



Safeguarding and Prevent Policy (14)

Competum Ltd is committed to safeguarding and promoting the welfare, both physical and emotional, of everyone (young people, adults, vulnerable adults) who participates in activities either directly organised by Competum Ltd or through a third party working collaboratively with us.

Competum Ltd learners, regardless of age, disability, gender, racial heritage, religious belief, sexual orientation or identity have the right to equal protection from all types of harm or abuse. This Policy sets out a clear and consistent framework for paid and unpaid staff and third parties working on behalf of Competum Ltd to deliver this commitment, in line with safeguarding legislation and statutory guidance.

It is always unacceptable for anyone to experience abuse, harm and neglect of any kind and Competum Ltd recognises its responsibility to safeguard the welfare of our learners, particularly children and vulnerable adults, by a commitment to practice which protects them. We also recognise our duty under the Counterterrorism and Security Act 2015 to prevent individuals from being drawn into terrorism or extremist activity. Radicalisation is considered a safeguarding concern and is managed through this policy. Competum Ltd recognises that radicalisation can occur through a variety of influences including online content, social networks and exposure to extremist ideologies. As part of our safeguarding approach, we aim to raise awareness among both staff and learners of the risks associated with radicalisation and extremism, encourage open discussion, and ensure that concerns are reported and addressed appropriately. We will carry out our responsibilities through adhering to, amongst other policies, our Safeguarding Policy, which aims to provide a caring, supportive and safe environment and values individuals for their unique talents and abilities – an environment in which all learners can learn, develop and grow to their full Potential.

All members of Competum Ltd are required to commit to this policy. They will be required to complete Safeguarding Training and are expected to uphold and promote the fundamental principles of British values, including democracy, the rule of law, individual liberty and mutual respect, and tolerance of those with different faiths and beliefs.

It is understandable that when a member of staff is faced with a safeguarding incident it can, in that moment, feel stressful and personally challenging. It is important that any members of staff who become involved in reporting and escalating safeguarding incidents feel suitably equipped and able to support our learners and act in their best interest.

This guidance has been prepared to support the members of staff to navigate their way through what can feel like a daunting and difficult process. Competum Ltd has in place a network of Local Designated Safeguarding Officers (DSO's) who are on hand to provide 1-2-1 support as well as a Designated Safeguarding and Prevent Lead(s) who can provide further support.



This guidance will be shared with all members of Competum Ltd during their onboarding and all learners during their induction, including information about safeguarding, Prevent, online safety, and how to report any concerns. A copy of the policy can be found on the Competum Ltd website. It is the expectation of Competum Ltd, that all staff will promote the policy to learners to ensure their understanding of Safeguarding and Prevent.

Competum LTD believes that all learners have the right to develop to their full potential. Therefore, we take seriously our role in promoting the health and well-being of our learners.

The Safeguarding Policy and supporting procedures will be widely promoted and mandatory for all team members within Competum Ltd. Failure to comply with the Safeguarding & Prevent Policy and procedures will be addressed without delay and dismissal/exclusion from the organisation may be the result. Any concerns relating to safeguarding, radicalisation, extremism or learner welfare must be reported immediately to a Designated Safeguarding Officer (DSO) or the Designated Safeguarding and Prevent Lead in accordance with Competum Ltd safeguarding procedures.

Purpose

The purpose of this policy is:

- To provide a framework for protecting people from abuse, harm and neglect.
- To provide a safe environment for people to live, learn and work in safety, free from abuse, harm and neglect.
- To ensure all members of staff recognise their responsibilities (through guidance, support and training), minimise risk and report situations where abuse or neglect might be alleged.
- To ensure all members of staff are clear that they are responsible for their own actions and behaviour and avoid any conduct which would lead any reasonable person to question their motivation and intentions.
- To provide all members of staff with guidance on procedures to adopt if they suspect a learner may be experiencing, or be at risk of, harm.
- To ensure the organisation meets its responsibilities under the Counterterrorism and Security Act 2015 and the Prevent Duty by protecting learners and staff from the risk of radicalisation and extremist influence.
- To ensure staff understand how to identify, respond to and report concerns relating to radicalisation, extremism or terrorism as part of safeguarding procedures.
- To promote a culture of respect, inclusion and tolerance that supports the development of fundamental British values and reduces the risk of extremist views influencing learners.

Scope

Competum Ltd believes that all members of staff have a collective and individual duty to provide a caring, safe and supportive environment that positively promotes the health and wellbeing of each individual learner along with their social, physical and moral development.

Competum Ltd recognises that all members of staff have a responsibility to protect learners from harm, including abuse, neglect, exploitation, radicalisation and exposure to extremist ideologies. This includes ensuring a consistent learner-centred approach to training and support, based on a clear understanding of learners' individual needs and views and of the Competum Ltd Safeguarding and Prevent Procedures.



This policy forms part of Competum Ltd's responsibilities under the Counterterrorism and Security Act 2015, which requires organisations to have due regard to the need to prevent people from being drawn into terrorism.

This policy applies to:

- All members of staff, including managers, tutors, trainers, assessors and support staff
- Contractors, partners and third parties working on behalf of Competum Ltd
- All learners participating in Competum Ltd programmes

The policy applies to all environments where Competum Ltd delivers services, including:

- training centres and classrooms
- online or remote learning environments
- employer premises or work placements where applicable

All members of staff and learners have access to this policy, the referral procedure and any supporting documentation.

Statutory Framework, Regulations & Guidance

This policy covers the legislative requirements and recommendations pertaining to the protection of children, young people and adults at risk in the UK, including safeguarding responsibilities relating to abuse, neglect, exploitation, **radicalisation and extremism**, in accordance with statutory guidance on safeguarding and promoting the welfare of learners in education.

This policy has been created in line with:

- The Children Act 1989 provides the legal framework for the protection of people under 18 in the UK.
- The Protection of Children Act 1999
- Working Together to Safeguard Children 2023 is a document which sets out how all agencies and professionals should work together to promote the welfare of children and vulnerable adults.
- DfE Safeguarding Children and Safer Recruitment in Education 2007 places the following responsibilities on all educational organisations:
 - o All members of staff should be alert to signs of abuse and know to whom they should report any concerns or suspicions.
 - o A Designated Safeguarding Lead or Officer should have responsibility for coordinating action within Competum Ltd and for liaising with other agencies.
 - o Members of the members of staff with designated responsibility for learner protection should receive appropriate training.
 - o Competum Ltd should be aware of and follow the procedures established by the Local Safeguarding partnerships and, where appropriate, by the Local Educational Authority or Children's Social Care.
 - o Competum Ltd should have procedures, of which all staff are aware, for handling suspected cases of abuse, including procedures to be followed if a member of staff is accused of abuse.



- Keeping Children Safe in Education 2023, setting out the legal duties you must follow to safeguard and promote the welfare of children and young people under the age of 18 in schools and colleges.
- Modern Slavery Act 2015, which is designed to combat modern slavery in the United Kingdom and consolidates previous offences relating to trafficking and slavery.
- Section 26 of the Counter-Terrorism and Security Act 2015 the Act places a duty on certain bodies, in the exercise of their functions, to have “due regard to the need to prevent people from being drawn into terrorism”.
- Prevent Duty Guidance for England and Wales (2023) issued under Counter-Terrorism and Security Act 2015, which sets out the expectations for schools, further education providers and training organisations to have due regard to the need to prevent people from being drawn into terrorism. This includes risk assessment, staff training, partnership working and appropriate referral mechanisms.
- The Prevent strategy, published by the Government in 2011, is part of the overall counter-terrorism strategy, CONTEST. The aim of the Prevent strategy is to reduce the threat to the UK from terrorism by stopping people becoming terrorists or supporting terrorism. The Prevent strategy has three specific strategic objectives:
 - o Respond to the ideological challenges of terrorism and the threat we face from those who promote it.
 - o Prevent people from being drawn into terrorism and ensure that they are given appropriate advice and support.
 - o Work with sectors and institutions where there are risks of radicalisation that we need to address.
- Channel Duty Guidance (2020) – the Channel Programme is a voluntary, confidential multi-agency programme which provides support to individuals who may be vulnerable to being drawn into terrorism or extremist activity.
- General Data Protection Regulation (GDPR)
- Data Protection Legislation (2018)
- Safeguarding Vulnerable Groups Act 2006
- Children Act 2004
- Education Act 2011
- Human Rights Act 1998
- Offender Rehabilitation Act 2014
- Domestic Abuse Act 2021
- Education and Training (Welfare of Children) Act 2021
- Local Safeguarding Partnerships that bring together all services for children and vulnerable people in a local area to focus on improving outcomes for all.

Procedure



Recognise

The ability to recognise possible indicators of abuse is of fundamental importance. Whether the abuse may occur on the premises or in any other setting. All those playing a role in meeting the



individuals needs should be aware and informed so that possible abuse can be recognised, investigated and acted on seamlessly and effectively.

In addition to abuse and neglect, staff should also be aware that safeguarding concerns may include radicalisation and exposure to extremist ideologies. Radicalisation is the process through which an individual may come to support terrorism or extremist beliefs. It can occur online, through social influences, or through exposure to extremist content.

Signs and symptoms of abuse may include direct disclosure. Other people in a position to identify concerns include assessors, coaches, facilitators, business support staff, immediate colleagues and peers. All of these people will be trained to understand the signs of abuse and know how, where and who to report concerns to.

Respond

An appropriate response is vital. No report of, or concern about, possible abuse or radicalisation should be ignored. To determine the most appropriate response, find out whether you are dealing with an allegation from a learner against a member of staff, a fellow learner or another. Is this a disclosure from an individual alleging abuse to themselves or to another? Is the reporting of concern or suspicion? What precisely is alleged to have happened? **Clarity is vital.**

- Do not lead or probe with questions, remain calm and demonstrate interest and concern while investigating.
- Listen well. Inform the person sharing a concern with you that what they have raised must be recorded and passed on so that possible abuse can be dealt with, and this will be done on a limited “need to know” basis with as few others as possible knowing the identity of the complainant and all in the chain of reporting will respect confidentiality.
- Reassure them that they have done the right thing in reporting their concerns and that you will do everything you can to help. Do not make unrealistic promises. Ensure that testimony is recorded and reported, and that the complaint and the subject of the complaint are treated in line with Competum Ltd.'s safeguarding policy and procedures - Recognise Respond Report Record Refer

Report

Report any safeguarding concerns, including concerns relating to abuse, neglect, exploitation or radicalisation, to your Local Designated Safeguarding Officer in the first instance. Should this be inappropriate you should report directly to the Designated Safeguarding Lead responsible for dealing with all issues relating to safeguarding. If this is not possible you should report your concern to a relevant member of Competum Ltd.'s Directors. Once you have reported the cause for concern via **safeguarding@competum.co.uk**, the responsibility resides with them.

Record

You should record precisely what has been alleged, using the words of the complainant. Your record should use accurate quotation. It should also, if felt appropriate, include factual observations about the physical and emotional state of the individual sharing their concerns with you. This information should be recorded and stored securely, in line with Competum Ltd.'s Privacy Policy and GDPR Policy and should be accessible only to those who need to access it as part of the action taken. Where relevant, records should include any concerns relating to extremist views, online content, or behaviours that may indicate vulnerability to radicalisation.



Please record all safeguarding incidents and concern via: cris@competum.co.uk or safeguarding@competum.co.uk

Refer

It is the Designated Safeguarding Lead or their Officers who can make decisions to refer a complaint or allegation, having gathered and examined all relevant testimony and information.

Where concerns relate to possible radicalisation or vulnerability to extremist influence, the Designated Safeguarding Lead may seek advice from the local Prevent team or make a referral to the Channel Programme UK counter-radicalisation programme, which provides early support for individuals who may be vulnerable to being drawn into terrorism.

However, in exceptional circumstances where people are at immediate risk of harm OR where the DSL/DSO is acting inappropriately, anyone can make this referral. If a member staff does make the referral, then they need to ensure they still report this to the DSL.

Only the Designated Safeguarding Leads Designated Safeguarding Officers should mount an enquiry into complaints, allegations, or suspicion of abuse.

Responsibilities

All members of the delivery team working with learners have a duty to:

- Understand and fulfil their safeguarding responsibilities as outlined in this policy, policy guidelines, referral procedure and any supporting documents
- Ensure that all data is kept confidential in line with Competum Ltd Privacy Policy and GDPR Policy
- Be familiar with the Keeping Children Safe in Education stator guidance: It is essential that everybody working in a school or college or training organisation understands their safeguarding responsibilities.
- Report any safeguarding concerns or disclosures immediately to their Designated Safeguarding Officer or in line with the reporting concerns procedure.
- Follow the formal safeguarding referral procedure implemented in support of this policy.
- Maintain strict confidentiality in line with this policy and guidance from the Designated Safeguarding Lead(s) and Officer(s).
- Engage in all safeguarding training and complete safeguarding assessments and qualifications as required.
- Act on the basis that the welfare of learners is of paramount concern and if in doubt, to immediately seek advice from the Designated Safeguarding Lead(s) and Officer(s).
- Undertake safeguarding training every three years as a minimum, with regular attendance at update briefings as appropriate.
- Understand that radicalisation and extremism are safeguarding concerns and must be reported through the same procedures as other safeguarding issues.
- Promote respect, equality and fundamental British values in training environments to help reduce the risk of extremist influence.



Safeguarding Concern Identified

- Ensure person is safe – if there is immediate risk, contact the emergency services.
- Find a suitable safe and secure place to discuss the concern with the person.
- Complete a record of the discussion.
- Inform the person that the concern may be referred to external agencies where required.
- Reassure the person that they have done the right thing in raising concern, share written record.
- Notify and seek IAG from your Designated Safeguarding Officer, if unavailable contact the Designated Safeguarding Lead
- Confirm follow up actions to be carried out.

Safeguarding Officer

- Ensure person and the person reporting the concern is safe and well.
- Upon receiving a Safeguarding Report Form, inform the Designated Safeguarding Lead and complete the report
- Update the safeguarding tracking sheet document.
- Ensure person who raised the concern is provided with relevant IAG.

Safeguarding Lead

- Ensure person and the person reporting the concern is safe and well.
- Collate detailed reports on the concern.
- Information should be logged on the safeguarding tracking sheet document.
- Ensure policy has been followed.
- Ensure support has been provided for the safeguarding officer if relevant.
- Appropriate agencies to be informed where appropriate.
- HR to be informed where appropriate.
- Feedback provided to safeguarding officer.
- Review of case and actions.
- Close case.

Safer Recruitment

Competum Ltd will undertake safe recruitment to ensure that all members of staff are fit to work in a training provider setting with potentially vulnerable learners. It also reserves the right to refuse to employ staff whom it has a reasonable belief may pose a risk to its learners. As part of safer recruitment, Competum Ltd will take reasonable steps to ensure that staff share the organisation's commitment to safeguarding, inclusion, equality and the promotion of fundamental British values.

Competum Ltd has systems in place to prevent unsuitable people from working with children or vulnerable adults and to promote safe practice. These systems apply to all new members of staff and require the following checks to be made prior to appointment:

- A minimum of two references, satisfactory to Competum Ltd, one of which should be from a previous employer.
- Documentary evidence checks of identify, nationality, residency and "right to work"



status.

- DBS checks Basic disclosure (Disclosure & Barring Service).
- Documentary evidence of qualifications.
- Satisfactory completion of the probationary period.

In accordance with the Regulations, records of all checks carried out are kept in a Single Central Register (SCR). If a DBS check is delayed for any reason the member(s) of staff will not be subject to lone working with learners. They must always have a member of staff present who is fully DBS checked until the point they receive a full DBS check. Should the DBS check be considered unsatisfactory by the DSL, the staff member may be moved into a non-contact role with learners, or their position may be terminated.

Allegations Against Staff

Competum Ltd take allegations against any member of staff seriously and believe it is essential that all cases of suspected maltreatment or significant harm are investigated quickly and professionally whatever the validity. Allegations may include concerns relating to abuse, neglect, exploitation, radicalisation, extremist behaviour or the promotion of extremist ideology.

Members of staff should take care not to place themselves in a vulnerable position with an learner or a situation which could be misconstrued.

As our team, can regularly work alone with people, it is important that the Local Designated Safeguarding Officer is made aware of any potential concerns that arise. If a member of staff suspects any other member of the team of safeguarding malpractice, it is their responsibility to immediately bring these concerns to the Local Designated Safeguarding Officer (DSO) or Designated Safeguarding Lead (DSL) in the interest of the learner and the business.

If the DSO's or DSL's are unavailable, then this concern should be immediately reported to a member of Competum Ltd.'s, Senior Leadership Team instead.

The Local Designated Safeguarding Officer/ Lead will:

- Provide support and advice to the reporting member of the delivery team including referring to and adhering to Competum Ltd Whistleblowing Policy.

Ask the reporting member of the delivery team to provide a written record of their concern following procedures for reporting concerns, which will be housed in the secure safeguarding single central file.

- Consult with a member of the Senior Leadership Team as appropriate.
- In the interest of the business and the learner, immediately seek advice from the relevant Local Authority and/or the Designated Officer from the relevant Local Safeguarding Children's Partnership or Adult Safeguarding Partnership.
- Efficiently act on advice, whether this is to take further investigative action or not.
- Consider whether concerns relating to radicalisation should be discussed with the local Prevent team or referred to the Channel Programme UK counter-radicalisation programme.

Any allegation made against a Designated Safeguarding Lead should be reported directly



to a member of the Senior Leadership Team, who will act as above, without notifying the Designated Safeguarding Lead.

All members of staff should be aware of their responsibility to immediately raise concerns, where they exist, about any member of staff, including the Designated Safeguarding Leads. We recognise that our learners cannot be expected to raise concerns in an environment where members of the members of staff fail to do so.

Approval and review

Approved by	Keith Mcgroarty
Policy owner	Cris Drant
Policy author	Cris Drant
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