

Kaplan Professional Education Safeguarding and Prevent Policy

Owner: Senior Safeguarding Officer

Issued: September 2025

Version: 8.0

Key Contacts

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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 mental 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

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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

Details of other External Support Organisations

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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).

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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 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

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• 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

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.

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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 <u>filtering and monitoring standards</u> 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

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.

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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:

• 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.

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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.

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

Individual liberty

The rule of law

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.

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Online safety

The breadth of issues classified within online safety is considerable and ever evolving, but can be categorised into four areas of risk:

Content: being exposed to illegal, inappropriate, or harmful content, for example: pornography, racism, misogyny, self-harm, suicide, antisemitism, radicalisation, extremism, misinformation, disinformation (including fake news) and conspiracy theories.

Contact: being subjected to harmful online interaction with other users; for example: peer to peer pressure, commercial advertising and adults posing as children or young adults with the intention to groom or exploit them for sexual, criminal, financial or other purposes.

Conduct: online behaviour that increases the likelihood of, or causes, harm; for example, making, sending and receiving explicit images (e.g. consensual and non-consensual sharing of nudes and semi-nudes and/or pornography, sharing other explicit images and online bullying, and

Commerce: risks such as online gambling, inappropriate advertising, phishing and or financial scams.

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.

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.

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Drugs and 'County Lines'

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.

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.

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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.

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.

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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.

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.

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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
- Promote fundamental British values at every opportunity throughout programmes
- 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
- 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
- Carry out an annual risk assessment in relation to the Prevent Duty, evaluating where
 and how learners or staff may be at risk of being drawn into terrorism. 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
- 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.

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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 Kaplan 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.

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.

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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

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Report

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

within 2 hours where any delay increases the risk.

DSO or DDSO should be contacted by phone using the details provided on <u>Page 2</u> of

the policy

• Details submitted on the <u>Safeguarding Report Form</u>

• Once concerns have been reported, responsibility for taking any further action resides

with the 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.

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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 Department for Education 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.

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.

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16. Policy Review

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

17.Revision History

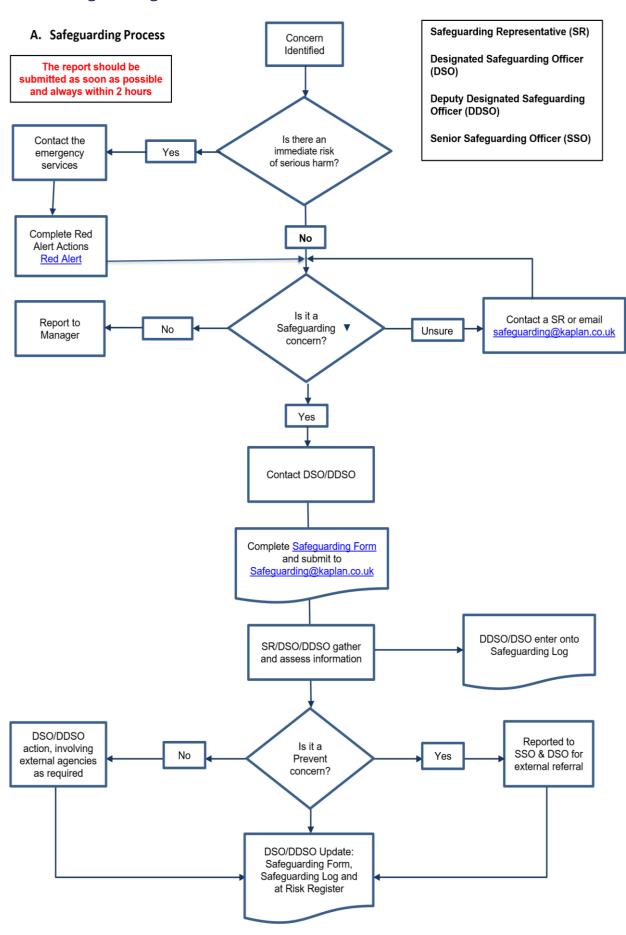
Revision	Version	Primary	Summary of changes
Date	Number	Author(s)	
16 Sep 25	8.0	Michael Kemp	 Annual review and update in line with KCSIE 2025 Section 4: Safeguarding Roles and Responsibilities: removed Safeguarding Representatives' responsibility of monitoring the inbox Section 8: New 'Online Safety' section added Consolidation and reordering of existing categories Section 11: Preventing Extremism updated to remove repetition of information Section 17: Revision History table added References to ESFA amend to DfE

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Issued: September 2025

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A. Safeguarding Process



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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 recruitment, induction or other student support activities	Safeguarding and Prevent training modules	Within 1 month of 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

For Help With	Organisation	Website	Contact Details
Autism	National Autistic Society	autism.org.uk	020 7833 2299
Bereavement	creavement Cruse Bereavement Care		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	Id Exploitation Child Exploitation & Online Protection Command		https://www.ceop.police.uk/ceop-reporting
Deaf Support	Support British Deaf Association		020 7697 4140
Domestic Abuse	estic Abuse Refuge		0808 2000 247*
Drugs	Talk to Frank	talktofrank.com	0300 123 6600
Employment	Job Centre Plus	gov.uk/find-a-job	0800 169 0310
	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
	Anti-Phishing Working Group	apwg.org	
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
Parental Support	Family Lives	familylives.org.uk	0808 800 2222*

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For Help With	Organisation	Website	Contact Details
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*
Sexual thoughts or behaviour	Shore - 100% anonymous	shorespace.org.uk	email.shorespace.org.uk
Suicide prevention Support (under 35s)	Papyrus	www.papyrus-uk.org	0800 068 4141
Suicide prevention for men 18+	Andy Mans Club: peer-to-peer support for men over 18	andysmanclub.co.uk	info@andysmanclub.co.uk
Under 25 Support	The Mix - Essential support for under 25s	themix.org.uk	0808 808 4994
Victim Support	Victim Support UK	victimsupport.org.uk	0808 168 9111*

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