



Safeguarding and Prevent Policy

COVER SHEET

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Scope of the policy

1. **School of Marketing** is committed to providing a safe environment for all apprentices and 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.
2. **School of Marketing** will take every reasonable step to ensure that all apprentices and 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. **School of Marketing** recognises that safeguarding against radicalisation and extremism is no different to safeguarding against other vulnerability issues that individuals may face. This policy also incorporates protecting individuals from being radicalised or exposed to extremist views and a process for escalation where radicalisation is suspected or has been identified. **School of Marketing** application of the Prevent Duty recognises that this applies to all individuals, including employees.
3. We enable all our employees and those who work with us to make informed and confident decisions regarding safeguarding. We expect all delivery and management employees 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 apprentice and learners facing employees 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, regional variations and priorities, and to inform the need for further employees 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.

2. Safeguarding Definitions

Safeguarding The term 'Safeguarding' describes the broader preventative 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. Safeguarding is more than having background check policies and procedures in place.

It means having a culture of vigilance where all employees 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.

A 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.

Indicators of harm

Harm can be caused in a number of ways and take different forms, including:

- Sexual – for example, trying to get someone to take part in sexual activity by using force, threats or bullying.
- Sexual harassment - unwanted behaviour of a sexual nature which: violates a person's dignity, makes them feel intimidated, degraded or humiliated
- 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 – for example, hitting another person or deliberately cutting yourself
- Psychological – 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 - 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 apprentices, learners and employees

School of Marketing will:

- Maintain thorough knowledge of safeguarding matters
- Promote this policy and accompanying procedures and guidance regularly through employee training
- 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
- 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 apprentices and learners to their rights and responsibilities with regard to Safeguarding and Prevent through their induction
- All apprentice and student-facing employees, including those at partners and subcontractors, undertake suitable training commensurate with their role in the organisation
- All apprentice and student facing employees will receive appropriate training as part of their induction
- The Safeguarding Policy will be reviewed on an annual basis to ensure it covers any changes in legislation and remains suitable for the needs of the organisation
- Regular meetings will be held to discuss Safeguarding and Prevent issues and processes, identify and address themes and standardise practice (Minutes recorded)
- The effectiveness of the Safeguarding and Prevent policy in terms of learner awareness and understanding will be monitored through discussions, surveys, observations and review of Safeguarding records.

4. Roles and Responsibilities

The following roles ensure that **School of Marketing** meets its responsibilities effectively.

Senior Leadership Team

Are responsible for ensuring that all necessary learners have an understanding of safeguarding and have received appropriate training and development and that the employees recruitment and selection procedure is followed at all times. They will ensure that safeguarding is given a high priority across the business and that regular meetings are held reviewing and implementing new practices.

Senior Safeguarding Officer

The Senior Safeguarding Officer is responsible for the implementation of the Safeguarding and Prevent Policy and **School of Marketing** commitments to safeguarding all employees' learners and apprentices. They will be responsible for ensuring that the safeguarding



processes and procedures are robust and consistently applied and that **School of Marketing** fulfils its legal duties.

Safeguarding Deputy and Officer

The Safeguarding Deputy Officer will deputise for the SSO in their absence. The role is held by the Apprenticeship Quality Manager. Responsibilities include:

- Review Policy and best practices
- Maintaining an up-to-date knowledge of current Safeguarding and Prevent practices
- Ensuring sufficient employee training and CPD to uphold an effective level of Safeguarding provision (including Level 3 & 2 in Safeguarding)
- Ensuring that records are maintained, recording any concerns
- Referring to relevant external agencies & support where relevant

Prevent Lead Officer

The Prevent Lead Officer has the responsibility for ensuring that the Prevent Risk assessment and action plan is maintained and takes account of local and seasonal issues and updates from

Human Resources

Is responsible for ensuring that safe recruitment practice is embedded and implemented across **School of Marketing** and that the supporting records of any background checks are accurately maintained. As part of employees being joining School of Marketing full training will be provided to raise awareness to the importance of Safeguarding and Prevent Duty **School of Marketing** will introduce our policies to learners and employers upon interview and induction to gain full engagement, commitment and to promote this policy to all parties. All policies are all available on our website, any updates to policies will be communicated to learners and employers as part of a workforce development via email to advise that a policy has been updated on the website.

Quality Department

Are responsible for ensuring that all online learning sessions and resources, facilities and equipment comply with legislative health and safety standards and meet external assessors and governing bodies requirements.



IT Department

Are responsible for ensuring that policies in regard to the Safeguarding and Prevent Duty have suitable filtering and firewalls are in place to prevent apprentices, learners, employees and visitors accessing extremist or illegal websites and or material that causes concern for safety and wellbeing.

Guidance on online safety can be found on our Online Safety Policy.

5. Underpinning Policies and Procedures

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

- Background Checks
- Code of Business Conduct
- Dignity at Work
- Equality, Diversity & Inclusion
- Health & Safety
- Online Safety
- Referrals to Disclosure and Barring Service
- Referrals to Disclosure Scotland
- Recruitment and Selection
- Student Code of Conduct
- Whistleblowing
- Cause for Concern Form

6. Indicators of Safeguarding Concerns

Safeguarding and Prevent can include, but is not limited to:

- Mental health
- Mental wellbeing
- Physical abuse
- Mental and emotional abuse
- Bullying (Including cyber bullying)
- Direct and indirect discrimination
- Racist, disability, gender, homophobic and transphobic abuse
- Child exploitation and human trafficking
- Female genital mutilation
- Radicalisation and Terrorism
- Drug abuse

7. Prevent Duty

The **Prevent Duty and Policy** requires that all employees are aware of the signs that a child, young person or adult may be vulnerable to radicalisation which is known as the **Prevent Duty**. The risks will need to be considered for political; environmental; animal rights; or faith-based extremism that may lead to an individual becoming radicalised. School of Marketing undertake responsibility in response to our legal duty in relation to Section 26 of the Counter Terrorism and Security Act 2015 and as part of the overall counter terrorism strategy, CONTEST.

Indicators of vulnerability include:

- Identity Crisis: the individual is distanced from their cultural / religious heritage and experiences discomfort about their place in society
- Personal Crisis: they may be experiencing family tensions/ a sense of isolation/ low self-esteem. They may have dissociated from their existing friendship group/ become involved with a new and different group of friends/ may be searching for answers to questions about identity, faith and belonging
- Personal Circumstances: migration/local community tensions/ events affecting the pupil's country or region of origin may contribute to a sense of grievance that is triggered by personal experience of racism/ discrimination/ aspects of Government policy
- Unmet Aspiration: the learner or apprentice may have perceptions of injustice; a feeling of failure; rejection of civic life
- Experiences of Criminality: which may include involvement with criminal groups, imprisonment, and poor resettlement / reintegration
- Special Educational or Additional Needs: individuals may experience difficulties with social interaction, empathy with others, understanding the consequences of their actions and awareness of the motivations of others
- Being in contact with extremist recruiters
- Accessing violent extremist websites, especially those with a social networking element
- Possessing or accessing violent extremist literature
- Using extremist narratives and a global ideology to explain personal disadvantage
- Justifying the use of violence to solve societal issues
- Joining or seeking to join extremist organisations



- Significant changes to appearance and / or behaviour
- Experiencing a high level of social isolation resulting in issues of identity crisis and / or personal crisis.

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

8. Preventing Extremism

School of Marketing share guidance in the following ways to ensure employees and apprentices are resilient to extreme narratives:

- Provide clear guidance on managing risks and procedure on responding to incidents
- Help all learners and apprentices feel empowered to create positive communities and help protect the wellbeing and safety of those vulnerable to being drawn into terrorist activity
- Promoting an anti-bullying approach that supports fairness and equality
- Helping provide a safe and supported learning environment, promoting British values at every opportunity
- Raise awareness of the threat from violent extremist groups and School of Marketing responsibility to minimise this within our organisation



- Work in partnership with our local Prevent Coordinator (<https://www.gov.uk/guidance/regional-further-education-fe-and-higher-education-he-prevent-coordinators>) and local communities in helping prevent and detect any concerns of neglect and abuse
- Share clear and open information about what extremism is and how to recognise the signs extremist behaviors
- Make prevent referrals to local authorities and the police. All referrals will be managed by our Senior Safeguarding lead

9. External Speakers and Events

School of Marketing has a responsibility to comply with the Prevent Duty to external speakers' 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 any external speakers' content is reviewed prior to the event taking place, suitable checks will be performed to ensure material will not promote radical or extremist views.

At **School of Marketing** all external speakers' are requested to complete an online booking form which is reviewed by our Prevent Lead Officer who will take a balanced approach of honoring **School of Marketing's** legal obligation to protect apprentices and learners welfare, whilst ensuring the importance of academic freedom of speech rights are preserved.

10. Safeguarding and Prevent Procedure

If there is any threat to life, always reach out to the emergency services on 999

For any suspicious, allegation or actual abuse of a learner or apprentice by School of Marketing employee or its faculty must be reported immediately to the Senior Safeguarding lead or Deputy. In their absence it must be reported to another senior leader which then will lead to a high-level investigation.

11. Dealing with a Disclosure

In order to ensure any disclosure is dealt with effectively, the 5 R's should be considered

- **Recognise** behaviors that may indicate abuse
- **Respond** appropriately and should never be ignored
- **Report** all concerns must be reported within 2 hours to Senior Safeguarding Team



- **Record** all Senior Safeguarding Team will be trained on how to record disclosures securely and confidentially
- **Refer** The decision to refer lies with SSO dealing with the disclosure who will gather and examine all relevant information.

12. Responding to a disclosure or incident

School of Marketing train all employees and Senior Management in how to deal with a disclosure swiftly and confidentially. Acting quickly and effectively can help save a life!

If there is any threat to life, always reach out to the emergency services on 999

- Keep calm and follow the Safeguarding Process (Page 12)
- Explain that information will need to be passed on to the relevant parties reduce risk or harm to them
- Follow the 5 R's procedure
- Report matter within 2 hours using Cause for Concern Form
- Keep an updated record of a Safeguarding Log
- Refer any disclosures to <https://www.met.police.uk/advice/advice-and-information/t/prevent/prevent/> where required

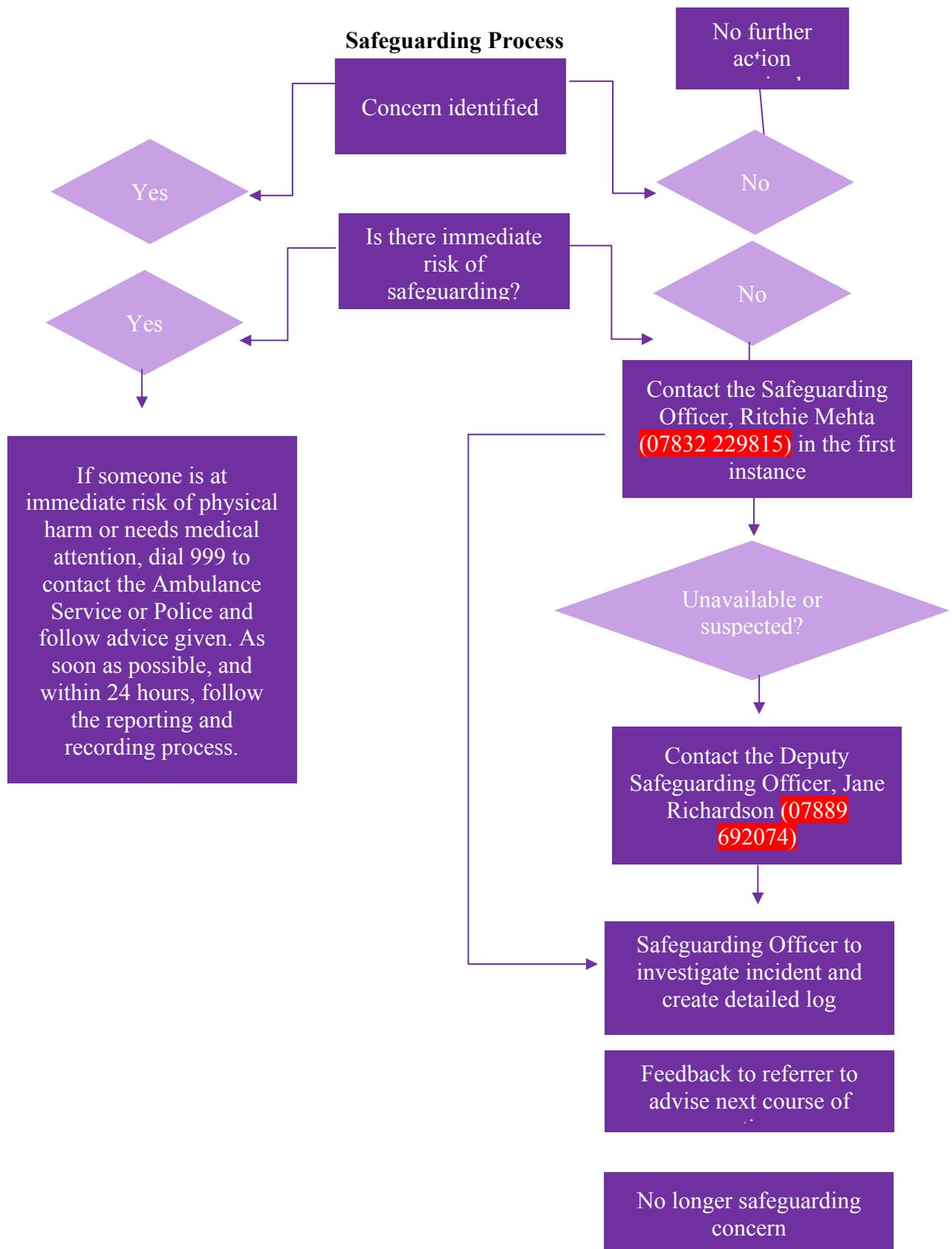
Cause For Concern Form

Cause for Concern

Learner Name	
Learner Email Address	
Learner Contact Number	
Company	
Company Contact	
Contact Email Address	
Contact Phone Number	

Date	Update	Supporting Evidence	Action by

13. Safeguarding Process



Safeguarding Training Requirements

Role	Requirement	Timeline
Senior Safeguarding Officer (SSO)	L3 Safeguarding Officer	Prior to taking on role updated every 2 years
Deputy Safeguarding Officer	L3 Safeguarding Officer	Prior to taking on role updated every 2 years
Prevent Lead Officer	Safeguarding and Prevent Training modules	Within 4 weeks of joining
Safeguarding Representatives	Safeguarding and Prevent Training modules (L2)	Within 4 weeks of joining
Apprenticeship Delivery Team	Safeguarding and Prevent Training modules (L2)	Within 4 weeks of joining
Tutors / Skills Coach	Safeguarding and Prevent Training modules (L2)	Within 4 weeks of joining
School of Marketing Employees	Safeguarding and Prevent Training modules	Within 4 weeks of joining
Support Employees/Temps	Safeguarding and Prevent Training modules	Within 4 weeks of joining

External Support Contacts



How can they help?	National Organisation	Telephone	Website
Racial Equality, Disability Rights, Equal Opportunities	Equality and Human Rights Commission	0808 800 0082	www.equalityhumans.com
Dyslexia	British Dyslexia Association	0333 405 4555	www.bdadyslexia.org.uk
Health and safety	HSE	0300 003 1747	www.HSE.gov.uk
Citizens' advice	Citizens' Advice Bureau	03444 111 444	www.citizensadvice.org.uk
Employment rights	ACAS	0300 123 1100	www.acas.org.uk
Student finance	Gov.uk		https://www.gov.uk/student-finance/extra-help
Careers advice	National Careers Service	0800 100 900	https://nationalcareerservice.direct.gov.uk
Victims of crime	Victims Support	0808 16 89 11	www.victimsupport.org.uk
NHS 111 service	NHS 111	111	www.nhs.uk
Drug related matters	National Drugs Helpline	0300 123 6600	www.talktofrank.com
Smoking	NHS Smoking Helpline		www.smokefree.nhs.uk
Emotional support	Samaritans	116 123	www.samaritans.org
Alcohol abuse	Drinkaware	020 7766 9900	www.drinkaware.co.uk
Rape victims	Rape Crisis	0808 802 9999	www.rapecrisis.org.uk
Sexual health	Department of Health/NHS		www.condomessentialwear.co.uk
Anti-terrorism hotline	Gov.uk	0800 789 321	www.gov.uk/report-terrorism
Child protection concerns	Childline	0800 1111	www.childline.org.uk
Online safety concerns	CEOP	0800 1111	www.CEOP.police.uk
Concerns for children (under 18)	NSPCC	0808 8005000	www.NSPCC.org.uk



Online Safety Statement

Introduction

This scope of this statement is to provide a coherent framework from which all **School of Marketing** employees, learners and apprentices can develop a safe, consistent and effective approach to Online learning. Online learning is an integral part of our delivery and work and E-Safety forms a fundamental part of **School of Marketing** safeguarding measures.

Online learning is valued as one of the ways in which learner attainment and achievement can be continued in the event of individual/group quarantine or local/national lockdown in response to Covid-19. **School of Marketing** have adapted their learning delivery to be fully remote, promoting a rich and diverse culture, whilst enabling all learners to continue their growth and development through supported and safe study.

Aims of Statement

1. To ensure that **School of Marketing** communicates remote learning expectations effectively so that all learners can participate in a safe and inclusive learning environment
2. To ensure that all programme structures adhere to the principles of this policy and support the collective best interests of learners, employees and apprentices
3. To promote independent learning and study skills as key enablers of achieving success
4. To ensure that the Delivery Team and Tutors have up to date training and knowledge to teach learners and apprentices about online safety
5. To review and update Online Safety provision on an ongoing basis

IT Safety and Data Protection

School of Marketing have strong IT infrastructure and data protection practices, which include the following:

- Managing Data in compliance with the GDPR/Data Protection Act 2018
- Use of a firewall and robust antivirus software
- Use of a recognised internet service provider
- Active monitoring and filtering of any inappropriate websites or content



- Use of an encrypted and password protected WIFI network
- Use of secure passwords with two-factor authentication encouraged (where available)

Online Consent Forms

All consent forms are stored in accordance with the Data Protection Act 2018 and stored securely within **School of Marketing's** records as evidence of consent.

Communicating with Learners, Apprentices and Employers

All delivery sessions taking place remotely are communicated through our brochures, learner timetables, module overviews and email. School of Marketing:

- Communicate within working hours wherever possible
- Communicate through **School of Marketing's** Online Platform
- Use only **School of Marketing** email accounts and work mobile numbers
- Use **School of Marketing** devices over personal devices
- Advise employees not to share personal information
- Ensure Employers are clear on where to access additional resources and support
- Ensure log in details and passwords are secure and learners and apprentices understand that they should not share this information with others

Remote Learning Principles

Remote delivery includes both pre-recorded video lessons and 'live' learning delivered via cloud-based videoconference software including Microsoft Teams and Zoom. **School of Marketing** ensure that consent forms are signed as part of the enrolment process, prior to learners starting a new programme.

To ensure learning is delivered appropriately, **School of Marketing** refer to Guidance provided by the National Cyber Security Centre (NCSC) which helps deploy virtual lessons safely.

The following actions are useful considerations when organising and participating in remote learning (this is not an exhaustive list):

- Use neutral/plain backgrounds
- Ensure appropriate privacy setting are in place
- Ensure employees understand and know how to set up and apply controls, including managing learner interaction, microphones and cameras
- Set up lessons with password protection and ensure passwords are kept securely



- Ensure all employees, learners and apprentices have clear expectations around behaviour and participation

The following Policies underpin this:

- Safeguarding and Prevent Policy
- Student Code of Conduct
- Bullying and Harassment Policy
- Data Protection Policy
- Health and Safety Policy

Providing Pastoral Care remotely

Our learners and apprentices are required to learn from remote locations, including their employer work premises and from home. Support and guidance on creating a weekly plan or structure is therefore important. These plans are advised to include learning, regular breaks and check-in meetings to reduce stress and anxiety. Pastoral care is offered through regular 1:1 meetings and Progress Reviews conducted by trained and industry specific experts. Any risks or concerns identified must be discussed with the appropriate Senior Leadership Team member.

Personal Data and GDPR

School of Marketing continue to follow guidance on data protection and GDPR. The guidance is obtained through <https://www.gov.uk/government/publications/data-protection-toolkit-for-schools> and from the ICO.

When managing personal data it is important to consider the following:

- Take care not to share contact details when emailing multiple people
- Be careful when sharing usernames and other personal data for access to online resources
- Provide access to School of Marketing platform systems safely
- Making available sufficient information to data subjects, learners, apprentices and employers to raise awareness about personal data captured during workshop/learning recordings, particularly where cameras are turned on

Useful additional Resources

Keeping Children Safe in Education in 2022



https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/1080047/KCSIE_2022_revised.pdf

<https://ico.org.uk/for-organisations/guide-to-data-protection/guide-to-the-general-data-protection-regulation-gdpr/lawful-basis-for-processing/>