

Safeguarding and Prevent Policy

Owner: Senior Safeguarding Officer

Issued: September 2024

Version: 7.0

Key Contacts

Concerns and general guidance

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Deputy Designated Safeguarding Officer

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Emergencies and out of business hours contacts

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

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

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

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

Mind: 020 8519 2122 - info@mind.org.uk - Advice and support around metal health

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

NSPCC Helpline: 0808 800 5000 – help@nspcc.org.uk advice for anyone who has concerns about the

welfare of a child or young person

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

Report online material promoting terrorism or extremism

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

report unonymously. <u>Interps.// www.gov.un/report terrorisr</u>

Details of other External Support Organisations

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Deputy Designated Safeguarding Officer

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1. Safeguarding Statement

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

believe that all have an equal right to protection from abuse, regardless of their age, race, religion, ability,

gender, language, background or sexual identity and consider the welfare of the young person or

vulnerable adult as paramount.

Kaplan will take every reasonable step to ensure that all learners are kept safe and secure so that they can

learn and thrive. All suspicions and allegations of abuse will be taken seriously and responded to swiftly

and appropriately as per our policy and internal procedures.

Kaplan recognises that safeguarding against radicalisation and extremism is no different to safeguarding

against other risks that individuals may face. This policy also incorporates protecting individuals from being

radicalised or exposed to extremist views. Kaplan's application of the Prevent Duty recognises that this

applies to all individuals.

We enable our staff and those who work with us to make informed and confident decisions regarding

safeguarding. We expect all delivery and management staff, including board members, directors and

partners and subcontractors, to have read, understood and to adhere to this policy and related procedures.

We will provide adequate and up to date training to all learner facing staff and their managers to ensure

that they are able to identify the signs of abuse and know how to deal with their own suspicions, reports of

concerns from others and reports of abuse from people directly affected. Records of safeguarding and

Prevent incidents will be periodically reviewed in the interests of recognising trends and priorities, and to

inform the need for further staff training.

We fully recognise the importance of academic freedom and the right to preserve freedom of speech for all

our employees, learners and visiting speakers. However, we will balance this with our obligations towards

the Prevent Duty and the promotion of British values.

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2. Safeguarding Definitions

Safeguarding

The term 'safeguarding' describes the broader preventive and precautionary approach to planning and

procedures that are necessary to be in place to protect children, young people and vulnerable adults from

any potential harm. It is about ensuring that help and support is provided as soon as problems emerge,

protecting them from harm, inside or outside the home, including online.

Safeguarding is more than having background check policies and procedures in place. It means having a

culture of vigilance where all staff know their responsibilities and act accordingly and all learners are aware

of what they can expect and what to do if they have concerns. It is about providing a deep commitment to

place the learner at the centre of our concerns and to build policies, practices and procedures around the

learner for them to succeed.

Child

Anyone under the age of 18 is defined as a child.

Vulnerable Adult

A person who is aged 18 years of age or over is defined as vulnerable if they are at risk of harm, abuse or

manipulation (including radicalisation) as a result of either their social or personal situation.

Harm

Harm, including abuse, neglect and exploitation, can be caused in a number of ways and take different

forms, including:

Sexual abuse – for example, trying to get someone to take part in sexual activity by using force,

threats or bullying. Sexual activity requires both consent to be given and also an understanding of

what is being consented to. 'Grooming' occurs when a person uses an emotional bond to gain the

trust of a child or vulnerable adult in order to sexually abuse or exploit them, or to trade them

(trafficking). The sexual abuse of children by other children is a specific safeguarding issue (also

known as child-on-child abuse).

• Radicalisation - the process by which a person comes to support terrorism and extremist ideologies

associated with terrorist groups

• Neglect – for example, not caring for yourself or someone you are responsible for. This could

include not washing regularly, not eating, or having unsafe living conditions

• Physical abuse – for example, hitting another person or deliberately cutting yourself

Psychological abuse – for example, saying things which could hurt someone else or which could

make them feel vulnerable, alone or isolated. Making threats, trying to control another person, or

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humiliating someone can be psychological harm. Psychological harm can include bullying in person or online, including 'revenge porn'.

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

3. Safeguarding learners and staff

Kaplan will:

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

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4. Safeguarding Roles and Responsibilities

The following roles ensure that Kaplan meets its responsibilities effectively.

All learner facing staff

Will be responsible for completing all directed training and familiarising themselves with Kaplan's

Safeguarding and Prevent Policy and procedures. They are also responsible for ensuring they understand

their own role in the promotion of safeguarding and the appropriate action to be taken should they receive

a disclosure or have concerns about a learner. Concerns should be reported at the very first opportunity

and within 2 hours.

The External (Non-Executive) Assurance Board

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

Apprenticeship Leadership Team

Are responsible for ensuring that all necessary staff understand safeguarding and have received

appropriate training and development and that the staff recruitment and selection procedure is followed

at all times. They will ensure appropriate systems are in place including internet filtering and monitoring

systems and that their effectiveness is regularly reviewed. They will ensure that safeguarding is given a high

priority across the business.

Human Resources and Designated Safeguarding Officer

Are responsible for ensuring that safer recruitment practice is embedded and implemented across Kaplan

and that the supporting records of any background checks are accurately maintained.

Properties & Facilities Management and Student Experience

Are responsible for ensuring that all training rooms, communal areas, facilities and equipment comply with

legislative health and safety standards. They will ensure that access and egress to Kaplan centres is

appropriately controlled to support the security and safety of all learners, visitors and contractors.

IT Department

Is responsible for ensuring that policies pay due regard to the safeguarding and Prevent Duty and that

suitable filtering and firewalls are in place to prevent learners, and visitors accessing extremist or illegal

websites and material. This will take account of the Department for Education's filtering and monitoring

standards and include:

• identify and assign roles and responsibilities to manage filtering and monitoring systems

review filtering and monitoring provision at least annually

• block harmful and inappropriate content without unreasonably impacting teaching and learning

have effective monitoring strategies in place that meet their safeguarding needs

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Senior Safeguarding Officer (SSO)

The SSO is responsible for the implementation of the Safeguarding and Prevent Policy and Kaplan's

commitment to safeguarding staff and learners, through delegation where appropriate. They will be

responsible for ensuring that the safeguarding processes and procedures are robust and consistently

applied and that Kaplan fulfils its legal duties. The role is held by the Head of Quality and Compliance.

Designated Safeguarding Officer (DSO)

The DSO will deputise for the SSO in their absence. The role is held by the Quality Development and

Improvement Manager. They are responsible for:

Policy and process review

Maintaining an up-to-date knowledge of current safeguarding and Prevent practice and issues

Ensuring sufficient staff training and CPD to uphold an effective level of safeguarding provision

Ensuring that records are maintained of all concerns raised

Creating and maintaining a network of relevant support and referral agencies

Periodically reporting on the concerns raised in relation to Safeguarding

Deputy Designated Safeguarding Officers (DDSO)

The Deputy Designated Safeguarding Officers will deputise for the DSO in their absence and support as

required with the implementation of the Policy, staff training and other responsibilities.

Safeguarding Representatives (SR)

SR can be contacted for informal advice and guidance with general queries or specific concerns. A full list

of the SRs will be maintained on the intranet and these roles will be held by a selection of Team Managers

and other specifically nominated staff from within Kaplan. It is not intended that SRs deal with high-level

concerns but they can be consulted where there is uncertainty about whether it is a safeguarding matter

or where initial guidance is required on the potential best course of action. A SR will escalate any concern

if necessary. As part of their responsibilities they will:

• Monitor the dedicated Kaplan safeguarding email inbox

• Provide a first response to any incidents, disclosures or concerns

• Participate in the review of processes and procedures

• Provide updates and training to their delivery teams

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5. Underpinning Policies

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

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

6. Safer Recruitment and Induction

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

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

KCSIE (Annex A) Essential Information for all Staff

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7. Identifying Indicators of Harm

Staff will receive appropriate training to be able to recognise the signs of harm and to respond effectively

where an individual makes a disclosure to them. Staff should also be aware of the measures to take if there

is a suspicion that a member of staff is involved in the harm of another individual.

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

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

• Bruises and injuries with which the explanation given seems inconsistent

Possible indicators of neglect, such as inadequate clothing, poor growth, hunger, poor hygiene

Possible indicators of emotional harm, such as excessive dependence, attention seeking, self-

harm

Possible indicators of sexual harm, such as signs of bruises, scratches, bite mark, or behavioural

signs such as precocity, withdrawal or inappropriate sexual behaviour

Agitated or anxious behaviour

Excessive nervousness

Inappropriate or improper clothing

Unhygienic or unkempt appearance

Signs of discomfort or pain

Frequent and increased absences

Uncharacteristic changes in appearance, behaviour or their course performance

Reluctant to go home or leave delivery locations

8. Categories of Potential Safeguarding Concerns

Action may be needed to protect our learners from many types of different safeguarding concerns. A

number of these are shown below although this is not an exhaustive list. There could be additional issues

that pose a risk to our learners.

Mental Health

Mental health includes emotional, psychological, and social well-being. It affects how a person thinks, feels,

and acts. It affects how they handle stress, relate to others, and make choices. Mental health issues such as

depression and anxiety may leave the individual vulnerable to self-harm and suicidal thoughts as well as

other safeguarding risks.

Sexual violence, harassment and abuse

Sexual violence: the general term used to describe any kind of unwanted sexual act or activity, including

rape, sexual assault, sexual abuse, and many others.

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Sexual harassment: unwanted behaviour of a sexual nature that makes someone feel distressed,

intimidated or humiliated. It can take lots of different forms. It can include or be called sexualised bullying.

Sexual abuse: forcing or enticing a child or young person to take part in sexual activities, not necessarily

involving a high level of violence, whether or not the child is aware of what is happening. Sexual abuse can

take place online, and technology can be used to facilitate offline abuse. Sexual abuse is not solely

perpetrated by adult males. Females can also be abusers as can other children. The sexual abuse of

children by other children is a specific safeguarding issue in education and all staff should be aware of it.

This is also known as **child on child** or **peer on peer** abuse.

Radicalisation or extremism

Radicalisation: The process by which a person comes to support terrorism and extremist ideologies

associated with terrorist groups

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

Democracy

• The rule of law

Individual liberty

Mutual respect for and tolerance of those with different faiths and beliefs and for those

without faith

Also included in the definition of extremism are calls for the death of members of our armed forces,

whether in this country or overseas.

Bullying (including cyberbullying)

Behaviour by an individual or group, repeated over time, that intentionally hurts another individual or

group either physically or emotionally.

Incels (involuntarily celibate)

An incel is a member of an online subculture of people who define themselves as unable to get a romantic

or sexual partner despite desiring one. Incel discussion forums are often characterised by resentment and

hatred, misogyny, self-pity, self-loathing, a sense of entitlement to sex, racism, and the endorsement of

violence against women and sexually active people.

There has been a large rise in the number of young men referred to the government's Prevent scheme over

the women-hating "incel" ideology.

Antisemitism

Antisemitism is a certain perception of Jews, which may be expressed as hatred toward Jews. Rhetorical

and physical manifestations of antisemitism are directed toward Jewish or non-Jewish individuals and/or

their property, toward Jewish community institutions and religious facilities.

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Racism

Racism is the belief that groups of humans possess different behavioural traits corresponding to physical

appearance and can be divided based on the superiority of one race over another. It may also mean

prejudice, discrimination, or antagonism directed against other people because they are of a different

ethnicity.

Domestic Abuse

Domestic abuse can encompass a wide range of behaviours and may be a single incident or a pattern of

incidents. That abuse can be, but is not limited to, psychological, physical, sexual, financial or emotional.

Children can be victims of domestic abuse. They may see, hear, or experience the effects of abuse at home

and/or suffer domestic abuse in their own intimate relationships (teenage relationship abuse). All of which

can have a detrimental and long-term impact on their health, well-being, development, and ability to learn.

Drugs

The misuse of drugs such as alcohol, tobacco, illegal drugs, medicines, new psychoactive substances (legal

highs) and volatile substances. This can also include where illegal drugs are transported from one area to

another, often across police and local authority boundaries (although not exclusively), usually by children

or vulnerable people who are coerced into it by gangs, referred to as 'County Lines'. The 'County Line' is

the mobile phone line used to take the orders of drugs.

Fabricated or Induced Illness

The fabrication of signs and symptoms in others including that of past medical history, falsification of

hospital charts and records and specimens of bodily fluids. May also include falsification of letters and

documents, and induction of illness by a variety of means.

Faith Abuse

Forms of child abuse linked to faith or belief. Examples of this include spirit possession, demons/the devil

acting through children, the evil eye or djinns (known in some Islamic faith contexts) and dakini (in Hindu

context) and ritual or multiple murders where the killing of children is believed to bring supernatural

benefits or the use of their body parts is believed to produce 'magical' remedies.

Upskirting

Upskirting is a term used to describe the act of taking a sexually intrusive photograph up someone's skirt or

other clothing without their permission. It is usually performed in a public place, such as on public

transport or in a nightclub, among crowds of people, making it harder to spot people taking the photos.

The practice can cause humiliation, distress or alarm. Offenders face up to 2 years in jail, with the most

serious being put on the sex offenders register.

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Stalking

Stalking can be defined as persistent and unwanted attention that makes someone feel pestered and

harassed. It includes behaviour that happens two or more times, directed at or towards another person,

which causes them to feel alarmed or distressed or to fear that violence might be used against you. Social

media and the internet are often used for stalking and harassment, and 'cyber-stalking' or online threats

can be just as intimidating. The effect of such behaviour is to curtail a victim's freedom, leaving them

feeling that they constantly have to be careful, causing significant alarm, harassment or distress to the

victim.

Forced Marriage

A forced marriage is one entered into without the full and free consent of one or both parties and where

violence, threats or any other form of coercion is used to cause a person to enter into a marriage. Threats

can be physical or emotional and psychological. A lack of full and free consent can be where a person does

not consent or where they cannot consent (if they have learning disabilities, for example). Nevertheless,

some perpetrators use perceived cultural practices to coerce a person into marriage.

Gangs (and Youth Violence)

Crime and violence are a core part of the identity of gangs, although delinquent peer groups can also lead

to increased behaviour and youth offending. Although some group gatherings can lead to increased

antisocial behaviour and youth offending, these activities should not be confused with serious violence in a

gang, which can also include knife crime.

Female Genital Mutilation

FGM comprises all procedures involving the partial or total removal of the female external genitalia or

other injury to the female genital organs for non-medical reasons. FGM is illegal in the UK and it is also

illegal to remove a child to another country for the purposes of performing FGM.

Teenage Relationship Abuse

May include emotional abuse (e.g. name calling, insults, isolation from friends, controlling what you wear

and where you go, constant checking up), physical abuse (hitting, punching, pushing, biting, kicking, using

weapons), sexual abuse (forcing sex, unwanted kissing or touching, being made to watch pornography

against will, pressure to not use contraception) or financial abuse (taking/controlling money, coercion to

buy the abuser things, forcing the abused to work or not work. See also the section on sexual violence and

harassment.

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Sexting

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

the internet.

Child Sexual Exploitation

This occurs in situations and relationships in which young people receive something as a result of engaging

in sexual activities. See also the section on sexual violence and harassment.

Trafficking

The recruitment, transportation, transfer, harbouring or receipt of persons, by means of threat or use of

force or other forms of coercion, of abduction, of fraud, of deception, of the abuse of power or of position

of vulnerability or of the giving or receiving of payments or benefits to achieve consent of a person having

control over another person, for the purpose of exploitation.

9. The Prevent Duty

The threat to the UK from international terrorism is substantial. The terrorist threats that we now face are

more diverse than ever before, dispersed across a wider geographical area and often in countries without

effective governance. We therefore face an unpredictable situation. Whilst it remains rare for learners to

become involved in extremist activity, any learner can be exposed to extremist influences or prejudiced

views, including via the internet, from an early age. Early intervention is a preferable way of tackling

extremism.

Kaplan must have due regard to the need to prevent people from being drawn into terrorism. This is

referred to as 'The Prevent Duty'. As part of Kaplan's commitment to safeguarding and the promotion of

British values, we will ensure that all staff have the confidence to recognise the signs that a learner or

colleague is at risk of radicalisation.

Kaplan recognises that its responsibility to the Prevent Duty is not limited to children, young people and

vulnerable adults, or to those learning through Government funded programmes but that all learners and

staff fall within the remit of this aspect of the Safeguarding & Prevent Policy.

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10.Prevent Definitions

Radicalisation

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

terrorist groups.

Extremism

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

Democracy

• The rule of law

Individual liberty

Mutual respect for and tolerance of those with different faiths and beliefs and for those

without faith

Also included in the definition of extremism are calls for the death of members of our armed forces,

whether in this country or overseas.

11.Preventing Extremism

Kaplan will:

• Raise awareness to all learners of the threat from violent extremist groups and the risks, and

Kaplan's responsibility to minimise this in their organisation

• Help learners to understand the positive contribution they can make to empower themselves to

create communities that are more resilient to extremism, and protect the wellbeing of particular

learners or groups who may be vulnerable to being drawn into violent extremist activity

Provide advice on managing risks and responding to incidents

• Promote fundamental British values at every opportunity throughout programmes and other

activities

• Challenge segregation, promoting cohesion and building learner resilience with the aim of our

learners and staff contributing actively to wider society

• Operate a clear and consistent anti-bullying approach that challenges harassment and

discrimination and enables learners and staff to feel safe and support

• Provide support, advice and guidance for learners and staff who may be at risk. This may include

referral to the Police and local authority as part of the Government's Prevent strategy and the

process by which multi agency support is provided to individuals who are at risk of being drawn

into terrorism

Ensure that staff, learners and employers are aware of their roles and responsibilities in preventing

radicalisation and extremism

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• Kaplan will carry out an annual risk assessment in relation to the Prevent Duty with the aim of

evaluating where and how learners or staff may be at risk of being drawn into terrorism. This will

include reviewing policies relating to student conduct, IT systems and security, health and safety

and diversity and inclusion. An action plan will be maintained and monitored to address any areas

requiring improvement.

Kaplan will ensure that there is a shared understanding amongst staff and learners as to the risks

posed within the training environment by extremist's behaviour by raising awareness through

training and information sharing

Take steps to mitigate the risk posed to individuals vulnerable to extremism where it is identified

Prevent referrals will be made to the local authority or police with consideration to the risk of

radicalisation or extremism. All such referrals will ultimately be made by the SSO or DSO.

12. Identifying Indicators of Radicalisation

Potential signs of radicalisation include:

• An individual's views become increasingly extreme regarding another section of society or

government policy

• An individual is observed downloading, viewing or sharing extremist propaganda from the web

• An individual becoming withdrawn and focused on one ideology

• An individual becoming increasingly intolerant of more moderate views

• An individual may change their appearance, their health may suffer (including mental health) and

they may become isolated from family, friends, peers or social groups

An individual expresses a desire/intent to take part in or support extremist activity

13.External Speakers and Events

In order to comply with the Prevent Duty Kaplan will ensure that any external speaker's views being

expressed, or likely to be expressed, do not constitute extremist views that risk drawing people into

terrorism or are shared by terrorist groups.

It is the responsibility of the host to ensure that the external speaker's content, planned to be delivered

either verbally, by presentation or other methods is reviewed prior to the event to check that it is suitable

and that it will not promote extremist views in any way.

An external speakers booking form should be completed by the host and this will be reviewed by the DSO.

Where a potential risk is identified the DSO will seek further information from the host to ensure a balance

of Kaplan's legal duties in terms of both ensuring freedom of speech and also protecting learner and staff

welfare. Where the DSO is in any doubt that the risk cannot be fully mitigated Kaplan will exercise caution

and the event will not be allowed to proceed.

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We fully recognise the importance of academic freedom and the right to preserve freedom of speech for all

our employees, learners and visiting speakers. However, we will balance this with our obligations towards

the Prevent Duty.

14. Guidelines to follow when receiving a disclosure

It is essential that all victims are reassured that they are being taken seriously, regardless of how long it has

taken them to come forward, and that they will be supported and kept safe. Abuse that occurs online or

outside of the learning environment should not be downplayed and should be treated equally seriously. A

victim should never be given the impression that they are creating a problem by reporting the abuse. Nor

should a victim ever be made to feel ashamed for making a report. It is important to explain that the law is

in place to protect young people and vulnerable adults rather than criminalise them, and this should be

explained in such a way that avoids alarming or distressing them.

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

Recognise

The ability to recognise behaviour that may indicate abuse is of fundamental importance. Signs and

symptoms of abuse of young people or vulnerable adults may include direct disclosure. All relevant staff

will be trained to understand signs of possible abuse and know how, where and to whom to report

concerns.

Respond

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

they should ensure:

• They do not lead or probe with questions

• Remain calm and demonstrate interest and concern while investigating

• Tell the learner that you may need to disclose information to others to ensure any risk to them or

others is minimised and do not agree to any off the record disclosures

Reassure them that they have done the correct thing in reporting their concerns and that it will be

dealt with in a sensitive and appropriate way, ensuring any information is suitably restricted

• Record any disclosures on the Safeguarding Report Form

Report

All safeguarding and Prevent concerns should be reported at the very first opportunity and within 2 hours

where any delay increases the risk. Once concerns have been reported, responsibility for taking any further

action resides with the SR, DDSO and DSO dealing with the report.

Record

DSO and DDSOs will be trained to ensure disclosures, incidents or concerns and the subsequent

investigation and assessment are accurately recorded, updated and monitored through the approved

systems and document formats. The Information will be stored securely, confidentially and only accessible

to those who need access to support with the concern.

Refer

The decision to refer lies with the DSO or DDSO dealing with the disclosure, having gathered and examined

all relevant information. Under normal circumstances investigations will not be completed by SRs or any

other staff. Investigations may involve questioning colleagues, learners, employers, carers, parents,

delivery staff and the complainant, as relevant and necessary. DSO and DDSO will have access to

organisations and websites in order to seek guidance including local safeguarding boards threshold

documents and a directory of relevant support agencies. The DSO or DDSO dealing with the disclosure will

decide what action to take, liaising with the SSO where necessary.

15. Safeguarding and Prevent Procedure

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

Receiving, reporting and responding to safeguarding and Prevent incidents by staff will follow the same

procedure. Please refer to the reporting process.

Any suspicion, allegation or actual abuse of a learner by a member of Kaplan staff or its subcontractors

must be reported immediately and directly to either the SSO or DSO. In their absence it should be reported

to another member of the Apprenticeship Leadership Team, who will then take the lead with the

investigation and subsequent actions, supported by a DDSO

Where Kaplan or one of its subcontractors refer a safeguarding concern related to sexual violence to Local

Authority children's social care/adult social care and/or the police, or an allegation of abuse is made

against any member of staff to the SSO or DSO, Kaplan will also inform the Education and Skills Funding

Agency as soon as practicable, providing a high-level summary of the nature of the incident. Where the

concern relates to a member of Kaplan staff, Human Resources will be included in the subsequent

investigation.

Confidentiality

Although an individual may insist information is kept confidential, concerns still need to be reported. The

safety of the learner, staff or other person will always take precedence to any confidentiality concerns. All

information received will always be dealt with sensitively and only shared further where there is a need to

prevent and protect anyone from harm.

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Once the DSO or DDSO has been made aware of a situation, they need to ascertain whether the learner is

at risk of actual or potential harm or abuse or whether there are sufficient grounds to suspect abuse or

potential radicalisation. Following this, the DSO or DDSO may decide that further action is necessary and

will refer it on to an external agency or that the situation can be monitored within Kaplan.

In the event of a decision being made to escalate a Prevent concern externally, this should only be carried

out by the SSO or DSO. In their absence, a DDSO will make a member of the Apprenticeship Leadership

Team aware of the concern and complete any agreed referral.

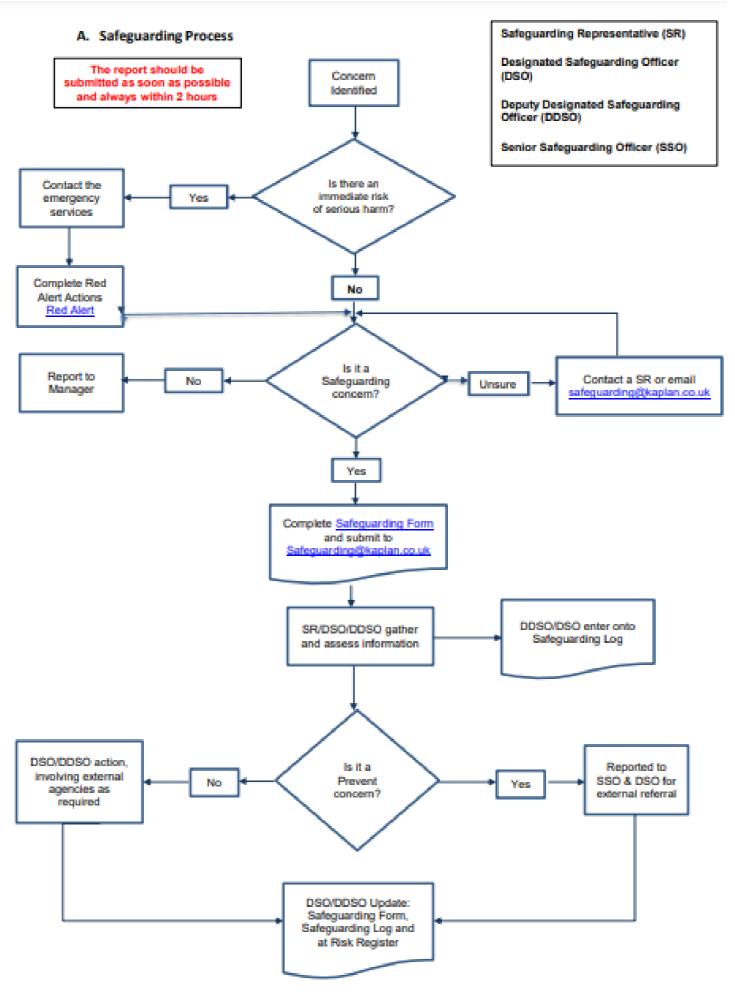
16.Policy Review

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

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B. Safeguarding Training Requirements

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

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

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

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C. External Support Organisations

External Support Organisations

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

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For Help With	Organisation	Website	Contact Details
Parental Support	Family Lives	familylives.org.uk	0808 800 2222*
Personal Safety	The Suzy Lamplugh Trust	suzylamplugh.org	0808 802 0300*
Racism	Stand Against Racism & Inequality	sariweb.org.uk	0117 942 0060
Relationships	Relate	relate.org.uk	0300 003 2324
Revenge Porn	Safer Internet	saferinternet.org.uk	0345 6000 459
Self-Harm	Self-Harm UK	selfharm.co.uk	info@selfharm.co.uk
Sexual Abuse	The Survivors Trust	thesurvivorstrust.org	0808 801 0818*
	Rape Crisis	rapecrisis.org.uk	0808 802 9999*
Sexuality	Stonewall	stonewall.org.uk	0800 050 2020*
Suicide prevention Support (under 35s)	Papyrus	www.papyrus-uk.org	0800 068 4141
Victim Support	Victim Support UK	victimsupport.org.uk	0808 168 9111*
Under 25 Support	The Mix - Essential support for under 25s	themix.org.uk	0808 808 4994

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