INTERNATIONAL	POL-IPS-005	Rev: 5.0	Next review date: 31 August 2026
	Safeguarding and Prevent policy		

Author or latest reviewer name	Mary Holmes	Date: 28/08/2025
Authoriser name	Mary Holmes	Date: 28/08/2025

Safeguarding and Prevent Policy

IPS International (IPS) is committed to safeguarding and promoting the welfare of children and young people, as well as vulnerable adults, and expects all staff, associates, visitors, clients and learners to share this commitment.

This Policy applies to all activity undertaken by us in pursuing our purpose as an Independent Training Provider whilst serving our community, clients and wider stakeholder interests.

Relevant Legislation and guidance IPS adheres to: (please note this list is not exhaustive)

- Children Act 1989, 2004
- Education Act 2011
- Keeping Children Safe in Education 2025
- Childcare Act 2006
- Education Act 2002
- Education and Training Act 2021
- Safeguarding Vulnerable Groups Act 2006
- Protection of Freedoms Act 2012
- Rehabilitation of Offenders Act 1974 (Exceptions) Order 1975 as amended)
- Mental Capacity Act 2005
- The Equality Act 2010
- Immigration, Asylum and Nationality Act 2006
- The Human Rights Act 1998
- Police Act 1997 Part V
- Criminal Justice & Court Services Act 2000
- The Care Act 2015
- Working Together to Safeguard Children 2023
- Counter Terrorism and Security Act 2015
- Modern Slavery Act 2015
- Female Genital Mutilation Act 2003
- Prevent Duty Guidance 2023
- Computer Misuse Act 1990
- Online Safety Act 2023

Scope of the Policy

This Policy applies to all those studying and visiting any IPS training centre, including learners, staff, workplace employers and visitors.

A ‘child’ is defined as a person aged up to 18. A care experienced learner (a Child in Care or Care leaver) and students with special education needs up to the age of 25 may also need additional services, assistance, protection and consideration.

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An adult at risk is a person aged 18 years or over who is or may need community care services as defined by the Safeguarding Vulnerable Adult Act 2006. It may also include adults who are vulnerable for some other reason, for example those who have caring responsibilities special educational needs, mental health concerns, or who have suffered abuse or trauma.
Where learners are employed, the employer will be asked to co-operate with IPS putting into place and subscribing to appropriate safeguards for learners.

Board of Director Responsibilities
IPS is led by a Board of Directors, whose aims are to provide a safe environment and vigilant culture as outlined in Keeping Children Safe in Education where learners can study and be safeguarded.
The board of Directors are committed to ensuring:

- The development and implementation of the Policy is overseen by the Safeguarding team which is led by the Director with overall responsibility for safeguarding.
- That the DSL responsible for safeguarding across all provision is appropriately trained.
- There is a training and development plan covering all IPS staff, regardless of role.
- IPS has undertaken a prevent Risk Assessment.
- A Safeguarding Audit is undertaken annually.
- There is effective safeguarding management of subcontractors.
- The Policy provides clear direction to all staff to ensure any safeguarding concerns, referrals and monitoring of actions are handled appropriately.
- The safer recruitment of staff.
- Ensure that staff undergo regular updated safeguarding training, including in relation to online safety and for learners to be taught about safeguarding, including in relation to online safety within their programmes (adults/Apprentices).
- Regular Safeguarding training for staff, including online safety training, is integrated, aligned and considered as part of the whole organisational safeguarding approach and wider staff training and curriculum planning.
- Whilst considering the above training requirements, they should have regard to behaviour standards for all staff. To manage behaviour effectively to ensure a good and safe educational environment and staff have a clear understanding of the needs of all learners
- They should consider the number of and age range of their learners those who are potentially at greater risk of harm and how often they access the IT system, along with the proportionality of costs versus safeguarding risks.
- They should review the Filtering and Monitoring Standards and discuss with its staff and service providers what more needs to be done to support IPS in meeting this standard.

Definitions of Abuse
IPS recognises the following as definitions of abuse and neglect:
Abuse – Learners can be at risk of harm inside and outside of IPS inside and outside of home and online. All staff exercise professional curiosity and receive training on what to look for in the identification of abuse and neglect and where they are unsure, they speak to the Designated Safeguarding Team.

Abuse is a form of maltreatment of a learner. Somebody may abuse or neglect a learner by inflicting harm or by failing to act to prevent harm. Harm can include ill treatment that is not physical as well as the impact of witnessing ill treatment of others. Abuse can take place wholly online or technology may be used to facilitate offline abuse. Technology is a significant component in many safeguarding and wellbeing issues. Learners may be abused by an adult or adults or by another child or children.

There is an emphasis that all staff should be able to reassure victims of abuse that they are being taken seriously and will be supported, ensuring that learners are never made to feel ashamed or that they are creating a problem by reporting abuse, sexual violence or sexual harassment. It is important that it is explained that the law is in place to protect them rather than criminalise.

Bullying – Is the repetitive, intentional hurting of one person or group by another person or group, where the relationship involves an imbalance of power.

Harassment (as defined by Section 26 of the Equality Act 2010) - includes;
Unwanted behaviour or conduct which has the purpose or effect of violating a person's dignity or creating an intimidating, hostile, degrading, humiliating, or offensive environment because of or connected to one or more of the following protected characteristics: Age, Disability, Gender reassignment, Race, Religion or belief, Sex, Sexual orientation.

Contextualised Safeguarding - Safeguarding incidences and all behaviours can be associated with factors outside IPS and/or can occur between learners outside IPS. Extra familial harms can take a variety of different forms, learners can be vulnerable to multiple harms, including but not limited to sexual abuse, including harassment and exploitation, domestic abuse in their own intimate relationships. Teenage relationship abuse, criminal exploitation, serious youth violence, county lines and radicalisation.

All staff need to consider the context within which such incidents and/or behaviours occur. This is known as contextualised safeguarding which means assessments of learners should consider whether wider environmental factors are present in the learners life that are a threat to their safety and or welfare.

Child on Child Abuse (including young people) - All staff play a vital role in preventing child on child abuse and have received training on how to respond where they believe a child may be at risk of it. Staff should understand intra-familial harms and any necessary support for siblings following incidents.

Children can abuse other children, and this is why it is referred to as child on child abuse, it can happen inside and outside of IPS and online.

Child on child abuse is most likely to include, but may not be limited to:

- Bullying (including cyberbullying, prejudice-based and discriminatory bullying)
- Abuse in intimate personal relationships between each other (sometimes known as 'teenage relationship abuse')
- Physical abuse such as hitting, kicking, shaking, biting, hair pulling, or otherwise causing physical harm (this may include an online element which facilitates, threatens and/or encourages physical abuse)
- Child on Child Sexual Violence and Sexual Harassment - causing someone to engage in sexual activity without consent, such as causing someone to strip, touch themselves sexually or to engage in sexual activity with a third party.
- Consensual and non-consensual sharing of nude and semi-nude images and/or videos (also known as sexting) or youth produced sexual imagery.
- Up skirting which typically involves taking a picture under a person's clothing without their permission with the intention of viewing their genitals or buttocks to obtain sexual gratification or cause the victim humiliation, distress or alarm.
- Initiation/hazing type violence and rituals (this could include activities involving harassment, abuse or humiliation used as a way of initiating a person into a group and may also include an online element).

Child on Child 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. Sexual violence and sexual harassment exist on a continuum and may overlap, they can occur online and face to face (physically and verbally) and are never acceptable.
Being subjected to sexual harassment, violence and or abuse, including that of a sexual nature, may breach any or all of these rights depending on the nature of the conduct and the circumstances. All staff must respond to all signs, reports and concerns, including those that have happened outside of IPS premises and/or online. All staff should maintain an attitude that 'it could happen here' and be aware of that there is a zero-tolerance approach. It is never acceptable and it will not be tolerated.

All staff should challenge physical behaviour (potentially criminal in nature) such as grabbing bottoms, breasts and genitalia, pulling down trousers, flicking bras and lifting up skirts. Dismissing or tolerating such behaviours risks normalising them.

Sexual violence is sexual offenses under the Sexual Offense Act 2003:

- Rape: Penetration of the vagina, anus or mouth of another person who has not consented.
- Assault by Penetration: Penetration of the vagina or anus by a part of another person's body or anything else, it is sexual and there is no consent to the penetration

and the person carrying out the assault, does not reasonably believe there is consent.

- Sexual assault: When someone intentionally touches another person, and the touching is sexual and not consented to. Staff are to be aware that sexual assault covers a wide range of behaviour so a single act of kissing someone without consent or touching someone's bottom/breast/genitalia without consent, can still constitute sexual assault.
- Causing someone to engage in sexual activity without consent: Causing someone to engage in sexual activity without consent, such as causing someone to strip, touch themselves sexually, or to engage in sexual activity with a third party.

Sexual harassment is unwanted conduct of a sexual nature that can occur online and offline and both inside and outside of college such as sexual comments, sexual remarks, sexual jokes, making lewd comments, making sexual remarks about clothes and appearance and calling someone sexualised names. Included in this is also physical behaviour such as deliberately brushing against someone or interfering with someone's clothing.

Online sexual harassment may be standalone or part of a broader pattern of sexual harassment and/or sexual violence. It may include:

- Consensual and non-consensual sharing of nudes and semi-nude images and/or videos. Taking and sharing nude photographs of under 18s is a criminal offence.
- Sharing of unwanted explicit content.
- Sexualised online bullying.
- Unwanted sexual comments and messages, including on social media.
- Sexual exploitation, coercion and threats.
- Coercing others into sharing images of themselves or performing acts they're not comfortable with online.

All inappropriate behaviours between children should be challenged as they are abusive in nature. Downplaying certain behaviours, for example dismissing sexual harassment as 'just banter', 'just having a laugh', 'part of growing up', or 'boys being boys' can lead to a culture of unacceptable behaviours, an unsafe environment for children and in worst case scenarios a culture that normalises abuse leading to children accepting it as normal and not coming forward to report it.

Harmful Sexual Behaviour (HSB) - can occur online and/or face to face and can also occur simultaneously. This exists on a continuum, ranging from normal and developmentally expected to inappropriate, problematic, abusive and violent. The term HSB has been widely adopted in child protection.

Stalking - is a pattern of abusive behaviour designed to incite fear and curtail freedom, such as watching or monitoring someone or forcing contact with them through any means (including via social media).

Physical abuse - This may involve hitting, shaking, throwing, poisoning, burning, scalding, drowning, suffocating or otherwise causing physical harm. Physical harm may also be

caused when a parent or carer feigns symptoms of, or deliberately causes, ill health to a learner they are looking after.

Emotional abuse - Emotional abuse is the persistent emotional ill treatment of a learner such as to cause severe and persistent adverse effects on the learners emotional development. It may involve conveying to the learner that they are worthless or unloved, inadequate, or valued only in so far as they meet the needs of another person. It may include not giving the learner opportunities to express their views, deliberately silencing them or 'making fun' of what they say or how they communicate. It may feature age or developmentally inappropriate expectations being imposed on learners, causing the learner frequently to feel frightened, or the exploitation or corruption of learners. It can include over protection and limitation of exploration and learning or preventing the learner from participating in normal social interaction. It may include serious bullying (including cyber bullying) causing the learner frequently to feel frightened or in danger, or the exploitation or corruption of learners. Some level of emotional abuse is involved in all types of maltreatment of a learner although it may occur alone.

Sexual abuse - This involves forcing or enticing a child, young person or vulnerable adult to take part in sexual activities, not necessarily involving violence, whether or not the learner is aware of what is happening. The activities may involve physical contact including penetration (rape or oral sex) or nonpenetrative (masturbation, kissing, rubbing and touching outside of clothing).
It may also include involving the looking at, or being involved in the production of sexual images or watching sexual activities, or encouraging the person to behave in sexually inappropriate ways or grooming a learner in preparation for abuse. Sexual abuse can take place online and technology can be used to facilitate offline abuse. Sexual abuse is not solely perpetrated by males, women can also commit acts of sexual abuse as can other children. The sexual abuse of children by other children is a specific safeguarding issue in education and all staff are trained to be aware of it and how to report.

Neglect - Neglect is the persistent failure to meet a child, young person or vulnerable adult's basics physical and/or psychological needs, likely to result in the serious impairment of their health or development. Neglect may occur during pregnancy, for example, as a result of maternal substance misuse. Once a child is born, neglect may involve a parent or carer failing to: provide adequate food, shelter (including exclusion from home or abandonment) and clothing, protect a child from physical and emotional harm or danger; ensure adequate supervision (including the use of adequate caregivers) or ensure access to appropriate medical care or treatment. It may also include neglect of, or unresponsiveness to, basic emotional needs.
Discriminatory abuse – this may include abuse, bullying and harassment based on an individual's age, sex, disability, religion, race, cultural background, sexual orientation or gender reassignment.
Financial or Material Abuse - Financial or material abuse, including theft, fraud, exploitation, pressure in connection with wills, property or inheritance or financial transactions, or the misuse or misappropriation of property, possessions or benefits.

Child Sexual Exploitation (CSE)– Is a form of abuse that occurs where an individual or group takes advantage of an imbalance in power to coerce, manipulate or deceive a child into taking part in sexual (or criminal) activity, in exchange for something the victim needs or wants, and/or for the financial advantage or increased status of the perpetrator or facilitator and/or through violence or the threat of violence. CSE and CCE (child criminal exploitation) can affect children of any gender and can include children who have been moved (commonly referred to as trafficking) for the purpose of exploitation.

CSE is a form of child sexual abuse which may involve physical contact, including assault by penetration (for example, rape or oral sex) or nonpenetrative acts such as masturbation, kissing, rubbing and touching outside clothing. It may include non-contact activities, such as involving children in the production of sexual images, forcing children to look at sexual images or watch sexual activities, encouraging children to behave sexually inappropriate ways or grooming a child in preparation for abuse including via the internet.

CSE can occur over time or be a one-off occurrence and may happen without the child's immediate knowledge for example through others sharing videos or images of them on social media. It can occur over time or be a one-off occurrence and may happen without the child's immediate knowledge for example through others sharing videos or images of them on social media.

Child Criminal Exploitation (CCE) - Some specific forms of CCE can include children being forced or manipulated into transporting drugs or money through county lines, working in cannabis factories, shoplifting, or pickpocketing. They can also be forced or manipulated into committing vehicle crime or threatening/committing serious violence to others.

Children become trapped by this type of exploitation as perpetrators can threaten victims (their families) with violence or entrap and coerce them into debt. They may be coerced into carrying weapons such as knives or begin to carry a knife for a sense of protection. As children involved in criminal exploitation often commit crimes themselves their vulnerability as victims is not always recognised by adults and professionals (particularly older children). Even if the activity appears to be something they have agreed or consented to they may still have been criminally exploited.

It is important to note that the experience of girls who are criminally exploited can be very different to that of boys. The indicators may not be the same, however professionals should be aware that girls are at risk of CE too. Both boys and girls maybe at a higher risk of sexual exploitation when being exploited criminally.
County Lines is a term used to describe gangs and organised criminal networks involved in exporting illegal drugs into one or more importing areas within the UK using dedicated mobile lines or other forms of 'deal line'. Exploitation is an integral part of the county lines offending model, with learners exploited to move and store drugs and money.
One of the ways of identifying potential involvement in county lines are missing episodes both from home and college when the victim may have been trafficked for the purpose of transporting drugs and referral to the Safeguarding Team should be made immediately where there is a concern.

All staff should be aware of indicators which may signal that learners are at risk or involved with serious violent crime. These may include increased absence from IPS or the work place, a change in friendships or relationships with older individuals or groups. Significant decline in performance, signs of self-harm, a significant change in well-being or signs of assault or unexplained injuries. Unexplained gifts or new possessions could also indicate that a learner has been approached by or are involved with individuals associated with criminal networks or gangs.

Forced marriage - A forced marriage is where one or both people do not consent to the marriage. Pressure can include threats, physical or sexual violence and financial pressure. All child marriages are forced because a child cannot provide informed consent and is therefore a violation of children's rights.
The Marriage and Civil Partnership (Minimum Age) Act 2022 states that 16- and 17-year-olds will no longer be allowed to marry or enter a civil partnership, even if they have parental consent. Since Feb 2023 it has also been a crime to carry out any conduct whose purpose is to cause a child to marry before their 18th birthday even if violence, threats or another form of coercion are not used. As with the existing forced marriage law this applies to non-binding, unofficial 'marriages' as well as legal marriages. Staff need to be aware that it is illegal even with no coercion.

Honour Based Abuse (includes Female Genital Mutilation and Forced Marriage) – So called honour based abuse (HBA) encompasses crimes that have been committed to protect or defend the honour of a family and/or the community, including female genital mutilation, forced marriage and practices such as breast ironing. All forms of HBA are abuse and should be handled and escalated as such.

Female Genitalia Mutilation (FGM) - May comprise of all procedures involving partial or total removal of the external female genitalia or other injury to the female genital organs. It is illegal in the UK and a form of child abuse. There is a legal duty on all staff to personally report to the police where they discover FGM appears to have been carried out on a girl under 18. Those failing to report such cases could face disciplinary action.

Domestic Abuse - Can encompass a wide range of behaviours and maybe a single incident or a pattern of incidents. The abuse can be, but is not limited to, violent, psychological, physical, sexual, financial or emotional. Children and young people 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). Teen relationship abuse was acknowledged formally in 2013 when the Home Office definition of Domestic Violence was extended to include young people aged 16 and over and awareness of the issue has increased in part due to the Home Office's targeted campaign. These can have a detrimental and long-term impact on the learner's health, well-being, development and ability to learn.
It also includes what is known as 'honour' based violence, female genital mutilation (FGM) and forced marriage. Domestic abuse affects people of every class, gender, wealth, geography, age, race, disability and sexuality. The abuse can begin at any stage of the

relationship and may continue after the relationship has ended. Domestic abuse is a pattern of controlling and aggressive behaviour that is intentional and calculated to exercise power and control within a relationship. If a learner discloses that they are in an abusive relationship we have a duty to offer them support, and /or find the relevant organisation that may be able to help them.
If the learner is a child, the information must be shared with a DSL without delay.
If the learner is an adult, it is important to establish if they have children under 18. If the victim has young children a referral may be made to Children's Social Care, with consent from the parent.

Young people who are Lesbian, Gay, Bi, or Trans (LGBT) - The fact that a young person may be LGBT is not in itself an inherent risk factor for harm. However young people who are LGBT can be targeted by other learners. In some cases a young person who is perceived by other learners to be LGBT (whether they are or not) can be just as vulnerable as learners who identify as LGBT.
It is vital that staff endeavour to reduce the additional barriers faced and provide a safe space for them to speak out or share their concerns with members of staff. As well as the learners primary tutors being available, the Safeguarding team will have access to safe spaces for learners to access staff for discussions.

Care Experienced Learners, Children in Care (CiC), Care leavers
Learners who are in care or are leaving care are a particularly vulnerable cohort and should be identified, monitored and supported throughout their time at IPS. The most common reason for children being looked after is as a result of abuse and/or neglect. IPS will ensure that staff have the skills, knowledge and understanding to keep looked after children safe.

A previously looked after child potentially remains vulnerable and all staff should have the skills, knowledge and understanding to keep previously looked after children safe. When dealing with looked after children and previously looked after children it is important that all agencies work together and prompt action is taken when necessary to safeguard these children who are a particularly vulnerable group.

The DSL must be notified once a learner has completed their enrolment form and indicated they are a looked after child, or leaving care and has not yet been identified as such. Each care experienced learner informed of the contact details of the DSL.
Trainers will work closely with the DSL particularly if there are concerns eg around non-attendance or change in behaviour.

Learners with Special Educational Needs, Disabilities or Health issues
Learners with additional needs (SEND) or certain medical or physical health conditions can face additional safeguarding challenges both online and offline. Additional barriers can exist when recognising abuse and neglect in this group of learners. These include:

- Assumptions that indicators of possible abuse such as behaviour, mood and injury relates to the learners condition without further exploration.
- These learners being more prone to peer group isolation or bullying, including prejudice-based bullying than other learners.

- The potential for learners with SEND or certain medical conditions being disproportionately impacted by behaviours such as bullying, without outwardly showing any signs.
- Communication barriers and difficulties in managing or reporting these challenges.
- Cognitive understanding, being unable to understand the difference between fact and fiction in online content and then repeating the content/behaviours in college or the consequences of doing so.

Any reports of abuse involving learners with SEND will therefore require close liaison with the Designated Safeguarding Lead.
Where concerns occur learners are supported by Safeguarding Team.

Mental Health
All staff should be aware that mental health problems can, in some cases, be an indicator that a learner has suffered or is at risk of suffering abuse, neglect and exploitation. All staff are well placed to observe learners' day to day and identify those who behaviour suggests that they may be experiencing a mental health problem or be at risk of developing one. However staff should not attempt to make a diagnosis of a mental health problem.

IPS has a team of Mental Health Champions, some of whom are Mental Health First Aiders and all of whom report directly to the DSL.

Learners who are Absent from Education
Learners being absent from education for prolonged periods and/or on repeat occasions, can act as a vital warning sign to a range of safeguarding issues including neglect, child sexual and child criminal exploitation – particularly county lines.
It is important that IPSs response to persistently absent learners missing education supports identifying such abuse. This includes when problems are first emerging but also where learners are already known to the local authority children's social care and need a social worker (such as a child who is a child in need or has a child protection plan or is a looked after child) where being absent from education may increase known safeguarding risks within the family or in the community.
Staff are to report incidences and have strategies in place to reengage learners. Where a learner has additional vulnerabilities, such as Care Experienced, has an EHCP, has a social worker etc, close liaison must take place with the DSL.

Prevent
Prevent is not about identifying or labelling learners. It's about supporting all learners by building resilience; developing critical literacy and thinking skills, and ensuring their safety. It is no different to any other form of protection.

Radicalisation and Extremism – Refers to the process of supporting terrorism and extremist ideologies and, in some cases, to then participate in terrorist activity.

Extremism is defined as:

The promotion or advancement of an ideology based on violence, hatred or intolerance, that aims to:

- negate or destroy the fundamental rights and freedoms of others; or
- undermine, overturn or replace the UK's system of liberal parliamentary democracy and democratic rights; or
- intentionally create a permissive environment for others to achieve the results in (1) or (2).

Radicalisation refers to the process by which a person comes to support terrorism and extremist ideologies. IPS seeks to protect all learners against the messages of violent extremism including, but not restricted to those linked to Islamist ideology, far right/Neo Nazi/White Supremacist ideology, Irish Nationalist and Loyalist paramilitary groups, and Extremist Animal Rights Movements.

IPS is subjected to a duty under section 26 of the Counter-Terrorism and Security Act 2015 in the exercise of their functions to have due regard to the need to prevent people from being drawn into terrorism.
Staff must be aware that all learners are vulnerable to an extent and that anyone could be affected by grooming (of any sort), radicalisation is an issue to all not just vulnerable learners.

Terrorism – is an action that endangers and causes serious violence to a person and/or people, cause serious damage to property or seriously interferes or disrupts an electronic system. The use or threat is designed to influence government or to intimidate the public and is made for advancing a political, religious or ideological cause.

IPS has a Prevent risk assessment which forms part of the Safeguarding Policy.

IPS values freedom of speech, and the expression of beliefs and ideology as fundamental rights underpinning our society, However, it recognises that free speech is subject to laws and policies. The Prevent Strategy has put in place a 'Freedom of Expression' to include the Freedom of Speech Code of Practice procedure.

Reporting and recording concerns
If staff have any concerns or notice any significant changes in the behaviour or temperament of a learner they should do what they always do i.e. ask the learner if everything is alright. If, during the conversation something is disclosed which makes them fear for the safety of the learner, then the staff member should do exactly what they would in any other situation - speak to a member of the safeguarding team at IPS and follow up their concerns with a written report to explain their concern.
The Designated Safeguarding Lead will liaise with Local Authority Designated Officer (LADO) and/or Kent and Medway Prevent Team for advice. If deemed appropriate following advice, a referral can be made to Channel who offer advice and guidance and support with the aim of preventing activity which could be deemed as criminal. IPS has built strong links with the South East Regional Prevent Co-ordinator.

Online Safety – The breadth of issues classified with online safety is considerable and ever evolving but can be categorised into four areas of risk:

- Content: being exposed to illegal, inappropriate, or harmful content eg pornography, fake news, racism, misogyny, self-harm, antisemitism, radicalisation and extremism. Misinformation, disinformation, including fake news, and conspiracy theories.

- Contact: being subjected to harmful online interaction with other users, for example, peer to peer pressure, commercial advertising and adults posing as children or young adults with the intention to groom or exploit them for sexual, criminal, financial or other purposes.

- Conduct: online behaviour that increases the likelihood of causing harm eg making, sending and receiving explicit images eg consensual and non-consensual sharing of nudes and semi-nudes and/or pornography, sharing other explicit images and online bullying.

- Commerce: online gambling, inappropriate advertising, phishing and or financial scams.

Filtering and Monitoring

The Director responsible for ICT systems has the responsibility to ensure that IPS has appropriate filtering and monitoring systems in place and regularly review their effectiveness. Clear roles, responsibilities and strategies are vital for delivering and maintaining effective filtering and monitoring systems. Learners with greater vulnerability should be considered when it comes to tech use, perhaps with different mitigation in place (those lacking critical thinking processes can be vulnerable).

Directors, the Designated Safeguarding Lead (DSL) and those responsible for IT service support, including the external service provider in all aspects of filtering and monitoring, work closely to ensure the systems are effective.
Day to day management of filtering and monitoring systems requires the specialist knowledge of both safeguarding and IT staff to be effective. The Designated Safeguarding Lead works closely together with the Director responsible for IT (who works closely with the IT service provider) to meet the needs of the whole organisation.

To understand and evaluate the changing needs and potential risks to IPS staff and learners the IT team review the filtering and monitoring provision at least annually.

An effective filtering system needs to block internet access to harmful sites and inappropriate content. It should not:

- unreasonably impact teaching and learning or IPS administration systems
- restrict learners from learning how to assess and manage risk themselves

Monitoring user activity on IPS devices is an important part of providing a safe environment for learners and staff. Unlike filtering it does not stop users from accessing material through internet searches or software.

Monitoring allows you to review user activity on IPS devices. For monitoring to be effective it must pick up incidents urgently, usually through alerts or observations, allowing you to take prompt action and record the outcome.

IPS has a clear policy on use of mobile and smart technology and clearly states what action will be taken if such devices are used to sexually harass, bully and control others, share indecent images consensually or non consensually, view and share pornography and other harmful content.

Cybercrime
Cybercrime is criminal activity committed using computers and/or the Internet. It is broadly categorised as either 'cyber-enabled' (crimes that can happen offline but are enabled at scale and at speed on-line) or 'cyber dependent' (crimes that can be committed only by using a computer). Cyber dependent crimes include:

- Unauthorised access to computers (Illegal hacking).
- Denial of service (attacks or 'booting') – makes computer/network/website unavailable
- Making, supplying, or obtaining malware (malicious software) - such as viruses

IPS is committed in meeting the Cybersecurity Standards of Schools and Colleges set by the Government by protecting all devices on our network:

- With a properly configured firewall.
- Network devices are known, correctly configured and up to date.
- Accounts only have the access they require.
- Multi factor Authentication is in place.
- Anti malware is in place.

If there are concerns about a learner in this area, the Designated Safeguarding Lead will consider referring to the Cyber Choices programme:
https://nationalcrimeagency.gov.uk/cyber-choices

This is a nationwide police programme supported by the Home Office and led by the National Crime Agency working with the regional and local policing.
It aims to intervene where young people are at risk of committing or being drawn into low level cyber dependent offences and divert them to a more positive use of their skills and interests. Cyber Choices does not currently cover cyber enabled crimes such as fraud, purchasing of illegal drugs online and child sexual abuse and exploitation, nor other areas of concerns such as online bullying or general online safety.

Learner Entitlements
All learners are entitled to:

- Be taught in environments which are safe, conducive to learning and free from disruption or threat of harm;

- Expect appropriate action from us to tackle any incidents of violence, threatening behaviour, abuse, discrimination or harassment;
- Have any report of safeguarding issues taken seriously by us and investigated / resolved as necessary;
- Be treated with respect.

Learner Responsibilities
Providing a safe atmosphere which enhances a learner's experience is a shared responsibility which also places responsibilities on the learners themselves.
Learner entitlements are most likely to be met fully when they:

- Show respect to staff, fellow learners, property and the environment;
- Take a positive and proactive role to keep themselves and others safe;
- Follow the reasonable instructions of staff and others involved with their learning;
- Report any incidents of concern (and are encouraged to do so);
- Appreciate that they are not allowed to increase safeguarding risks to themselves or others, or use our identity or that of our funders online (or in other media) inappropriately;
- Adhere to codes of conduct and do not contravene any aspect them;
- Co-operate with, and abide by, any arrangements put in place to support their behaviour.

Trainer / Assessor Responsibilities
All staff have a responsibility to:

- Be aware of and implement the Policy on Safeguarding Young People and Vulnerable adults
- Provide a safe, secure and supportive environment for Young People and Vulnerable adults
- Listen to Young People and Vulnerable adults and respond in an appropriate way;
- Protect Young People and Vulnerable adults from abuse;
- Make referrals, preferably via a Designated Safeguarding Lead, in accordance with Local Authority Designated Officer (LADO) procedures;
- Recognise that, if at any time there is a risk of immediate serious harm to a person, a referral should be made to the LADO immediately. Anybody can make a referral. If the person's situation does not appear to be improving, the staff member with concerns should press for re-consideration. Concerns should always lead to help for the person at some point;

Board and Curriculum Manager Responsibilities
To ensure that:

- There are effective safeguarding policies and procedures that are in line with the Local Safeguarding Children Board (LCSB) and Safeguarding Adults Board (SAB) procedures and that the policy is made available to learners on request;
- The organisation operates safe recruitment procedures and appropriate checks are carried out on staff who work with Young People and Vulnerable adults

- Procedures for dealing with allegations of abuse against members of staff comply with the LSCB and SAB inter agency procedures;
- There is a Designated Safeguarding Lead (DSLs), who is a Senior Manager who takes lead responsibility for dealing with safeguarding issues;

Monitors compliance and undertakes an annual review of the Safeguarding Young People and Vulnerable adults Policy. It amends as soon as practicable any weaknesses in arrangements as these are brought to its attention;
Ensures all staff are trained and aware of safeguarding and the Prevent Strategy, to a level 2 accredited qualification.

Designated Safeguarding Lead
The organisation will designate an appropriate member of staff to take lead responsibility for young people and vulnerable adults. This person will have the status and authority to carry out the duties of the post including committing resources and, where appropriate, supporting and directing other staff. When required she/he has the responsibility for:

- The referral of cases of suspected abuse or allegations of abuse to the relevant investigating agencies, contributing to assessment /case conferences as appropriate;
- Acting as a source of support and expertise when deciding whether to make a referral and liaising with relevant agencies;
- Ensuring staff who work with Young People and Vulnerable adults have information on the Safeguarding Young People and Vulnerable adults Policy and its associated Procedure and they participate in appropriate induction and training;
- Maintaining accurate, secure records of referrals or concerns;

Standards by which the Success of this Policy can be Evaluated

- Learner feedback received from surveys and, where applicable, focus groups and forums.
- Formal reflection of, and reporting on, operating safeguarding procedures through the recording, monitoring, and analyses of safeguarding concerns submitted relating to student behaviour.
- Self-assessment and external review.
- Staff responses to training and employing appropriate strategies.

Confidentiality and Information Sharing
IPS commits to the Data Protection Act including the General Data Protection Regulations (DPA & GDPR). The legislation does not prevent the sharing of information for the purposes of keeping learners safe and promoting their welfare. If in any doubt about sharing information staff should speak to the Designated Safeguarding Lead. Fears about sharing information must not be allowed to stand in the way of the need to safeguard and promote the welfare of learners.
All concerns, discussions, decisions made and the reasons for those decisions should be recorded in writing. This will also help if and when responding to any complaints about the way a case has been handled by IPS. Information should be kept confidential and stored securely. It is good practise to keep concerns and referrals on IPS Safeguarding drive.

A record should include:

- a clear and comprehensive summary of the concern
- details of how their concerns were followed up and resolved
- a note of any action taken, decisions reached and the outcome.

If in doubt about recording requirements staff should discuss with the designated safeguarding lead.

Reporting and dealing with safeguarding allegations made against members of staff
Appropriate whistleblowing procedures are in place for such concerns to be raised with the Director responsible for Safeguarding or the Managing Director or IPS.
Where a staff member is able to raise an issue, the complaint will be dealt with under the Grievance Procedure. Where a staff member feels unable to raise an issue with their employer or feels that their genuine concerns are not being addressed other whistle blowing channels are open to them.
Some examples of allegations may be:

- Behaved in a way that has harmed a learner or may have harmed a learner.
- Possibly committed a criminal offence against or related to a learner.
- Behaved towards a learner in a way that indicates he or she may pose a risk of harm to learners.
- Behaved or may have behaved in a way that indicates they may not be suitable to work with learners.

There are two aspects to consider when an allegation is made:
Looking after the welfare of the learner and investigating and supporting the person subject to the allegation. The DSL should discuss with the LADO the nature, content and context of the allegation and agree a course of action.
Before contacting the LADO. IPS should conduct basic inquiries in line with local procedures to establish the facts and to help them determine whether there is any foundation to the allegation being careful not to jeopardise any future police investigation.

IPS recognises that an allegation of abuse made against a member of staff may be made for a variety of reasons and that the facts of the allegation may or may not be true. It is imperative that those dealing with an allegation maintain an open mind and those investigations are thorough and not subject to delay.
IPS recognises that the welfare of the child, young person or vulnerable adult is of paramount concern. It is also recognised that hasty or ill-informed decisions in connection with a member of staff can irreparably damage an individual's reputation, confidence and career. Therefore, those dealing with such allegations within IPS will do so with sensitivity and will act in a careful, measured way.
If staff have a safeguarding concern, or an allegation is made about another member of staff (including associates or sub-contractors) harming or posing a risk of harm to learners then the IPS procedure needs to be accessed.

Sharing low level concerns (do not meet the harm threshold)

The term low level concern does not mean that it is insignificant. 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 working in or on behalf of IPS may have acted in a way that is:

- Not consistent with IPS's code of conduct, including inappropriate conduct outside of work
- it doesn't meet the threshold of harm or is not considered serious enough for IPS to refer to the LADO.

Examples of such behaviour could include, but are not limited to:

- Being over friendly with learners
- Having favourites.
- Taking photographs of learners on their mobile phone without a media consent form
- Engaging with a vulnerable learner on a one-to-one basis in a secluded area or behind a closed door, where others are not aware of your presence or activity.
- Humiliating learners.

Low level concerns about agency, contractors etc should be notified to their employer

Reporting safeguarding concerns

All staff should be able to reassure victims that they are being taken seriously and that they will be supported and kept safe. A victim should never be given the impression that they are creating a problem by reporting any form of abuse and or neglect. Nor should a victim ever be made to feel ashamed of making a report.

All staff should be aware that learners may not feel ready or know how to tell someone that they are being abused, exploited or neglected and or they may not recognise their experiences as harmful. For example, learners may feel embarrassed, humiliated or being threatened. This could be due to their vulnerability, disability and/or sexual orientation or language barriers. This should not prevent staff from having a professional curiosity and speaking to the designated safeguarding lead they have concerned about a learner.
It is also important that staff determine how best to build trusted relationships with learners which facilitate communication.
All staff should respond to all signs, reports and concerns of child-on-child sexual violence and sexual harassment, including those that have happened outside of IPS premises and/or online. All staff working with learners are advised to maintain an attitude of it 'could happen here' and this is especially important when considering child on child abuse.

Removing a learner from an unsafe workplace

Introduction:
This procedure will be followed in a situation where a learner has stated that, or it is perceived that, a situation has arisen where that learner does not feel safe in the workplace or is under threat - and it can be deemed to be a safeguarding issue.

The aim is to move the learner to a safe environment whilst immediately launching an investigation to identify/rectify any issues with the employer and to work with the employer to resolve these.

Immediate actions to be taken by the Safeguarding Officer on notification of a work-based Safeguarding issue:

1. On notification of every potential safeguarding issue a case file will be opened. At this point further information must be sought and any immediate decisions related to the learner must be made on the information available at that point in time.
2. If there is any indication of an immediate threat to either the safety or wellbeing of the learner, and this is deemed to be a safeguarding issue, the first priority is to ensure that the learner is in a safe environment.
3. Where a withdrawal is deemed necessary then the Safeguarding Director within IPS International must be involved/consulted.
4. In the scenario where the perceived threat to the learner is in the workplace then the learner will be advised by the Safeguarding officer to temporarily leave the workplace and go to a place of safety.
5. Where the Safeguarding Officer is unavailable then the Director or Section Manager for the affected department should be contacted to make a joint decision on the withdrawal.
6. Immediately following this, the employer must be informed and a meeting set up to examine the situation, to gather information, review available facts and seek a resolution to the situation.

In terms of initial employer notification, all avenues of communication will be used and it is important that an acknowledgement of receipt of this notification is received from the employer.

This initial communication is vital and must be made to the appropriate person within the organisation. Ideally this should be the learner's direct supervisor however, if the situation deems that this is not appropriate, then an alternative must be sought.

Review meeting:
Review available facts, statements and information and establish what needs to be done to ensure that any issues are addressed. Meetings will be documented, emphasising the actions that will be taken to resolve the situation, and minutes saved in the confidential case file.

Safer Recruitment
IPS fully implements the requirements of 'Keeping Children Safe in Education' (updated September 2025), Part 3 Safer Recruitment has recruitment and selection procedures. These are reviewed to ensure that they take account of the following:

- Robust recruitment and selection process – this should deter and prevent people who are unsuitable to work with children from applying for or securing employment, or volunteering opportunities in IPS.
- To ensure that any persons conducting the interview has completed safer recruitment awareness support and training.

- Application forms – a statement in the application form to state to applicants that it is an offense to apply for the role if the applicant is barred from engaging in regulated activity relevant to children.
- A CV should only be accepted alongside a full application form and is not sufficient on its own to support safer recruitment.
- Shortlisting – Candidates are asked to complete a self-declaration of their criminal record or information that makes them unsuitable to work with children and young people. In addition, as part of the shortlisting process, IPS will consider carrying out an online search as part of their due diligence on the short-listed candidates. This may help identify any incidents or issues that have happened and are publicly available online which the IPS might want to explore with the applicant at interview. IPS will inform shortlisted candidates that online searches may be done as part of the Due Diligence checks.
- Employment history and references – references are obtained before interview, where possible. This allows any concerns raised to be explored further with the referee and taken up with the candidate at interview. Employment cannot commence without at least one reference from recent employer
- Selection – interviews should be used to explore potential areas of concern and to determine the applicant suitability to work with children.
- Any information about past disciplinary action or substantiated allegations should be considered in the circumstances of the individual case.
- Pre-appointment vetting checks, regulated activity and recording information - It is important to ensure that the correct pre appointment checks are carried out to identify whether a person may be unsuitable to work with children and young people. All offers should be conditional until satisfactory completion of the mandatory pre-employment checks take place as well as verifying a candidate's identity and Enhanced DBS (Disclosure and Barring Service) checks for those who will be engaging in regulated activities with children should take place. A separate children's barred list check to be obtained if an individual is to start work in regulated activity with children before the DBS certificate is available.
- A job applicant can be asked relevant questions about disability and health in order to establish whether they have the physical and mental capacity for the specific role.

Links for referrals
Safeguarding referrals for learners aged 16 – 18
Kent safeguarding children's multi-agency partnership
https://www.kscmp.org.uk/

Safeguarding referrals for learners aged 18 +
http://bit.ly/3UJfaLX

Allegations about staff that relate to learners aged 16-18

https://www.kscmp.org.uk/procedures/local-authority-designated-officer-lado

Prevent queries
https://www.kent.gov.uk/about-the-council/strategies-and-policies/service-specific-policies/community-safety-and-crime-policies/contest/prevent

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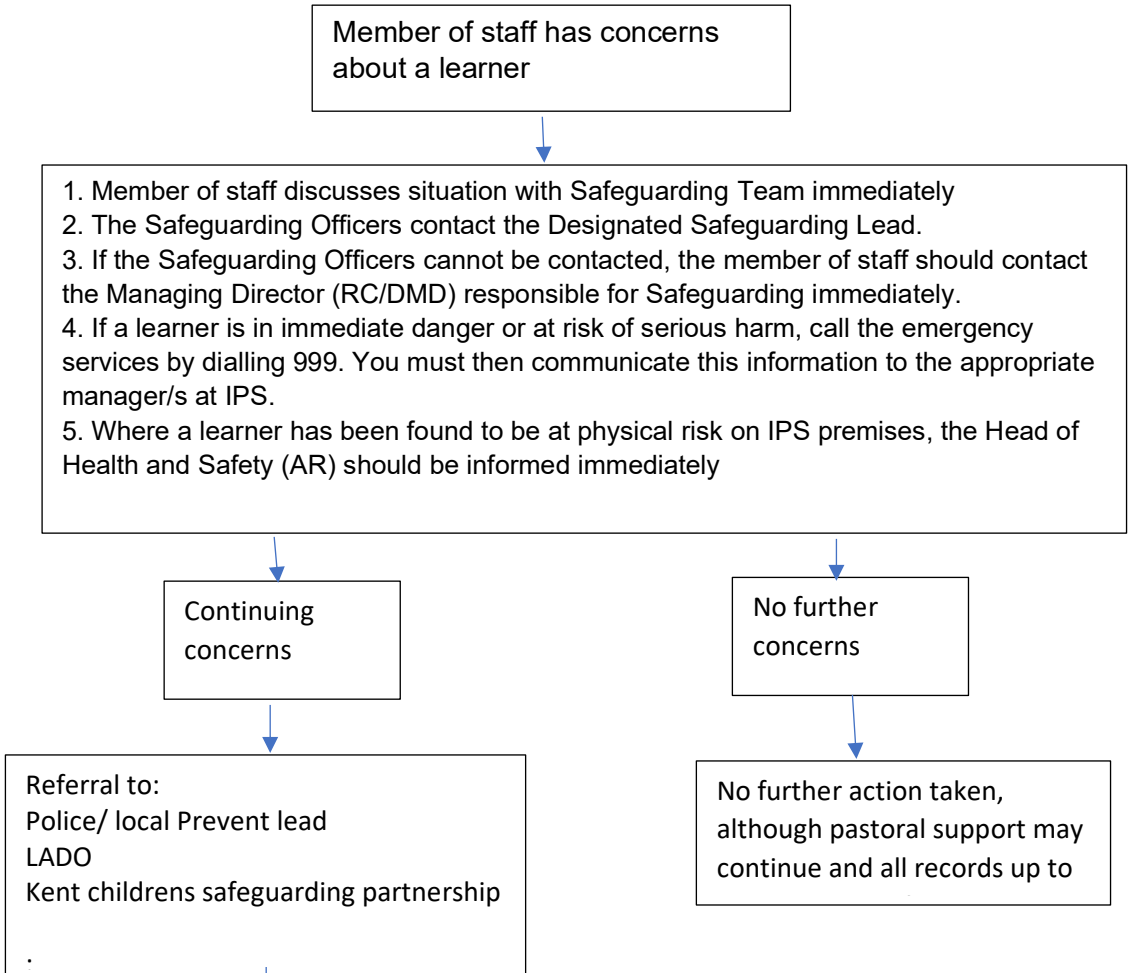
Prevent referrals
https://www.kscmp.org.uk/__data/assets/pdf_file/0007/168496/Prevent-National-Referral-Form-2024_EN_reader-enabled.pdf

Safeguarding referral flow chart