



# **SAFEGUARDING POLICY AND PROCEDURE**

This policy outlines QA's approach to safeguarding, and key information to ensure all employees are compliant and aware of safeguarding.

**VERSION CONTROL**

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1.0	First document release		
Revision History			
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1.1	12/02/2020	Stephen Smith           Katie Colborn	1.7 code of conduct  3.2 Care Act 2014  3.6 Care and support information on statutory guidance  3.12 The Mental Capacity Act 2005  5.3 categories of abuse: addition of up-skirting as a crime  7.6 Incorporated Enshrined Principles from the Care Act 2014 around the safeguarding of adults  1.9 H&S  1.19 Safer Recruitment  Appendix A: Safeguarding code of behavior for employees <ul style="list-style-type: none"> <li>Firmer wording on not contacting apprentices outside of the context of work.</li> <li>Confirmation of the sexual offences act 2003.</li> <li>Clarification GDPR and Safeguarding</li> </ul> Appendix c: protesting and supporting protest groups  Appendix F: Prevent referral form
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1.3	04/11/2020	Stephen Smith	Inclusion of Appendix G: Arrangements for Safeguarding whilst in Lockdown (initially made available 01.06.20)
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1.4	01/03/2024	Mark Soady	Addition of low-level concern section Update to roles and responsibilities section. Update to referral process. Addition of safeguarding governance structure

Document Approval		
Name	Position	Viewed / Comments
Bandna Rana	People Projects & People Advisory Manager	25/07/2019 approved
Stephen Smith	Safeguarding Manager	01/06/2021 approved
Stephen Smith	Safeguarding Manager	27/07/2022 approved
Mark Soady	Designated Safeguarding Lead	01/03/2024 approved



**CONTENTS**

Version Control ..... 2

Contents ..... 4

1 Introduction to QA Policy Statement ..... 5

2 What is covered?..... 8

3 Key Principles - Statutory Framework ..... 9

4 Monitoring and Review ..... 13

5 Designated safeguarding lead (DSL) ..... 14

6 Safeguarding guidelines ..... 15

7 Advice to Employees ON WHEN TO TAKE ACTION and HOW ..... 21

8 What Happens Next? ..... 24

9 Confidentiality and Information Sharing ..... 25

10 Allegations against Employees ..... 26

11 Low-level concern ..... 28

12 Staff support ..... 31

APPENDIX A: Safeguarding code of behaviour for QA employees ..... 32

APPENDIX B: Radicalisation and Extremism ..... 37

Appendix C: Protesting And Supporting Protest Groups ..... 39

APPENDIX D: SAFEGUARDING ESCALATION MATRIX for QAA..... 40

APPENDIX e: SAFEGUARDING ESCALATION MATRIX for QAHE ..... 42

APPENDIX F: Prevent Referral form and Prevent lead information ..... 43



## 1 INTRODUCTION TO QA POLICY STATEMENT

- a) QA (including all solutions of the QA Group, including QA Apprenticeships and QA Higher Education) will carry out its responsibilities under all relevant legislation, regulations and formal guidance for the protection of children and adults at risk, as stated in the Education Act 2002.
- b) One of QA's highest priorities is the health, safety and welfare of all children and adults at risk involved in courses or activities, which come under the responsibility of QA.
- c) QA have a collective and individual duty to ensure that their employees fulfil their responsibilities to safeguard and promote the welfare of children and adults at risk, to prevent child abuse and to report any abuse discovered or suspected. This includes employees taking complete responsibility for ensuring they adhere to this too.
- d) Commitment to Policy is obtained through safeguarding centric recruitment, a robust safeguarding induction plan, closely monitored safeguarding training, reporting lead by QA Leadership, safeguarding promotion by senior leaders in all meetings and regular updates within the QA business. QA employee recruitment procedures make specific reference to the role and responsibilities of all employees towards upholding the principles, policy and practice of effective safeguarding and all appointments are subject to satisfactory DBS checks and identification checks as set out in the QA Vetting and Screening policy, available on the People Hub.
- e) QA will advise all parents/guardians/carers of learners under 18 of the existence of the QA's Safeguarding Policy and Procedures routinely for QA Higher Education and upon request for all other business solutions. This includes the fact that this may require cases to be referred to the investigative agencies in the interests of the child or adult at risk. The process used follows QA's Safeguarding escalation matrix models found in Appendix C and D (depending on business area).
- f) QA will advise children and adults at risk who are learners about the standards of behaviour and conduct which they can expect from employees and volunteers, and of what to do if they experience or suspect abuse. QA does this by introducing Safeguarding standards and how this is managed within the classroom via an induction and an introduction to the low-level concern policy.
- g) QA will advise children and adults on QA Apprenticeships of the code of conduct expected of them including observing Health and Safety rules in the workplace and at QA centres. QA will also provide all apprentices with other relevant policy and procedural notices which are in place to protect learner's health and wellbeing.



- h) QA will work with appropriate local agencies, and in particular the Local Authority Designated Officer (LADO), Local Safeguarding Partners or Safeguarding Adult Boards to ensure that children and adults at risk are safeguarded through the effective operation of QA's safeguarding procedures.
- i) QA will comply with all Health and Safety legislation to protect the safety of learners during onsite training with QA. The relevant apprenticeships statement and procedural documentation is embedded into QAs overall approach within Health and Safety Policy.
- j) QA recognises that any child and adult at risk can be subject to abuse, and all allegations of abuse will be taken seriously and treated in accordance with QA's procedures. This can be found under section 7 of this document.
- k) QA recognises that it is the responsibility of all employees to act upon any concern no matter how small or trivial it may seem.
- l) QA recognises that children/adults with Special Educational Needs and Disabilities (SEND) are at a significantly higher risk of harm by the simple nature of their core needs or vulnerability. QA accepts that the indicators of abuse when dealing with a person with a disability may not always be a conclusive account of abuse taking place. QA will ensure it applies its SEND policy, Equality & Diversity Policy and QAA Apprenticeship Bullying Policy that seeks to stop peer group isolation and bullying. QA utilises the expertise of SEND specialists within our Learner Support Team who assists the support of learners and the ongoing awareness for staff on how to best support and communicate with SEND learners.
- m) QA recognises its responsibility to implement, maintain and annually review the procedures that are designed to prevent or notify suspected abuse.
- n) QA requires all employees to follow the Code of Behaviour on Children and Adults at Risk Protection, which is appended to this policy document, and will draw the attention of employees to this code of behaviour and procedures in induction and relevant training.
- o) QA will have appropriate policies and procedures in place that aim to prevent bullying and harassment.
- p) QA is committed to supporting, resourcing and training those who work with, or who come into contact with, children and adults at risk and to providing appropriate supervision.
- q) QA will ensure that any contracted or partner provider used by us in the delivery of services to learners have appropriate safeguarding, child protection and health and safety policies in place where relevant.



- r) QA will prepare and implement an action plan to ensure that it fulfils its duties to protect children and adults at risk.
- s) QA takes a Safer Recruitment approach to the on-boarding of staff as laid out in Keeping Children Safe in Education (KCSIE). This is carried out by complying with the recognised set principals and procedures. Safer recruitment is embedded with QA Recruitment practises and documented in the QA Recruitment policy.
- t) QA further protects the welfare of adults at risk and children by way of QA'S Health & Safety Policy. Staff who are deemed appropriate to check work placements will undergo further training.
- u) QA's Whistleblowing policy defines the approach to help maintain the accountability, integrity and transparency towards safeguarding all learners and staff.
- v) QA will promote the safeguarding policy with staff via an induction and promote routine policy reading during visits by its Safeguarding team. Promotion of safeguarding will be a feature with suppliers, employers and learners alike. This will be done by ensuring marketing materials promote safeguarding and identify employer responsibilities and by ensuring apprentices and managers are educated on safeguarding at QA within meetings. QA will promote safeguarding with all apprentices at every opportunity, from guidance available to all applicants online, sign up emails to vulnerable apprentices, training materials online, induction covering safeguarding and regular discussion. We also expect employees to regularly review this policy to ensure they are familiar with the content and are complying with this policy.
- w) QA will train and annually refresh all staff on Safeguarding responsibilities and QA Processes. This includes Online Safeguarding Learning on induction accessed via QA365, QA Safeguarding Policy & Procedure and part 1 of KCSIE. Targeted E-Learning for all staff as identified. Additionally, staff will have access to guidance via monthly safeguarding updates from their identified safeguarding representative. QA will pay particular attention to the training and support available to staff who are responsible for challenging and addressing extreme narratives: QA will work with staff to provide appropriate training: using internal and external experts, to develop staff resilience and confidence, in managing extreme narratives and views that are contrary to British values.

## 2 WHAT IS COVERED?

### **Policy Outline**

This policy outlines the protection of children and adults at risk. Children are those under 18 years of age and will include those on courses and programmes aged 16 and 17. In addition, it includes disclosures regarding any persons under 18-year-old e.g. younger siblings or child of a student, and anyone registered with QA who may have previously completed a course, are not yet on programme or have not yet found a course to enrol on. This also encompasses learners who may be 18 and older, but are still on an apprenticeship programme for on a Higher Education programme. Due to the governments funding rules for 16 – 19 this may mean that those who are 18 and above are likely to be responded to in the same way. Beneficiaries are those who are on Apprenticeship, Traineeship, Degree Apprenticeship or Higher Education courses. Additionally, an adult at risk may be a student or family member of a student, aged 18 years or older.

### **Employee Responsibilities**

All employees must read this policy along with part one of DfES Keeping Children Safe in Education to comply with safeguarding obligations. Key employees and leaders should also be familiar with Working Together to Safeguard Children (July 2018) and Care and Support statutory guidance.



### 3 KEY PRINCIPLES - STATUTORY FRAMEWORK

- a) The Children Act 1989 provides the legal framework for the protection of children in the UK. Under the Children Act a child is defined as any person under 18 years of age.
- b) The Care Act 2014 provides the legal framework for the protection of adults at risk in the UK. An adult at risk is any person who is aged 18 years or over and at risk of abuse or neglect because of their needs for care and or support.
- c) The Protection of Children Act 1999 requires employers to carry out criminal checks with Disclosure and Barring Service before employees are allowed to come into contact (in line with the regulated activity guidelines) with children and adults at risk. QA is required under this legislation to apply for an enhanced disclosure from the Disclosure and Barring Service for employees working with such learners. Further information relating to this can be found in QA Vetting and Screening Policy.
- d) Working Together to Safeguard Children (2018) is a Government Guidance document which sets out how all agencies and professionals should work together to promote children and adults at risk welfare and protect them from abuse and neglect and requires QA to follow the procedures for protecting children from abuse. The guidance is clear that QA is also expected to ensure that they have appropriate procedures in place for responding to situations in which they believe that a learner/student has been abused or is at risk of abuse – these procedures should cover circumstances in which an employee is accused or suspected of abuse.
- e) DfES Keeping Children Safe in Education derives from the Education Act 2002 and places the following responsibilities in Safeguarding and promoting the welfare of children:
  - I. Employees should be alert to signs of abuse and know to whom they should report any concerns or suspicions.
  - II. A Designated Safeguarding Lead (DSL) should have responsibility for co-coordinating action within QA and for liaising with other agencies.
  - III. Employees with designated responsibility for children and adults at risk's protection, should receive appropriate training.
  - IV. Educational Organisations should be aware of and follow the procedures established by Safeguarding Partners and, where appropriate, by the Local Education Authority or Children's Social Care (England)/Social Services Department (Scotland).



- V. Educational Organisations should have procedures, of which all employees are aware, for handling suspected cases of abuse of children, including procedures to be followed if an employee is accused of abuse. Section 175 of the Education Act 2002 requires providers to safeguard and promote the welfare of children and adults at risk. QA will follow any guidance issued on this section of the Act. QA will keep its policy and procedures on safeguarding under review to take account of any new Government legislation, regulations or best practice documents to ensure that employees are kept fully up to date with their responsibilities and duties with regard to the safety and well-being of children and adults at risk.
- f) Care and support statutory guidance: issued under the Care Act 2014. This guidance associated with the Care Act sets out how Part 1 of the Act will work in practice. The core purpose of adult care and support is to help people to achieve the outcomes that matter to them in their life. Throughout the guidance document, the different chapters set out how a local authority should go about performing its care and support responsibilities. Underpinning all these individual “care and support functions” (that is, any process, activity or broader responsibility that the local authority performs) is the need to ensure that doing so focuses on the needs and goals of the person concerned.
- g) Safeguarding Partners bring together all services for children and young people in a local area to focus on improving outcomes for all children and young people. The aim of the Safeguarding partners is to make arrangements to identify and review serious child safeguarding cases which, in their view, raise issues of importance in relation to their area. They must commission and oversee the review of those cases, where they consider it appropriate for a review to be undertaken.
- A safeguarding partner in relation to a local authority area in England is defined under the Children Act 2004 (as amended by the Children and Social Work Act, 2017), as:
- o The local authority
  - o A clinical commissioning group for an area any part of which falls within the local authority area
  - o The chief officer or policy for an area any part of which falls within the local authority area
- h) Safeguarding Adult Boards, Section 43 of the Care Act, requires every Local Authority to establish a Safeguarding Adults Board (SAB) for its area. The SAB operates at a strategic level, helping and protecting adults in its area from abuse and neglect through co-ordinating and reviewing a multi-



agency approach across all member organisations. The approach that the SAB takes directly influences how frontline safeguarding operations are undertaken in each member organisation.

Although the Local Authority is responsible for establishing and maintaining a SAB the SAB is concerned with much more than the safeguarding activity of the Local Authority. It oversees and leads on all adult safeguarding across the entire locality area. To do this effectively it must concern itself with a whole range of matters, including but not limited to

- The safety of patients in its local health services (commissioned and non-commissioned).
  - The quality of local Care and Support services (commissioned and non-commissioned).
  - The effectiveness of prisons in safeguarding vulnerable offenders.
  - How effectively further education services safeguard adults.
  - To gather intelligence about the whole range of matters the SAB must concerns itself with it must have representation from each area. Collaboration and co-operation are key to the effectiveness of the SAB.
- I) Prevent - 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”. Further information on Prevent can be found in Appendix B at the end of this document.

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. In the Act this has simply been expressed as the need to “prevent people from being drawn into terrorism”.

The 2011 Prevent strategy has three specific strategic objectives:

- Respond to the ideological challenge of terrorism and the threat we face from those who promote it.
- Prevent people from being drawn into terrorism and ensure that they are given appropriate advice and support.
- Work with sectors and institutions where there are risks of radicalisation that we need to address.

- j) The Children and Social Work Act 2017 (the Act) is intended to improve support for looked after children and care leavers, promote the welfare and safeguarding of children, and make provisions about the regulation of social workers.

Local authorities have on-going responsibilities to the young people who are no longer being looked after and become care leavers. That includes keeping in touch with them, preparing an assessment of their needs and appointing a personal adviser who develops a pathway plan with the young person. This plan describes how the local authority will support the care leaver to participate in education or training. Designated Safeguarding Leads should therefore have details of the local authority Personal Advisor appointed to guide and support the care leaver and should liaise with them as necessary regarding any issues of concern affecting the care leaver.

- k) Children missing education September 2016. Children missing from education are children of compulsory school age, who are not registered pupils at a school and are not receiving suitable education otherwise than at school. All local authorities should have in place arrangements for information sharing and joint working. In the guidance it states the responsibility of the local authority to work with other agencies to provide a safe and stable upbringing for the learner. QA will report on any absence through the established channels.
- l) The Mental Capacity Act 2005. The MCA has been in force since 2007 and applies to England and Wales. The primary purpose of the MCA is to promote and safeguard decision-making within a legal framework. It does this in two ways:

I. by empowering people to make decisions for themselves wherever possible, and by protecting people who lack capacity by providing a flexible framework that places individuals at the heart of the decision-making process

II. by allowing people to plan ahead for a time in the future when they might lack the capacity to make specific decisions

## 4 MONITORING AND REVIEW

### **Governance**

This policy will be monitored through update reports presented to QA's Safeguarding Governance Board by the Designated Safeguarding Lead (DSL). This Policy will be reviewed and updated where relevant, annually.

The DSL will be responsible for ensuring QA's Safeguarding Governance Board understand and promote the Policy by ensuring they are regularly updated on internal and external safeguarding related information. The DSL will provide a monthly update for visibility, and present a quarterly review of safeguarding services and effectiveness to QA's Safeguarding Governance Board

### **Lessons Learned**

A review of every high-risk case will be undertaken once closed to ensure any lessons can be taken forward. In addition, any themes or trends will be reviewed each quarter and presented to QA's Safeguarding Governance Board.

### **Learner Surveys**

All QA learners will be surveyed on how safe they feel at QA and on the effectiveness of support services. Feedback will be reviewed and actioned monthly to ensure QA complies with policy and that policy ensures and promotes the safety of learners.

### **Whole Business Awareness**

To maintain a high level of safeguarding awareness within the business, senior managers will be provided with a safeguarding representative who will provide a monthly update to them and their teams. This initiative provides an opportunity for timely updates and gives employees an open forum to discuss process etc. During 1-2-1's, if a training need has been identified by a manager from a skills gap perspective these are noted at the time, with the requirement shared with the Safeguarding representative to support the required improvement.

## 5 DESIGNATED SAFEGUARDING LEAD (DSL)

### Statutory Guidance

All schools, organisations and providers are required to have a DSL, who is assigned to act upon child and adults at risk protection concerns.

### The DSL's Role

At QA this person is called the Designated Safeguarding Lead (DSL) for safeguarding and they are responsible for coordinating action within QA and liaising with other agencies. The QA contacts for safeguarding are listed in appendix D and E, at the end of this document, (depending on business division).

The DSL for safeguarding is required to know:

- How to identify the signs and symptoms of abuse and when to make a referral
- The local child and adult at risk protection procedures and the DSL's role within them
- The role and responsibilities of the investigating agencies and how to liaise with them
- The requirements of record keeping
- The conduct of a child protection conference\* and how the DSL or other employees can make an appropriate contribution to it.

(\*The local authority will call a child protection conference when they have investigated concerns about child abuse and they believe the child is suffering, or likely to suffer, significant harm.)

## 6 SAFEGUARDING GUIDELINES

These guidelines should be read in conjunction with the Department for Education and Skills document 'What to do if you're worried a child is being abused' March 2015, which can be found on the GOV website.

### **Purpose**

The purpose of these guidelines is to ensure that the rights of children and adults at risk are protected through employee awareness of the issues, including the statutory and local guidelines listed in the reporting of concerns. It is the responsibility of all employees working within QA to record and report Child Protection concerns, i.e. where they believe a child, or an adult has been or is at risk of abuse, neglect or significant harm. This responsibility extends to all employees and not just those specifically working with under 18s.

### **Definition of Terms**

The Safeguarding Policy describes the support and protection procedures for all learners as well as those of specified groups such as a child or adult learners over this age, who may be “at risk” of abuse.

The definition of a “child”

“Child” is defined as all young people under the age of 18, or in the case of those with learning difficulties under 25 years, in accordance with the 1989 Children Act.

The definition of an “Adult at Risk”

“An adult at risk”. An adult at risk of abuse or neglect is defined as someone who has needs for care and support, who is experiencing, or at risk of, abuse or neglect and as a result of their care needs - is unable to protect themselves.

### **Categories of Abuse**

Children can be potentially abused within the family, community, and in QA by employees (including those employed to promote their welfare and protect them from abuse), volunteers, visitors, and fellow learners. The following are broad categories of abuse. Harm can include ill treatment that is not physical as well as the impact of witnessing ill treatment of others.

- Physical Abuse: may involve hitting, shaking, throwing, burning or scalding, drowning, suffocating, or otherwise causing physical harm to a child and adult at risk. Physical harm may also be caused when an employer, parent or carer feigns the symptoms of, or deliberately causes ill health to a child



or adult at risk who they are looking after. This is commonly described using terms such as 'fictitious illness by proxy' or 'Munchausen's syndrome by proxy'.

- Female genital mutilation (FGM) is the partial or total removal of external female genitalia for non-medical reasons. It is also known as female circumcision, cutting or sunna. Religious, social or cultural reasons are sometimes given for FGM.
- Emotional Abuse: is the persistent emotional ill-treatment of a child or adult at risk such as to cause severe and persistent effects on the child or adult's emotional development. It may involve conveying to children or adults at risk that they are worthless and unloved, inadequate, or valued only so far as they meet the needs of another person. It may involve age or developmentally inappropriate expectations being imposed on children and adults at risk. It may involve causing children or adults at risk frequently to feel frightened or in danger, or the exploitation or corruption of children or adults at risk. Some level of emotional abuse is involved in all types of ill-treatment of a child or adult, though it may occur alone. Cyberbullying is the bullying of individuals online through various outlets of modern technology. This can include isolating or ignoring someone, verbal abuse, gossiping, threatening or humiliating behaviour.
- Sexual Abuse: involves forcing or enticing a child or adult at risk to take part in sexual activities, whether or not the child or adult at risk is aware of what is happening. The activities may involve physical contact, including penetrative (e.g. rape) or non-penetrative acts. They may include non-contact activities, such as involving children or adults at risk in looking at, or in the production of, pornographic materials or watching sexual activities, or encouraging children or adults at risk to behave in sexually inappropriate ways. Children in exploitative situations and relationships may receive something such as gifts, money or affection as a result of performing sexual activities or others performing sexual activities on them. Children or adults at risk may be tricked into believing they are in a loving, consensual relationship. They might be invited to parties and given drugs and alcohol. They may also be groomed online.
- Neglect: is the persistent failure to meet the child or adult's basic physical and/ or psychological needs, likely to result in the serious impairment of the child or adult's health or development. It may involve a parent or carer failing to provide adequate food, shelter and clothing, failure to protect a child or adult at risk from physical harm or danger, or failure to ensure access to appropriate medical care or treatment. It may also include neglect of, or unresponsiveness to, a child or adult's basic emotional needs.
- Significant Harm: Some children or adults at risk may be in need because they are suffering or likely to suffer significant harm. The Children Act part





V section 47 (1) introduced the concept of significant harm as the threshold that justifies compulsory intervention in family life in the best interest of the children.

- Financial Abuse: Some children and adults at risk may be abused or exploited financially including fraud and extortion.
- County lines: Some children and/or Adults at risk are susceptible to the gang influence that is county lines. This tends to happen when urban drug dealers make contact out of typical city areas and convince mainly young people to sell the drugs to the local users, often forming a base location where the recruit is forced to stay. This allows the senior drug dealers to maintain income without often having travelled to the area where their drugs are being sold. In this situation the manipulated individual takes all the risk, whilst the dealer is unlikely to be caught or charged with their offence. Whilst someone is in this situation there is always the risk of violence to stay put from associated gang members.
- Honour Based Violence: Can involve many different things but is when violence is committed against someone in the name of 'honour'. This takes place when usually a woman (however not exclusive to) is hurt because of behaviour which is seen to be immoral by her family. Often these family members believe it has brought shame upon them.
- Honour Based Violence might include making threats, assaults, rapes or sexual assault, Kidnappings or abductions, forced abortions or imprisoning someone.
- Peer to Peer: Allegations against learners should be reported as stated in part 7 in this document (Advice to Employees on When to Take Action & How) If harmful sexual behaviour is alleged to have occurred, the DSL will have regard to Part 5 KCSIE and take into account the local response of the police and children's social care to these issues. The views of the alleged victim will be taken into account but will not be determinative. All those involved in such allegations will be treated as being at risk and in need of support in accordance with this Policy.
- Sexual Violence and Harassment: Sexual violence and sexual harassment can occur between two children of any age and sex. It can also occur through a group of children sexually assaulting or sexually harassing a single child or group of children.
- Children who are victims of sexual violence and sexual harassment will likely find the experience stressful and distressing. This will, in all likelihood, adversely affect their educational attainment. Sexual violence and sexual harassment exist on a continuum and may overlap, they can occur online and offline (both physical and verbal) and are never acceptable. It is



important that all victims are taken seriously and offered appropriate support. Staff should be aware that some groups are potentially more at risk. Evidence shows girls, children with SEND and LGBT children are at greater risk.

- Upskirting: Upskirting typically involves taking a picture under a person's clothing without them knowing, with the intention of viewing their genitals or buttocks to obtain sexual gratification, or cause the victim humiliation, distress or alarm. Upskirting if proven is a criminal offence.
- Serious violence: All QA staff should be aware of the indicators and signs, which may signal that learners may be at risk of serious violence. These may include increased absence from training/work, a change in friendships or relationships with older individuals or groups, a significant decline in performance, signs of self-harm or a significant change in wellbeing, or signs of assault or unexplained injuries. Unexplained gifts or new possessions could also indicate that mainly children have been approached by, or are involved with, individuals associated with criminal networks or gangs.
- 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.

Staff should be aware of the importance of:

- making clear that sexual violence and sexual harassment is not acceptable, will never be tolerated and is not an inevitable part of growing up.
- not tolerating or dismissing sexual violence or sexual harassment as "banter", "part of growing up", "just having a laugh" or "boys being boys"; and
- challenging behaviours (potentially criminal in nature), such as grabbing bottoms, breasts and genitalia, flicking bras and lifting up skirts. Dismissing or tolerating such behaviours risks normalising them.
- Any staff who observes any of the aforementioned behaviour needs to report immediately and follow the above procedure at the time, which is to challenge at the time of the incident.
- Child Trafficking is the act where children find themselves in situations where they are forcibly required to move and/or live in settings which they



have no control over. Normally children are trafficked for reasons such as exploitation, slavery or financial gain.

In addition to the categories detailed above the following categories also apply to adults at risk:

- Psychological abuse, including emotional abuse, radicalisation, threats of harm or abandonment, deprivation of contact, humiliation, blaming, controlling, intimidation, coercion, harassment, verbal abuse, isolation, or withdrawal from services or support networks.
- Financial or material abuse, including theft, fraud, exploitation, pressure in connection with inheritance, property or financial transactions, or the misappropriation of property, possessions or benefits.
- Neglect and acts of omission, including ignoring medical or physical care needs, failure to provide access to appropriate health, social care or education services, the withholding of the necessities of life, such as medication, adequate nutrition or heating.
- Discriminatory abuse, including racism or sexism, abuse based on a person's disability, faith, sexual orientation and other forms of harassment, slurs, or similar treatment.
- Institutional abuse occurs when the routines, systems and regimes of an institution results in poor and inadequate standards of care and poor practice which affects the whole setting and denies, restricts or curtails dignity, privacy, choice, independence or fulfilment of adults at risk. Institutional abuse can occur in any setting providing health and social care.

### **How to Make a Referral**

Our referral process has been designed to ensure all stakeholders are able to submit a referral in a structured manner, enabling the Safeguarding Team to provide timely and effective support.

- [Safeguarding Referral Form \(Staff/Employers/Peer\)](#) – This form affords staff, employers, and even fellow apprentices the opportunity to raise a safeguarding concern about an apprentice.
- [Safeguarding Self-Referral \(Apprentices\)](#) – This form will allow an apprentice to raise a concern about themselves.
- [Low-Level and Behavioural Safeguarding Concern](#) – This form serves 2 purposes.
  - I. It gives all parties an opportunity to raise concerns regarding the conduct of QA staff towards apprentices.



- II. It allows all parties to highlight concerning behaviour from all parties that may not be a safeguarding concern but could be interpreted as more of a behavioural concern. For example, where a person uses misogynistic language or a microaggression of some kind. This allows us to build a picture and to take a proactive approach.

## 7 ADVICE TO EMPLOYEES ON WHEN TO TAKE ACTION AND HOW

### Raising a Concern

Once you suspect or know of any abuse of any child or adult at risk, you should immediately inform safeguarding team by telephone or via the appropriate referral form. Even if you have only heard rumours of abuse, or you have a suspicion but do not have firm evidence, you should still contact the safeguarding team to discuss your concerns. It is important to understand that your responsibilities extend to suspicion of abuse in any area of the child or adult's life, not just in the QA learning environment. If appropriate, the safeguarding team member will escalate the case to the DSL for further guidance.

### Historical Concerns

You must also contact the safeguarding team if you know or suspect that an employee or student has a previous history of abuse of children and/or adults. If you become aware of any allegations against an employee this must always be escalated to the safeguarding team via the low-level concern referral form, and you must urgently notify the People Team. All employee-related low-level concerns will be escalated to the DSL.

### Providing Evidence

If escalation is required, a written email report must be prepared by the individual who raised the low-level concern to document all relevant detail; a proforma will be provided. A written report is essential to prevent any misrepresentation of your findings and should be sent to the DSL within 24 hours of the DSL's request to complete. The report should be factual and should not include opinions or personal interpretations of the facts presented. The report should contain as much detail as possible, including any apparent physical signs of abuse or other circumstances which led to your suspicions, or the account given to you of abuse by the child or adult concerned, as accurately as you are able to record it, including details of any witnesses if there are any. The report should be signed, dated and a copy stored in a secure place. If you are unsure about what to write, you can get advice from the DSL.

### Receiving a Disclosure

If a child or adult comes to you with a report of apparent abuse, you should listen carefully to the child or adult, using the following guidelines. When listening to a child or adult, employees must:

- allow the child or adult to speak without interruption
- never trivialise or exaggerate the issue



- never make suggestions
- never coach or lead the child or adult in any way
- reassure the child or adult, let them know you are glad they have spoken up and that they are right to do so
- always ask enough questions to clarify your understanding, do not probe or interrogate – no matter how well you know the child or adult – spare them having to repeat themselves over and over
- be honest – let the child or adult know that you cannot keep this a secret; you will need to tell someone else
- try to remain calm – remember this is not an easy thing for them to do
- not to show your emotions – if you show anger, disgust or disbelief, they may stop talking. This may be because they feel they are upsetting you or they may feel your negative feelings are directed towards them
- let the child or adult know that you are taking the matter very seriously
- make the child or adult feel secure and safe without causing them any further anxiety

### **Adult Safeguarding Enshrined Principles (Care Act 2014)**

#### *Principle 1: Empowerment*

Adults are encouraged to make their own decisions and are provided with support and information.

*'I am consulted about the outcomes I want from the safeguarding process and these directly inform what happens'.*

#### *Principle 2: Prevention*

It is better to take action before harm occurs.

*"I receive clear and simple information about what abuse is, how to recognise the signs and what I can do to seek help."*

#### *Principle 3: Proportionality*

Proportionate and least intrusive response appropriate to the risk presented.

*"I am sure that the professionals will work for my best interests, as I see them and they will only get involved as much as I require."*

#### *Principle 4: Protection*



Support and representation for those in greatest need.

*"I get help and support to report abuse. I get help to take part in the safeguarding process to the extent to which I want and to which I am able."*

*Principle 5: Partnership*

Local solutions through services working with their communities. Communities have a part to play in preventing, detecting and reporting neglect and abuse.

*"I know that staff treat any personal and sensitive information in confidence, only sharing what is helpful and necessary. I am confident that professionals will work together to get the best result for me."*

*Principle 6: Accountability*

Accountability and transparency in delivering safeguarding.

*"I understand the role of everyone involved in my life."*

**Communicating with Appropriate Stakeholders**

The DSL will be responsible for liaising with external agencies and recording essential information about each case and for collecting reports and notes as appropriate.

Any detailed information about a case will be confined to the safeguarding specialist concerned and the DSL (if not involved in the allegations), Managing Director/Executive responsible for the business area/function and any external agencies, the DSL determines to engage. The Manager(s) and employees reporting the allegations will be kept informed of the progress of the case on a 'need to know' basis, but will likely not be informed of any detail, the outcome or actions taken.



## 8 WHAT HAPPENS NEXT?

### Analysing the Referral

Taking into account all the information available, the DSL or deputies will decide on the next steps, which may include taking no further action. In most cases the DSL will seek advice from the Local Authority Designated Officer (LADO) and agree what further action is necessary, which may include:

- Seek further advice from the Safeguarding Partners
- Undertake further investigation under the direction of the LADO or support an investigation by the Safeguarding Partners
- Make a referral to the appropriate agency, as signposted.
- Report the incident to a designated Social Worker, as signposted.
- Report the matter to the police if a crime is suspected.

If a referral is made, this must be confirmed in writing to the appropriate agency within 24 hours.





## **9 CONFIDENTIALITY AND INFORMATION SHARING**

### **Confidentiality Versus Concern**

Confidentiality and trust should be maintained as far as possible, but employees must act on the basis that the safety of the child or adult is the overriding concern. The degree of confidentiality will be governed by the need to protect the child or adult. The child or adult should be informed at the earliest possible stage of their disclosure that this will then be escalated onto the appropriate agencies. All conversation regarding a child or adult should always be held in private. QA complies with the requirements of the Data Protection Act 2018, which allows for disclosure of personal data where this is necessary to protect the vital interests of a child or adult.

### **Breadth of Communication**

Employees must not discuss the case with anyone other than those involved in the case. If employees have any concerns about the progress of the case or have any other concerns these must be discussed with the DSL. Breaching this could result in an employee facing disciplinary action.

## 10 ALLEGATIONS AGAINST EMPLOYEES

### Context

The primary concern of the organisation is to ensure the safety of the child or adult. It is essential in all cases of suspected abuse by an employee that action is taken quickly and professionally whatever the validity. There are occasions where a child or adult will accuse an employee of physically or sexually abusing them. In some cases, this may be false or unfounded. However, in some cases the allegations may be true.

### Raising a Concern

Any instance of a child or adult being abused by an employee is particularly serious. On the other hand, for an innocent person to be accused of such an act is a serious ordeal which can result in long term damage to their health and career. If any employee, employer or learner suspects any other employee of abusing a learner/student, it is their responsibility to bring these concerns to the People Team and the DSL. This can be done directly or via the completion of a low-level concern form if the person referring is unsure whether the harm threshold has been met (see the low-level concern section for guidance).

### Process

On being notified of any such matter the DSL shall:

- Seek and follow advice from the LADO.
- Take such steps as he/she considers necessary to ensure the safety of the child or adult in question and any other child or adult who might be at risk.
- Ensure that an email report of the matter is completed by the person who reported the original concern.
- Put in place the steps necessary to follow the advice of the LADO.

### Evidence Gathering and Investigation

The DSL or DSO's will investigate the concern with the learner, child or an appropriate adult gathering the appropriate evidence. All learner discussions will be carried out by staff who sit within the recognised safeguarding team within the respective QA solutions, with involvement from the People Team if the matter includes a QA employee or if the situation deems this necessary. Interviewing of staff regarding an investigation will always be carried out by QA's People Team by those who are recognised as DSLs. The names of all DSLs or DSOs can be found in the below Escalation Matrix. All face-to-face interviews, including arranging,



liaising with Line Managers and lastly the management of referrals, will be carried out by the People Advisory Team in cases described in this section.

**Allegation Against the DSL**

If the allegation concerns the DSL, the matter should be discussed with the DSL's line manager with the Deputy DSL managing the learner investigation, and the People Advisory team should be notified immediately. This is in addition to following the above stated safeguarding procedures outlined in this section of the document.



## 11 LOW-LEVEL CONCERN

A low-level concern is any concern that an adult has behaved in a way that:

- is inconsistent with the DofE and QA code of conduct. This includes inappropriate conduct both inside and outside of work
- does not meet the threshold of harm or is not considered serious enough for the QA to refer to the local authority

Low-level concerns include a spectrum of behaviours which may be:

- intentionally designed to facilitate abuse
- unintentional, inadvertent or thoughtless

The key is that the behaviour is inappropriate and not what QA expects, as set out in Appendix A of the Safeguarding Policy Code of Conduct and the DfE's Code of Conduct. It may take place face-to-face, in writing or digitally such as in online meetings, or via social media or email.

Examples include:

- showing favouritism
- being over-friendly
- using inappropriate language that is sexual, profane, intimidating or offensive
- inappropriate touching or initiating of hugging
- intimidation, punishment or degrading treatment

To support the implementation of this policy, QA will provide support, information and training so that staff and volunteers

- are clear about what is meant by appropriate behaviour and can distinguish this from concerning, problematic or inappropriate behaviour in themselves and others
- can recognise the importance of professional boundaries and when to report concerns
- feel empowered to share any low-level concerns with the DSL and through the reporting system
- know that the response will be measured and proportionate



When receiving low-level concerns, QA will

- ensure all concerns that are raised are handled sensitively and proportionately
- appraise information in order to distinguish between unprofessional behaviour and intentional harm or abuse
- identify concerning, problematic or inappropriate behaviour – including any patterns – that may need to be consulted upon with, or referred to, the local authority dedicated officer (LADO) or equivalent officer
- focus on the behaviour, not the language used to describe or report it
- address unprofessional behaviour and support the individual to correct it at an early stage
- identify any areas for development in the organisation's safeguarding system as well as any training needs

### **The 'Harm' Threshold**

An 'allegation of harm' is where it is alleged that a person who works with children or adults at risk has or may have behaved in a way that meets the harm threshold as specified below:

- behaved in a way that has harmed or may have harmed a child or adult at risk
- possibly committed a criminal offence against or related to a child or adult at risk;
- behaved towards a child or children or adult/s at risk in a way that indicates they may pose a risk of harm to children or adults at risk
- behaved or may have behaved in a way that indicates they may not be suitable to work with children or adults at risk (this behaviour includes inside and outside of the workplace)

In this case, staff and volunteers should follow the Allegations Against Employees Procedures set out in the QA's Safeguarding Policy and Procedures and report the matter to the DSL or deputy.

Concerns that do not meet the harm threshold are treated as low-level concerns.

The term 'low level' concern does not mean that it is insignificant, it means that the adult's behaviour towards a child or adult at risk does not meet the harm threshold.



To confirm, a low-level concern is any concern – no matter how small, and even if no more than causing a sense of unease or a ‘nagging doubt’ – that an adult may have acted in a way that:

- is inconsistent with an organisation’s staff code of conduct, including inappropriate conduct outside of work, and
- does not meet the allegation threshold, or is otherwise not serious enough to consider a referral to the LADO or equivalent local authority professional – but may merit consulting with and seeking advice from them.

Staff and volunteers do not need to be able to determine in each case whether their concern is a low-level concern, or if it is not serious enough to consider a referral to the local authority, or whether it meets the threshold of an allegation.

Once the concern has been shared, the determination about thresholds and appropriate action should be made by the DSL or deputies who will follow the appropriate procedures in line with that decision. The DSL or deputies may seek advice from the local authority LADO or local authority equivalent in order to make the determination and decide next steps.

Any low-level Concern must be shared with DSL or DDSL’s by completing the [Low-Level & Behavioural Safeguarding Concern \(office.com\)](#) referral form.



## 12 STAFF SUPPORT

Protection of staff wellbeing is laid out in the QA Wellness Strategy and includes guidance on how to access the Employee Assistance Programme as well as other wellness tools. However, if QA employees are experiencing difficulties with their mental health, housing, finances etc., they can also access support from QA's Safeguarding Team.

If an employee is experiencing work-related difficulties, they should reach out to the People Team. However, if an individual is experiencing personal difficulties, they can reach out to the Safeguarding Team for support.

The Safeguarding Team will support the individual and refer to external agencies where appropriate. All support will remain confidential unless an individual is at risk of harming themselves or others.

If an employee is in crisis, they can call the Safeguarding Team, People Team or, if required, 999.



## **APPENDIX A: SAFEGUARDING CODE OF BEHAVIOUR FOR QA EMPLOYEES**

QA recognises that it is not practical to provide definitive instructions that would apply to all situations at all times whereby employees come into contact with children and adults at risk, or to guarantee the safeguarding and protection of children and adults at risk and employees.

However, below are the standards of behaviour required of employees in order to fulfil their roles and duty of care. This code should assist in the safeguarding and promotion of the welfare of children and adults at risk and in the protection of both children, adults at risk and employees.

These guidelines also apply to volunteers who work in an unpaid capacity in QA premises and any other capacity at QA including agency workers or contractors.

### **Employees must:**

- Implement the Safeguarding Policy and Procedures at all times, including acting to promote children and adults at risk's welfare, prevent abuse and report any abuse discovered or suspected.
- Inform their line manager and People team of any prior association or relationship with a student or learner.

### **Employees must never:**

- Engage with learners outside the context of work. In addition, staff must never discuss or share data relating to children, parents or carers in staff social media groups.
- Under the Sexual Offences Act 2003, it is a crime for an adult in a position of trust to engage in sexual activity with a person under the age of 18.
- Engage in rough, physical games including horseplay with children or adults at risk.
- Allow or engage in inappropriate touching of any kind. The main principles of touch are:
- Touch should always be in response to the child or adult's need – for example to administer first aid.
- You should not touch a learner/student (of any age) in response to an emotional need – such as hugging, placing an arm around someone. Instead use empathetic language/ facial expressions and offer tissues.





- Touch should always be appropriate to the age and stage of development of the child or adults.
- Touch should always be with a child or adult's permission.
- Do things of a personal nature for a child or adult that they can do for themselves or that their parent can do for them.
- Physically restrain a child or adult unless the restraint is to prevent physical injury of the child or adult/other children/visitors or employees/yourself. In all circumstances physical restraint must be appropriate and reasonable; otherwise, the action can be defined as assault.
- Make sexually suggestive comments to or within earshot of a child or adult.
- Have children, learners, or adults at risk on their own in a vehicle. Where circumstances require the transportation of children or adults at risk in their vehicle, another member of employees/volunteer must travel in the vehicle. Also, it is essential that there is adequate insurance for the vehicle to cover transporting children or adults at risk as part of the business of your work. In extreme emergencies (for medical purposes) where it is required to transport a child or adult on their own, it is essential that another leader and the parent is notified immediately.
- Take a child or adult to the toilet unless another adult is present or has been made aware (this may include a parent or QA employee).
- Where there is shared use of toilet facilities all male QA employees should use the cubicles rather than urinals.
- Spend time alone with a child or adult on his/her own outside of the normal tutorial/ classroom situation. If you find you are in a situation where you are alone with a child or adult, make sure that you can be clearly observed by others.
- Engage in a personal relationship with a child or adult who is a learner/student, beyond that appropriate for a normal teacher/student relationship.
- Give their personal contact details including, but not limited to, personal mobile telephone number/home telephone number or personal email address, to a child or adult.
- Keep secret any information or disclosures made by learners, family / carers or employers which indicates a learner is at risk of any harm. GDPR rules make allowance for 'safeguarding of children and



individuals at risk' as a processing condition. Any concerns should be raised by staff to the safeguarding or Welfare team.

### **Employee Guidance on the Use of Social Networking**

- Interaction with learners through a social networking site should be avoided unless this has been agreed by the Managing Director/Executive responsible for the business area/function as part of a marketing role or for managing collaborative learning.
- Collaborative learning must be done by setting up an “invitation only” business/professional group discussion group for the course with appropriate privacy settings where the content can be monitored.
- Employees should only contact learners and parents using the Company's mail, SMS, telephone and e-mail/intranet systems, and do so within reasonable business hours or those which are deemed appropriate in exceptional circumstances based on business needs, e.g. contacting a learner in the morning, before working time, if an interview starts at 9am, and if the message could not have been relayed the day before during business hours
- Employees can make a judgment on whether to accept an invitation to connect on social media from a former learner/student, however, no employee should instigate or make extra efforts to connect with these individuals.
- Acceptable reasons for connecting with former learners would be for business or professional networking purposes.

It is unacceptable for employees to:

- Allow learners to access their personal social networking spaces; privacy settings should be set to ensure that access is restricted to friends only. It is up to you to ensure that you do not have anyone on your social media network, and for you to check before accepting or sending any friend requests, to ensure that you are not breaching this policy.
- Add learners as 'friends' to their personal social networking space.
- Access as a 'friend' on the individual social networking sites of learners/student
- Post comments, photographs etc. critical of QA on any forum, website, social networking site, blog etc.



- Use WhatsApp or any other messaging service as a method of contact with learners, from their personal mobile phone
- Use WhatsApp to communicate with learners except in cases where it has been expressly authorised by senior management and it is solely for the purposes of work communication not social interaction, even on a Company device
- Engage in conversation, on any platform or device, which is not work related
- Post comments critical of any other employees or learner/student on any forum, website, social networking site, blog etc.
- Post comments that run counter to the QA's Equality and Diversity Policy
- Post comments that recommend, or appear to endorse, law-breaking of any kind.
- Post comments that exhibit grossly irresponsible behaviour, or appear to endorse irresponsible behaviour, that could be argued to encourage "copycat" behaviour by learners. This would include, for example, dangerous driving or alcohol abuse.
- Incite violence and hatred based on ethnic, racial or religious grounds.

### **Implications for employees**

Employees who breach any of the above may be subject to disciplinary action. If there is an allegation against an employee, then the People Team will be notified so that they can trigger the implementation of the relevant process and investigate.

QA reserves the right to suspend any employee under the Safeguarding Policy to protect children and adults at risk whilst an internal and/or external investigation takes place. The organisation can implement its own internal investigation during any stage of this process, which will be under the advice and support of the People Team. This may result in disciplinary action being taken against an employee, which could result in sanctions up to and including dismissal. Please see the Disciplinary Policy, available on the People Hub, for further information.

### **Suspension of employees under the Safeguarding Procedure**

Should QA decide to suspend the employee because of a safeguarding concern the company disciplinary policy will be utilised. The People Team



will immediately be made aware prior to suspension being made to ensure the relevant processes are being followed and to advise accordingly.

## APPENDIX B: RADICALISATION AND EXTREMISM

QA recognises the positive contribution it can make towards protecting its learners from radicalisation to violent extremism and is committed to fulfilling its duties under the Prevent Duty Guidance. QA will empower its learners to create communities that are resilient to extremism and to protect the wellbeing of particular learners who may be at risk of being drawn into violent extremism or crime.

Radicalisation is the process by which individuals come to support terrorism or violent extremism. It is recognised that radicalisation can occur to an individual from any section of society and is not particular to any racial, ethnic or social group. It is further recognised that in many instances the process of radicalisation is essentially one of grooming by others.

Possible behaviour indicators are below:

- Discriminatory language or actions towards specific groups or people with a particular protected characteristic
- Possession or sharing of violent extremist literature
- Showing or sharing online material of an extreme nature to others
- Behavioural changes (for example, becoming withdrawn)
- Expression of extremist views
- Advocating violent actions and means
- Association with known extremists
- Seeking to recruit others to an extremist ideology

In respect of safeguarding individuals from radicalisation, QA works to the Prevent element of the Government's Counter Terrorism Strategy, and where deemed appropriate seeks external support for learners through referrals to the Channel Programme. This programme aims to work with the individual to address their specific vulnerabilities, prevent them becoming further radicalised and possibly entering the criminal justice system because of their actions. More information can be found within the Channel Duty Guidance document available at <https://www.gov.uk/government/publications/channel-guidance>.

If you have concerns about a learner, contact the relevant Designated Safeguarding Lead.



To ensure all staff awareness related to Prevent is as effective as possible, staff should be encouraged to complete or engage with the following on a regular basis:

- [Managing risk of radicalisation in your education setting](#)
- [Prevent duty training: Learn how to support people susceptible to radicalisation](#)
- [Educate against hate](#)
- [Education and Training Foundation – Safeguarding and Prevent](#)



## APPENDIX C: PROTESTING AND SUPPORTING PROTEST GROUPS

QA enables critical thinking in respect of allowing individuals to hold their own valid views. This also extends to protest groups. Any communication shared or distributed as a result of this is checked for its suitability.

QA enforces a safety-first approach, with regards to significant Protests or Marches. Information on keeping safe will be made available prior to and during the event.

Learners who express an intention to travel to an event are referred to Safeguarding. The safeguarding team provides learners who wish to express their democratic right to protest with information, advice and guidance on how to prepare for, and stay safe during a protest.

Learners and staff, who wish to know more about this, or would like to check the safety and validity of a Protest, can email [safeguarding@qa.com](mailto:safeguarding@qa.com) (Workforce Learning) [qahe.welfare@qa.com](mailto:qahe.welfare@qa.com) (Higher Education).



## APPENDIX D: SAFEGUARDING ESCALATION MATRIX FOR QAA

Risk levels are attributed to each case to determine the risk of harm to the vulnerable individual/parties concerned.

The key below describes the following:

- Red fields denote where immediate or emergency intervention is required.
- Amber fields denote where the risk is moderate and at risk of escalating without intervention.
- Green fields denote low risk referrals where intervention is likely to be minimal and proactive in nature.

Risk Likelihood	Emotional harm	Physical harm	Severe physical or emotional harm	Life threatening harm
Very likely	4	4	5	5
Likely	3	4	4	5
Neither likely nor unlikely	2	3	4	4
Unlikely	1	2	3	4
Very unlikely	1	1	2	3



**Roles and Named Persons**

Role/Area		Description or named persons
DSL	Designated Safeguarding Lead	Mark Soady 07808050273 Deputies – Stephen Smith, Clare Stuart
SS	Safeguarding Specialist	Stephen Smith, Clare Stuart, Jaspreet Hothi, Luke Mellard, Sarah Rootham, Alana Davies & Chloe O'Neill
DSL	Designated Safeguarding Leads for Employees	Lucinda Suter, Bandna Rana, Annie Ellis, Amy Lennon
QD	Quality Director	Naomi Lavender
SGI	Safeguarding Inbox	<a href="mailto:safeguarding@qa.com">safeguarding@qa.com</a>
OD	Managing Director	Jo Bishenden
LA	Local Authority	Local authority or relevant other local partner
AOBD	Area of Business Director	Allan Allison, Louise Sciberras, Louise Clark, Jo Bishenden, Carly Evans, Kirsty Ellis, Sohail Oosman
999	Emergency services	
ST	Senior Management Team	Senior Managers under directors

**Risk Matrix**

Risk Level		Responsible	Accountable	Consult (as required)	Immediately Inform Always	Inform Post Case Analysis
1	Negligible risk	Employee	Employee	SS / DSL	SGI	
2	Low impact / risk	SS	SS / DSL	SS/DSL	SGI	
3	Medium impact / risk	SS / DSL	SS / DSL	LA/DSL	DSL / SGI	QD / OD /
4	High impact / risk	SS / DSL	QD/ DSL	QD / LA	DSL / SGI / AOBD	QD / OD / AOBD
5	Very high impact / risk	SS / DSL	QD/MD	HOQ / LA / 999	DSL / QD / OD / SGI / AOBD / ST	QD / OD / AOBD / ST

**APPENDIX E: SAFEGUARDING ESCALATION MATRIX FOR QAHE****Roles and Named Persons**

Role/Area		Description or named persons
DSO	Designated safeguarding officer	Karen Flowers Matini, Alex Booth
DSL	Designated safeguarding lead	Lorraine Walsh
DSL	Designated safeguarding leads for employees	Stephen Greatrex
WT	Welfare team	Referrals to be hand delivered where possible or emailed directly to the Designated Safeguarding lead/officer
COO	Chief Operating Officer	Kit Tse
LA	Local Authority	Local authority or relevant other local partner
999	Emergency services	

**Risk Matrix**

Risk Level	Responsible	Accountable	Consult (as required)	Immediately Inform Always	Inform Post Case Analysis
1 Negligible risk	Employee	Employee	DSO / DSL	WT	
2 Low impact / risk	DSO	DSO / DSL	/ DSL	WT	
3 Medium impact / risk	DSO / DSL	DSO / DSL	DSL/ LA	WT/DSL	DD
4 High impact / risk	DSO / DSL	DSL	DSL / LA	WT / DSL	DD
5 Very high impact / risk	DSO / DSL	DSL	DSL / LA / 999	DSL	DD



## APPENDIX F: PREVENT REFERRAL FORM AND PREVENT LEAD INFORMATION

As per guidance received from Regional Prevent coordinators, this form should be utilised for all future Prevent Referrals:

### Prevent Referral Form

QA will continue to follow local referral pathways in respect of the submission of the form to the relevant body.

Please find named regional Prevent leads below as well as the safeguarding team member who is to attend monthly updates for that area.

Stephen Smith is the Prevent lead for QA.

Area	Prevent Lead and Email Address	QA Safeguarding Team
London	Jennie Fisher <a href="mailto:jennie.fisher@education.gov.uk">jennie.fisher@education.gov.uk</a>	Stephen Smith <a href="mailto:Stephen.smith@qa.com">Stephen.smith@qa.com</a>
South West	Cheri Fayers <a href="mailto:cheri.fayers@education.gov.uk">cheri.fayers@education.gov.uk</a>	Stephen Smith <a href="mailto:Stephen.smith@qa.com">Stephen.smith@qa.com</a>
South East	Helene Morris <a href="mailto:helene.morris@education.gov.uk">helene.morris@education.gov.uk</a>	Alana Davies <a href="mailto:Alana.davies@qa.com">Alana.davies@qa.com</a>
West Midlands	Alamgir Sheriyar <a href="mailto:alamgir.sheriyar@education.gov.uk">alamgir.sheriyar@education.gov.uk</a>	Stephen Smith <a href="mailto:Stephen.smith@qa.com">Stephen.smith@qa.com</a>
East Midlands	Sam Slack <a href="mailto:sam.slack@education.gov.uk">sam.slack@education.gov.uk</a>	Stephen Smith <a href="mailto:Stephen.smith@qa.com">Stephen.smith@qa.com</a>
East of England	Dave Layton-Scott <a href="mailto:david.layton-scott@education.gov.uk">david.layton-scott@education.gov.uk</a>	Clare Stuart <a href="mailto:Clare.stuart@qa.com">Clare.stuart@qa.com</a>
North West	Claire Little <a href="mailto:claire.little@education.gov.uk">claire.little@education.gov.uk</a>	Clare Stuart <a href="mailto:Clare.stuart@qa.com">Clare.stuart@qa.com</a>
North East	Christopher Sybenga <a href="mailto:chris.sybenga@education.gov.uk">chris.sybenga@education.gov.uk</a>	Clare Stuart <a href="mailto:Clare.stuart@qa.com">Clare.stuart@qa.com</a>



## APPENDIX G - ONLINE SAFETY ARRANGEMENTS

### IT Systems Management

The IT team works with the Designated Safeguarding Lead and are responsible for:

- Putting in place appropriate filtering and monitoring systems, which are reviewed and updated accordingly keep learners safe from potentially harmful and inappropriate content and contact online while at QA, including terrorist and extremist material
- Ensuring that QA's IT systems are secure and protected against viruses and malware, and that such safety mechanisms are updated regularly
- Conducting a full security check and monitoring QA's IT systems on an agreed basis
- Blocking access to potentially dangerous sites and, where possible, preventing the downloading of potentially dangerous files
- Ensuring any online safety incidents are logged in line with procedures.
- Ensuring that any incidents of cyber-bullying are dealt with appropriately in line with QA's learner Bullying policy

This list is not intended to be exhaustive.

### All staff and volunteers

All staff, including contractors and agency staff, and volunteers are responsible for:

- Maintaining an understanding of this policy
- Implementing this policy consistently
- Agreeing and adhering to the terms on acceptable use of the QA's IT systems and the internet (Computer User Agreement), and ensuring that learners follow the QA's terms on acceptable use additionally found in The Learner Code of Conduct.
- Working with the DSL to ensure that any online safety incidents are flagged and dealt with appropriately in line with this policy
- Ensuring that any incidents of cyber-bullying are dealt with appropriately in line with QA's Safeguarding Policy and Procedure

This list is not intended to be exhaustive.

### Educating learners about online safety

Learners will be taught about online safety as part of continued updates and information sharing, in line with QA Safeguarding obligations.

Learners will be taught to:

- Understand a range of ways to use technology safely, respectfully, responsibly and securely, including protecting their online identity and privacy
- Recognise inappropriate content, contact and conduct, and know how to report concerns



Learners should know:

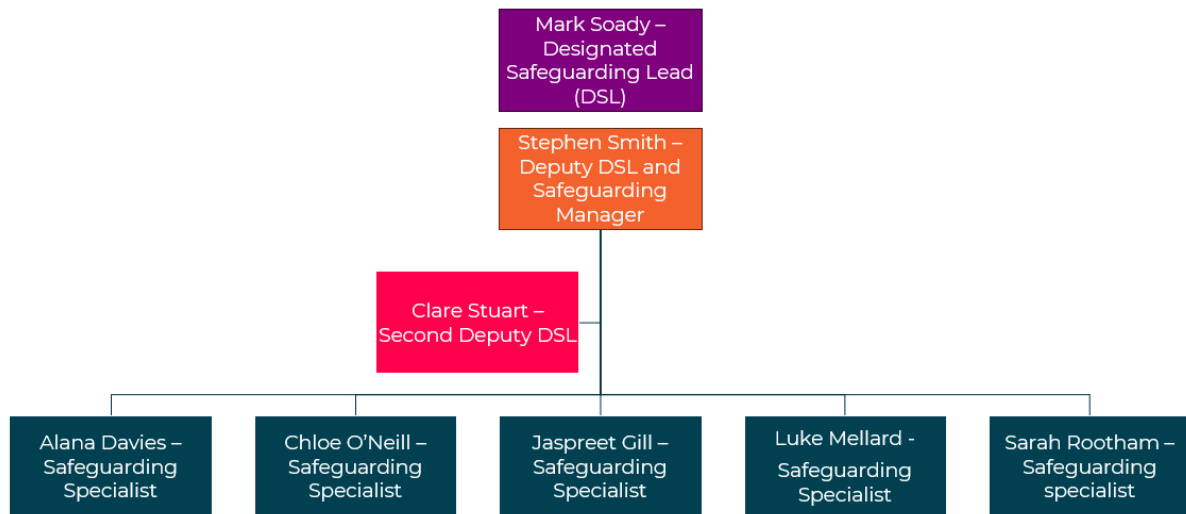
- Their rights, responsibilities and opportunities online, including that the same expectations of behaviour apply in all contexts, including online
- About online risks, including that any material someone provides to another has the potential to be shared online and the difficulty of removing potentially compromising material placed online
- Not to provide material to others that they would not want shared further and not to share personal material which is sent to them
- What to do and where to get support to report material or manage issues online
- The impact of viewing harmful content
- That specifically sexually explicit material (e.g. pornography) presents a distorted picture of sexual behaviours, can damage the way people see themselves in relation to others and negatively affect how they behave towards sexual partners  
That sharing and viewing indecent images of children (including those created by children) is a criminal offence which carries severe penalties including jail
- How information and data is generated, collected, shared and used online
- How to identify harmful behaviours online (including bullying, abuse or harassment) and how to report, or find support, if they have been affected by those behaviours
- It is not permitted to record or photograph staff or learners without the tutor and the subject's express permission

The safe use of social media and the internet will be covered where relevant. QA will use a range of platforms to raise learners' awareness of the dangers that can be encountered online.



## APPENDIX H - SAFEGUARDING TEAM AND GOVERNANCE STRUCTURE

### The Safeguarding Team



### Safeguarding Governance Board

The DSL will provide monthly updates to the Safeguarding Governance Board to ensure they are made aware of all relevant information/updates related to safeguarding. Additionally, the board will be informed when a risk level 5 (severe) alert is received and updated accordingly in a frequency that will be determined by the severity of each case.

### DSL and Deputies

Mark Soady – Designated Safeguarding Lead

Stephen Smith – Safeguarding Manager/Deputy DSL/Prevent Lead

Clare Stuart – Safeguarding Specialist/Deputy DSL

### Safeguarding Governor and Board Members

Peter Stacey – Safeguarding Governor

Jo Bishenden – Managing Director of Apprenticeships

Carrie Hooper – Group Head of People Operations

Lou Clark – Vice President of Apprenticeships

Naomi Lavender – Quality Director

Sohail Oosman – Apprenticeship Learning Director

Carly Green – Director of Delivery