volunteers.
- Developing and implementing an effective online safety policy and related procedures.
- Providing effective management for staff and volunteers through supervision, support, training and quality assurance measures so that all staff and volunteers know about and follow policies, procedures and behaviour codes confidently and competently.
- Recruiting and selecting staff and volunteers safely, ensuring all necessary checks are made (See Safer Recruitment Policy).
- Recording, storing and using information professionally and securely in line with data protection legislation and guidance [more information about this is available from the Information Commissioner's Office: ico.org.uk/for-organisations].
- Sharing information about safeguarding and good practice with all service users via training and discussion.
- Making sure that children, young people, adults, their families and staff know where to go for help if they have a concern.
- Ensuring policies and procedures are followed to manage any allegations made against staff and volunteers appropriately.
- Creating and maintaining an anti-prejudicial and anti-bullying environment and ensuring there is a policy and procedure designed to effectively deal with any bullying that does arise.
- Ensuring there are effective complaints and whistleblowing procedures in place.
- Ensuring LearnTech provides a safe environment in person and online for children, young people, learners, staff and volunteers, by applying health and safety measures in accordance with the law and regulatory guidance.
- Building a safeguarding culture where staff, learners, children and young people and their families treat each other with respect and are comfortable about sharing concerns.

Scope

This policy applies to anyone working on behalf of LearnTech including senior managers, the Board of Directors (including any external directors), paid staff, volunteers, agency staff and learners.

Groups that must be safeguarded include children (those aged under 18) and vulnerable adults (those aged over 18 who by reason of mental or other disability, age or illness are or may be unable to take care of themselves or may be unable to protect themselves against significant harm or exploitation), those with EHCPs in place up until the age of 25 and care leavers.

All employees of LearnTech must be committed to safeguarding every person we serve. The obligations of employees include:

- Understanding the definitions

- Following the procedures set out in relation to safeguarding
- Maintaining safeguarding CPD and certifications as set out in the Training & Development and Induction & Orientation Policies.

Failure to undertake duties set out in this policy will result in disciplinary, as set out in the employee handbook.

Policy Ownership

Policy Owner: Lucy Brighton, Head of Inclusion (E+M, Designated Safeguarding Lead & Pastoral)

This policy has been approved by the Policy Steering Committee (PSC) and the Board of Directors. Any changes to this policy must follow the LearnTech change control process.

The safeguarding policy is reviewed annually and immediately following any significant legislative, regulatory or organisational change.

All LearnTech employees are responsible for adherence to and for the implementation of this policy.

Roles & Responsibilities

Designated Safeguarding Lead:

Name: Lucy Brighton

Date: August 2024

Deputy Designated Safeguarding Lead, ICN:

Name: Aaran Hall

Date: June 2023

Deputy Designated Safeguarding Lead, ICN:

Name: Mark Pinchen

Date: January 2026

Deputy Designated Safeguarding Lead, Inclusion

Name: Jennifer Low

Date: December 2025

Deputy Designated Safeguarding Lead, SEND:

Name: Nicole Abbott
Date: February 2024

Deputy Designated Safeguarding Lead, DSAI

Name: Georgina Thomas
Date: September 2024

Deputy Designated Safeguarding Lead, SBS

Name: Ash Williams
Date: January 2026

Deputy Designated Safeguarding Lead, E&M

Name: Hana Korah
Date: September 2024

Deputy Designated Safeguarding Lead and Governor/Board Member for Safeguarding:

Name: Katie Fowler
Date: May 2017

The Board of Directors retains ultimate accountability for safeguarding and promoting the welfare of learners.

The Board will ensure that:

- Effective safeguarding, child protection, Prevent and online safety arrangements are in place and operating effectively.
- Safeguarding policies and procedures are reviewed at least annually and updated in response to changes in legislation, guidance or organisational risk.
- Appropriate resources, staffing, time and funding are allocated to safeguarding activities.
- The Designated Safeguarding Lead is provided with sufficient authority, capacity, training and support to carry out their responsibilities effectively.
- Deputy Designated Safeguarding Leads are appropriately trained and able to fulfil safeguarding responsibilities in the absence of the DSL.

- Safer recruitment procedures are consistently applied across the organisation.
- Appropriate safeguarding training is completed by all staff, governors, trustees and directors and refreshed in line with organisational requirements.
- Regular safeguarding reports are received, reviewed and challenged to provide assurance regarding safeguarding effectiveness.
- Learners are provided with opportunities to contribute to safeguarding improvements and feel safe raising concerns.
- Appropriate oversight is maintained of safeguarding arrangements operated by subcontractors, partners and employers where relevant.
- Online safety risks are regularly reviewed, including consideration of emerging technologies, artificial intelligence, filtering, monitoring and digital safeguarding risks.
- Lessons learned from safeguarding concerns, audits, reviews, complaints and inspections are used to strengthen safeguarding practice.

The Board member with lead responsibility for safeguarding will provide strategic challenge and assurance to ensure safeguarding remains a priority across all areas of LearnTech's provision.

As an Independent Training Provider, LearnTech recognises that safeguarding responsibilities are shared across education, employment and external agencies. The organisation will work collaboratively with employers, local authorities, social care, police, health services and other relevant partners to promote learner safety, wellbeing and protection from harm.

Policy Definitions

Child

A child is anyone under the age of 18 years.

An adult at risk is a person aged 18 or over who has needs for care and support and may be unable to protect themselves from abuse, neglect, exploitation or harm.

LearnTech's safeguarding responsibilities apply to all learners regardless of age.

Safeguarding

In the UK, safeguarding means protecting peoples' health, wellbeing, and human rights, and enabling them to live free from harm, abuse, and neglect.

Further definitions relating to safeguarding are provided below.

Mental Health & Wellbeing

LearnTech recognises that mental health and wellbeing are important components of safeguarding.

Mental health concerns are not, in themselves, a safeguarding issue. However, poor mental health may be an indicator that a learner has suffered, or is at risk of suffering, abuse, neglect, exploitation, trauma, domestic abuse, discrimination, online harm or other safeguarding concerns.

All staff should remain alert to indicators which may suggest a learner's mental health or emotional wellbeing is deteriorating, including:

- Significant changes in behaviour, mood or engagement.
- Withdrawal from learning or social interaction.
- Expressions of hopelessness, distress or anxiety.
- Self-harm or discussion of self-harm.
- Sudden changes in attendance, punctuality or participation.
- Changes in presentation, appearance or personal care.
- Increased risk-taking behaviours.
- Concerns raised by employers, family members or other professionals.

Staff are not expected to diagnose mental health conditions or provide therapeutic interventions. However, all staff have a responsibility to recognise potential concerns, provide appropriate support within their role and report concerns through LearnTech's safeguarding and wellbeing procedures.

Where a learner presents with an immediate risk of harm to themselves or others, staff must follow emergency safeguarding procedures without delay.

LearnTech will work collaboratively with employers, parents/carers (where appropriate), local authorities, health professionals and external support agencies to promote positive learner wellbeing and ensure appropriate support is in place.

Abuse

Abuse and neglect are forms of maltreatment of a person. A person may abuse or neglect a child/young person by inflicting harm or by failing to act to prevent harm. Types of abuse can include physical, emotional, sexual and neglect.

The Department of Health in 'No secrets' has defined abuse for adults as: "a violation of an individual's human and civil rights by any other person or persons."

Sexual Harassment

Sexual harassment can be verbal, non-verbal or physical conduct, including but not limited to unwelcome sexual advances, inappropriate touching, forms of sexual assault, sexual jokes, displaying pornographic photographs or drawings, upskirting or sending email with material of a sexual nature.

(Dependent on the type of harassment, legal action can also be pursued as a criminal or civil matter using the Protection from Harassment Act 1997. Such cases would include stalking, unwanted calls, texts, letters and online abuse, including on social media).

Sexual Exploitation

Child sexual exploitation is a form of child sexual abuse. It occurs where an individual or group takes advantage of an imbalance of power to coerce, manipulate or deceive a child or young person under the age of 18 into sexual activity (a) in exchange for something the victim needs or wants, and/or (b) for the financial advantage or increased status of the perpetrator or facilitator. The victim may have been sexually exploited even if the sexual

activity appears consensual. Child sexual exploitation does not always involve physical contact; it can also occur through the use of technology.

Child criminal exploitation (CCE) and child sexual exploitation (CSE)

Both CCE and CSE are forms of abuse that occur where an individual or group takes advantage of an imbalance in power to coerce, manipulate or deceive a child into taking part in criminal or sexual activity. It may involve an exchange for something the victim needs or wants, and/or for the financial advantage or increased status of the perpetrator or facilitator and/or through violence or the threat of violence. This can be committed or facilitated by an organised network or gang, and the victim may identify as being part of this group. CCE and CSE can affect children, both male and female, and can include children who have been moved (commonly referred to as trafficking) for the purpose of exploitation. This may constitute modern slavery, and further information is available in the Modern Slavery statutory guidance. In accordance with this guidance, a relevant child protection and modern slavery referral should be completed where a potential victim of CCE or CSE is identified.

Domestic Abuse

Any incident or pattern of controlling, coercive, threatening, violent or abusive behaviour between people aged 16 or over who are, or have been, intimate partners or family members.

Honour-Based Abuse

Abuse committed to protect or defend the perceived honour of a family, community or culture. This may include violence, coercion or control.

Forced Marriage

A marriage where one or both people do not consent and pressure, threats or abuse are used to force them into the marriage.

Child-on-Child Abuse

Abuse that occurs between children and young people. This can include bullying, physical abuse, sexual violence, sexual harassment, online abuse and harmful behaviours.

County Lines

Criminal exploitation where organised crime groups use children and vulnerable people to transport, store or sell drugs across different areas.

Modern Slavery

The recruitment, movement, harbouring or exploitation of people through coercion, abuse, deception or force for personal or financial gain.

Serious Violence

Violence that causes significant harm or poses a serious risk to others, including knife crime, gang-related violence, assault and other violent offences.

FGM

Female genital mutilation (FGM) is a procedure in which the female genitals are deliberately cut, injured or changed, but there's no medical reason for this to be done. It can also be known as female circumcision or cutting, and by other terms, such as Sunna, Tahir, Megrez and Khitan, amongst others.

Nudes and semi-nudes, including where generated by AI

For the purposes of this policy, the term 'making or sharing nudes and semi-nude' refers to the creation, sending or posting of nude or semi-nude images by young people under the age of 18. The term 'images' includes all visual content, such as photographs, videos and livestreams. We use the term 'nudes' because it is the most widely understood by young people and best captures the full range of image-sharing behaviours covered in this guidance. Images may be taken by the child themselves (sometimes referred to as 'self-generated imagery') or taken or created by another person. They may also be digitally altered or wholly generated using artificial intelligence, including what are sometimes described as 'deepfakes' or 'deep nudes'.

Prevent

Prevent is a Home Office agenda which aims to stop people from being drawn into terrorism or becoming terrorists or supporting terrorism. Prevent also extends to supporting the rehabilitation and disengagement of those already involved in terrorism.

The Prevent duty requires specified authorities such as education, health, local authorities, police and criminal justice agencies (prisons and probation) to help prevent the risk of people becoming terrorists or supporting terrorism. It sits alongside long-established safeguarding duties with professionals to protect people from a range of other harms, such as substance abuse, involvement in gangs, and physical and sexual exploitation. The duty helps to ensure that people who are susceptible to radicalisation are supported as they would be under safeguarding processes.

"The objectives of Prevent are to:

- Tackle the ideological causes of terrorism.
- Intervene early to support people susceptible to radicalisation.
- Enable people who have already engaged in terrorism to disengage and rehabilitate" (Prevent Duty Guidance, 2023)

The UK counter-terrorism strategy is called CONTEST, and its aim is to "reduce the risk from terrorism to the UK, its citizens and interests overseas, so that people can go about their lives freely and with confidence". Prevent remains one of the key pillars of CONTEST alongside the other P work strands:

- Prevent: to stop people becoming terrorists or supporting terrorism
- Pursue: to stop terrorist attacks
- Protect: to strengthen our protection against a terrorist attack
- Prepare: to mitigate the impact of a terrorist attack" (Prevent Duty Guidance, 2023)

Extremism

This is defined in the 2023 Prevent Duty Guidance as “vocal or active opposition to fundamental British Values, including democracy, the rule of law, individual liberty and mutual respect and tolerance of different faith and beliefs [...] calls for the death of members of our armed forces, whether in this country or overseas.”

Radicalisation

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

British Values

There are:

- Democracy
- Rule of the law
- Individual liberty
- Mutual respect and tolerance of those with different faiths and beliefs

Related Documentation

This policy is informed by the principles and requirements of Keeping Children Safe in Education (KCSIE), Working Together to Safeguard Children, the Education and Training (Welfare of Children) Act 2021, the Children Acts 1989 and 2004, the Counter-Terrorism and Security Act 2015 (Prevent Duty), and associated safeguarding legislation and guidance.

Legislation

- **Children Act 1989**
[Children Act 1989](#)
- **Gender Recognition Act 2004**, section 22: In a safeguarding context, it's a criminal offence for a person in acting in an official capacity (Such as a safeguarding) to disclose information.
[Gender Recognition Act 2004](#)
- **Children Act 2004**
[Children Act 2004](#)
- **Counterterrorism and Security Act 2015**
[Counter-Terrorism and Security Act 2015](#)
- **Education Act 2011**
[Education Act 2011](#)
- **The Police Act 1997 (Criminal Records) (Amendment) Regulations 2013 OR The Police Act 1997 (Enhanced Criminal Record Certificates) (Protection of Vulnerable Adults) Regulations 2002**
[The Police Act 1997 \(Criminal Records\) \(Amendment\) Regulations 2013](#)
- **Safeguarding Vulnerable Groups Act 2006**
[Safeguarding Vulnerable Groups Act 2006](#)

- **Care Act 2014**
[Care Act 2014](#)
- **Modern Slavery Act (2015)**
[Modern Slavery Act 2015](#)
- **Working Together to Safeguard Children 2026**
[Working together to safeguard children - GOV.UK](#)
- **Education and Training (Welfare of Children) Act 2021**
[Education and Training \(Welfare of Children\) Act 2021](#)
- **Prevent Duty Guidance for Further Education Institutions**
[Prevent duty guidance: England, Scotland and Wales \(2015\) - GOV.UK](#)
- **Data Protection Act 2018 & UK GDPR**
[Data Protection Act 2018](#)

Guidance

- **Keeping Children Safe in Education (2026)**
[Keeping children safe in education 2026 \(comes into force from 1 September 2026\)](#)
- **Terrorism (Protection of Premises) Act 2025: factsheets**
[Terrorism \(Protection of Premises\) Act 2025: factsheets - GOV.UK](#)
- **What to do if you are worried a child is being abused (March 2015) -**
[Stat guidance template](#)
- **The UK's strategy for countering terrorism: CONTEST (2023)**
[Microsoft Word - English Standard CONTEST 2023](#)
- **Domestic Abuse Act 2021**
[Domestic Abuse Act 2021](#)

LearnTech Policies

This policy should be read in conjunction with organisational policies, procedures and other related documents:

- Job description for the Designated Safeguarding Lead and Deputy Designated Safeguarding Lead
- Safer Recruitment Policy
- IT Acceptable Usage Policy
- Complaints Policy
- Whistleblowing Policy
- Health and Safety Policy
- Induction and Orientation Policy
- Training and Development Policy
- HR Framework
- Quality Assurance Policies and Procedures
- Equality, Diversity and Inclusion Policy

- Data Protection, Retention and Privacy policies
- Additional Learning Support Policy including accessibility and inclusion
- Bullying and Harassment Policy – Employee Handbook
- Disciplinary and Grievance Policy – Employee Handbook

Safeguarding Policy Implementation Taking Action

See Appendix One for Safeguarding Policy flow chart.

It is the responsibility of staff to report and record their concerns as soon as possible.

LearnTech actively encourages a ‘never do nothing’ attitude if staff have a concern about a learner and promote discussion with DSL if in any doubt.

It is not the staff member’s responsibility to investigate or decide whether a learner is at risk.

Key points for staff to remember for taking action are:

- If an emergency situation, take necessary action to help the learner, for example, call 999.
- REPORT concerns to the DSL as soon as possible and certainly by the end of the day.
- Do not start an independent investigation.
- Share information on a need-to-know basis only – do not discuss the issue unnecessarily with colleagues, friends, or family.
- Seek personal support if distressed.

What to do if a Learner discloses:

It takes a lot of courage for anyone to disclose that they are being abused or if they have any issues surrounding their safety, health or well-being.

In circumstances of abuse of any nature, they may feel ashamed, particularly if the abuse is sexual; their abuser may have threatened what will happen if they tell; they may have lost all trust in others; or they may believe, or have been told, that the abuse is their own fault.

If a learner talks to a member of staff about any risks to their safety or wellbeing, **the staff member will need to let the learner know that they must pass the information on** – staff are not allowed to keep secrets. The point at which they tell the learner this is a matter for professional judgement. If they jump in immediately the learner may think that they do not want to listen, if left until the very end of the conversation, the learner may feel that they have been misled into revealing more than they would have otherwise.

During their conversations with the learners, it is best practice for staff to:

- Allow learners to speak freely.
- Remain calm and not overreact – the learner may stop talking if they feel they are upsetting their listener.
- Give reassuring nods or words of comfort – ‘I want to help’, ‘This isn’t your fault’, ‘You are doing the right thing in talking to me’.

- Not be afraid of silences, and allow space and time for learner to continue, staff will recognise the barriers the learner may have had to overcome to disclose.
- Clarifying or repeating back to check what they have heard if needed but will not lead the discussion in any way and will not ask direct or leading questions – such as... whether it happens to siblings too, or what does the learner's mother think about it.
- Use questions such as Tell me.....? Is there anything else?
- At an appropriate time tell the learner that to help them, the member of staff must pass the information on.
- Not automatically offer any physical touch as comfort. It may be anything but comforting to a child who has been abused.
- Remember professional boundaries and not share personal experiences such as 'that happened to me'.
- Avoid admonishing the learner for not disclosing earlier. Saying things such as 'I do wish you had told me about this when it started' or 'I can't believe what I'm hearing' may be the staff member's way of being supportive but may be interpreted by the learner to mean that they about have done something wrong.
- Tell the learner what will happen next. The learner may agree to have a Teams meeting or call with the Designated Safeguarding Lead. Otherwise, let them know that they will have to be contacted.
- Write up the conversation as soon as possible and hand it to the Designated Safeguarding Lead in whichever format is quickest.
- Seek support if they feel distressed.

Recording & Monitoring

Information relating to concerns about the welfare of children or vulnerable adults, or any concerns relating to learners' safety and wellbeing should be disclosed as soon as possible after the event, situation, or disclosure.

Information passed to children's or adult services must ensure a clear distinction between fact, opinion and hearsay and must include the following:

- The nature of the concern/allegation
- Details of the child or vulnerable adult, any alleged perpetrator, any witnesses
- A description of any visible injuries i.e. bruising
- An account of anything that has been said, stating who said it. If a learner recounts what has happened, staff should not question this but record it as accurately as possible.
- Any times, dates and places

LearnTech process for logging Safeguarding concerns (including Prevent)

See Appendix One for flow chart for logging safeguarding concerns.

Step One: Concern Logging/Asking for Support

On the Team LearnTech SharePoint site there is a "Log a Concern" button.

- Any pastoral, wellbeing or safeguarding concern or question must be logged through this section on the LearnTech website with ***as much detail as possible***.

- As detailed above, concerns should be passed to the DSL in the quickest manner possible, therefore, this could be in an alternative approved format. However, the concern will be logged in the appropriate location as soon as possible.
- LearnTech adopts the approach that all concerns should be logged irrespective of whether staff believe this to be a safeguarding concern or not. This ensures that the DSL can assess the concern and allocate it to a particular type of concern (safeguarding/wellbeing)
- No communication regarding safeguarding concerns should be conducted outside the approved communication platforms.

Approved:

1. Telephone calls
2. Teams call
3. Through the Log a Concern section on the Team LearnTech Site
4. Via Confidentially flagged email direct to safeguarding@learn-tech.com

NB: Teams Messages should not be used to communicate any questions regarding safeguarding concerns or questions. This is due to these being more at risk of being lost or ineffectively followed through. Any communications via Teams will be re-directed through the above approved channels.

Step Two: Assessment of Concern

Once a concern or question has been passed to the DSL, it will be assessed upon receipt as to whether this is a safeguarding or wellbeing/pastoral concern, then the DSL WILL allocate the concern to a concern level (Very High - Low) which correspond with actions taken.

Depending on the concern raised and the concern level determined, the DSL could take the following action:

- Immediately get in touch with the appropriate authorities (referrals to outside agencies e.g. Social Services)
- Immediately get in touch with the member of staff who submitted the concern for more information and assess further.
- Allocate the concern either to a DDSL within a specific area who is best placed to provide the support, or themselves to work directly with the learner and/or training team to provide support.
- Following assessment, immediately notify the person who has submitted the concern of the concern level and the support allocation.

Step Three: Action

Following the assessment of the concern the DSL/DDSL will determine the appropriate form of action to be taken.

- This will be documented in the safeguarding concern log with details and next appropriate actions to be taken.
- Comments on the log will be updated continuously and following each interaction regarding the concern, whether internal or external

- Following each interaction, the concern rating will be updated to reflect the current position and the DSL/ DDSL allocated to the case will review.
- Should any changes be made, those involved in the interactions will be informed and updated accordingly as per information sharing policies below.

Step Four: Resolution & Completion

- Following any action taken, should it be deemed that no further action should be taken, then the status will be changed to 'no further action'. All parties involved in the case will be informed.
- Should a case be deemed as completed, then the status will be changed to 'completed'. All parties involved in the case will be informed.

Should a learner leave programme then the following steps will be taken:

- The learner will be informed that LearnTech can continue with providing any information, advice and guidance to support them, and will work with any other new providers or employers in agreement with the learner as required.
- The spirit in which LearnTech provides safeguarding, pastoral and wellbeing concerns does not end when a learner stops learning with LearnTech, therefore DSL and DDSL will seek guidance from the Board in continuing any support needed.
- Any further communications should be logged as per Step Three.

Sharing Information

Responsible information sharing plays a key role in enabling services to protect victims of adult abuse and, in extreme cases, can save lives.

As a matter of good practice, staff should routinely consider getting explicit consent, but if this is not possible and other vulnerable adults are at risk it, may be necessary to override this requirement.

Staff should not give assurances of absolute confidentiality, where there are concerns about abuse. In circumstances where abuse is a criminal act or it places other vulnerable people at risk, the information must be disclosed.

Allegations against LearnTech Staff

If a concern suggests that a member of staff may have:

- behaved in a way that harmed a child
- committed a criminal offence against a child
- behaved towards a child in a way that indicates they may pose a risk

The Designated Safeguarding Lead or Director must seek advice from the Local Authority Designated Officer (LADO) before conducting any internal investigation.

All steps taken and any documentation must be saved and logged in the safeguarding tracker and member of staff's HR folders.

Online Safety

LearnTech recognises its responsibility to promote online safety and digital wellbeing for all learners and staff. While the organisation does not directly control learners' personal devices or employers' networks, it actively promotes safe online practices through staff vigilance, learner education, secure learning platforms and robust reporting procedures.

Online Safety Risk Areas

LearnTech addresses the four key categories of online risk as outlined in national safeguarding guidance:

1. Content

All digital content created, used or shared by LearnTech is reviewed and approved through appropriate quality assurance processes. This helps ensure that learners and staff are protected from exposure to illegal, inappropriate or harmful content, including but not limited to:

- Pornographic material
- Racist, discriminatory or misogynistic content
- Self-harm and suicide-related content
- Antisemitism and hate speech
- Radicalisation and extremism
- Extreme sexual or physical violence
- Misinformation, disinformation (including fake news) and conspiracy theories

2. Contact

LearnTech provides secure online learning environments and appropriate communication channels for learners and staff. Whilst the organisation has the capability to monitor interactions within its digital platforms where necessary, routine monitoring of communications is not undertaken. Any concerns regarding inappropriate contact, grooming, harassment or other safeguarding risks should be reported immediately through the organisation's safeguarding procedures.

3. Conduct

Expectations regarding online behaviour are outlined within LearnTech's Equality, Diversity and Inclusion (EDI) Policy and Code of Conduct. These documents promote respectful and responsible digital behaviour and address behaviours that may increase the likelihood of harm, including:

- Online bullying, harassment or discrimination
- Sharing, creating or receiving inappropriate or explicit images, including AI-generated content
- Misuse of social media or digital communication platforms
- Any online activity that places an individual or others at risk of harm

4. Commerce

Although learners are provided with a LearnTech email account, this is not typically their primary email account due to their employment arrangements. LearnTech raises awareness of online commercial risks and maintains clear reporting mechanisms for learners to report concerns relating to:

- Online gambling
- Phishing attempts
- Financial scams and fraud
- Inappropriate advertising
- Requests for personal or financial information
- Generative Artificial Intelligence (AI)

LearnTech recognises the growing use of generative AI technologies and is committed to ensuring their safe, ethical and responsible use. Learners have access to AI-related learning opportunities as part of their apprenticeship programmes.

In line with the LearnTech AI Policy, Microsoft Copilot is the only approved generative AI platform for use by staff and learners.

Learners are provided with guidance on the safe, responsible and ethical use of AI technologies, including data protection, academic integrity and online safety considerations.

5. Online Safety Education

Online safety forms part of LearnTech's Core Learning Curriculum and wider pastoral programme. This includes education on:

- Keeping yourself safe online
- Recognising and reporting online risks
- Safe use of social media and digital communication
- Cybersecurity awareness
- The responsible use of artificial intelligence and emerging technologies

6. Further Guidance

Staff and learners may find the following government guidance useful:

- **Generative Artificial Intelligence (AI) in Education:**
<https://www.gov.uk/government/publications/generative-artificial-intelligence-in-education/generative-artificial-intelligence-ai-in-education>
- **Using AI in Education Settings: Support Materials:**
<https://www.gov.uk/government/collections/using-ai-in-education-settings-support-materials>
- **Using AI in Education: Support for School and College Leaders:**
<https://www.gov.uk/government/publications/using-ai-in-education-support-for-school-and-college-leaders>

Core Curriculum content regarding AI, deepfakes, consent and misogyny

LearnTech's approach to pastoral support is learner-centred, inclusive, and responsive to individual needs. We are committed to promoting learners' wellbeing, safety, and personal development through a comprehensive pastoral

curriculum. As part of the Core Curriculum, learners engage with a range of safeguarding and personal development modules, including:

- Online safety, including the safe and responsible use of digital technologies, artificial intelligence (AI), and awareness of deepfakes
- Consent and healthy relationships
- Misogyny and gender-based attitudes and behaviours
- Mental health, emotional wellbeing, and stress awareness
- Equality, diversity, inclusion, and understanding bias and microaggressions

These topics are designed to equip learners with the knowledge, skills, and confidence to recognise risks, make informed decisions, and contribute positively to a safe and respectful learning environment.

Staff Training

Please refer to both **the Induction & Orientation** and **Training & Development** policies, **along with the Employee Handbook**, for procedure and further information regarding mandatory safeguarding training.

All staff have regular training to enable them to recognise the possible signs of abuse and neglect and to know what to do if they have a concern. All staff, including support staff and the Directors, will be regularly trained in safeguarding, including digital safeguarding.

The DSL will receive Level 3 Designated Safeguarding Lead training updated every two years, including training in inter-agency procedures. They will be supported and encouraged to attend additional training to keep up-to-date, including forums and multi-agency training offered.

All training will be recorded and monitored to flag in advance when updates are required.

All staff will be required to confirm their acceptance of the safeguarding and Prevent policies, code of practice and implementation through signing the safeguarding policy during the recruitment process.

Renewal requirements for mandatory safeguarding training

All staff must participate in mandatory safeguarding and Prevent training, provided either in-house or externally to support LearnTech's work with children and vulnerable adults.

- All staff including support staff and Directors are required to undertake safeguarding training (including Prevent) and this is to be renewed every 3 years.
- Designated Lead safeguarding training is mandatory and is to be completed by all members of the Safeguarding Team, Programme Heads of Department and the Head of Quality every 2 years.

Role of the DSL

DSL Responsibilities

The Designated Safeguarding Lead (DSL) role will be clearly defined within the post holder's job description via an addendum. The DSL will have the appropriate status, authority, time, funding, training, resources and support necessary to carry out their safeguarding responsibilities effectively.

The company will ensure that robust arrangements are in place to provide safeguarding leadership and decision-making when the DSL is unavailable. There are a number of Designated Safeguarding Leads (DDSLs) who are trained to the same standard as the DSL to enable them to undertake the role when required.

The DSL has lead responsibility for all aspects of safeguarding and child protection, including:

- Safeguarding and child protection
- Online safety
- Prevent duty responsibilities
- Liaison and information sharing with statutory agencies and external partners
- Making decisions regarding safeguarding referrals
- Maintaining accurate and confidential safeguarding records
- Providing safeguarding information, guidance and updates to staff
- Promoting a strong culture of safeguarding throughout the school

Deputy DSLs will receive the same level of safeguarding and child protection training as the DSL and will be supported to carry out delegated safeguarding responsibilities effectively.

Staff Code of Conduct & Professional Boundaries in relation to Safeguarding & Wellbeing

All LearnTech employees, contractors, volunteers and associates share a responsibility to safeguard and promote the welfare of learners.

Staff must maintain professional boundaries with learners at all times and conduct themselves in a manner that protects both learners and staff from actual or perceived harm.

Staff must:

- Treat all learners with dignity, respect and fairness.
- Maintain professional relationships with learners at all times.
- Act as positive role models and uphold LearnTech's values.
- Follow all safeguarding, Prevent, online safety and data protection procedures.
- Report any safeguarding concern, disclosure, allegation or welfare concern immediately using the organisation's reporting procedures.
- Record concerns accurately, factually and without delay.
- Challenge inappropriate behaviour, discriminatory language, harassment or bullying.
- Promote equality, diversity, inclusion, British Values and a culture of respect.
- Be alert to signs of abuse, exploitation, neglect, radicalisation, online harm and mental health concerns.
- Use only approved LearnTech systems and communication platforms when communicating with learners.
- Complete all mandatory safeguarding, Prevent and online safety training.

Staff must not:

- Develop personal or inappropriate relationships with learners.
- Communicate with learners through personal social media accounts or personal communication channels.

- Accept or offer gifts, favours or inducements that could compromise professional boundaries.
- Engage in behaviour that could be perceived as grooming, exploitation, harassment or abuse.
- Promise confidentiality where safeguarding concerns are disclosed.
- Investigate safeguarding concerns themselves.
- Share safeguarding information outside authorised reporting and information-sharing processes.

Any breach of this Code of Conduct may be treated as a disciplinary matter and, where appropriate, may result in referral to external safeguarding agencies, the Local Authority Designated Officer (LADO), the Disclosure and Barring Service (DBS), the Teaching Regulation Agency (where applicable), or the police.

Safeguarding During Online Delivery

LearnTech delivers the majority of learning and support online. Staff must take reasonable steps to ensure that online interactions are professional, transparent and safe.

Staff must:

- Use approved LearnTech communication systems.
- Conduct meetings through scheduled organisational platforms.
- Maintain professional standards of behaviour and communication during online interactions.
- Remain vigilant to signs of distress, abuse, exploitation, radicalisation, coercion or changes in learner wellbeing.
- Report any concerns in accordance with safeguarding procedures.
- Follow LearnTech's Online Safety, IT Acceptable Use and Data Protection policies

Operational requirements relating to online delivery, meeting management, dress standards, recording arrangements and quality assurance are detailed within the Staff Code of Conduct, Digital Communications Policy and associated operational procedures.

Apprenticeship Safeguarding Risks

LearnTech recognises additional safeguarding risks linked to apprenticeships including:

- Workplace bullying
- Sexual harassment at work
- Unsafe working environments
- Exploitation
- Modern slavery
- Domestic abuse
- Financial exploitation
- County lines activity
- Criminal exploitation
- Radicalisation
- Mental health concerns

- Online harm

Role Expectations and code of conduct for those in Delivery Roles

All staff working with learners are expected to:

- Actively embrace and embed the prevent agenda and British Values in sessions
- Ensure that development for understanding of Safeguarding, Prevent, British values and pastoral topics are embedded into the teaching, learning and assessment plans and curriculum/lesson plans
- Read and understand policies and procedures and ensure they are implemented as part of their work activities
- Read, understand and follow guidance shared through central communications bulletins on SharePoint for safeguarding and wellbeing (monthly) and policies and procedures (for changes)
- Actively participate in the development of policies and procedures where needed and where possible share relevant feedback for their improvement through the Policy Hub and Submit a Change Request button

These will be monitored through staff RAG ratings and through QA Activities and feedback.

Prevent Policy Implementation

Introduction

Extremists of all persuasions aim to develop destructive relationships between different communities by promoting division, fear and mistrust of others based on ignorance or prejudice. Education is a powerful weapon against this, and LearnTech aims to equip learners with the knowledge, skills and critical thinking to challenge and debate in an informed way. Staff should ensure that LearnTech is a safe place, where learners can explore controversial issues safely, with trainers, mentors and assessors facilitating this. LearnTech provide a provision delivered by skilled professionals, so that learners understand and become tolerant of difference and diversity; and, to ensure that they thrive, feel valued and not marginalised.

LearnTech will ensure that we promote tolerance and respect for all cultures, faiths, and lifestyles. The Board ensures that this ethos is reflected and implemented effectively in training policy and practice and that there are effective risk assessments in place to safeguard and promote learners' welfare. LearnTech recognise they have a duty to prepare learners for life in modern Britain and to keep them safe.

LearnTech promotes British values and holds staff members responsible for ensuring they are intrinsic in the approach to all parties.

Signs of Vulnerability

There are no known definitive indicators that a person is vulnerable to radicalisation, but there are number of signs that together increase the risk.

Signs of vulnerability can include (and not limited to):

- Underachievement

- Being in possession of extremist literature
- Poverty
- Social exclusion or isolation
- Traumatic events
- Global or national events
- Religious conversion
- Change in behaviour.
- Extremist influences
- Conflict with family over lifestyle
- Confused identify.
- Victim or witness to race or hate crimes.
- Rejection by peers, family, social groups, or faith
- Migration
- History of social care
- Perceptions and experience of discrimination
- Peer pressure, seduction of adventure
- Drug abuse.

Recognising extremism

Early indicators of radicalisation or extremism may include:

- Showing sympathy for extremist causes
- Glorifying violence, especially to other faiths or cultures
- Making remarks or comments about being at extremist events or rallies outside school
- Evidence of possessing illegal or extremist literature
- Advocating messages similar to illegal organisations or other extremist groups
- Being drawn into conspiracy theories that are gateways to radicalised thinking.
- Out of character changes in dress, behaviour, and peer relationships (but there are also very powerful narratives, programmes, and networks that young people can come across online so involvement with particular groups may not be apparent.)
- Secretive behaviour
- Online searches or sharing extremist messages or social profiles.
- Intolerance of difference, including faith, culture, gender, race, or sexuality
- Graffiti, artwork or writing that displays extremist themes.
- Attempts to impose extremist views or practices on others.
- Verbalising anti-Western or anti-British views
- Advocating violence towards others

Referral Process

Staff at LearnTech must refer all concerns about learners who show signs of vulnerability or radicalisation. These concerns must be passed to the DSLs as soon as possible, using the appropriate referral method as set out in the safeguarding policy.

When there are significant concerns about a learner, the DSL will liaise with the appropriate authorities and provide up to date information to senior management and the Board. If a child or a person is in immediate danger, call 999.

Prevent Training

Please refer to both the **Induction & Orientation** and **Training & Development** Policies, along with the **Employee Handbook**, for further information regarding mandatory Safeguarding & Prevent training.

Staff will be given training to help them understand the issues of radicalisation, are able to recognise the signs of vulnerability or radicalisation and know how to refer concerns. This information also forms part of induction safeguarding training. Staff are updated as necessary in safeguarding briefings (if there are any current issues).

All training will be recorded and monitored to flag in advance when updates are required.

- All staff will be required to confirm their acceptance of the safeguarding and Prevent policies, code of practice and implementation.
- All staff must participate in mandatory safeguarding and Prevent training offered either in-house or externally to support LearnTech's work with learners, young people and vulnerable adults.
- All staff, including support staff and Directors, are required to undertake Prevent training to be renewed every 3 years.

Reporting Prevent Concerns: Reporting Concerns About Terrorism

If staff consider anything to be suspicious or connected with terrorism, call 101.

Alternatively, log a concern via the Team LearnTech site using the log a concern button or via email using safeguarding@learn-tech.com email address to request advice and guidance.

Staff should consider, suspect it, report it.

How to report concerns about terrorism and individuals who may be at risk of radicalisation.

If staff members are worried about anyone who is at risk of being radicalised by people who are involved in, or support, terrorism please contact;

- In an emergency, dial: 999
- Anti-Terror Hotline: 0800 789 321
- **MI5** Freephone: 0800 111 4645
Telephone: 020 7930 9000

PREVENT Officer(s)

- *Lucy Brighton – Designated Safeguarding Lead*
- *Aaran Hall – Deputy Designated Safeguarding Lead*

0333 014 8260 – option one **OR** 0330 014 0270 – Direct.

Please sign this copy of the Safeguarding Policy to confirm that you have read and understand the contents of this policy. Please ask the Designated Safeguarding Lead, should you have any questions.

Signature	
Staff Name	
Date	

Appendix 1

Safeguarding process

