



SAFEGUARDING, PREVENT AND WELLBEING POLICY

June 2026

Optimum Skills

Department:	Safeguarding, Prevent and Wellbeing Policy
Date Issued:	25/05/2026
Created By:	Stephanie Hudson (Head of Quality / Lead DSPO)
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Revision History	
A	Initial issue
B	Merged Safeguarding and Prevent together and embedded new values
C	Updated to reflect Keeping Children Safe in Education 2025, Working Together to Safeguard Children 2023 and Prevent Duty Guidance: England and Wales (2023). Added the Safeguarding QR Code reporting route; learner recruitment and enrolment safeguarding; a dedicated Online Safety, Filtering and Monitoring section; employer and workplace safeguarding; attendance as a safeguarding indicator; low-level concerns about staff; and an Information Sharing section. Updated terminology from “peer-on-peer” to “child-on-child” abuse, clarified the DSL/DSPO role, added a designated safeguarding governor, referenced the Single Central Record, and reset reporting to “report immediately, record within 24 hours.”

1. Policy Statement

Optimum Skills is fully committed to safeguarding all learners, apprentices, staff, visitors and stakeholders. Safeguarding is at the heart of our business and central to our organisational culture. We recognise our moral and statutory duties to create an inclusive, safe and respectful environment that protects individuals from harm, including abuse, exploitation, neglect, extremism and radicalisation.

Our responsibility includes compliance with the **Prevent Duty** as set out in the Counter-Terrorism and Security Act 2015 and the Prevent Duty Guidance: England and Wales (2023). Prevent requires us to have due regard to the need to prevent people from being drawn into terrorism. Protecting learners from the risk of radicalisation is part of our wider safeguarding obligations and is embedded throughout our operations, curriculum and partnerships. This includes protection from both violent and non-violent extremism where it can reasonably be linked to, or risks drawing people into, terrorism.

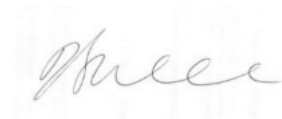
Safeguarding is proactive, not reactive; it is embedded in everything we do and underpinned by a strong culture of vigilance, pastoral care and early intervention.

As a training and apprenticeship provider working with both young people and adults, we apply Keeping Children Safe in Education for our duties towards learners under 18, and the Care Act 2014 for adults with care and support needs. This policy reflects and complies with:

- Keeping Children Safe in Education (KCSIE 2025), in force from 1 September 2025
- Prevent Duty Guidance: England and Wales (2023), made under the Counter-Terrorism and Security Act 2015
- Working Together to Safeguard Children 2023
- The Care Act 2014
- The Children Act 1989 (Sections 17 and 47)
- The Domestic Abuse Act 2021
- Channel Duty Guidance (2023)
- Ofsted Education Inspection Framework
- ESFA / Skills England funding rules and provider accountability frameworks

This policy will be reviewed annually, or sooner where statutory guidance is updated.

Signed



Diane Shakespeare (CEO) 16/05/2026

2. Scope

This policy is mandatory and applies to:

- All staff and contractors, including board members
- All learners and apprentices (including adults and young people)
- Employers and partner organisations
- Visitors to Optimum Skills premises including contractors
- Volunteers and agency workers

3. Our Safeguarding Approach

We adopt a whole-organisation safeguarding culture where everyone shares responsibility to:

- Protect children, young people and adults at risk from harm, abuse, exploitation, neglect, radicalisation and extremism.
- Promote welfare and wellbeing through education, early help and preventative intervention.
- Maintain robust policies, procedures and staff training.
- Embed British Values, equality, diversity and inclusion throughout delivery.

Our adult safeguarding procedures reflect the six statutory principles of the Care Act 2014 – Empowerment, Prevention, Proportionality, Protection, Partnership and Accountability – and we apply a Making Safeguarding Personal (MSP) approach, ensuring the adult's wishes and desired outcomes are central to any safeguarding response.

Embedding a Culture of Vigilance at Optimum Skills

At Optimum Skills, safeguarding is not just a policy – it is a mindset. We foster a culture of vigilance where every member of staff, in every role, is alert, informed and empowered to act in the best interests of our learners. A culture of vigilance means:

We remain alert to the early signs of harm, risk or vulnerability – no matter how small they may seem.

We foster an environment where learners feel safe, heard and supported to speak up.

We challenge assumptions, follow up on concerns and refuse to become complacent.

We believe safeguarding is everyone's responsibility – not just the DSPO's.

This culture is embedded through ongoing staff training, reflection and scenario-based CPD; clear procedures grounded in the 5 Rs (Recognise, Respond, Refer, Record, Reflect); routine reminders in team meetings, supervision and organisational communication; visible safeguarding leadership and accessible reporting pathways for all; and a formal Prevent risk assessment that is reviewed

at least annually and updated in response to emerging local, national or international risks.

What Safeguarding Covers

Safeguarding covers, but is not limited to:

Physical abuse

Emotional abuse

Sexual abuse

Child-on-child abuse (including sexual violence, sexual harassment and “up-skirting”)

Neglect

Bullying (including cyberbullying and prejudice-driven bullying)

Domestic abuse (including coercive control, and children as victims in their own right under the Domestic Abuse Act 2021)

Child criminal exploitation (e.g. county lines)

Child sexual exploitation (CSE)

Child trafficking and modern slavery

Fabricated or induced illness

Faith abuse (witchcraft or spirit-possession allegations)

Gender-based violence / violence against women and girls (VAWG)

Honour-based abuse (HBA)

Female genital mutilation (FGM)

Forced marriage

Breast ironing

Private fostering

Youth-produced sexual imagery (“sexting” / nudes and semi-nudes)

Relationship abuse

Radicalisation and extremism

Serious youth violence

Cybercrime (including hacking, DDoS attacks and malware creation)

Online harms, including misinformation, disinformation and conspiracy theories

Mental health and wellbeing challenges (including suicidal ideation and self-harm)

Homelessness and housing vulnerability

Emerging trends of risk associated with AI

Financial / material abuse

Discriminatory abuse

Organisational abuse

Self-neglect (as defined in the Care Act 2014)

Child-on-Child Abuse

We recognise that children and young people can abuse other children, and we take a “it could happen here” approach. Child-on-child abuse (previously referred to as peer-on-peer abuse) includes bullying, physical abuse, sexual violence and sexual harassment, sharing of nudes and semi-nudes, and initiation or “hazing”-type behaviours. Such abuse is never acceptable and will not be tolerated or dismissed as “banter” or “part of growing up.” All concerns are taken seriously, recorded and responded to through the procedures in this policy.

Contextual and Extra-Familial Safeguarding

In line with Working Together to Safeguard Children 2023, we recognise that significant harm can occur outside the home – in the community, online, in the workplace or through peer relationships. Our risk assessment and response therefore consider the wider contexts in which learners live, learn and work, not only their family circumstances.

Definitions

Adult at Risk (Care Act 2014)

An adult at risk is a person aged 18 or over who has needs for care and support (whether or not the local authority is meeting those needs), is experiencing or at risk of abuse or neglect, and as a result of those care and support needs is unable to protect themselves.

Child or Young Person at Risk (KCSIE 2025)

In accordance with KCSIE 2025 and statutory guidance, a child or young person (anyone under 18) is considered at risk of harm if they are experiencing abuse or neglect; are at risk of suffering significant harm; have safeguarding vulnerabilities that may place them at increased risk of harm, exploitation, radicalisation or abuse; or require early help or statutory intervention to protect their welfare.

Children Act 1989 – Sections 17 and 47

A Child in Need (Section 17) is a child who is unlikely to achieve or maintain a reasonable standard of health or development without the provision of services. A child is subject to Child Protection (Section 47) where there is reasonable cause to suspect they are suffering, or are likely to suffer, significant harm.

4. Proactive Safeguarding and Pastoral Support Model

We operate a proactive system of learner wellbeing management, including:

- **Wellbeing “Watch List”:** learners flagged for emerging concerns (low-level mental health, early vulnerability indicators, emerging safeguarding needs), regularly reviewed by DSPOs and Pastoral Coaches.
- **Pastoral Coach Support:** designated support roles working closely with learners, tutors and employers to identify and address concerns before they escalate, aligned to empower-ed program.
- **At-Risk Cases:** serious safeguarding cases requiring immediate DSPO intervention, external referrals and/or Channel Panel engagement.

This model works in close alignment with our Learner Support and Inclusion Policy (OS-01-27), which sets out full processes for supporting learners with EHCPs, looked-after and previously looked-after children, SEND and other complex needs.

- **Leadership and Safeguarding Structure**

Optimum Skills uses the title Designated Safeguarding and Prevent Officer (DSPO) for the statutory role of Designated Safeguarding Lead (DSL) and deputies described in KCSIE 2025. References to “DSL” in statutory guidance, by Ofsted or by external agencies should be read as referring to our DSPO team.

Designated Safeguarding and Prevent Officers (DSPO Team)

- Lead DSPO (DSL): Stephanie Hudson (Head of Quality, and operations)
- Deputy DSPO: Kellie Duggan (Senior Quality Manager and professionals service delivery manager)
- DSPO: Kayleigh Atkins (pastoral coach)
- DSPO: Nathan Lyons (construction delivery manager)
- DSPO: Sophie Crawford (IQA/EQA, curriculum and Inclusion manager)

At least one trained DSPO will be available during operational hours. Where the Lead DSPO is unavailable, responsibility transfers to a Deputy DSPO

Governance

A nominated member of the board (Jo Smith) holds strategic leadership responsibility for safeguarding and prevent on behalf of the governors. The CEO retains overall accountability. Safeguarding and Prevent are standing agenda items at Senior Management Team and Board level.

Supporting Officers (Pastoral and Curriculum)

- Curriculum Tutors
- Pastoral Coaches

The DSPO team oversees case management, triage, training, policy compliance, liaison with external agencies and governance reporting.

DSPO Roles and Responsibilities

Safeguarding and Case Management

- Act as the first point of contact for safeguarding concerns raised by staff, learners or external agencies.
- Respond promptly to disclosures or concerns, ensuring appropriate action is taken in line with Optimum Skills policies and statutory guidance.
- Maintain accurate and confidential safeguarding records in compliance with data protection law.
- Make timely referrals to external safeguarding and support services where required.
- Liaise with external agencies including children's and adult social care, police, Prevent partners, Channel Panel and safeguarding partnerships.
- Attend and contribute to multi-agency safeguarding meetings, case conferences and strategy discussions.
- Work in partnership with Local Authority Safeguarding Adults Boards (SABs) and Multi-Agency Safeguarding Hubs (MASH) in accordance with Section 42 of the Care Act 2014.
- The Lead DSPO has organisational authority to escalate concerns directly to Local Authority social care without prior management approval where risk is identified.

Training and Awareness

- Deliver safeguarding and Prevent training to all staff, ensuring they understand their responsibilities and reporting processes.
- Keep up to date with safeguarding legislation, best practice and policy developments, sharing updates across the organisation.

- Promote a safeguarding culture, ensuring learners understand how to report concerns and access support.
- Ensure adult safeguarding training includes Care Act 2014 responsibilities and local authority referral procedures.

Monitoring, Compliance and Continuous Improvement

- Conduct and support regular safeguarding audits, risk assessments and internal quality reviews.
- Monitor safeguarding records and processes to ensure consistency and effectiveness.
- Review alerts generated by online monitoring systems for repeated or high-risk searches relating to extremism or harm.
- Contribute to policy reviews, ensuring procedures remain current and compliant.

Prevent Duty and Radicalisation

Optimum Skills recognises the importance of freedom of expression and open debate within a lawful and respectful framework. We do not seek to limit lawful discussion or debate; however, speech that promotes violence, hatred or extremist ideology contrary to the Prevent Duty will be addressed proportionately.

In line with the Prevent Duty Guidance: England and Wales (2023), we recognise that preventing radicalisation is part of our wider safeguarding responsibilities, that tackling the ideological causes of terrorism is central to Prevent, and that we should not create or tolerate “permissive environments” in which extremist views can take hold. Under the Prevent Duty we will:

- Embed British Values (democracy, the rule of law, individual liberty, and mutual respect and tolerance) across our curriculum and activities.
- Conduct Prevent risk assessments that consider local, national and global threats, reviewed at least annually and aligned to the current CONTEST threat picture.
- Refer at-risk learners to the Channel programme where appropriate, using the national Prevent referral process.
- Provide all staff with mandatory Prevent Duty and Channel awareness training.
- Monitor external speakers and activities to ensure alignment with safeguarding standards.
- Maintain robust IT filtering and monitoring (see Section 8).
- Make a Prevent/Channel referral where vulnerability indicators suggest a risk of radicalisation, even where no criminal offence has occurred.

AI – Emerging Trends of Risk

We recognise the emerging trends of AI and possible risk associations. We define “Emerging trends of risk associated with AI as evolving ways in which artificial intelligence technologies—such as generative tools, chatbots, facial recognition, deepfakes, and algorithmic platforms—may be used to exploit, manipulate, or endanger children, young people, or vulnerable adults. These risks may be deliberate (e.g. grooming, fraud, radicalisation), or indirect (e.g. biased content, digital harm, identity-based discrimination).

Key safeguarding risks emerging from AI that we screen for include:

- **Online grooming and impersonation:** AI-generated deepfakes or voice cloning used to impersonate trusted individuals; chatbots used to engage and manipulate learners.
- **Image-based abuse:** non-consensual AI-generated sexual imagery, so-called “undressing” apps, deepfake abuse, sextortion, image-based bullying, impersonation and online coercion. Concerns of this nature must always be treated as safeguarding concerns and reported through the safeguarding reporting route.
- **Disinformation and harmful content:** AI used to create convincing fake news, violent content or hate speech; radicalisation, misinformation, disinformation or conspiracy theories amplified through AI-powered platforms.
- **Bias, discrimination and exclusion:** AI algorithms reflecting or reinforcing social bias (e.g. racial, gender or SEND bias); learners misclassified, profiled or unfairly treated based on AI outputs.
- **Mental health and self-image:** hyper-personalised AI content fuelling anxiety, eating disorders or isolation; AI-generated influencers or “perfect” avatars affecting self-esteem.
- **Privacy and data exploitation:** AI collecting, analysing and predicting behaviour without informed consent; increased surveillance of vulnerable learners.

Staff and learners are guided by our AI Policy and, where AI tools are used in delivery, by the DfE’s guidance on generative AI in education. Filtering and monitoring requirements (Section 8) apply equally to the use of generative AI.

Online Safety, Filtering and Monitoring

We take a whole-organisation approach to online safety and recognise the four areas of online risk set out in KCSIE 2025:

- **Content:** exposure to illegal, inappropriate or harmful material, for example pornography, self-harm and suicide content, extremism, misinformation, disinformation and conspiracy theories.
- **Contact:** harmful online interaction with others, including grooming and exploitation.

- **Conduct:** personal online behaviour that increases the likelihood of, or causes, harm – including sharing nudes or semi-nudes and cyberbullying.
- **Commerce:** risks such as online gambling, scams and financial exploitation.

We maintain appropriate filtering and monitoring systems with Bondgate, and align our provision with the DfE filtering and monitoring standards through the use of a contracted company called Bondgate. To support this:

- Named role-holders are responsible for filtering and monitoring: the Lead DSPO holds strategic responsibility, supported by IT for technical implementation.
- The effectiveness of filtering and monitoring is reviewed at least annually, with the review recorded, and we use the DfE “plan technology for your school” self-assessment tool to benchmark against the standards.
- Monitoring systems generate alerts for repeated or high-risk searches relating to extremism or harm, which are reviewed by the DSPO team.
- We have regard to the Cyber Security Standards for education settings and maintain proportionate cyber-resilience and incident-response arrangements.

9. Learners at Greater Risk of Harm

We recognise that some learners face heightened safeguarding risks, and that some – for example learners with SEND, or LGBT learners – may face additional barriers to recognising or disclosing abuse. These include:

- **Learners with a Social Worker:** monitored closely, with support plans developed collaboratively with external agencies.
- **Looked-after and previously looked-after children and care leavers:** managed in line with the Learner Support and Inclusion Policy, including liaison with the Virtual School Head and care-leaver bursary processes where applicable.
- **Learners with LDD/SEND:** supported via the Learner Support and Inclusion Policy, recognising they may face greater safeguarding vulnerabilities and additional barriers to disclosure.
- **Mental health support needs:** the Safeguarding Team is Mental Health First Aid trained and will coordinate appropriate internal support or refer to external mental health professionals as needed.

10. Safeguarding at Recruitment and Enrolment

10.1 Purpose

Safeguarding begins at recruitment and enrolment, not only once learning has started.

Where an applicant or prospective learner discloses a criminal conviction, pending charge, licence condition, probation involvement or other relevant risk

information, this must be referred to the DSPO team before enrolment is confirmed. Recruiters, tutors and business development staff must not make isolated suitability decisions in these cases.

A learner safeguarding risk assessment must be completed. Where risk is assessed as medium or high, enrolment must be reviewed and approved by SLT before the learner is accepted onto programme. The risk assessment should consider:

- The nature, seriousness and relevance of the offence
- The time elapsed since the offence
- Any current restrictions, licence conditions or probation involvement
- Risk to other learners, staff, employers and visitors
- The support needs of the learner
- Suitability of the delivery model, placement or employer setting
- Required controls, monitoring and review arrangements

Optimum Skills remains committed to inclusion and second chances; however, this must be balanced with robust safeguarding, risk assessment and documented decision-making.

10.2 Scope

This procedure applies where an applicant discloses:

- Criminal convictions (spent or unspent)
- Pending court proceedings
- Community orders
- Licence conditions
- Probation involvement
- MAPPA involvement
- Youth offending service involvement
- Other information which may indicate safeguarding risk

10.3 Initial Disclosure

Where a disclosure is made during:

- IAG
- Application
- Interview
- Initial Assessment
- Enrolment

staff must not make a suitability decision independently.

The disclosure must be referred to:

- Designated Safeguarding Lead (DSL)
- Deputy Safeguarding Lead (where appropriate)

- Relevant member of Senior Leadership Team within 24 hours.

10.4 Immediate Risk Screening

The DSL will undertake an initial screening to determine whether there is any immediate safeguarding concern.

Consideration should be given to:

- Nature of offence
- Recency of offence
- Current restrictions
- Probation involvement
- Risk to others
- Vulnerability of learner groups
- Employer requirements
- Delivery environment

10.5 Safeguarding Risk Assessment

Where appropriate, a formal Learner Safeguarding Risk Assessment must be completed prior to enrolment.

The assessment should consider:

Risk to Learners

- Age profile of learners
- Vulnerable adults
- Group delivery environments
- Shared learning spaces

Risk to Staff

- Lone working arrangements
- Home visits
- Community settings
- Professional boundaries

Risk to Employers

- Workplace placement requirements
- Site access restrictions
- Industry-specific risks

Risk to the Individual

- Mental health concerns
- Housing instability
- Substance misuse

- Exploitation risk
- Social isolation
- Financial hardship

10.6 Risk Rating

Risk assessments should be graded:

Rating	Definition
Low	Minimal safeguarding concerns identified
Medium	Safeguarding controls required
High	Significant controls and oversight required
Critical	Enrolment not appropriate at current time

10.7 Senior Leadership Approval

Where a learner is assessed as:

- Medium Risk
- High Risk
- Critical Risk

the case must be reviewed by SLT before enrolment can proceed.

No learner assessed above Low Risk should be enrolled without documented approval.

The rationale for the decision must be recorded.

10.8 Control Measures

Where enrolment proceeds, appropriate controls may include:

- Safeguarding monitoring plan
- Welfare reviews
- Attendance monitoring
- Employer notification (where appropriate and lawful)
- Placement restrictions
- Enhanced supervision
- Regular DSL review
- Support plans

Controls must be proportionate and risk based.

10.9 Review Arrangements

Risk assessments should be reviewed:

Risk Level	Review Frequency
Low	Every 12 weeks
Medium	Every 6 weeks
High	Monthly

Reviews should consider:

- Attendance
- Behaviour
- Engagement
- Employer feedback
- Safeguarding concerns
- Changes in circumstance

12.10 Equality & Rehabilitation

Optimum Skills recognises the importance of rehabilitation and social mobility.

A criminal conviction alone will not automatically prevent an individual from accessing learning.

Decisions will be based upon:

- Current risk
- Individual circumstances
- Safeguarding considerations
- Ability to implement suitable controls

The organisation seeks to balance inclusion, opportunity and rehabilitation with its duty to safeguard learners, staff, employers and the wider community.

Additional Procedure Flowchart

I would then add a one-page process immediately after this section:

Disclosure Made



Recruiter/Tutor Completes Referral



DSL Initial Screening



Risk Assessment Required?



No → Enrolment

or

Yes



Safeguarding Risk Assessment



SLT Review



Approve / Approve with Controls / Defer / Decline



Monitoring & Review Plan

11. Attendance, Punctuality and Engagement as Safeguarding Indicators

Attendance, punctuality and engagement are key safeguarding indicators. Patterns of absence, sudden disengagement, missed off-the-job learning or unexplained withdrawal may indicate wider risk such as mental health concerns, homelessness, exploitation, financial hardship or domestic instability.

Staff must ensure attendance concerns are followed up promptly and escalated to the DSPO team where patterns suggest potential safeguarding risk. This is embed through learner behaviour and attendance policy.

12. Employer and Workplace Safeguarding

For apprentices and work-based learners, safeguarding responsibilities extend into employer settings. Employers are expected to provide safe, respectful and appropriate working environments, and safeguarding expectations are reinforced through employer agreements and engagement.

Concerns relating to workplace bullying, harassment, intimidation, unsafe supervision, or inappropriate language or conduct must be reported to the DSPO team and managed through our safeguarding and employer-engagement procedures. Employers have access to the QR code for reporting, they also receive the termly newsletters promoting culture around safeguarding.

13. Staff Responsibilities

All staff (including contractors and, where relevant, employers) must:

- Understand and adhere to this policy.
- Read at least Part 1 of KCSIE 2025 (those who do not work directly with children may read the condensed version in Annex A), and confirm they have read and understood it; understanding is recorded and refreshed as part of induction and annual training.
- Complete mandatory safeguarding and Prevent training.
- Recognise and report any safeguarding, wellbeing or Prevent concern immediately.
- Promote a safe, inclusive and respectful learning environment.

Curriculum and Delivery Staff

- Embed safeguarding, wellbeing, British Values, Prevent and resilience-building within teaching.
- Foster open dialogue and learner empowerment.
- Act as the first line of pastoral support, escalating concerns as needed.

Managers and Leaders

- Model best practice in safeguarding leadership.
- Ensure departmental policy compliance.
- Monitor staff competence and support ongoing CPD.

14. Referral and Reporting Process

All staff follow the 5 Rs:

1. Recognise indicators of harm, abuse, neglect or radicalisation.
2. Respond sensitively and calmly, reassuring the individual and listening without judgement, prompting or interruption.
3. Refer the concern immediately.
4. Record full, factual notes of any disclosure or concern.
5. Reflect, with support from the DSPO team.

Report immediately – do not wait. Any safeguarding concern must be reported to a DSPO on the same day, and without delay where there is any risk to a person's immediate safety. Where there is a risk to life or of serious harm, contact a DSPO by telephone immediately and/or the emergency services on 999. A written record must then be completed and submitted to the DSPO team within 24 hours via **safeguarding@optimumskills.co.uk**.

Safeguarding QR Code Reporting Route

To support accessible and timely reporting, Optimum Skills provides a Safeguarding QR Code reporting route. This allows staff, learners, employers and visitors to quickly raise a safeguarding concern using a simplified reporting form.

The QR code does not replace DSPO triage or full safeguarding recording. It acts as an initial alert mechanism to ensure concerns are captured quickly and reviewed by the safeguarding team. The simplified form asks:

- Who are you concerned about?
- Why are you concerned?
- What level of risk do you believe this presents: low, medium, high or immediate?

Where immediate risk is identified, staff must still contact a DSPO directly and/or the emergency services as appropriate.

Staged Reporting and Recording

1. Stage 1 – Quick “Cause for Concern” report (QR code or immediate verbal report to a DSPO).
2. Stage 2 – DSPO triage and risk rating (classified as Watch List for monitored pastoral support, or At-Risk where external referral is required).
3. Stage 3 – Full Safeguarding Record / DSPO Follow-Up Form completed where required (Appendix 5).
4. Stage 4 – External referral, monitoring, review or closure.

The DSPO will review and assess the disclosure, classify it, liaise with external safeguarding partners where necessary, maintain accurate and secure case records, and support staff and learners through all stages of intervention. Where an adult safeguarding concern meets the threshold under Section 42 of the Care Act 2014, the DSPO will submit a Safeguarding Adults Concern to the relevant Local Authority Adult Social Care team within 24 hours.

15. Safer Recruitment and Staff Training

We comply with KCSIE 2025 safer-recruitment standards, including DBS checks at the appropriate level, references, identity verification, right-to-work and qualification checks, and checks on prohibition and barring where relevant. We maintain a Single Central Record (SCR) of the recruitment and vetting checks carried out on staff, and on volunteers and contractors where applicable.

Staff training includes:

- Safeguarding and Prevent Duty (induction and annual refreshers)
- Counter-terrorism and radicalisation awareness, including Channel
- Safer recruitment (for managers and those involved in recruitment)
- Regular hot-topic briefings and communication updates
- Annual safeguarding training for the Governance Board

16. Whistleblowing, Low-Level Concerns and Allegations Against Staff

All staff are encouraged to report any suspected wrongdoing or risk, including concerns about the conduct of colleagues, via their line manager (if appropriate), the DSPO team, or Senior Leadership / a Director where escalation is needed. The NSPCC whistleblowing helpline is also available for staff who do not feel able to raise concerns internally.

Low-Level Concerns

All staff must report low-level concerns about adult conduct where behaviour is inconsistent with the staff code of conduct, professional boundaries or safeguarding expectations – even where it does not meet the threshold for a formal allegation. This includes inappropriate language, over-familiarity with learners, personal social-media contact, sexualised conversations in learner spaces, or any conduct that could undermine learner safety. Low-level concerns

are recorded, reviewed and managed proportionately to prevent escalation and to support a culture of transparency.

Allegations That Meet the Harm Threshold

Allegations that a member of staff, contractor, volunteer or agency worker has harmed, or may have harmed, a child or adult at risk – or behaved in a way that indicates they may be unsuitable to work with them – are managed in line with KCSIE Part 4. Such allegations are referred to the Local Authority Designated Officer (LADO) and HR, and managed alongside our Disciplinary, Bullying and Harassment, and Whistleblowing policies. Where a person is dismissed or removed due to a risk of harm, a referral to the Disclosure and Barring Service will be made. Where an allegation concerns the Lead DSPO or CEO, it is reported to the CEO or, respectively, to the Chair / governance lead and the Local Authority.

17. Information Sharing and Confidentiality

Safeguarding records are kept confidential, accurate and secure, and are processed in line with the UK GDPR and the Data Protection Act 2018. In line with KCSIE 2025 and Working Together to Safeguard Children 2023, data protection law is not a barrier to sharing information for the purposes of keeping someone safe. Fears about sharing information must not stand in the way of promoting the welfare and protecting the safety of children and adults at risk. Information will be shared with relevant agencies promptly, lawfully and proportionately, and on a need-to-know basis.

18. Continuous Improvement and Monitoring

- Safeguarding and Prevent are standing agenda items at SMT and Board level.
- Termly audits of safeguarding practice are conducted.
- Annual policy reviews ensure compliance with legislation and evolving risks, and the policy is updated sooner where statutory guidance changes.
- Stakeholder feedback informs ongoing policy refinement.

19. Related Policies and Documents

- Equality, Diversity and Inclusion Policy
- Anti-Bullying and Harassment Policy
- Whistleblowing Policy
- Safer Recruitment Policy
- Business Continuity and Critical Incident Plan
- IT and Online Safety Policy
- AI Policy
- Code of Conduct for Staff
- Learner Support and Inclusion Policy (OS-01-27)

Safeguarding is everyone's responsibility. Every learner matters. Every voice matters.

Appendix 1 – Safeguarding External Contacts

Area / Team	Telephone	Email
Durham – First Contact (Children)	03000 267 979	Firstcontact-gcsx@durham.gcsx.gov.uk
Durham – Adult Safeguarding	03000 267 979	Safeguardingadults@durham.gov.uk
Darlington – Children’s Access Point	01325 406222	childrensaccesspoint@darlington.gcsx
Darlington – Adult Safeguarding	01325 406111	ssact@darlington.gcsx.gov.uk
Gateshead – Children’s Social Care	0191 433 2653	Aduty@gateshead.gov.uk
Gateshead – Adult Safeguarding	0191 433 7033	adultsocialcaredirect@gateshead.gov.uk
Hartlepool – Children’s Hub	01429 284284	childrenshub@hartlepool.gov.uk
Hartlepool – Adult Safeguarding	01429 284284	dutyteam@hartlepool.gcsx.gov.uk
Middlesbrough – First Contact Team	01642 130700	southteesmach@redcar.cleveland.gov
Middlesbrough – Adult Safeguarding	01642 726004	socialservices@middlesbrough.gov.uk

LADO Contacts

Area	Telephone	Email
Newcastle	0191 277 2500	lado@newcastle.gov.uk
Gateshead	0191 433 8031	lado@gateshead.gov.uk
Middlesbrough	01642 726004	lado@middlesbrough.gov.uk

Area	Telephone	Email
County Durham	03000 267 979	Firstcontact-gcsx@durham.gcsx.gov.uk

National Contacts

- Emergency services (immediate risk to life): 999
- Police non-emergency: 101
- NSPCC Whistleblowing Helpline: 0800 028 0285
- Report terrorism or extremism concerns (ACT): 0800 789 321
- Internal safeguarding reporting: safeguarding@optimumskills.co.uk

Appendix 2 – Expanded Definitions

Term	Definition
Abuse	A form of maltreatment of a child or adult, by inflicting harm or failing to prevent harm. It can occur in person or online and includes physical, emotional and sexual abuse, and neglect.
Physical abuse	Hitting, shaking, throwing, poisoning, burning, suffocating or deliberately inducing illness.
Emotional abuse	Persistent emotional maltreatment that harms emotional development, including intimidation, humiliation, bullying, controlling behaviour or withholding love and support.
Sexual abuse	Forcing or enticing someone to take part in sexual activities, not necessarily involving violence. Includes grooming and exploitation via technology.
Neglect	Persistent failure to meet basic physical and/or psychological needs, such as food, shelter, safety, medical care or emotional support.
Child-on-child abuse	Abuse of one child or young person by another, including bullying, physical abuse, sexual violence and sexual harassment, sharing of nudes and semi-nudes, and initiation/hazing behaviours. (Previously termed peer-on-peer abuse.)
Bullying (including cyberbullying)	Persistent, intentional harm through verbal, physical, emotional or cyber means, including prejudice-driven bullying based on protected characteristics.
Domestic abuse	Any incident of controlling, coercive or threatening behaviour, violence or abuse between intimate partners or family members. Under the Domestic Abuse Act 2021, children who see, hear or experience the effects of domestic abuse are recognised as victims in their own right.
Child criminal exploitation (CCE) / county lines	Exploitation of children for criminal activity, including drug trafficking across areas, involving violence, intimidation and grooming.

Term	Definition
Child sexual exploitation (CSE)	Manipulation or coercion of a child or young person into sexual activity for financial gain, status or gratification.
Modern slavery and trafficking	Recruiting, moving or harbouring people for the purpose of exploitation (sexual, labour, domestic servitude or criminal activity).
Faith abuse	Abuse linked to faith or belief, including witchcraft, spirit possession, or ritualistic abuse.
Honour-based abuse (HBA)	Abuse committed to protect perceived family or community honour, including FGM, forced marriage and breast ironing.
Female genital mutilation (FGM)	Partial or total removal of external female genitalia for non-medical reasons; illegal in the UK and a form of abuse.
Forced marriage	Marriage without free and full consent, where violence, threats or coercion are used.
Breast ironing	Use of heated or hard objects to flatten a young girl's developing breasts to delay physical development.
Private fostering	A private arrangement where a child under 16 (or 18 if disabled) lives with someone other than a parent or close relative for more than 28 days.
Youth-produced sexual imagery (nudes/semi-nudes)	Creating, sharing or possessing indecent images of under-18s; illegal even if consensual between peers.
Sexual violence and sexual harassment	Unwanted sexual activity or comments, including rape, sexual assault, unwanted touching, online harassment and sharing explicit images without consent.
Radicalisation and extremism	The process by which individuals come to support extremist ideologies or terrorist groups. Extremism includes opposition to fundamental British Values.
Serious youth violence	Weapon-enabled crime or severe physical violence among young people, often linked to gang activity.

Term	Definition
Cybercrime	Illegal activity using technology, including hacking, denial-of-service attacks, and creation or distribution of malware.
Mental health concerns	Including self-harm, suicidal ideation, eating disorders, anxiety, depression and emotional crisis requiring a safeguarding response where risk of harm exists.
Homelessness	Lack of stable, safe and suitable accommodation, which may increase safeguarding vulnerability.
AI emerging trends of risk	Evolving ways in which AI technologies may be used to exploit, manipulate or endanger learners (see Section 7).

Appendix 3 – Safeguarding Reporting Procedure

A safeguarding or Prevent disclosure or concern is raised (in person, via a DSPO, or through the Safeguarding QR Code).

If life-threatening or at risk of serious harm

1. Immediately telephone a member of the DSPO team for advice, and/or contact the emergency services (999).
2. The DSPO team assesses the disclosure and advises on next steps.

If non-severe

1. Raise the concern via the QR code or to a DSPO, and complete a Full Safeguarding Record / DSPO Follow-Up Form, emailed to safeguarding@optimumskills.co.uk.
2. The DSPO contacts the person reporting the concern within 24 hours.

In both routes

The DSPO gathers the facts and assesses whether a referral to external stakeholders is necessary. Where required, a referral is made by the DSPO to the relevant agency. The DSPO supports the staff member with next steps and ensures appropriate information, advice and guidance (IAG) is given to the person.

Appendix 4 – The 5 Rs Approach to Safeguarding

When an individual exhibits signs of concern or discloses abuse, staff must follow the 5 Rs:

Step	Action
1. Recognise	Be aware of behaviours that may indicate abuse, including direct disclosures from the learner.
2. Respond	Stay calm and respond positively. Reassure the person that they did the right thing by speaking up. Listen without judgement, prompting or interruption.
3. Record	Document the person's words as accurately as possible. Keep it factual, avoiding personal interpretation. Include observations about appearance and behaviour, e.g. "He had a black eye and was crying." Avoid suggesting words they did not use.
4. Refer / Report	Immediately escalate the concern to a DSPO. Once reported, the DSPO assumes responsibility for any further actions or decisions.
5. Reflect	With support from the DSPO team, reflect on the concern and the response to inform learning and continuous improvement.

Appendix 5 – Full Safeguarding Record / DSPO Follow-Up Form

This form is the full safeguarding record completed at Stage 3 of the reporting process, following an initial QR-code or verbal “Cause for Concern” alert. It supports DSPO triage, decision-making and any external referral. Please send the completed form directly to a member of the DSPO team or to safeguarding@optimumskills.co.uk.

Reporting details

Date and time of incident / disclosure	
Date and time of report to DSPO	

1. Person reporting the concern

Name	
Contact number (preferably mobile)	
Relationship to subject (e.g. tutor, employer)	
Has the learner given consent to refer? (Yes / No)	

2. Person(s) affected by the concern

Number of people affected	
Name	
Date of birth	
Address (including postcode)	
Contact number	
Programme / qualification enrolled on	

Tutor name (if different from above)	
Does the individual have a disability? (Yes / No – give details)	
Is the person under 18 or an adult at risk? (If yes, complete parent/carer details)	

3. Nature of the concern (tick all that apply)

Immediate danger ☐ Child protection (0–17) ☐ Adult at risk (18+) ☐
 Vulnerable person ☐ e-Safety / online ☐ Illegal activity ☐ Prevent /
 radicalisation ☐ Behaviour management ☐ Bullying & harassment ☐ Child-
 on-child abuse ☐ Other ☐

If other, please give details	
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4. Details of the incident, disclosure or issue

Give an account of the issue, disclosure or incident in as much detail as possible, including when and where it took place (if applicable). Keep the account factual.

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Signature of person reporting	
Date	

