



Estu Global Ltd

Safeguarding and Prevent Policy

V4.0



Policy version control

Issue	Date	Approved By	Position	Revision Notes
V1				New policy
V2	Feb 24	Bruce Storey	COO	Update and revision
V3	Sept 24	Bruce Storey	COO	Policy objectives and KCSiE references updated
V4	Sept 25	Bruce Storey	COO	KCSiE references and DBS timeline updated. Reference to AI added.
Next Review Date: Sept 26			Policy Owner: Designated Safeguarding Lead (DSL)	

Safeguarding and Prevent policy

Policy Statement

Estu is committed to ensuring it meets and exceeds all its statutory duties and responsibilities to both learners and staff, supporting them to keep safe, healthy and free from harm whilst attending learning programmes and at work. Estu informs all learners, including apprentices, of the processes to follow if they have any concerns. This policy covers all aspects of safeguarding, including Prevent, in line with our legal and moral obligations.

Estu commits to transparent communication regarding its dedication to safeguarding to all learners, staff, and relevant stakeholders. Information about safeguarding procedures will be made easily accessible, and learners will be informed of the channels available to them for seeking support. This policy will be circulated with all staff, learners, subcontractors and customers.

Scope

Estu's safeguarding and Prevent policy applies and is mandatory for:

- All Estu staff and associates
- Subcontractors
- Learners
- All other users of Estu services.

Policy objectives

The purpose of this policy is to achieve the following:

- To provide a safe and supportive environment where learners, particularly vulnerable individuals, are protected from harm, abuse, neglect, and exploitation in all aspects of their training and education.
- To ensure full compliance with safeguarding laws and regulations, including the Care Act 2014, the Prevent Duty under the Counter-Terrorism and Security Act 2015, and Ofsted standards.
- To prevent individuals from being drawn into terrorism by implementing the UK Government's Prevent strategy, raising awareness, and promoting safeguarding practices that counter radicalisation and extremism.
- To promote a culture of vigilance where staff, learners, and stakeholders are encouraged to recognise, report, and act on any concerns or signs of potential abuse, harm, or radicalisation.

- To implement clear and accessible safeguarding procedures, ensuring that any concerns related to abuse, neglect, or radicalisation are reported, investigated, and appropriately referred to external agencies when necessary.

Introduction

The primary purpose of this policy is to establish a framework to Estu maintains a safe and secure learning environment for learners, fostering their welfare and protecting them from harm. By providing clear procedures for identifying, reporting, and responding to concerns related to the safety and well-being of learners, this policy underscores Estu's commitment to their holistic development. Estu takes as its starting point the principles set out in Keeping Children Safe in Education (2025) (KCSiE) and seeks to apply these for all learners.

Definitions

Estu uses definitions of the term 'safeguarding' from statutory guidance.

Safeguarding children is defined in [Working together to safeguard children \(2023\)](#) as:

- Providing help and support to meet the needs of children as soon as problems emerge
- Protecting children from maltreatment.
- Preventing impairment of children's health or development.
- Ensuring that children are growing up in circumstances consistent with the provision of safe and effective care.
- Taking action to enable all children to have the best outcomes.

Safeguarding vulnerable adults is defined in the [Care and support statutory guidance](#) issued under the Care Act 2014 as:

- Protecting the rights of adults to live in safety, free from abuse and neglect.
- People and organisations working together to prevent and stop both the risks and experience of abuse or neglect.
- People and organisations making sure that the adult's wellbeing is promoted including, where appropriate, taking fully into account their views, wishes, feelings and beliefs in deciding on any action.

A **child** is defined as a person who has not yet reached their 18th birthday (Children Act 2004).

A **vulnerable adult** (or adult at risk) is defined as a person who is 18 years of age or over and who is or maybe in need of community care services by reason of mental health or other disability, age or illness and who is or maybe unable to take care of themselves or protect themselves against harm or exploitation (Safeguarding Vulnerable Groups Act 2006).

Responsibilities

Designated Safeguarding Lead (DSL)

Estu recognises the critical role of a Designated Safeguarding Lead (DSL) in championing its safeguarding work. The DSL appointed by Estu, will take the lead in ensuring the implementation of safeguarding policies and procedures. The DSL will be supported by a Deputy Designated Safeguarding Lead (DDSL). The DSL and deputies will also take lead responsibility for the Prevent Duty.

Continuous training for the DSL and DDSL will be prioritised, ensuring they remain informed about evolving legislation and best practices in safeguarding.

Key roles

- Designated Safeguarding Lead (DSL):
 - Anne-Marie Smith, anne-marie.smith@estuglobal.com
- Designated Deputy Safeguarding Lead (DDSL):
 - Chris Harper, chris.harper@estuglobal.com
- Designated Deputy Safeguarding Lead (DDSL):
 - Yvonne Hayes, yvonne.hayes@estuglobal.com

Estu staff

All staff members at Estu will complete safeguarding training at least annually. This training will empower staff to recognise signs of abuse, understand reporting procedures, and be fully aware of their responsibilities in safeguarding apprentices.

In the escalation of safeguarding issues, staff will follow the 5R's:

- 1. Recognise** – Staff are trained to ensure they have an understanding of the signs that could suggest potential harm, neglect or radicalisation.
- 2. Respond** – If staff have a concern they will need to respond appropriately and not ignore the situation. Staff do not need to have all the answers, however the safeguarding procedure has examples of responses.
- 3. Report** – Safeguarding concerns need to be reported to the safeguarding team by completing the safeguarding report form and send via the dedicated email address safeguarding@estuglobal.com to the safeguarding team.
- 4. Record** – Safeguarding team will record the concern as per the safeguarding policy and procedures.
- 5. Refer** – Safeguarding team will refer to external agencies or signposting information as required.

Confidentiality

Promises of confidentiality should not be given to learners as concerns and disclosures will be passed to the DSL and maybe also be referred to external agencies. Confidentiality can be broken if there is a risk of harm to the learner or others, or if a criminal activity has taken place.

As part of maintaining confidentiality, the safeguarding team will be transparent about the circumstances in which we will contact third parties with or without a learner's consent using a series of serious harm criteria to make this judgement.

Staff training

All staff will receive at least a basic level of safeguarding training as part of their induction, and thereafter on an annual basis or as required, for example, when legislative changes are made.

The DSL and DDSL will all complete a higher level of safeguarding training.

During induction, all staff are required to familiarise themselves with the content of the policy and receive training on their responsibilities and how the policy will be implemented.

Types of harm, abuse or neglect

The following summarise a range of different types of abuse, however, this list is not exhaustive and new types of abuse may be noted, either through changes in law or in reporting.

Physical abuse

This may include hitting, slapping, pushing, kicking, misuse of medication, or other causes of physical harm. Signs and indicators may include bruising, cuts or other marks, frequent injuries or subdued or changed behaviours.

Sexual abuse

This may include sexual assault, penetrative or non-penetrative acts. It also includes non-contact activities such as forcing a person to look at pornographic material. Child Sexual Exploitation (CSE) is also a form of sexual abuse. Signs and indicators may include changes in behaviours, self-harming, sexually transmitted diseases or sexualised behaviours.

Psychological or emotional abuse

This may include threats of harm or abandonment, deprivation of contact, blaming, controlling, intimidation, coercion or verbal abuse. Signs and indicators may include an unnatural or unexplained level of fear, passivity, apathy, low levels of self-esteem or a reluctance to talk openly.

Financial or material abuse

This may include theft, fraud or other exploitation in relation to financial transactions or the misuse of property, possessions or benefits. Signs and indicators may include a lack of money for personal items, inadequate clothing or malnourishment or financial hardship.

Discriminatory abuse

This may include abuse, bullying or harassment based on protected characteristics. Signs and indicators may include changes in behaviours, low levels of self-esteem or a reluctance to talk openly.

Neglect and acts of omission

This may include ignoring medical or physical care needs or withholding life necessities such as heating, clothing or nutrition. Signs and indicators may include malnutrition, dehydration, high levels of infections or uncharacteristic failure to engage in social interactions.

Modern slavery

This may include forced labour, domestic servitude, sexual exploitation or debt bondage. Signs and indicators may include signs of physical abuse, changes in behaviours, community isolation, a reluctance to talk openly or a lack of personal effects including clothing.

Prevent Duty

Introduced as part of the Counter-Terrorism and Security Act 2015, the aim of the Prevent Duty is to reduce the threat to the UK from terrorism by stopping people becoming terrorists or supporting terrorism. This duty recognises that some learners may be more vulnerable to extremist ideology and radicalisation.

Similar to protecting learners from other forms of harms and abuse, protecting them from this risk is part of Estu's safeguarding approach, and leaders and managers adopt the principles set out in the Prevent Duty guidance.

- **Radicalisation** is defined as the process by which people come to support terrorism and extremism and, in some cases, to then participate in terrorist groups.
- **Extremism** is "vocal or active opposition to fundamental British values, including democracy, the rule of law, individual liberty and mutual respect and tolerance of different faiths and beliefs; and/or calls for the death of members of our armed forces, whether in this country or overseas" (HM Government Prevent Strategy 2015).
- **Terrorism** is an action that endangers or causes serious violence to a person/people, serious damage to property or seriously interferes with an electronic system. The use of threat must be intended to influence government or intimidate the public – this can be for the purpose of aiding a political, religious or ideological cause.

Estu will maintain a Prevent Risk Assessment to ensure that risk to staff and learners are minimised.

Main policy areas

New employees

All new Estu employees will be subject to DBS checks at an appropriate level, depending on their engagement with learners. Full details are set out in the Safer Recruitment Policy.

DBS checks

Staff who are on the updated service will be subject to checks every year to see if any changes have occurred. Staff with a physical DBS will be asked to renew every two years to ensure good practice and updated records. On notification of any adverse DBS check, managers will make a decision on whether to continue an application for new members of staff or continue the employment of an existing members of staff. This will depend on the nature of the issue and whether additional measures can be put in place.

Mental health and well-being

Estu recognises the impact of mental health on the overall well-being of learners and is committed to promoting positive mental health, destigmatising mental health issues, and providing access to appropriate support services. Staff will be trained to recognise signs of mental health concerns, and learners will be informed about available resources. Estu also partners with Able Futures, who provide mental health support on behalf of the Department for Work and Pensions.

Online safety

Given the increasing reliance on digital platforms, Estu is dedicated to ensuring the online safety of its learners. This includes educating learners about the risks associated with online activities, providing guidelines for responsible online behaviour, and implementing measures to protect against cyberbullying and online exploitation.

When Estu uses remote teaching platforms such as Zoom or Teams, it is an expectation that all session have 'cameras on' as a starting point to ensure the well-being of all learners. The use of AI note-taking software is not permitted in any online training sessions.

Role of Estu's curriculum in learners' personal development

All teaching programmes will provide a broad and balanced curriculum, delivered by skilled professionals, to ensure that all learners are enriched and understand safeguarding topics

including harm, risks of harm and online safety. All curricula promote respect, tolerance and diversity.

All learners are encouraged to share their views and recognise that they are entitled to have their own different beliefs which should not be used to influence others. Estu's programme also aims to build learners' resilience to radicalisation by promoting fundamental British values and enabling them to challenge extremist views.

Learners with LDD/SEND

A learner is defined as having a learning difficulty or disability (LDD) if he or she has a significantly greater difficulty in learning than most others of the same age. A child or young person has SEND (Special Educational Needs or Disabilities) if they have a learning difficulty or disability which calls for special educational provision to be made for them.

All Estu staff need to be aware that these learners can have additional safeguarding challenges and can be impacted educationally by these. The safeguarding team will log any learners with additional support needed and ensure these are in place.

External speakers

As part of its commitment to providing learners with the best possible learning experience, Estu will, where appropriate, welcome visiting speakers from around the world to contribute to its learning programmes. Leaders and managers recognise that such speakers can bring a great diversity of experience, insight and opinion, enriching events and activities and sparking discussion and debate among our learner and staff.

Holding open, challenging debates rather than silencing the views of those we do not agree with helps to build tolerance and address prejudice and discrimination. Freedom of speech in education should be upheld at every opportunity and should only be limited where there are genuine safety concerns or it constitutes unlawful behaviour.

Leaders and managers also recognise their obligation to keeping their learners and staff safe, to provide balance viewpoints and to mitigate any risk of radicalisation towards extremist behaviour. To that end, Estu will ensure that the following are in place.

- A guest speaker is defined as anyone who is not an employee or associate employee of Estu, who is invited to speak at an Estu arranged event, whether paid or unpaid.
- Managers will complete an assessment of risk, which will include an assessment of the safety of learners and staff when considering the event's format and audience, including as relevant, a check of social media activity as well as an assessment of institutional risk.

- Guest speakers will always be accompanied by an Estu employee or associate employee, both at in-person sessions and online sessions.
- It is the responsibility of the event organiser to ensure that guest speakers are briefed about acceptable content for the event, and will be expected to act with civility, consideration and respect for others.
- Potential guest speakers will be required to declare any reason that may impact on their role to act in such a capacity.

What should a learner do if they have a concern?

If learners have any safeguarding issues, they can report their concern directly to the safeguarding team. Alternatively, they can speak to any member of Estu staff they feel comfortable speaking to, and that staff member will begin the reporting process.

All Estu staff are trained in safeguarding and know the Estu safeguarding procedures outlined in the operations model.

Estu staff are committed to the promotion of open conversations around safeguarding and wellbeing with learners and will encourage use of the resources available from the Safeguarding team. The team are available to contact for any concern during working hours via email and mobile.

Allegations about an employee or associate

Any allegations about an employee or associate of Estu should be reported immediately to the Designated Safeguarding Lead, following the usual reporting procedure. The DSL will first consider the immediate safety and well-being of any learner who may be involved. The DSL will make reference to KCSiE to help determine whether or not the allegation fits the criteria for a low-level concern.

The DSL will not investigate such allegations, but pass the details of any incidents to the Chief Operating Officer (COO), who will determine the extent of any investigation in line with Estu's disciplinary policy. The DSL will ensure the allegation is included in the safeguarding log.

The results of any investigation will be used by the DSL to determine whether or not a referral to external agencies should be made and whether disciplinary proceedings should commence.

Implications for Estu operations

Leaders and managers must ensure:

- all staff are DBS checked at the appropriate level, and know where these records kept
- everyone who is associated with Estu, is familiar with this policy and know their role in its implementation
- everyone who is associated with Estu, is aware of their responsibility to the Prevent Duty and knows how to contribute to the implementation of the strategy
- all staff are trained in safeguarding
- Estu's DSL and DDSs are known throughout the organisation
- learners know what to do if they have a concern and how Estu defines different safeguarding concerns.

Continuous improvement

Estu is committed to a culture of continuous improvement in its safeguarding practices. This includes staying abreast of developments in safeguarding legislation, incorporating feedback from apprentices and staff, and actively participating in relevant training and initiatives that enhance our ability to safeguard apprentices effectively.

This safeguarding policy will be reviewed as a minimum annually or when there is a change to legislation or guidance.

Related policies and documents

This policy is to be read in conjunction with other policies and procedures, including those listed below.

Policy Name	Policy Number
Safer recruitment policy	303
Health and safety policy	105
Remote teaching and learning policy	205
Modern slavery policy	106

Reviewed and signed on behalf of Estu's Board: Bruce Storey

Name: Bruce Storey

Role: COO, Estu Global Ltd.

Signing date: 26/09/2025

Date of next review: 30/09/2026