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**POLICY & PROCEDURES**

**SAFEGUARDING  
& PREVENT DUTY**

<b>REFERENCE</b>	PPSWV2025DSL 26
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# SECTION 1

## 1.1. INTRODUCTION

This policy outlines the responsibilities of Crosby Training in reference to the safeguarding and promotion of wellbeing of all of their learners.

Crosby Training believes:

- that all learners have the right to be in a safe and caring environment, which includes the right to protection from all types of abuse
- learners have the right to expect adults in positions of responsibility to do everything possible to foster these rights

We believe therefore, that we have a duty of care to:

- learners who take part in any activity organised by Crosby Training
- staff, including learner helpers, who are asked to take part in any activities
- parents/carers of any child or vulnerable adult that is a learner of Crosby Training

Working Together to Safeguard Children 2025 outlines safeguarding children as:

- Safeguarding and promoting the welfare of children is defined for the purposes of this guidance as:
- providing help and support to meet the needs of children as soon as problems emerge
- protecting children from maltreatment, whether that is within or outside the home, including online
- preventing impairment of children's mental and physical health or development
- ensuring that children grow up in circumstances consistent with the provision of safe and effective care
- promoting the upbringing of children with their birth parents, or otherwise their family network through a kinship care arrangement, whenever possible and where this is in the best interests of the children



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- taking action to enable all children to have the best outcomes in line with the outcomes set out in the Children’s Social Care National Framework

The Care Act 2014 outlines the aims of safeguarding adults as to:

- Stop abuse or neglect wherever possible
- Prevent harm and reduce the risk of abuse or neglect to adults with care and support needs
- Safeguard adults in a way that supports them in making choices and having control about how they want to live
- Promote an approach that concentrates on improving life for the adults concerned
- Raise public awareness so that communities, alongside professionals, play their part in preventing, identifying and responding to abuse and neglect
- Provide information and support in accessible ways to help people understand the different types of abuse, how to stay safe and what to do to raise a concern about the safety or well-being of an adult

## 1.2. DEFINITIONS

<b>Child</b>	a learner who is under 18 years of age
<b>Vulnerable Adult</b>	a learner who is over 18 years of age “who is or may be in need of community care services by reason of mental or other disability, age or illness; and who is or may be unable to take care of themselves, or unable to protect themselves against significant harm or exploitation” (DH, 2000)
<b>Staff</b>	any member of Crosby Training staff or learner helpers employed to assist with a particular activity
<b>Event</b>	any activity organised by Crosby Training where we are primarily responsible for the delivery. Examples include Community Projects, Mentoring, etc

*For ease, the term learner will be used to describe both children and adults throughout this document.*



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### 1.3. SAFEGUARDING POLICY STATEMENT

Crosby Training is committed to safeguarding and promoting the welfare of all learners and expect all staff and volunteers to share this commitment. As a result, Crosby Training has done the following to meet the company ethos as described above:

- Designed a full and detailed Safeguarding Policy and Procedural Guide that covers all areas of our responsibilities, procedures, and duties of care
- Ensured properly trained staff are in place, all of whom have passed an enhanced check by the Disclosure and Barring Service (DBS)
- All staff, including those who are responsible for learner support, are aware of their responsibilities regarding safeguarding
- All staff will agree to a code of behaviour when around learners
- Crosby Training has a “zero tolerance” policy to all forms of abuse, intimidation, bullying (physical or emotional), racist and Harmful Sexual Behaviour
- Crosby Training will immediately inform the police in the event that illegal substances are discovered, e.g., drugs, weapons, etc
- Whilst respecting privacy and data protection, Crosby Training cannot promise confidentiality in all circumstances. If we discover anything that we believe parents/carers/social care/other agencies should be informed of we will do so, believing it to be in the best interests of the learner
- We are obliged to share confidential information without authorisation from the person who provided it, or to whom it relates, if it is in the interest of safeguarding. Our procedure is based on the General Data Protection Regulation (GDPR)

Crosby Training will continue to strive to ensure that:

- A safe environment is provided for learners and staff
- All learners who are suffering, or who are at risk of suffering significant harm, are identified and supported as per the company policies and procedures
- Learners who require additional support from outside agencies are identified as per Early Help requirements and appropriate action is taken



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- All external referrals are completed and/or monitored by the Designated Safeguarding Lead or Deputy Safeguarding Lead
- All allegations of abuse against members of staff are dealt with appropriately as per local/national procedures and outlined in company policies and procedures
- Safe recruitment of staff is implemented in compliance with relevant legislation
- All staff will receive training regarding safeguarding and will complete a company induction to include policies and procedures relating to safeguarding
- All staff receive regular safeguarding updates via training sessions, emails and meetings
- All employers or subcontractors are made aware of Crosby Training's expectations regarding safeguarding learners. A letter of assurance will be requested for any subcontractors who may work on a one to one basis with any learner
- All satellite centres are risk assessed for facility lockdown purposes.

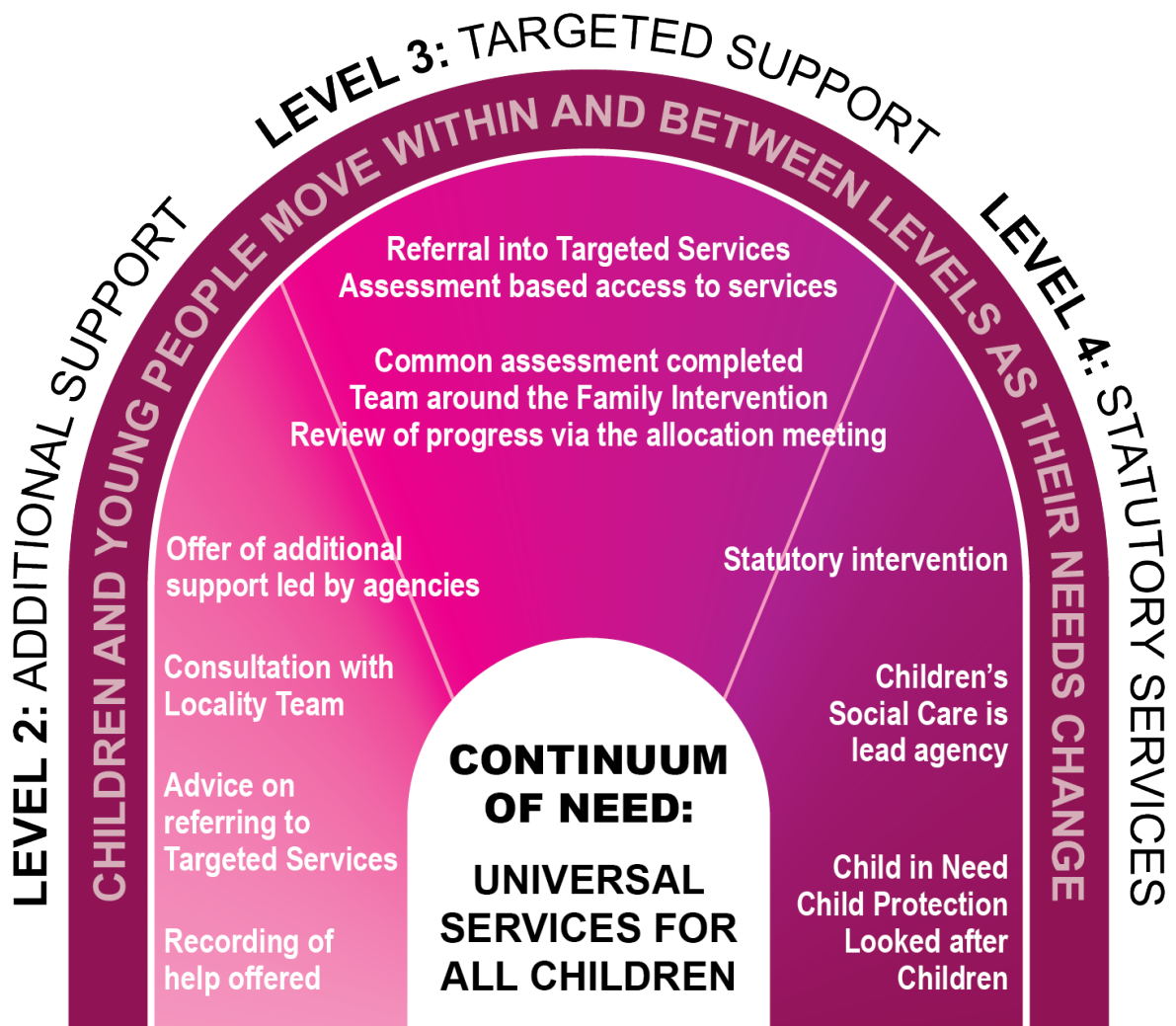
## 1.4. LEGAL FRAMEWORK

This policy is developed as per the following legislation and guidance:

- The Children Act 1989
- The Children Act 2004
- The Education Act 2011
- The Counter-Terrorism and Security Act 2015
- The Prevent Agenda
- Safeguarding Vulnerable Groups Act 2006
- Keeping Children Safe in Education 2025
- Care Act 2014
- Working together to Safeguard Children 2025

## SECTION 2

### 2.1. THRESHOLDS OF NEED FOR CHILDREN



**GO STRAIGHT TO LEVEL 4 AS SOON AS SIGNIFICANT HARM IS SUSPECTED**

**If in doubt consult**

Seek advice from your Locality Team/Safeguarding Lead



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**Level 1 - Universal Services:** These are children and young people who make good overall progress in all areas of development. All children and young people are entitled to receive support from these services which are available to everyone, irrespective of their needs. This includes GP's, health visitors and school nurses, schools, youth service, leisure and play facilities and housing.

**Level 2 - Additional Support:** Some children/young people require support beyond that provided by their families and universal services. Their life chances would be improved with effective, single agency support. Any practitioner working with a child/young person or their family may identify, in the presentation or behaviour of a child/young person, that they have additional needs, which could be met by a single agency or service. The thresholds of need will help determine whether or not the child's needs can be addressed within one's own agency or from other services. If these needs can be met in a coordinated manner by the single agency service, there is no need to do anything else. Informal or formal consultation may help at this point.

**Level 3 - Targeted Support:** Some children/young people will have more complex needs. Their life chances will be almost certainly improved by effective multi-agency support. If a practitioner believes that a multi-agency response may be required, and appropriate consent has been given, he/she should complete a referral to Targeted Services. This referral should focus on the strengths as well as the areas in which families need to make changes. The referral should be discussed with child, young person and/or their parent/carer and consent obtained in respect of both the referral and information sharing. The referral will be considered by multi agency managers at a Locality meeting and the most appropriate lead professional will be identified, to carry out the family assessment.

**Level 4 - Statutory Services** (Section 17, Child in Need, Section 47, Looked After Children). Where a child is at risk of significant harm or has experienced significant harm a referral must be made to Social Care without delay.

Upon making a referral to any agency the following will be required:

- Full details about the child and their circumstances
- Clear details on what concerns you have about the child
- Whether or not the family are aware that you have contacted agency
- A multi-agency referral form following the conversation



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## 2.2. ABUSE AND ADULTS

As with children, abuse towards adults can take place in a variety of settings such as, a person's own home or in the workplace. Unfortunately, those being abused are often the least likely to bring the situation to anyone's attention.

Abuse towards adults may look like:

- physical - hitting, slapping, pushing, or physically restraining, or the mismanagement of medication
- domestic - unexplained injuries, changed behaviour in the presence of a particular person, or frequent changes of G.P.
- sexual - unwanted touching, kissing, sexual intercourse, sexual teasing, sexual innuendo, or sexual harassment
- emotional or psychological - shouting and swearing to make a person afraid, preventing them from meeting their religious or cultural needs.
- financial or material - money or belongings taken under pressure or stolen
- modern slavery - forced labour, domestic servitude, and human trafficking
- discriminatory - unequal treatment based on age, disability, gender reassignments, marriage and civil partnership, pregnancy and maternity, race, religion and belief, and sex or sexual orientation.
- organisational or institutional - lack of leadership and supervision, lack of respect for dignity and privacy, not offering choice or promoting independence
- neglectful or acts of omission - not being properly cared for, mismanaging medication or being denied privacy, choice or social contact
- self-neglect - inability to avoid self-harm, neglecting personal hygiene, health or surroundings



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## 2.3. CHILD/ADULT CONCERN & DISCLOSURES

**CONCERN:** When you have seen or heard something that concerns you. For example, a learner appears unusually tired recently, self-harm marks or a colleague has given learners their personal contact details. Recognising concerns and reporting them is vital for early help.

If you have a concern about a learner or staff member:

- Make notes including the date, time, and your observations
- Speak to the Safeguarding Lead or Deputy Safeguarding Lead for advice if necessary
- Ensure all concerns are recorded via the company safeguarding email address [safe@crosbytraining.com](mailto:safe@crosbytraining.com) using the Logging a Concern form

Actions may include:

- Continue to monitor the situation and keep the Designated Safeguarding Lead up to date
- Speak to the learner or their parent/carer regarding your concerns
- Other recorded information may mean a referral to social care, or another agency may be required
- Liaison with other educational providers if relevant
- Liaison with Work Coach or DWP Safeguarding Lead

**DISCLOSURE:** When a learner or staff member tells you that something has happened or might happen to themselves, or someone else, that is unsafe or distressing.

If a learner makes a disclosure you should follow this guidance:

- Listen to what is being said without displaying shock or disbelief
- Only ask questions when necessary to clarify *e.g. who, what, where, when?*
- Allow the learner to talk freely - don't lead or put words in their mouth
- Reassure the learner that what has happened is not their fault



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- Do not make promises that you may not be able to keep
- Do not promise confidentiality - it may be necessary to refer the learner to other agencies
- Stress that it was the right thing to tell
- Do not criticise the alleged perpetrator
- Do not comfort the person physically or ask to see any physical signs, especially if this means moving or removing clothing
- Record the details using the learner's own words, even if this means using unsavoury language
- Read the information back to them to ensure your recording is accurate
- You do not have to provide a copy of this record to the learner; they can access this through other means at a later time
- If required, include a separate statement of your professional judgement, any changes in behaviour you have witnessed and/or your opinion so long as you make sure these are clearly identified as opinion
- Explain what has to be done next and who has to be told
- Inform the Safeguarding Lead without delay

## **2.4. CHILDREN (POTENTIALLY AT GREATER RISK OF HARM)**

### **Child in Need and Child Protection Plans**

Crosby Training operates as a sub-contractor for Riverside College and, as such, will uphold all Safeguarding policies as per the main contractor. To this end Crosby Training will follow all local authority procedures relating to children who need a social worker due to safeguarding or welfare needs including sharing of information under existing duties of local authorities. Where children require a social worker, this should inform decisions about safeguarding (for example, responding to unauthorised absence or missing education, where there are known safeguarding risks) and about promoting welfare, including pastoral support, alongside action by statutory services.

### **Looked After Children and Previously Looked After Children**

Crosby Training will ensure that the appropriate staff have the information they need in relation to a child's looked after status (whether they are looked after under voluntary arrangements with consent of parents, or on an interim or full care order) and the child's contact arrangements with birth parents or those with



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parental responsibility. The appropriate staff will also have information about the child's care arrangements and the levels of authority delegated to the carer by the authority looking after the child. The Designated Safeguarding Lead will have details of the child's social worker and the name of the virtual school head in the authority that looks after the child. The appropriate staff, including the Designated Safeguarding Lead, will work alongside the relevant agencies to ensure prompt action is taken to safeguard these children, who are a particularly vulnerable group.

Crosby Training will liaise with the Local Authority Personal Advisor who has been appointed to guide and support children who have ceased to be looked after and have become care leavers. Crosby Training will report any areas of concern affecting the care leaver to the Personal Advisor as soon as concerns arise.

### **Children With Special Educational Needs, Disabilities or Physical Health Issues**

Children with special educational needs or disabilities (SEND) or certain health conditions face additional safeguarding challenges. Staff need to be aware of the indicators when recognising abuse and neglect in this group of children. These can include;

- Assumptions that indicators of abuse such as behaviour, mood and injury relate to the child's condition without further exploration
- These children being more prone to peer group isolation or bullying (including prejudice-based bullying) than other children
- The potential for children with SEND, or certain medical conditions, being disproportionately impacted by behaviours such as bullying, without showing any signs
- Communication barriers and difficulties in managing or reporting these challenges

### **Children Missing from Education**

All staff should be aware that children missing from education, particularly persistently, could be an indicator of a range of safeguarding issues including, neglect, sexual abuse and child sexual and criminal exploitation. Crosby Training will ensure that all staff are trained to report any incidences of non-attendance, especially in relation to LAC, to the Designated Safeguarding Lead.

Dealing with a disclosure from a learner and safeguarding issues can be stressful. Consider seeking support for yourself and discuss this with the Safeguarding Lead.



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## 2.5. ROLES & RESPONSIBILITIES

### Crosby Training Safeguarding Staff

Beth Nolan	Representative at the Board of Directors for Safeguarding and matters concerning the Safeguarding Lead or other staff in Manager's absence	<a href="mailto:beth.nolan@crosbytraining.com">beth.nolan@crosbytraining.com</a>
Lisa Sumner	Designated Safeguarding Lead Matters relating to learners, staff and processes	<a href="mailto:lisa.sumner@crosbytraining.com">lisa.sumner@crosbytraining.com</a>
Caroline Grundy	Deputy Safeguarding Lead Matters relating to learners,	<a href="mailto:caroline.grundy@crosbytraining.com">caroline.grundy@crosbytraining.com</a>
Sarah Owen	Deputy Safeguarding Lead Matters relating to learners	<a href="mailto:sarah.owen@crosbytraining.com">sarah.owen@crosbytraining.com</a>
James Fearon	Deputy Safeguarding Lead Matters relating to learners	<a href="mailto:james.fearon@crosbytraining.com">james.fearon@crosbytraining.com</a>



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## **2.6. DUTIES OF DESIGNATED SAFEGUARDING PERSON RECEIVING DISCLOSURE**

- Where possible, formal referrals will be done through the Designated Safeguarding Lead
- The Designated Safeguarding Lead should request written details from the referrer as soon as possible after the initial contact and check that enough detail has been provided for a formal referral if required
- Local requirements for referral are to be checked with the Local Safeguarding Board from the area that the learner lives
- If the Designated Safeguarding Lead decides that they must refer the disclosure, they should contact social care duty team (e.g. MASH, CADT) and/or the Police. The date and time of the contact, the duty officer's name and any case no./reference should be recorded
- The learner and referring staff member/manager should know of the action being taken and the reasons for this decision before the appropriate agency is informed, unless doing so would place the learner at greater risk
- The Designated Safeguarding Lead should ensure that all written records relating to the incident are kept in the learner's safeguarding file
- If the learner is linked to another provider, then the Designated Safeguarding Lead there must be informed of the concerns or disclosure as soon as possible, unless this will increase the risk to the learner
- In the case where the disclosure or concern is made by a learner against a member of staff, the Designated Safeguarding Lead should follow the procedure outlined within the Staff Code of Conduct Policy
- In the case where the disclosure or concern is made by a learner against another learner the Designated Safeguarding Lead will need to liaise with the Course Tutor to establish the facts. Advice will be sought from social care and/or the Police if appropriate and will take appropriate action to ensure the safety and welfare of all learners involved.



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## SECTION 3

### 3.1. THE PREVENT DUTY

Crosby Training is committed to providing a secure environment for learners and staff where people feel safe and are kept safe. It is recognised that extremism and exposure to extremist materials and influences can lead to poor outcomes for learners. It is further acknowledged that if we fail to challenge extremist views, we are failing to protect our learners from potential harm. As such, the Prevent agenda will be addressed as safeguarding concern.

Crosby Training has adopted the Prevent Duty in accordance with legislative requirements. However, it will endeavour to incorporate the relevant duties so as not to:

- Stifle legitimate discussions, debate, or learner engagement activities in the local communities; or
- Stereotype, label or single out individuals based on their origins, ethnicity, faith and beliefs or any other characteristic protected under the Equality Act 2010.

### 3.2 BACKGROUND INFORMATION

Prevent is one of the four strands of the Government's counter terrorism strategy – CONTEST (2018). The UK currently faces a range of terrorist threats. Terrorist groups who pose a threat to the UK seek to radicalise and recruit people to their cause. Therefore, early intervention is at the heart of the Prevent Duty which aims to divert people away from being drawn into terrorist activity.

Prevent happens before any criminal activity takes place by recognising, supporting, and protecting organisations and seeks to:

- Respond to the ideological challenge of terrorism and aspects of extremism, and the threat we face from those who promote these views
- Provide practical help to prevent people from being drawn into terrorism and violent extremism and ensure they are given appropriate advice and support
- Work with a wide range of sectors where there are risks of radicalisation which needs to be addressed, including education, criminal justice, faith, the internet, and health



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### 3.3 DEFINITIONS

The following are commonly agreed definitions within the Prevent agenda:

<b>Ideology</b>	a set of beliefs
<b>Radicalisation</b>	the process by which a person comes to support terrorism and forms of extremism that may lead to terrorism
<b>Safeguarding</b>	the process of protecting vulnerable people, whether from crime, other forms of abuse or from being drawn into terrorism related activity
<b>Terrorism</b>	an action that endangers or causes serious violence, damage or disruption and is intended to influence the government or to intimidate the public and is made with the intention of advancing a political or religious ideology
<b>Vulnerability</b>	factors and characteristics associated with being susceptible to radicalisation
<b>Extremism</b>	vocal or active opposition to <b>British Values</b> , including democracy, the rule of law, individual and mutual respect and tolerance of different faiths and beliefs

### 3.4 AIMS

As per the Prevent Duty requirements, Crosby Training will ensure the following:

- There are clear and visible policies and procedures for managing whistleblowing and complaints.
- Policies are in place for learners using IT equipment to research terrorism and counter terrorism in the course of their studies.
- A risk assessment of the physical management of the company's sites is in place, including policies and procedures for events held by staff, learners or visitors, and relationships with external bodies and community groups who may use premises, and/or work in partnership with the organisation



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- Robust procedures are in place to ensure that sub-contractors are aware of the Prevent Duty and are not inadvertently funding extremist organisations
- If a risk is identified, staff notify the Safeguarding Lead and others as necessary and develop a Prevent action plan
- All staff undertake appropriate training and development and attend regular WRAPs throughout the year
- That staff exemplify British values in their management, teaching and through general behaviours and the curriculum and pastoral care are also used to promote British values to learners
- There is a clear Prevent referral process which is in line with the safeguarding procedures

### **Leadership and Values**

To create and maintain an ethos that upholds core values of shared responsibility and wellbeing for all learners, staff and visitors whilst promoting respect, equality, diversity and inclusion.

This will be achieved through:

- Promoting core values of respect, equality and diversity, democratic society, learner voice and participation
- Building staff and learner understanding of the issues and confidence to deal with them through mandatory staff training, awareness campaign and community engagement activities
- Deepening engagement with local communities

### **Teaching and Learning**

To provide a curriculum that promotes British Values, knowledge, skills and understanding, to build the resilience of learners by undermining extremist ideology and supporting the learner voice.

This will be achieved through:

- Embedding British Values, equality, diversity and inclusion, wellbeing, and community cohesion throughout the curriculum



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- Promoting wider skills development such as, social, and emotional aspects of learning
- A curriculum adapted to recognise local needs, challenge extremist narratives, and promote universal rights
- Teaching, learning and assessment strategies that explore controversial issues in a way that promotes critical analysis and pro-social values
- Use of external programmes or groups to support learning while ensure that the input supports our values
- Encouraging learner voice

### **Learner Support**

To ensure that staff take preventative and responsive steps.

This will be achieved through:

- Strong, effective, and responsive learner welfare support
- Developing strong community links and being aware of what is happening in the locality
- Implementing anti-bullying strategies and challenging discriminatory behaviour
- Recognising factors that may increase risk to a learner, i.e., vulnerability, disadvantage, or hardship, and implementing early risk management strategies
- Ensuring that learners and staff know how to access support in house and/or via partners
- Supporting learners with problem solving and repair of harm
- Supporting 'at risk' learners through safeguarding and crime prevention processes
- Working collaboratively to promote support for learners across all areas of Crosby Training



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## 3.5 ROLES & RESPONSIBILITIES

### Leaders and Governors

All of Leaders and Governors have a legal responsibility under the Prevent Duty to make sure they have undertaken training in the Prevent Duty. Additionally, they must ensure that:

- All staff have undertaken training in the Prevent Duty
- All staff are aware of when it is appropriate to refer concerns about learners or colleagues to the Designated Safeguarding Lead
- All staff exemplify British Values into their own values
- Policies and procedures to implement the Prevent Duty are in place and acted on where appropriate

### Designated Safeguarding Lead

The Designated Safeguarding Lead is also the Prevent Lead with responsibility for ensuring that the Prevent Strategy is implemented across the organisation and that any concerns are shared with relevant organisations. The Designated Safeguarding Lead also completes and reviews the company Prevent Self-Assessment and Risk Assessment.

### Senior Leadership Team Meetings

These meetings are held regularly and any concerns raised under the Prevent agenda or changes to the Duty that affect Crosby Training are discussed.

### All staff

All staff at Crosby Training have a responsibility to:

- Create and support an ethos that upholds Crosby Training's mission, vision and values including British Values, to create an environment of respect, equality and diversity and inclusion
- Undertake Prevent training in order to have the skills to recognise those who may be vulnerable to radicalisation, involved in violent or non-violent extremism, and to know the appropriate action to take if they have concerns
- Report any concerns around extremism or radicalisation via the safeguarding reporting channels



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### **3.6. MANAGING RISKS & RESPONDING TO EVENTS**

Crosby Training will ensure that it monitors risks and is ready to deal appropriately with issues which arise through the following:

- Understanding the nature of threat from violent extremism and how this may impact directly and indirectly on the organisation
- Identifying, understanding, and managing potential risks within Crosby Training from external influences
- Responding appropriately to events reported via local, national, or international news that may impact on learners and communities
- Ensuring plans are in place to minimise the potential for acts of violent or non-violent extremism within premises used by the organisation
- Ensuring measures are in place to respond appropriately to a threat or incident within premises used by the organisation
- Continuously developing effective ICT security and responsible user policies. Ensuring compliance with related policies



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## **SECTION 4**

### **4.1. SAFER RECRUITMENT**

Crosby Training takes responsibility for its recruitment processes seriously and follows the legal guidelines set out for schools, academies and colleges in relation to the Single Central Register. Crosby Training ensures the following information is recorded on the SCR:

Identity checks which include:

- the full name of the individual
- the current home address
- the date of birth.

Crosby Training will ensure that the documents seen for evidence of ID are the originals and will never accept photocopies. Photographic evidence of identity is the ideal but, in instances where this is not available, at least one additional form of ID, such as required for a DBS check, will be requested.

- Pre-employment checks for staff, agency and third party supply staff, contractors, volunteers and governors and dates on which safeguarding and safer recruitment training was undertaken
- The dates the checks were carried out and by whom
- Certificates, professional qualifications obtained and by whom - only professional qualifications which are a requirement for the role need to be recorded
- An enhanced DBS check
- Checks of professional qualifications
- Check of a person's right to work in the UK
- Social media checks
- 2 checkable references



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Crosby Training will ensure that all staff are properly vetted and it will be recorded on the Single Central Register whether relevant staff have been informed of their duty to disclose relevant information under the childcare disqualification arrangements. Where information does not apply to an individual, this will be recorded as N/A on the Single Central Register.

Crosby Training will demonstrate compliance with Keeping Children Safe in Education and OFSTED standards.



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## **SECTION 5**

### **5.1. ALLEGATIONS TOWARDS STAFF**

The majority of people who work within education act professionally and aim to provide a safe and supportive environment for learners. However, sometimes the behaviour of adults who work or volunteer with children and adults can result in allegations of harm being made against them. When an allegation is made against a member of staff, set procedures must be followed.

Staff who are subject to an allegation have the right to have their case dealt with fairly and to be kept informed of the progress. Suspension is not automatic; however, it may be deemed appropriate in some cases to ensure learners are protected. Allegations against the Safeguarding Lead are to be reported to the Chair of Governors.

### **5.2. STAFF CONDUCT**

Staff should always be aware of the needs of learners and be vigilant for any possible signs of abuse.

Meetings with individual learners should take place as openly as possible. If privacy is needed, the door should be left partly open and other staff present or informed of the meeting where possible.

Staff should not have unnecessary physical contact with learners. There may be occasions when physical contact is unavoidable or positively desirable or necessary, such as providing comfort or reassurance, or for physical support. Contact may also take place during sports. Physical contact should, however, only take place with the consent of the learner and the purpose of the contact should be made clear.

Staff should not contact or meet with learners outside of organised activities.



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Staff should never:

- Engage in sexually provocative or rough physical games
- Allow learners to use inappropriate language unchallenged (e.g. racist, sexist, homophobic or discriminative comments)
- Make sexually suggestive comments in front of, about, or to a learner, even in fun, i.e. “banter”
- Let allegations made by a learner go without being addressed and recorded
- Deter learners from making allegations through fear of not being believed
- Jump to conclusions without checking facts
- Rely on their own good name to protect them (i.e. everyone regardless of position should adhere to these guidelines)

### **5.3. STAFF TRAINING**

Crosby Training ensures its commitment to protecting children and adults from risk of harm or abuse by ensuring mandatory training is completed by all staff. This equips all staff with the necessary skills and knowledge to protect and safeguard all individuals for whom they are responsible. Staff training will include:

- Introduction to Safeguarding: Basic understanding of child and adult protection and safeguarding procedures
- Legislation and Guidance: Familiarity with relevant laws and regulations governing safeguarding
- Specific training for education
- Regular refresher training: Continuing education and training sessions to maintain and update knowledge
- Specialist training: Additional training for staff who have specific safeguarding responsibilities



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Crosby Training will regularly review and update safeguarding training to reflect current legal duties and the evolving nature of safeguarding practices.

Records of attendance for all staff will be kept as evidence, along with feedback to ensure the effectiveness of the training provided.

## **5.4. GDPR**

Crosby Training handles enormous amounts of Data pertaining to the participants who enrol on a course. To ensure compliance with the legal duties placed on Crosby Training, the following will apply:

- Annual Training for all staff
- Role Specific Training for staff who handle sensitive personal information
- New Employees who require immediate training upon joining the company
- Regular updates whenever legislative changes or internal process modifications occur.

Crosby Training will maintain records of training completion and ensure that staff can demonstrate their understanding of GDPR principles and procedures. This is essential for compliance especially in relation to a Data breach.

## **5.5. LOW LEVEL CONCERNS**

A separate policy covers low level concerns (Appendix 1)



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## **SECTION 6**

### **6.1. ONLINE SAFETY, MONITORING & FILTERING**

Crosby Training will ensure compliance with the statutory guidance Keeping Children Safe in Education (KCSIE) when carrying out their duties to safeguard and promote the welfare of children and adults in relation to Online Safety, including the use of AI and Monitoring and Filtering.

The Department of Education's guidance on the safe and effective use of AI in education provides clear guidance on the capabilities and features that generative AI products and systems should meet to be considered safe for users in educational settings.

Key areas of the guidance include:

- Content filtering
- Activity monitoring
- Security
- Data protection
- Intellectual Property
- Transparency and accountability

The UK's Online Safety Act places new duties on social media companies and search services to make them more responsible for their users' safety but it is important to remember that safeguarding is everyone's responsibility.



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# APPENDIX 1

## LOW LEVEL CONCERNS

### ALLEGATION

Behaviour which indicates that an adult who works with children has:

- behaved in a way that has harmed a child, or may have harmed a child; and/or
- possibly committed a criminal offence against or related to a child; and/or
- behaved towards a child or children in a way that indicates they may pose a risk of harm to children; and/or
- behaved or may have behaved in a way that indicates they may not be suitable to work with children.

### LOW-LEVEL CONCERN

Does not mean that it is insignificant, it means that the adult's behaviour towards a child does not meet the threshold set out above. 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 - than an adult may have acted in a way that:

- is inconsistent with Crosby Training'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 Local Authority Designated Officer (LADO) but may merit consulting with and seeking advice from the LADO, and on a no-names basis if necessary.

### APPROPRIATE CONDUCT

Behaviour which is entirely consistent with Crosby Training's Staff Code of Conduct, and the law.



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## APPENDIX 2

### ABUSE & OTHER SPECIFIC SAFEGUARDING ISSUES

**Abuse:** maltreatment of a child or vulnerable adult. This may be from somebody inflicting harm or failing to act to prevent harm. This may be in a family or in an institutional or community setting by those known to them or, more rarely, by others (e.g. via the internet). Abuse can be peer on peer.

**Physical abuse:** may involve hitting, shaking, throwing, poisoning, burning or scalding, drowning, suffocating or otherwise causing physical harm to a child. Can also include fabrication of or induced illness by a parent or carer.

**Emotional abuse:** persistent emotional maltreatment of a child or vulnerable adult. Examples include, making someone feel worthless or unloved, not giving someone opportunity to express themselves or their views, having inappropriate expectations of a person's emotional capacity, seeing or hearing abuse on others and bullying (including cyber bullying). There is likely to be some form of emotional abuse apparent when other abuse is found.

**Harmful sexual behaviour:** Sexual behaviours expressed by children and young people under the age of 18 years old that are developmentally inappropriate, maybe harmful towards self or others, or abusive towards another young person or adult.

**Sexual abuse:** forcing or enticing a child or vulnerable adult to take part in sexual activities, not necessarily involving a high level of violence, whether or not they are aware of what is happening. The activities may or may not involve physical contact, for example, forcing a child or vulnerable adult to watch sexual activities or online grooming. Sexual abuse is not solely perpetrated by adult males but also by females and peers.

**Neglect:** the persistent failure to meet a basic physical and/or psychological need, likely to result in the serious impairment of a child or vulnerable adult's health or development.



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**Financial abuse:** acquiring money or property by deception or using other people's money contrary to their wishes or the best interests of the individual. This may include theft of money/possessions, encouraging people to spend money when they do not want to, misuse of benefits/allowances.

**Psychological Abuse:** the wilful infliction of mental suffering. The 'No Secrets' guidance defines psychological abuse, in relation to vulnerable adults, as emotional abuse and includes other factors such as, threats of harm, punishment or abandonment and isolation, withdrawal of basic rights and needs, humiliation and reminding them of their inadequacies and inabilities, verbal abuse including bullying, swearing, or shouting, intimidation and coercion.

**Homelessness:** not having a home. A home is a place that provides security, privacy, and links to a community and support network. It needs to be decent and affordable. Under the law, even if someone has a roof over their head, they can still be homeless. This is because they may not have any right to stay where they live, or their home may be unsuitable to live in.

**Hate Crime:** a criminal offence motivated by prejudice based on the individual's disability, race, religion or belief, sexual orientation, or transgender identity. Some examples include, name calling or drawing attention to a person's differences or disabilities, ethnic origin or cultural differences in negative ways. It can be a physical or non-physical.

**Domestic Abuse:** an incident of threatening behaviour, violence or abuse (psychological, physical, sexual, financial or emotional) between adults who are or have been intimate partners of family members regardless of gender or sexuality.

**Female Genital Mutilation (FGM):** all procedures involving partial or total removal of the external female genitalia or other injury to the female genital organs. There is a statutory duty upon teaching staff to report to the police where they discover that FGM appears to have been carried out on a girl under 18.

**Forced Marriage:** a forced marriage is one entered into without the full and free consent of one or both parties and where violence, threats or any other form of coercion is used to cause a person to enter into a marriage. Threats can be physical or emotional and psychological. A lack of full and free consent can be where a person does not consent or where they cannot consent (e.g. if they have learning disabilities).



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**Honour-Based Violence:** where a person is being punished by their family or community for actually or allegedly undermining what they believe to be the correct code of behaviour. sBy not conforming it may be perceived that the person may have brought shame or dishonor to the family.

**Modern Slavery:** encompasses slavery, human trafficking, forced labour and domestic servitude.

**Radicalisation:** the process by which a person comes to support terrorism and extremist ideologies associated with terrorist groups.

**Child Sexual Exploitation:** is a form of sexual abuse where children are sexually exploited for money, power or status. It can involve violent, humiliating and degrading sexual assaults. In some cases, young people are persuaded or forced into exchanging sexual activity for money, drugs, gifts, affection or status. Consent cannot be given, even where a child may believe they are voluntarily engaging in sexual activity with the person who is exploiting them. Child sexual exploitation does not always involve physical contact and can happen online.

**Child Criminal Exploitation:** Criminal exploitation of children and vulnerable adults is a geographically widespread form of harm that is a typical feature of county lines activity. County lines is the term for urban gangs supplying drugs to suburban areas and market and coastal towns using dedicated mobile phone lines or “deal lines”. Gangs use children and vulnerable people to move drugs and money.

**Peer on Peer Abuse:** Peer-on-peer abuse is any form of physical, sexual, emotional, financial, and/or coercive control exercised between children and young people; this includes intimate and non-intimate relationships. Examples include (but are not limited to) bullying (online and offline), gender-based violence, sexual assaults, and sexting.

**Fabricated or Induced Illness:** can include the parent/carer fabricating signs and symptoms of illness, falsification of hospital charts and records of specimens of bodily fluids as well as letters and documents or the induction of illness by a variety of means.



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**Private Fostering:** when a child is cared for by someone other than their parent/ carer due to a private arrangement, without the involvement of the local authority.

**Sexual Violence:** such as rape, assault by penetration and sexual assault.

**Sexual Harassment:** Such as sexual comments, remarks jokes and online sexual harassment which may be stand alone or part of a broader pattern of abuse.

**Up skirting:** 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 to cause the victim humiliation, distress, or alarm.

**Sexting:** Sending, receiving, or forwarding sexually explicit messages, photographs, or videos primarily between mobile phones, of oneself to others. It may also include the use of a computer or other digital device.

**Online abuse:** Any type of abuse which happens on the internet. It can happen on any device connected to the web like computers, tablets and mobile phones. It can happen anywhere online including social media, text messaging and messaging apps, emails, online chats, online gaming and live streaming sites. Children can be at risk of online abuse from people they know or strangers. It might be part of other abuse which is taking place offline, like bullying or grooming, or the abuse might only happen online.



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## APPENDIX 3

### LOGGING A CONCERN ABOUT A LEARNER'S SAFETY & WELFARE

1. Basic Details							
Learner's Name:				Date of Birth:			
Learner's telephone number:				Tutor:			
Learning Programme:				Referrer Name:			
Job Title:				Date of Referral:			
2. Disclosure/Concern							
<b>Type of Abuse:</b> Please tick relevant boxes							
<b>Emotional</b>	<input type="checkbox"/>	<b>Physical</b>	<input type="checkbox"/>	<b>Sexual</b>	<input type="checkbox"/>	<b>Neglect</b>	<input type="checkbox"/>
Other safeguarding issue:							
Learner has SEN and/or disabilities				Yes/No			
Record the following factually: What are you worried about? Who? What (if recording a verbal disclosure by a learner use their words)? Where? When (date and time of incident)? Any witnesses?							
What is the learner's account/perspective?							
Any other relevant information (distinguish between fact and opinion). Previous concerns etc.							