



Safeguarding, PREVENT and CONTEST Policy and Procedure

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Contents

1. Policy Statement	4
2. Purpose	4
3. Scope.....	5
4. Key Definitions	5
5. Responsibilities.....	7
6. What is Safeguarding?.....	9
6.7. Definitions.....	10
6.8. Types of Abuse	10
6.11. What Do I Do If My Learner Discloses Information To Me?	11
7. Channel	12
7.2. Who Does Channel Work With?	12
7.3. How Does Channel Work?.....	12
7.4. What Does Channel Support Look Like?	12
7.5. How Will The Person Be Involved In This Process?	12
7.6. Who Can Make A Referral?	12
7.7. What Happens With The Referral?	12
8. Reporting For FGM.....	12
9. Cyberbullying	13
9.1. What is Cyberbullying?	13
9.2. Who Is Most At Risk?	14
9.3. Definitions.....	14
10. Grooming	14
10.1. What Does The Term Grooming Mean?	14

10.2. What Is Sexual Online Grooming?	14
10.3. How Do You Know If A Child Is Being Groomed Online?.....	15
10.4. Grooming – In Person.....	15
11. Legislation	15
11.1. Legislative Requirements and Statutory Guidance	15
11.2. Equality and Diversity.....	16
11.3. Working with Partners and Information Sharing	16
11.4. Training and Referral Procedure.....	16
12. Safer Recruitment	17
13. Reporting a Concern	18
14. Keeping Yourself Safe	19
15. Whistle Blowing	19
13. Use of External Agencies and Speakers	20
14. Monitoring and Review	21
15. Data Protection and Confidentiality.....	21
16. Alternative Format	21
Annex 1 – Process for Escalating a Safeguarding Concern.....	22
Annex 2 – Useful Information	23
Appendix 1 - Courage Consultants UK Limited Safeguarding Reporting Process.....	24
Appendix 2 – Courage Consultants UK Limited Checklist External Speaker/Guest Form	25

1. Policy Statement

- 1.1. Courage Consultants UK Limited recognises the importance of safeguarding. The purpose of this policy is to outline the principles and procedures that we have adopted to ensure the safety and wellbeing of young people and adults at risk of harm, including our staff, students, apprentices, users of our facilities, and those who engage in activities that we have organised. Courage Consultants UK Limited aims to provide a safe, inclusive environment, conducive to work, learning, scholarly activity, and the enjoyment of a positive experience to all at Courage Consultants UK Limited.

The Prevent and Safeguarding Policy for Courage Consultants UK Limited reflects the importance of our responsibility to safeguard and promote the welfare of all our staff, tutor/assessors and learners by protecting them from physical, sexual or emotional abuse, neglect and bullying. We are committed to providing a caring, friendly and safe environment for all our Learners so that they can learn in a relaxed and secure atmosphere. We believe every learner should be able to participate in all learning and social activities in an enjoyable and safe environment and be protected from harm.

In writing this policy, Courage Consultants UK Limited have considered:

The statutory guidance published by the Department for Education (DfE) – ‘Working Together to Safeguard Children’ March 2015 (amended July 2018)

Keeping children safe in education – statutory guidance for schools and colleges (amended September 2018)

The Prevent Duty guidance for England and Wales: on the duty in the Counter Terrorism and Security Act 2015 (amended March 2016) to have due regard to the need to prevent people from being drawn into terrorism

Counter-terrorism strategy (CONTEST) 2018 June 2018

Lead Safeguarding Manager is:

Email: courage@courageconsultants.co.uk Telephone: 01612312038

2. Purpose

- 2.1. This policy outlines Courage Consultants UK Limited’ commitment to safeguarding. Our aim is to safeguard the safety and wellbeing of the young people and adults at risk of harm, whilst at the same time protecting freedom of speech and embedding a commitment to the promotion of positive learning and community relations. With this aim in mind, we will:

- Publish guidance and procedures for identifying risk, reporting concerns and taking action.
- Take all safeguarding concerns seriously and report them promptly to the relevant authority, where appropriate, including suspicions and allegations of exploitation, harm, or abuse.
- Ensure we have processes in place to check the suitability of staff and students whose roles and responsibilities involve regular contact with, or supervision of, young people and adults at risk of harm.

- Provide training for staff who are in routine and direct contact with young people and adults at risk of harm.
- Foster a culture of trust between those who work at Courage Consultants UK Limited, those who attend it, young people and visitors.
- Prevent people who pose a risk of harm from working or studying at Courage Consultants UK Limited.
- Ensure staff receive appropriate safeguarding training which is regularly updated.

2.2. Staff should be aware of and be able to effectively respond to a range of safeguarding issues. The list given below is not intended to be exhaustive but is indicative of the types of issues that might lead a person to be deemed as ‘vulnerable’:

- Domestic violence.
- Peer to peer bullying
- self-harm.
- Mental health issues.
- Online risks.
- Physical abuse, which includes rough handling or any other unnecessary or unwarranted physical force.
- Sexual abuse.
- Psychological abuse, which includes emotional abuse, threats of harm, deprivation of contact, humiliation, blaming, controlling, intimidation, coercion, harassment, and verbal abuse.
- Financial or material abuse which includes exploitation, misuse or misappropriation of property, theft, and fraud.
- Discriminatory abuse, which includes racism, sexism, cultural, religious and abuse based on disability.

3. Scope

3.1. This policy applies to:

- All full-time, part-time, sessional, and temporary staff employed by, or working for or on behalf of Courage Consultants UK Limited.
- All students studying at Courage Consultants UK Limited.
- Contractors and consultants working for Courage Consultants UK Limited.
- All other individuals or groups, including visitors, who have been granted access to Courage Consultants UK Limited ICT and facilities.
- Young people aged under 18 years, and Adults at Risk (as defined by Section 42 of the Care Act 2014).

3.2. Every individual defined within the scope of this document is responsible for the implementation of this policy.

4. Key Definitions

4.1. Young people: references to “young people” in this policy means anyone under the age of 18 years.

- 4.2. Adult at Risk: Courage Consultants UK Limited bases its definition of an “Adult at Risk” on that used within the Care Act 2014 and defines an Adult at Risk as someone over 18 years of age who:
- i. has needs for care and support;
 - ii. is experiencing, or is at risk of experiencing abuse or neglect; and
 - iii. as a result of those needs is unable to protect themselves against the abuse or neglect or the risk of it.
- 4.3. Safeguarding: in defining our approach towards young people, Courage Consultants UK Limited draws on the definition used by the DfE in Keeping Children Safe in Education 2022 (KCSE). While KCSE only applies to schools and colleges, we will play our part in:
- Protecting young people from maltreatment.
 - Preventing impairment of young people’s mental or physical health and development.
 - Taking action to enable all young people to have the best outcomes.
- 4.4. Safeguarding Adults at Risk: while Courage Consultants UK Limited is not subject to the provisions of the Care Act 2014, we draw broadly on this act to inform our policy on safeguarding Adults at Risk. We will play our part to:
- Ensure that the rights of Adults at Risk are protected to enable them to live in safety, free from abuse and neglect.
 - Ensure that the wellbeing of the Adults at Risk is promoted and that in deciding on any action to be taken we will consider their views, wishes, feelings and beliefs, for example when considering whether to refer concerns to statutory bodies or when seeking support from charitable organisations.
- 4.5. PREVENT: A key aspect of safeguarding is the PREVENT duty, which requires the Education sector to have "due regard to the need to prevent people from being drawn into terrorism", supporting terrorism or being drawn into non-violent extremism. Sect 26 CTS Act places a duty on certain bodies (specified authorities – listed in Schedule 6) to have “due regard to the need to prevent people from being drawn into terrorism”. Guidance is issued under Section 29 of the Act:
- Respond to the ideological challenge of terrorism and the threat we face from those who promote it
 - Prevent people from being drawn into terrorism and ensure that they are given appropriate advice and support
 - Work with sectors and institutions where there are risks of radicalisation that we need to address

Prevent aims to safeguard vulnerable individuals (both adults and children) who may be at risk of potentially becoming involved in terrorist activities. It also aims to support institutions, such as schools, colleges and universities where this may happen.

- 4.6. CONTEST: CONTEST is the Government's Counter Terrorism Strategy, published in June 2018. The aim of the strategy is 'to reduce the risk from international terrorism, so that people can go about their lives freely and with confidence.' CONTEST has four strands, often known as the four Ps. The aims of the 4 Ps are:
- PREVENT - to stop people becoming terrorists or supporting violent extremism
 - PURSUE - to stop terrorist attacks through disruption, investigation and detection
 - PREPARE - where an attack cannot be stopped, to mitigate its impact
 - PROTECT - to strengthen against terrorist attack, including borders, utilities, transport infrastructure and crowded places
- 4.7. Extremism: The Government has defined extremism as "vocal or active opposition to fundamental British values, including democracy, the rule of law, individual liberty and mutual respect and tolerance of different faiths and beliefs".
- Individual Liberty
 - Democracy
 - Rule of Law
 - Mutual respect and Tolerance of Different Faiths and Beliefs
 - not discriminating against those with protected characteristics (Equality Act 2010)
- 4.8. Terrorism: An action that endangers or causes serious violence to a person/people, causes serious damage to property or seriously interferes or disrupts an electronic system. The use of threat must be designed to influence the Government or to intimidate the public and is made for the purpose of advancing a political, religious or ideological cause.
- 4.9. Radicalisation: Radicalisation is defined as the act or process of making a person more radical or favouring of extreme or fundamental changes in political, economic or social conditions, institutions or habits of the mind. We recognize that safeguarding against radicalization is no different from safeguarding against any other vulnerability. The risk of radicalization is the product of a number of factors and identifying this risk requires that staff and tutors/assessors exercise their professional judgement, seeking further advice as necessary. It may be combined with other vulnerabilities or may be the only risk identified. Potential indicators include.
- Use of inappropriate language
 - Possession of violent extremist literature
 - Behavioural changes
 - The expression of extremist views
 - Advocating violent actions and means
 - Association with known extremists
 - Seeking to recruit others to an extremist ideology

5. Responsibilities

- 5.1. The Head of Student Welfare is the Courage Consultants UK Limited designated lead for safeguarding. Courage Consultants UK Limited has specific responsibility to promote good

safeguarding practice and ensure that the Safeguarding Policy and related procedures are fit for purpose. The Courage Consultants UK Limited safeguarding lead will:

- Ensure that the Safeguarding Policy and accompanying procedures, advice and guidance are fit for purpose and sufficient to ensure that Courage Consultants UK Limited meets its statutory obligations and complies generally with good practice and where reasonably possible.
- Ensure that faculty and professional services departments are aware of their duties under the Safeguarding Policy and receive any assistance that they may require to arrange appropriate training and guidance on safeguarding procedures.
- Ensure that appropriate safeguarding training is available for Courage Consultants UK Limited staff who work with young people and Adults at Risk.
- Ensure that that processes and procedures are in place for relevant recruitment checks and that these are conducted for relevant roles.
- Ensure that routes to report or escalate safeguarding concerns are clearly signposted, accessible, and appropriately monitored.
- Ensure that reported safeguarding concerns are reviewed, specialist guidance sought, and appropriate action taken to escalate internally and/or to the relevant external agency within statutory time frames.
- Prepare and submit referrals as appropriate to OfS, the Local Authority Designated Officer, the Multi Agency Safeguarding Hub and/or Local Authority Children's or Adults Safeguarding Board.
- Ensure that Courage Consultants UK Limited is aware of its responsibilities to safeguard young people and Adults at Risk whether they are acting as a paid member of Courage Consultants UK Limited staff or supporting Courage Consultants UK Limited -led activity in an unpaid capacity as a volunteer.
- Ensure that all are aware of how to report a safeguarding concern (Annex 1). Any such concerns can be reported verbally or via the Courage Consultants UK Limited's Safeguarding email – courage@courageconsultants.co.uk

5.2. All provider staff and tutor/assessors have a legal responsibility under the PREVENT Duty to make sure that:

- They have undertaken training in the Prevent Duty as identified by their management
- They are aware of when it is appropriate to refer concerns about learners to the Prevent officer, usually the provider's Safeguarding officer
- They exemplify British values of "democracy, the rule of law, individual liberty and mutual respect and tolerance for those with different faiths and beliefs" into their practice

The Prevent Strategy will specifically:

- Respond to the ideological challenge of terrorism and the threat we face from those who promote it
- Prevent people from being drawn into terrorism and ensure that they are given appropriate advice and support and work with sectors and institutions where there are risks of radicalisation which we need to address

6. What is Safeguarding?

- 6.1. Courage Consultants UK Limited are committed to safeguarding and promoting the welfare of all learners including young people and vulnerable adults.
- 6.2. A vulnerable adult is defined as a person whom:
 - Has needs for care and support (whether or not the local authority is meeting any of those needs) and;
 - Is experiencing, or at risk of abuse or neglect; and
 - As a result of those care and support needs is unable to protect themselves from either the risk of, or the experience of abuse or neglect
- 6.3. Employers also have a responsibility to the learners they employ. We also recognise that we have a duty to help employers, staff, tutor/assessors and learners to recognise their responsibilities, through guidance, support and training. As the employer of a learner, it is important that you understand your responsibilities to the learner and what safeguarding means to you. The following information should provide answers to some of the questions you may have. If they are not answered here, please get in touch with us using the contact details provided.
- 6.4. The aims of this Policy are:
 - To identify the expectations of staff and tutor/assessors in relation to safeguarding
 - To ensure relevant and effective safeguarding practices are in place
 - To ensure the right of every applicant and learner to learn within a safe environment
 - To promote awareness to staff and tutor/assessors of the need to safeguard children and vulnerable adults and to recognise that safeguarding is everyone's responsibility
- 6.5. To ensure that the fundamental rights and needs of our applicants and learners are observed
 - To prevent abuse through the pastoral support offered to all applicants and learners
 - To raise awareness of different types of abuse and children/vulnerable adults in need issues
 - To provide guidelines for staff and tutor/assessors in handling matters relating to actual or suspected abuse
 - To ensure staff and tutor/assessors act professionally
 - To deter potential, unsuitable individuals from applying to Courage Consultants UK Limited by demonstrating our attentiveness and vigilance in relation to safeguarding through our website and job advertisements
 - To reject at interview stage anyone where we have doubts about suitability
 - To prevent the risk of abuse by ensuring procedures and standards are in place
 - Academies to enable all staff and tutor/assessors to recognise the signs and report accordingly
- 6.6. The term 'safeguarding' embraces both child and vulnerable adult protection and preventative approaches to keep our students, staff, tutor/assessors and employers safe. Safeguarding encompasses learners' health and safety, welfare and well-being.

- 6.7. Courage Consultants UK Limited is committed to safeguarding and promoting the welfare of children, young people and vulnerable adults and expects all staff, tutor/assessors and employers to share this commitment. We have developed a Safeguarding Policy and Procedure that aims to meet this commitment.

6.7. Definitions

- 6.7.1. Safeguard: Protect from harm or damage with an appropriate measure
- 6.7.2. Vulnerable: Exposed to the possibility of being attacked or harmed, either physically or emotionally
- 6.7.3. A Vulnerable Adult: Is in need of special care, support, or protection because of age, disability, or risk of abuse or neglect
- 6.7.4. Safeguarding: Is the process of protecting vulnerable people, whether from crime, other forms of abuse or from being drawn into terrorism-related activity
- 6.7.5. Vulnerability: Describes the condition of being capable of being injured; difficult to defend; open to moral or ideological attack. Within Prevent, the word describes factors and characteristics associated with being susceptible to radicalisation

6.8. Types of Abuse

- 6.8.1. Physical Abuse: Is defined as the use of physical force that may result in bodily injury, physical pain, or impairment. Physical abuse may include but is not limited to such acts of violence striking, hitting, beating, pushing, shoving, shaking, kicking, pinching and burning.
- 6.8.2. Emotional/Psychological Abuse: A person subjecting another to behaviour that may result in psychological trauma, including anxiety, chronic depression, or post-traumatic stress disorder.
- 6.8.3. Financial Abuse: Tactic used by abusers to limit and restrict their victims' access to their finances. For example, a young adult having their benefits taken away from them.
- 6.8.4. Neglect by others: Where a parent, carer or guardian will actively and knowingly fail to care for or attend to the basic needs of a child or vulnerable adult. For example, not feeding a child and/or leaving them in the same clothes and not helping them wash for days on end.
- 6.8.5. Self-neglect: Is any failure of an adult to take care of themselves? It could be a result of poor health, depression, cognitive problems or being physically unable to care for themselves. In this situation, family and carers would be expected to pick up on these signs and give or apply for appropriate care.
- 6.8.6. Discriminatory Abuse: Is when you are picked out deliberately for unfair treatment because of a protected characteristic. For example, a vulnerable adult is picked on by an employer because of their disability.
- 6.8.7. Organisational Abuse: Is where an institution fails to provide basic care for its residents. It is also related to gang culture where an individual is forced into committing crime for the financial gain of gang leaders.

6.9. Providers of government funded training have a duty to safeguard their learners and to take such steps that try to ensure the safety of its learners (children under 18 or vulnerable adults) at all times. As part of that duty, we will talk to you about what you can do to ensure that learners are not exposed to threats or dangers.

6.10. The responsibilities of an employer are to:

- To understand what is meant by safeguarding and promote the welfare of learners
- Be aware of your statutory duties towards the welfare of children and vulnerable adults
- Be familiar with our guidance and reporting arrangements
- to ensure employees working alongside learners are free from convictions and of sound character and judgement
- ensure employees working alongside learners will not pose as any threat or danger to learners.

6.11. What Do I Do If My Learner Discloses Information To Me?

6.11.1. Re-assure the learner that they have done the right thing

6.11.2. Record what the learner said, using their words where possible. Sign and date the record inform our Lead or Deputy Safeguarding Manager as soon as possible and pass on the written record.

- Maintain confidentiality and do not discuss with others
- Listen without making judgements
- Stay calm
- Try not to ask questions, but if you must, make sure they are open-ended questions to clarify understanding and not to probe or investigate
- Don't give an opinion or offer advice
- Don't promise confidentiality - explain you may need to talk to a designated safeguarding officer

6.11.3. Employees working closely with children or vulnerable learners should be alert to the possibilities of harm and they should inform only—and not investigate or offer advice.

6.11.4. If a member of staff, tutor/assessors has a safeguarding issue brought to their attention, they must treat it as a matter of urgency and contact one of our Lead of Deputy Safeguarding Manager.

6.11.5. Any concern must be documented and emailed within 2 hours of the disclosure. Unless the vulnerable adult is in immediate harm, where the relevant authorities will be contacted immediately. Refer to Appendix 1

6.11.6. In this situation ensure that the vulnerable adult is accompanied and kept safe until the relevant authorities arrive.

7. Channel

7.1. Channel is an early intervention multi-agency process designed to safeguard vulnerable people from being drawn into violent extremist or terrorist behaviour. Channel works in a similar way to existing safeguarding partnerships aimed at protecting vulnerable people.

7.2. Who Does Channel Work With?

7.2.1. Channel is designed to work with individuals of any age who are at risk of being exploited by extremist or terrorist ideologues. The process is shaped around the circumstances of each person and can provide support for any form of radicalisation or personal vulnerabilities.

7.3. How Does Channel Work?

7.3.1. Each Channel Panel is chaired by a local authority and brings together a range of multi-agency partners to collectively assess the risk and can decide whether a support package is needed. The group may include statutory and non-statutory partners, as well as lead safeguarding professionals. If the group feels the person would be suitable for Channel, it will look to develop a package of support that is bespoke to the person. The partnership approach ensures those with specific knowledge and expertise around the vulnerabilities of those at risk are able to work together to provide the best support.

7.4. What Does Channel Support Look Like?

7.4.1. Channel interventions are delivered through local partners and specialist agencies. The support may focus on a person's vulnerabilities around health, education, employment or housing, as well as specialist mentoring or faith guidance and broader diversionary activities such as sport. Each support package is tailored to the person and their particular circumstances.

7.5. How Will The Person Be Involved In This Process?

7.5.1. A person will always be informed first if it's felt that they would benefit from Channel support. The process is voluntary, and their consent would be needed before taking part in the process. This process is managed carefully by the Channel Panel.

7.6. Who Can Make A Referral?

7.6.1. Anyone can make a referral. Referrals come from a wide range of partners including education, health, youth offending teams, police and social services.

7.7. What Happens With The Referral?

7.7.1. Referrals are first screened for suitability through a preliminary assessment by the Channel Coordinator and the local authority. If suitable, the case is then discussed at a Channel panel of relevant partners to decide if support is necessary. Raising a concern if you believe that someone is vulnerable to being exploited or radicalised, please use the established safeguarding or duty of care procedures within your organisation to escalate your concerns to the appropriate leads, who can raise concerns to Channel if appropriate.

8. Reporting For FGM

8.1. Female Genital Mutilation (FGM) is illegal in England and Wales under the FGM Act 2003 ("the 2003 Act"). It is a form of child abuse and violence against women. FGM comprises all

procedures involving partial or total removal of the external female genitalia for non-medical reasons.

- 8.2. The FGM mandatory reporting duty is a legal duty provided for in the FGM Act 2003 (as amended by the Serious Crime Act 2015). The legislation requires regulated health and social care professionals and teachers in England and Wales to make a report to the police where, in the course of their professional duties, they either:
 - Are informed by a girl under 18 that an act of FGM has been carried out on her; or
 - Observe physical signs which appear to show that an act of FGM has been carried out on a girl under 18 and they have no reason to believe that the act was necessary for the girl's physical or mental health or for purposes connected with labour or birth
- 8.3. For the purposes of the duty, the relevant age is the girl's age at the time of the disclosure/identification of FGM (i.e. it does not apply where a woman aged 18 or over discloses, she had FGM when she was under 18). Complying with the duty does not breach any confidentiality requirement or other restriction on disclosure which might otherwise apply. The duty is a personal duty which requires the individual professional who becomes aware of the case to make a report; the responsibility cannot be transferred. The only exception to this is if you know that another individual from your profession has already made a report; there is no requirement to make a second.
- 8.4. Reports under the duty should be made as soon as possible after a case is discovered, and best practice is for reports to be made by the close of the next working day, unless any of the factors described below are present. You should act with at least the same urgency as is required by your local safeguarding processes.
- 8.5. A longer timeframe than the next working day may be appropriate in exceptional cases where, for example, a professional has concerns that a report to the police is likely to result in an immediate safeguarding risk to the child (or another child, e.g. a sibling) and considers that consultation with colleagues or other agencies is necessary prior to the report being made.
- 8.6. If you think you are dealing with such a case, you are strongly advised to consult colleagues, including your designated safeguarding lead, as soon as practicable, and to keep a record of any decisions made. It is important to remember that the safety of the girl is the priority.
- 8.7. It is recommended that you make a report orally by calling 101, the single non-emergency number. Explain that you are making a report under the FGM mandatory reporting duty

9. Cyberbullying

9.1. What is Cyberbullying?

- 9.1.1. Cyberbullying involves the use of electronic communication devices to bully people. These include mobile phones, tablets, iPods, laptops and PCs
- 9.1.2. Social media platforms such as Facebook, Instagram, Twitter and WhatsApp are used by cyberbullies to put out their communications

9.2. Who Is Most At Risk?

- 9.2.1. Children using social media unsupervised
- 9.2.2. Vulnerable adults are particularly at risk if they are using social media, as they may be more emotionally and mentally susceptible to the abuse

9.3. Definitions

- 9.3.1. Flaming: Online fights usually through emails, instant messaging or chat rooms where angry and rude comments are exchanged.
- 9.3.2. Denigration: Putting mean online messages through email, instant messaging, chat rooms, or websites set up to make fun of someone.
- 9.3.3. Exclusion: Intentionally leaving someone out of a group such as instant messaging, friend sites, or other online group activities.
- 9.3.4. Outing: Sharing secrets about someone online including private information, pictures, and videos.
- 9.3.5. Impersonation: Tricking someone into revealing personal information then sharing it with others.
- 9.3.6. Harassment: Repeatedly sending malicious messages to someone online.
- 9.3.7. Cyber-stalking: Continuously harassing and denigration including threats of physical harm

10. Grooming

10.1. What Does The Term Grooming Mean?

- 10.1.1. Grooming is a word to describe people befriending children and vulnerable adults to take advantage of them for sexual preferences
- 10.1.2. Grooming is also used by extremist groups to radicalise individuals in to supporting and potentially committing terrorist attacks
- 10.1.3. You will probably associate grooming with children, and predominantly this is what you will hear and see in the media on the subject, but it does also affect vulnerable adults

10.2. What Is Sexual Online Grooming?

- 10.2.1. Sexual online grooming is when people form relationships with children pretending to be their friend, using social media platforms to do so
- 10.2.2. The person carrying out the online grooming will try to establish the likelihood of the child telling someone. They will also find out as much as they can on the child's family and social networks
- 10.2.3. Online groomers will tend to use chatrooms, which are focused on young people. There are countless teen chat rooms on the internet

10.2.4. Those carrying out the grooming will pretend to be a child themselves, similar in age to the person they are grooming. They will even change their gender to make it easier to befriend the person they are grooming

10.2.5. Grooming online is anonymous and children find it easier to trust an online 'friend' than someone they have met 'face to face'

10.3. How Do You Know If A Child Is Being Groomed Online?

10.3.1. The Child may be:

- Wanting to spend more and more time on the internet
- Being secretive about who they are talking to online and what sites they visit
- Switching screens when you come near the computer
- Possessing items – electronic devices or phones – you haven't given them
- Using sexual language, you wouldn't expect them to know
- Becoming emotionally volatile

10.4. Grooming – In Person

10.4.1. Groomers will hide their true intentions and may spend a long time gaining a child or vulnerable adults trust

10.4.2. They may try to gain the trust of the whole family to allow them to be left alone with a child or vulnerable adult

10.4.3. Groomers may deliberately try to work with children or vulnerable adults and gain the trust of their colleagues

10.5. To Gain Trust, Groomers Will

- Pretend to be someone they are not, for example saying they are the same age online
- Offer advice or understanding
- Buy gifts
- Give the child or vulnerable adult attention
- Use their professional position or reputation Take them on trips, outings or holidays

10.6. Children Or Vulnerable Adults May Not Speak Out About Their Situation Because:

- Feel ashamed
- Feel guilty
- Are unaware that they are being abused
- Believe they are in a relationship with a 'boyfriend' or 'girlfriend'

11. Legislation

11.1. Legislative Requirements and Statutory Guidance

11.1.1. The Policy is established to meet the following statutory requirements:

- Care Act 2014
- Children Act 1989

- Children Act 2004
- Data Protection Act 2018, the General Data Protection Regulation and the Data Protection (processing of Sensitive Personal Data) Order 2000
- Domestic Abuse Act 2021
- Equality Act 2010
- Human Rights Act 1998
- Safeguarding Vulnerable Groups Act 2006
- Protection of Freedoms Act 2012
- Sexual Offences Act 2003
- Mental Capacity Act 2005, and the Mental Capacity (Amendment) Act 2019
- HM Government (2018) Working together to safeguard children. A guide to inter-agency working to safeguard and promote the welfare of children.
- Management of Health and Safety at Work Regulations 1999

11.2. Equality and Diversity

11.2.1. The Equality Act 2010 provides protection against discrimination, harassment, and victimisation on the grounds of disability and other protected characteristics. It is a legal duty for higher education institutions to anticipate needs and make reasonable adjustments so that disabled students are not placed at a substantial disadvantage compared to students who are not disabled.

11.3. Working with Partners and Information Sharing

11.3.1. Courage Consultants UK Limited will share information with local organisations, as appropriate. Courage Consultants UK Limited may also share specific information about an individual or a group of individuals engaged in any actual or suspected unlawful activity, which would pose a risk to the safety or wellbeing of others. In reaching a decision to share information with third parties, Courage Consultants UK Limited will adhere to our Data Protection Policy and take any decision in the context of our Freedom of Speech Policy. Courage Consultants UK Limited will refer to and maintain communication with external agencies in relation to safeguarding, where necessary. This includes children and adults safeguarding boards, MARAC, Police, NHS & therapeutic services.

11.4. Training and Referral Procedure

11.4.1. The staff body will receive annual training on safeguarding. New staff will complete mandatory training during their onboarding. Members of staff who hold responsibility for safeguarding will be given training and participate in workshops to ensure staff understand Courage Consultants UK Limited Safeguarding Policy. Training and workshops for Courage Consultants UK Limited staff will involve:

- The context and expectations of Safeguarding
- Duties and responsibilities of Courage Consultants UK Limited, its staff and students
- Referral procedures for suspected cases of abuse
- Definitions of terminology and how to identify vulnerable individuals and risks
- Understanding the importance of their own behaviour and professionalism and not discussing inflammatory subjects with students within the context of Courage Consultants UK Limited Freedom of Speech Policy.

- Ensuring Student Representatives and the wider student body are fully aware of this policy and associated procedures. This will include:
 - understanding terminology
 - understanding how to refer a student of concern.
 - importance of maintaining a supportive, respectful, and tolerant culture in Courage Consultants UK Limited

11.5. If any member of staff or student is concerned about another staff member or student or group of students, they must contact courage@courageconsultants.co.uk Courage Consultants UK Limited Safeguarding Lead will manage student concerns and make the necessary referrals.

12. Safer Recruitment

12.1. Courage Consultants UK Limited carries out a safe recruitment process and ensures that all appropriate checks are carried out on new staff and tutor/assessors that will work or come into contact with children and adults at risk in line with the Disclosure and Barring Service requirements.

12.2. The Disclosure and Barring Service (DBS) is an executive agency of the Home Office and its primary purpose is to help employers make safer recruitment decisions and appointments. By conducting checks and providing details of criminal records and other relevant information, DBS helps to identify applicants who may be unsuitable for certain work and positions, especially those involving contact with children (those less than 18 years old) or adults at risk.

12.3. Depending on the type and regularity of contact with children or adults at risk involved in a particular role, employers are entitled to make appropriate types of enquiry about the applicant's criminal record and seek a disclosure through a DBS check.

12.4. Courage Consultants UK Limited can undertake five types of criminal records checks depending on the role applied for:

12.4.1. Standard DBS check: This will be for positions that are included in the Rehabilitation of Offenders Act (ROA) 1974 (Exceptions) Order 1975. This type of check contains details of individual's convictions, cautions, reprimands or warnings recorded on police central records and includes both 'spent' and 'unspent' convictions that will be shown on a criminal records check.

12.4.2. Enhanced DBS check: This will be for positions included in both the ROA 1974 Exceptions Order and in the Police Act 1997 regulations. This type of check contains the same details as the standard check plus any information held locally by police forces that it is reasonably considered to be relevant to the post applied for.

12.4.3. Enhanced DBS & Barred List Check (Child): An enhanced check with information from the DBS's children's barred list is only available for those individuals engaged in regulated activity with children and a small number of posts as listed in the Police Act 1997 regulations.

- 12.4.4. Enhanced DBS & Barred List Check (Adult): An enhanced check with information from the DBS's adults barred list is only available for those individuals engaged in regulated activity with adults and a small number of posts as listed in the Police Act 1997 regulations.
- 12.4.5. Enhanced DBS & Barred List Check (Child and Adult): An enhanced check with information from the DBS's children and adults barred list is only available for those individuals engaged in regulated activity with both vulnerable groups including children and a small number of posts as listed in the Police Act regulations.

13. Reporting a Concern

- 13.1. If the learner has a concern over their own personal welfare and wellbeing, you are to listen to and record all information given, making no judgement or assumptions. Take any actions required to secure the immediate safety of the child or adult at risk if deemed appropriate, this may involve staying with them until a responsible adult can be located. This will only be recorded on the reporting form if learner agrees and raised with the SDSO if learner agrees. You must report the issue to the Lead or Deputy Safeguarding Manager, regardless of whether the learner agrees.
- 13.2. If a learner/ parent has a concern/ allegation about a member of Courage Consultants UK Limited staff:
 - 13.2.1. All learners are to be informed that if they have a concern over their own personal welfare and wellbeing that they do not feel comfortable talking to their tutor about, they are to contact Courage Consultants UK Limited Lead or Deputy Safeguarding Manager.
 - 13.2.2. Contact details for the designated person are available in this policy and on Courage Consultants UK Limited external website.
 - 13.2.3. If a parent contacts, you to report a concern about their child. Ensure you listen and record the details as per a learner reporting a concern to you.
 - 13.2.4. Ensure you have contact details for the parent. You must report the issue to the Lead or Deputy Safeguarding Manager. The Lead or Deputy Safeguarding Manager will then decide the appropriate course of action, and if a referral outside the organisation is appropriate, liaise with the parent as appropriate.
 - 13.2.5. Be mindful of confidentiality as all learners aged 16 and above and of employed status are deemed to be adults, and therefore no information should be passed to parents or careers without prior content to do so from the learner.
 - 13.2.6. If you observe a safeguarding issue taking place within the working practices of an employer's setting - example would be a practitioner hitting a child or observing inappropriate restraint techniques. Take action to stop the activity immediately, and inform the individual of your concerns, ask them to remove themselves from the area and advise them you will inform their senior manager.

- 13.2.7. Take any actions to secure the safety of the child or adult at risk, this may involve staying with them until a responsible adult can be located. Inform Lead or Deputy Safeguarding Manager. Be mindful of differences between poor practice and a safeguarding issue and apply your action appropriately.
- 13.2.8. If a learner reports unsafe practices or safeguarding issues to you within their working environment advise the learner to follow in house reporting or whistle blowing procedures. You may support the learner in speaking to the appropriate senior team members. Report the incident to your Lead or Deputy Safeguarding Manager who will offer additional guidance and signposting for the learner and will monitor.
- 13.2.9. It is important you do not pass any information to other parties or try to investigate the concern yourself. All concerns should be reported to the Lead or Deputy Safeguarding Manager as soon as possible.

14. Keeping Yourself Safe

- 14.1. To maintain yours and the learner's safety, the following are strictly prohibited:
 - Befriending learners on personal social media sites
 - Distributing personal telephone numbers
 - Visit learners at home or transporting learners to and from locations (this includes travelling in the car with a learner driving)
 - Do not use sarcasm, insults or belittling comments towards learners
 - Personal relationships with learners
- 14.2. It also important to be mindful of the following when conducting yourself:
 - You will naturally build a rapport with learners through the learnership contact, and the learners may see you as a confident and support but be sure to maintain professional boundaries whenever carrying out work on Courage Consultants UK Limited behalf.
 - Be respectful of all young and vulnerable people, and appreciate you are in a position of trust. We have the opportunity to listen to their concerns and support them.
 - Uphold confidentiality within certain remits when required by the situation but be careful not to promise to keep secrets or ask others to do so.
 - Avoid spending time alone with learners in a closed environment. If this is unavoidable for example during a formal assessment/ examination, ensure a member of the site staff and tutor/assessors are aware where you are and monitors this.
 - Be careful when giving learner advice – as this is based on your opinion, focus support around information (facts) and guidance (signposting).
 - If at any point, you feel unsafe in a learner's company inform the site manager, your line manager, the Lead or Deputy Safeguarding Manager and leave the premises.

15. Whistle Blowing

- 15.1. It is acknowledged that there may be times where the staff and tutor/assessors witness' an incident, action or event that may give them cause for concern.

- 15.2. If any member of staff or tutor/assessors witnesses a potential safeguarding issue, they must treat it as a matter of urgency and contact one of our Lead or Deputy Safeguarding Manager.
- 15.3. Any concern must be documented and emailed to the Lead or Deputy Safeguarding Manager within 2 hours of the disclosure. Unless the child is in immediate harm, where the relevant authorities will be contacted immediately.
- 15.4. In this situation ensure that the child is accompanied and kept safe until the relevant authorities arrive.
- 15.5. We are committed to the safety and security of all learners at all times whilst in our care equally, we are committed to the safety and security of all staff and tutor/assessors.
- 15.6. Therefore, we recognise the issues and concerns in regard to reporting concerns regarding the care and welfare of the learners within the business.
 - All staff and tutor/assessors and are required to share any concerns in regard to any staff and tutor/assessors practices that compromise the safety of the learners to a designated safeguarding officer.
 - Failure to notify the Lead or Deputy Safeguarding Manager of any concerns regarding any incidents, events or practice by individual staff and tutor/assessors will result in referral to the safeguarding team, Ofsted and the police for investigation.
 - Where external authorities are conducting their own enquiries, our own investigation will run in parallel without jeopardy to any official enquiries and the member of staff and tutor/assessors will be placed on suspension.
 - Any staff and tutor/assessors member who discloses a concern will be given assurance of confidentiality as far as practically possible, without jeopardy to any investigations by external authorities or our own investigation
- 15.7. Any staff and tutor/assessors member expressing a concern about their safety following a disclosure will be give all necessary support to enable them to continue in their role with security safely.

13. Use of External Agencies and Speakers

- 13.1. Courage Consultants UK Limited is committed enriching our learners' experience and to the health and wellbeing of our learners via themed events. We value the opportunities presented by external speakers and the diverse opinion that they afford. We value freedom of opinion and speech but recognise that, in the interests of the staff, tutor/assessors and learners, this must exist within formal guidelines. Courage Consultants UK Limited will not accept the use of language by external speakers that offends and is considered to be intolerant. Specifically, this means offensive 'street' misogynistic, misanthropic, sexual or racist language irrespective of context. Direct attacks on any religions or beliefs are not permitted.
- 13.2. We proactively vet those organisations that we invite into our centre to ensure their suitability, effectiveness and benefit to our learners. This is to ensure that we do not unwittingly use agencies that contradict each other with their messages or that are inconsistent with or are in opposition to the College's values and ethos.

- 13.3. All requests for an external speaker must be submitted by the tutor/assessors, on the Courage Consultants UK Limited Checklist External Speaker/Guest form (appendix 2) to the Lead or Deputy Safeguarding Manager of at least 5 working days before the event.

14. Monitoring and Review

- 14.1. This policy may be amended by Courage Consultants UK Limited at any time and will be reviewed annually, reporting to Academic Board to ensure it is fit for purpose. The annual report will include the number of safeguarding cases across partnerships and campus specific. No protected information will be shared in the report

15. Data Protection and Confidentiality

- 15.1. Courage Consultants UK Limited is registered with the Information Commissioner's Office as a Data Controller. Details of the School's registration are published on the Information Commissioners website. Courage Consultants UK Limited as a Data Controller shall implement appropriate technical and organisational measures to ensure that processing of personal information is performed in accordance with the UK General Data Protection Regulations (UK GDPR) and under the Data Protection Act 2018 (DPA).
- 15.2. The UK GDPR and DPA regulates the use and storage of personal information (i.e., any information which identifies a living individual) on computing systems. It is the user's responsibility to ensure that their information and computer usage complies with this law. Failure to do so could result in criminal charges being brought against both you and Courage Consultants UK Limited.
- 15.3. Courage Consultants UK Limited recognises that all matters relating to safeguarding will only be shared with individuals who need to be made aware of the situation to appropriately discharge Courage Consultants UK Limited' responsibilities and duty of care. All Courage Consultants UK Limited staff must be aware that they have a responsibility to immediately disclose information which, if not shared, may compromise a student's safety or welfare. All Courage Consultants UK Limited staff will be fully supported by the Courage Consultants UK Limited Safeguarding Lead.

16. Alternative Format

- 16.1. This policy can be provided in alternative formats (including large print, audio and electronic) upon request. For further information, or to make a request, please contact courage@courageconsultants.co.uk

Annex 1 – Process for Escalating a Safeguarding Concern



Annex 2 – Useful Information

The Care Act 2014 introduces responsibilities for local authorities. It also has major implications for adult care and support providers, people who use services, carers and advocates. It replaces No Secrets and puts adult safeguarding on a statutory footing.

<https://www.legislation.gov.uk/ukpga/2014/23/contents/enacted>

The general principle is that everybody over the age of 16 years has capacity unless it is proved otherwise; people should be supported to make their own decisions, anything done for or on behalf of people without capacity must be in their best interests and should be the least restrictive intervention

https://www.legislation.gov.uk/ukpga/2005/9/pdfs/ukpga_20050009_en.pdf

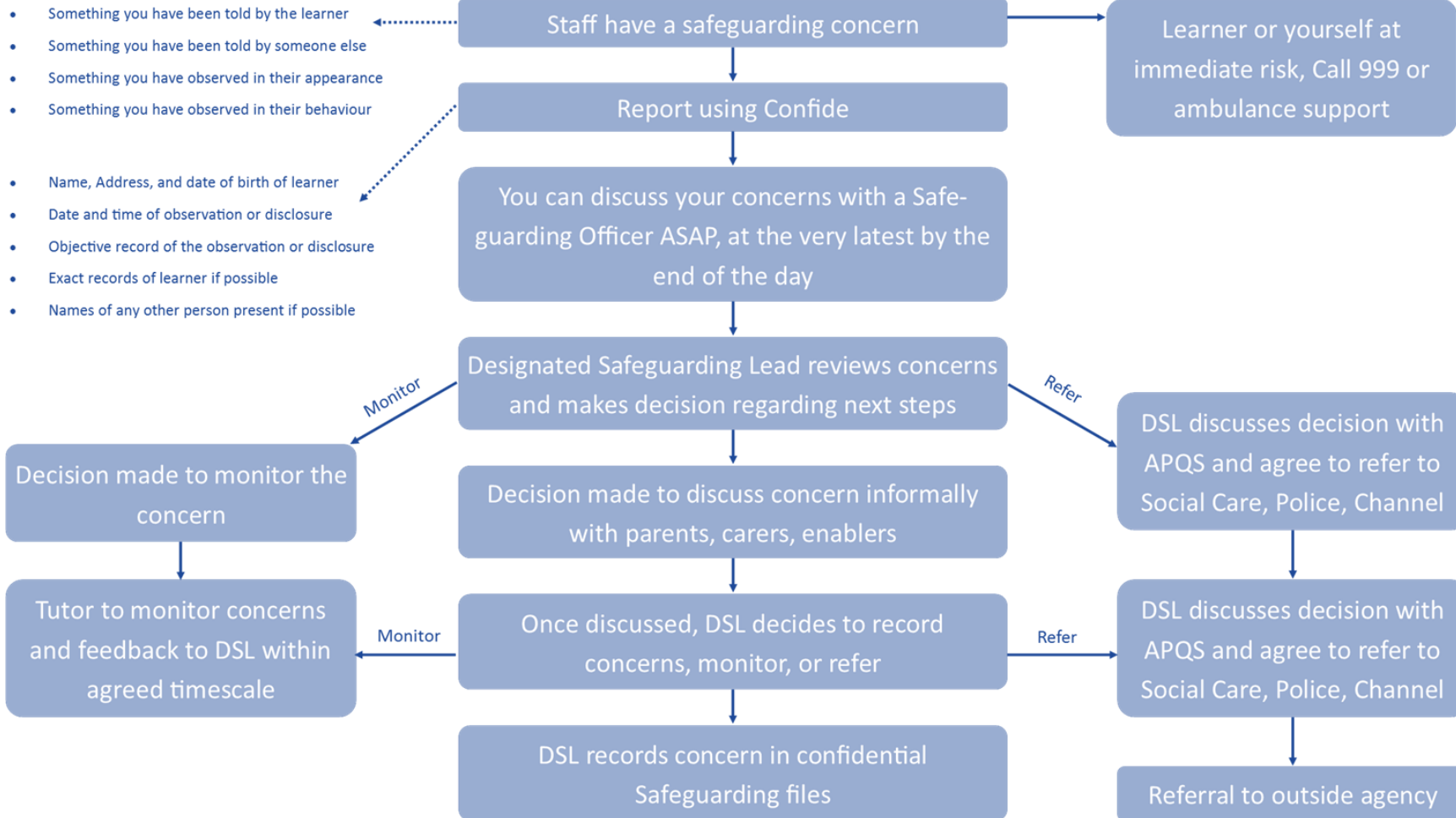
Further Education and Training (FET) Providers are expected to take responsibility for the safeguarding of their learners which extends beyond the physical FE environment. Any signs of learners, or colleagues being at risk whether on the programme or not is something that we need to action or refer.

<https://www.et-foundation.co.uk/professional-development/safeguarding-prevent/designated-safeguarding-lead/safeguarding-guidance-and-legislation-for-adults-and-children/>

The Equality Act 2010 legally protects people from discrimination in the workplace and in wider society. It replaced previous anti-discrimination laws with a single Act, making the law easier to understand and strengthening protection in some situations. It sets out the different ways in which it's unlawful to treat someone.

<https://www.legislation.gov.uk/ukpga/2010/15/contents>

Appendix 1- Courage Consultants UK Limited Safeguarding Reporting Process



Appendix 2 – Courage Consultants UK Limited Checklist External Speaker/Guest Form

Name of staff or tutor/assessor		Line Manager				
Partner Agency		Course				
Session Title		Date of Session				
Aim of Session		Guest Speaker				
Name and address of Organisation Telephone number		Name, address telephone number of Organisation confirmed	Yes	No	Location of information	
Resources to be used		Resources received in advance of event	Date:	Contents checked and suitable	Yes	No
If no, actions taken:						
Approval by:	Signature:		Date:			
Name of tutor/assessor present during session						
Other information						