SAFEGUARDING AND CHILD PROTECTION POLICY
Pearson Online Learning Services International Short Courses

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Purpose and Scope of this Policy

The Safeguarding and Child Protection policy is based on legislation, statutory guidance and policies that seek to protect learners and vulnerable adults. It outlines our position and clarifies the action to be taken to ensure that we meet our duties relating to protecting the safety and promoting the wellbeing of learners. We believe everyone has a responsibility to promote the welfare of learners and young people, to keep them safe and to practise in a way that protects them.

The welfare of our learners is paramount in all the work we do and in all the decisions we take. All learners, regardless of age, disability, gender reassignment, race, religion or belief, sex, or sexual orientation have an equal right to protection from all types of harm or abuse.

Some learners are additionally vulnerable because of the impact of previous experiences, their level of dependency, communication needs or other issues.

This policy applies to all Learners. It applies to anyone working for or on behalf of Pearson Online Learning Services International Short Courses.

This Policy relates to all situations in both the UK and Internationally. We commit that even where English law and regulation does not apply, we shall be operate as if the laws and regulations shall apply.
Our learners live in a range of jurisdictions which are governed by laws and cultural expectations that differ from one country to the next. We welcome the chance to forge an international community and champion the diversity of our learners and staff.

We expect the behaviour of staff and learners within our community to be governed by the expectations laid out in our policies, which are informed by British Values and English law.

The term 'online' in this document refers to someone using a device to gain access to the internet.

The term 'parent' refers to birth parents and other adults who are in a parenting role, for example, stepparents, guardians, carers and adoptive parents.

Our Beliefs

We aim for all learners to have the same opportunity to use and engage with us therefore all should have equality of protection when doing so. Our objective is to do all that we can to ensure that learners are not at risk of harm. We will recognise and take appropriate action when any learner may be at risk of harm.

How We Keep Learners Safe

- Valuing, listening to and respecting them.
- Appointing a nominated Designated Safeguarding Lead.
- Adopting child protection and safeguarding best practice through our policies, procedures and code of conduct for staff and volunteers.
- Developing and implementing effective online safety.
- Providing effective management for staff and volunteers through supervision, support, training and quality assurance measures so that all staff and volunteers know about and follow our policies, procedures and codes of conduct confidently and competently.
- Recruiting and selecting staff and volunteers safely, ensuring all necessary checks are made.
- Recording, storing and using information professionally and securely, in line with data protection legislation and guidance.
- Sharing information about safeguarding and good practice.
- Making sure that learners, vulnerable adults and their families know where to go for help if they have a concern by using our safeguarding and child protection procedures to share concerns and relevant information with agencies who need to know, and involving learners, vulnerable adults, parents, families and carers appropriately.
- Using our procedures to manage any allegations against staff and volunteers appropriately.
- Creating and maintaining an anti-bullying environment and deal effectively with any bullying that may arise.
- Ensuring that we have effective complaints and whistleblowing measures in place.
- Building a safeguarding culture where staff and volunteers, learners, young people and their families, treat each other with respect and are comfortable about sharing concerns.

Online Safety

We take a robust approach to online safety, both to protect and educate learners in responsible use of technology and to establish mechanisms which can identify, intervene and escalate any safeguarding concerns. The four main areas of risk online are content, contact, conduct and commerce.

Content (Learner as recipient)

- Material that can be damaging to learners, young people or vulnerable adults when it isn't age appropriate.
- Sites may show sexual, violent or, hate material.
- Sites may promote harmful behaviour.

Contact (Learner as participant)

- This is where adults or peers contact learners with a view to abusing them.
- This is where learners, young people, and vulnerable adults are contacted for exploitation and radicalisation.

Conduct (Learner as actor)
- This relates to learners, young people and vulnerable adults' behaviour online.
- This may include bullying and sexting.

Commerce (Learner as consumer)
- This includes risks such as online gambling, inappropriate advertising, phishing and or financial scams.
- If we feel learners are at risk, this is reported to the Anti-Phishing Working Group.

Equality of Safeguarding Provision

Some learners may be at an increased risk of abuse or face additional barriers which make them less likely to disclose abuse. We are committed to ensuring that all learners receive equal protection regardless of their circumstances or the barriers they face. We therefore give special consideration to a learner who:
- is disabled or has specific additional needs
- has special educational needs
- is a young carer at home
- shows signs of being drawn into anti-social or criminal behavior, including gang involvement and association with organized crime groups
- frequently misses education or goes missing from care or from home
- is misusing drugs or alcohol
- is in a family circumstance presenting challenges, such as substance abuse, adult mental health problems or domestic abuse
- is showing early signs of abuse and/or neglect
- is known or believed to have either consensually or non-consensually shared nudes or semi-nude images and/or videos
- is at risk of modern slavery, trafficking, FGM, sexual exploitation, forced marriage, or being radicalized
- is or has previously been fostered or looked after outside of their family unit due to government intervention; and/or
- is vulnerable to discrimination and maltreatment on the grounds of race, ethnicity, religion, disability or sexuality or who does not have English as a first language.

Definitions

Abuse
- A form of maltreatment of a child. Somebody may abuse or neglect a child 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. This can be particularly relevant, for example, in relation to the impact on children of all forms of domestic abuse.
- Children may be abused in a family or in an institutional or community setting by those known to them or, more rarely, by others.
- Abuse can take place wholly online, or technology may be used to facilitate offline abuse.
- Children may be abused by an adult or adults or by another learner or learners.

Physical Abuse

- Any form of threatened or actual violence, which may involve hitting, shaking, throwing, poisoning, burning or scalding, drowning, suffocating or otherwise causing physical harm to a child.
- Physical harm may also be caused when a parent or carer fabricates the symptoms of, or deliberately induces, illness in a child.

Emotional Abuse
- The persistent emotional maltreatment of a child such as to cause severe and persistent adverse effects on the child's psychological state and emotional development. This may involve:
    - conveying to a child that they are worthless or unloved, inadequate, or valued only insofar as they meet the needs of another person
    - not giving the child opportunities to express their views, deliberately silencing them or 'making fun' of what they say or how they communicate
    - age or developmentally inappropriate expectations being imposed on children, including interactions that are beyond a child's developmental capability
    - overprotection and limitation of exploration and learning
    - preventing the child participating in normal social interaction
    - seeing or hearing the ill-treatment of another person
    - serious bullying (including cyber-bullying);
    - causing children to frequently feel frightened or in danger; and/or
    - 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
- Forcing or enticing a child or young person to take part in sexual activities, not necessarily involving a high level of violence, whether the child is aware of what is happening or not. The activities may involve:
    - physical contact, including assault by penetration (for example, rape or oral sex) or non-penetrative acts such as masturbation, kissing, rubbing and touching outside of clothing; or
    - non-contact activities, such as involving children in looking at, or in the production of, sexual images, watching sexual activities, encouraging children to behave in sexually inappropriate ways, or grooming a child in preparation for abuse. Sexual abuse can take place online, and technology can be used to facilitate offline abuse.

Neglect
- The persistent failure to meet a child's basic physical and/or psychological needs, likely to result in the serious impairment of the learner's health or development.
- Neglect may occur during pregnancy for example, because of maternal substance abuse.
- Once a child is born, neglect may involve a parent or carer failing to:
    - provide adequate food, clothing and shelter (including exclusion from home or abandonment)
    - protect a child from physical and emotional harm or danger
    - ensure adequate supervision (including the use of inadequate caregivers); and/or
    - ensure access to appropriate medical care or treatment.
- This form of abuse may also include neglect of, or unresponsiveness to, a child's basic emotional needs.

Child on Child Abuse
- Child on Child abuse may take different forms, such as:

- o bullying (including cyberbullying, prejudice-based and discriminatory bullying);
- o abuse in intimate personal relationships between children (also known as teenage relationship abuse); and/or
- o physical abuse which can include hitting, kicking, shaking, biting, hair pulling, or otherwise causing physical harm.

Managing Internally: Incidents where there is no risk of significant harm will normally be managed internally using the Code of Conduct. If the abusive behaviour is particularly serious, or the Code of Conduct is deemed ineffective further interventions will be needed. All concerns will be discussed with the Designated Safeguarding Lead.

Where there are concerns of significant harm: Where the abuse causes or is likely to cause significant harm, it is referred to the Designated Safeguarding Lead, who will cooperate with internal and external parties to support both the instigator of the abuse and the subject of the abuse.

Children who abuse others may be victims of abuse themselves, and the learner protection procedures will be followed for victims and perpetrators. We will work with others to ensure that victims and perpetrators are supported and protected, especially from bullying and harassment.

We have a zero-tolerance approach to abuse, and it should never be passed off as "banter", "just having a laugh", "part of growing up" as this can lead to a culture of unacceptable behaviours and an unsafe environment for learners.

Child Sexual Exploitation (CSE) and Child Criminal Exploitation (CCE)
Both CSE and CCE are forms of abuse that occur 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 can affect children regardless of gender and can include children who have been moved (commonly referred to as trafficking) for the purpose of exploitation.

Child Criminal Exploitation (CCE)
Child Criminal Exploitation of children is a form of harm which:
- o can affect any child or young person (male or female) under the age of 18 years;
- o can affect any vulnerable adult over the age of 18 years;
- o can still be exploitation even if the activity appears consensual;
- o can involve force and/or enticement-based methods of compliance and is often accompanied by violence or threats of violence; and/or
- o can be perpetrated by individuals or groups, males or females, and young people or adults.
CCE is typified by some form of power imbalance in favour of those perpetrating the exploitation. Whilst age may be the most obvious, this power imbalance can also be due to a range of other factors including:
- o gender
- o cognitive ability
- o physical strength
- o status and/or
- o access to economic or other resources.
It is also important to note that both boys and girls being criminally exploited may be at higher risk of sexual exploitation

Child Sexual Exploitation
- A form of sexual abuse which occurs where an individual or group takes advantage of an imbalance of power to coerce, manipulate or deceive a child or young person under the age of 18 into sexual activity (a) in exchange for something the victim needs or wants, and/or (b) for the financial advantage of increased status of the perpetrator or facilitator. The victim may have been sexually exploited even if the sexual activity appears consensual.
- Child sexual exploitation does not always involve physical contact. It can also occur with technology.
- Child sexual exploitation is a serious crime and can have a long-lasting adverse impact on a child's physical and emotional health. It may also be linked to child trafficking.

Domestic Abuse

Domestic abuse can encompass a wide range of behaviours and may be a single incident or a pattern of incidents. That abuse can be, but is not limited to
- psychological
- physical
- sexual
- financial and/or
- emotional.

Children can be victims of domestic abuse. They may see, hear, or experience the effects of abuse at home and/or suffer domestic abuse in their own intimate relationships (teenage relationship abuse). All of this can have a detrimental and long-term impact on their health, well-being, development, and ability to learn.

Mental Health
- A person's condition regarding their psychological and emotional well-being.
- It affects how we think, feel, and act. It also helps determine how we handle stress, relate to others, and make choices.
- Positive mental health allows people to:
  - realize their full potential
  - cope with the stresses of life
  - work productively; and
  - make meaningful contributions to their communities.

Serious Violence

The following indicators may signal children are at risk from, or are involved with, serious violent crime. These may include:
- increased absence from education
- a change in friendships or relationships with older individuals or groups
- a significant decline in performance; and/or
- signs of self-harm or a significant change in wellbeing, or signs of assault or unexplained injuries.
- Unexplained gifts or new possessions could also indicate that children have been approached by, or are involved with, individuals associated with criminal networks or gangs and may be at risk of criminal exploitation.

Honour Based Violence

So-called 'honour based' violence encompasses crimes which have been committed to protect and defend the honour of the family and/or a community. These crimes should be dealt with as part of existing

safeguarding/child protection structures, policies and procedures. The following practices are illegal in England:

- Female Genital Mutilation: Honour based violence includes the physical act of Female Genital Mutilation (FGM). This is a form of child abuse and a method of violence against women and girls which is recognised by UNICEF as an internationally recognized human rights violation. Members of staff are alert to the mandatory reporting requirement for suspected cases of FGM in England, Wales and Northern Ireland.
- Forced Marriage: A forced marriage is one entered without the full and free consent of one or both parties and where violence, threats or any other form of coercion is used to cause a person to enter a marriage. Threats can be physical or emotional and psychological. A lack of free and full consent can be where a person does not consent or where they cannot consent (if they have learning disabilities, for example). Forcing a person into a marriage is a crime in the United Kingdom. Education staff can contact the Forced Marriage Unit if they need advice or information: contact +44 (0)20 7008 0151 or email fmu@fco.gov.uk.

Private Fostering

Private fostering is when a parent decides for their child (who is under 16, or under 18 if they are disabled) to live with someone who isn't an aunt/uncle, grandparent, brother/sister or stepparent, for longer than 28 days. The person who has been asked to look after the learner is known as a private foster carer. Education providers have a legal duty to tell the relevant Local Authority if it becomes aware of any private fostering arrangement in the UK or if it suspects that a child is subject to a private fostering arrangement in the UK. The Local Authority is then able to check that the child is safe and being well looked after and that the accommodation and care being given is satisfactory.

Looked After child

A looked after child is a child who is looked after by a local authority, subject to a care order or who is voluntarily accommodated by a local authority, commonly as a result of abuse or neglect. All staff should understand how to keep a looked after child safe. Where a staff member is given responsibility for a looked after child, they will be provided with the information they need in relation to the learner's legal status, care arrangements and the level of authority delegated to the cases by the local authority looking after him. The Designated Safeguarding Lead takes the lead on all looked after learners and in the UK will hold details of and liaise with the learner's social worker.

Signs and Indicators

All staff should be aware of indicators of abuse and neglect (see below), understanding that learners can be at risk of harm inside and outside of education, inside and outside of home and online. Exercising professional curiosity and knowing what to look for is vital for the early identification of abuse and neglect so that staff can identify cases of learners who may need help or protection. All staff should be aware that abuse, neglect, and safeguarding issues are rarely standalone events and cannot be covered by one definition or one label alone. In most cases, multiple issues will overlap with one another.

When identifying abuse, staff should be mindful of the need to consider the context of the culture, law and guidance of the relevant jurisdiction of the learner. It is important to consider whether the learner, their family and their society view the behaviour as unacceptable, as this will be a determining factor in whether the learner views the behaviour as abusive. Staff should report the behaviour in line with expectations of behaviour in the UK, and in determining next steps the cultural context of the learner or learners involved will always be taken into consideration. For situations outside the UK, we take expert advice to ascertain

what is and is not acceptable in the specific country and will consider the potential impact of reporting any such concerns with regards the learner and their family.

It is the responsibility of all members of staff to report all worries or concerns over safeguarding and welfare. It is not their responsibility to investigate or decide whether a learner has been abused. A learner who is being abused or neglected may:
- be reluctant to turn on their webcam
- have visible bruises, bleeding, burns, fractures or other injuries
- show signs of pain or discomfort
- look unkempt and uncared for
- have difficulty in making or sustaining friendships
- appear fearful
- be reckless regarding their own or other's safety
- self-harm
- show signs of not wanting to be at home
- display a change in behaviour – from quiet to aggressive, or happy-go-lucky to withdrawn
- challenge authority
- become disinterested in their education or have significant declines in performance
- be constantly tired or preoccupied
- be involved in, or particularly knowledgeable about drugs or alcohol; and/or
- display sexual knowledge or behaviour beyond that normally expected for their age.

A member of staff or volunteer may also see or hear something in the background when interacting online which raises concern. Any concerns should be reported even if there is no conclusive evidence of abuse.

Legal Framework and Related Policies and Procedures

This policy is complementary to several existing policies and practices mentioned below. In general, where any reference is made to the physical world in these documents, this will apply in the same way in the online world, or as near to it as is reasonably foreseeable and possible.
- Code of conduct
- Health and safety policy
- Social media safeguarding guidelines
- Information Technology Acceptable Use
- Global Information Security
- Safer Recruitment Policy & Procedure
- Global Safeguarding Statement
- Global Safeguarding Standards

Review Dates

We review our Policy at least every year to ensure that our commitments remain relevant to the nature of operations and practices.

Signature:

shaun kelly

Date: 18.01.2023

Shaun Kelly, Global Director of Safeguarding

Procedures

Responding to Concerns

We track any concerns reported and use these to help build up a better understanding of learner welfare. We act on identified concerns and provide early help to prevent concerns from escalating.

SERIOUS INCIDENT	SAFEGUARDING CONCERN	WELFARE CONCERN
OVERVIEW An incident which either took place as part of a Pearson service we deliver online or face to face or in the community, or the family • A learner is at risk of or has experienced significant harm • A crime has been committed • May result in reputational risk to the organisation • Title IX report where learner needs external support in addition to internal support.	**OVERVIEW** A concern which: • requires learners' welfare to be monitored • Has been raised by the third-party asking Pearson to be mindful of needs and provide support • Title IX report where learner can be supported only internal services	**OVERVIEW** A concern which: • Can be actioned immediately and requires no ongoing actions • A historic safeguarding concern which has come to our attention through a third party • Title IX report consultation
STEPS TO TAKE • Person identifying incident reports to emergency service if concerns someone is at immediate risk of harm • Incident reported to Global safeguarding team and/or Title IX Coordinator immediately • Title IX coordinator completes formal complaint process and informs Global Safeguarding team if not already aware • Concern recorded on Safeguarding form • Global Safeguarding team screens form to ensure correct category of concern • Global Safeguarding team organises internal strategy meeting for the same day as report made (as per serious incident guidance, including Title IX investigation in USA) to collate all information and agree next steps including referrals to external agencies/organisations. • Safeguarding Lead completes Title IX safety assessment/Risk assessment and/or support plan if required • If allegation made against a member of staff the Global safeguarding team coordinates the response. • Global Safeguarding Lead records on incident reporting platform (for example, CPOMS, PRISM, CONNEXUS) and ensures all fields complete and actions agreed noted, and all related communication/documents uploaded • Global Safeguarding Lead instructs on actions required • Record actions taken and all related documents are uploaded • Safeguarding team ensures all follow up actions completed	**STEPS TO TAKE** • Concern recorded on Safeguarding report form or ticket • Safeguarding Lead screens form to ensure correct category of concern, ensure no further information required • Safeguarding Lead records on incident reporting platform (for example, CPOMS, PRISM, CONNEXUS) and ensures all fields complete and actions agreed noted, and all related communication/documents uploaded • Safeguarding Lead instructs on actions required • Safeguarding Lead completes Title IX safety assessment/Risk assessment and/or support plan if required • Incident recording platform updated to record actions taken, adds any additional communication/documents • Safeguarding Lead closes case when concern no longer exists and all actions complete	**STEPS TO TAKE** • Concern recorded on Safeguarding report form or ticket • Safeguarding Lead screens form to ensure correct category of concern, ensure no further information required • Safeguarding Lead records on incident reporting platform (for example, CPOMS, PRISM, CONNEXUS) and ensures all fields complete and actions agreed noted, and all related communication/documents uploaded • Safeguarding Lead instructs on actions required • Incident recording platform updated to record actions taken, adds any additional communication/documents • Safeguarding Lead closes case when all actions complete
EXAMPLE INCIDENTS • Death of a Learner, including suicide • Where a learner is alleged to have seriously harmed themselves or another person • Serious concerns that a learner is engaged in extremist behaviour • Serious or protracted bullying, • Serious sexual abuse or harassment • Pearson member of staff, associate or person acting on behalf of Pearson is alleged to have caused harm, sexual or otherwise to a Pearson learner/child/vulnerable adult	**EXAMPLE CONCERNS** • Low level mental health (self-managed) • Concerns around changes in appearance • Concerns around changes in and/or inappropriate behaviour • Concerns around changes in communication and/or inappropriate verbal comments • Concerns around digital footprint • Accumulation of low-level concerns	**EXAMPLE CONCERNS** • Learner conduct/low level behaviour concerns • Relationship issues with peers • Challenging behaviours with staff • Concerns around learner which are inconclusive

Your response to the level of concern should be dependent on the vulnerability of the learner for example, age, additional support needs. If you suspect that a learner may be at risk but have no 'real' evidence, where possible you should give the learner an opportunity to talk. It is fine to ask the learner if he or she is okay, or if you can help in any way. Following an initial conversation with the learner, if you remain concerned, you should discuss your concerns with the DSL.

Responding to Immediate Danger

If you believe a learner is in immediate danger or is at risk of harm, you must take appropriate action to address this. This could include:

- Contacting the learner's main education provider
- Calling the police or emergency services where the learner is resident.
- Contact Parents (where appropriate and only if this will NOT increase level of risk)

When reporting any such concern you should ensure that the external parties including parents, police or emergency service agencies give you feedback on what actions they will take.

After taking initial action, speak to the Designated Safeguarding Lead. A written record of concern should be completed and submitted to the Designated Safeguarding Lead. Any verbal contact with external parties should be followed up in writing within 24 hours; the Designated Safeguarding Lead will liaise with you on this.

Responding to Crimes

If you believe a crime has been committed, you should report this to the Designated Safeguarding Lead who will escalate further.

Recording Concerns

All concerns and correspondence will be kept in a secure, confidential safeguarding case management system. The learner's circumstances will be kept under review and external organisations will be made aware again if in the learner's best interest. All concerns, discussions and decisions made, and the reasons for those decisions, are recorded in writing. We use an online system to keep safeguarding and pastoral records.

Records should include:

- The date and time of the incident
- The date and time of the disclosure of incident
- The date and time the record is being made
- The name, role, and contact details of the person the concern was originally reported to
- The name, role and contact details of the person making the report (if this is not the same person as above)
- The name, age and other relevant information about the learner, young person or vulnerable adult who is the subject of the concern
- The names of all parties involved in the incident including any witnesses
- What was said and done and by whom
- Any action taken to investigate the matter and any further action taken (such as referrals)
- If appropriate, the reasons why the matter was not referred to statutory agencies

Staff should only record the facts as the learner presents them; the notes should not reflect the opinion of the note taker. Staff should be aware that notes of such reports could become part of an assessment by social care and/or a criminal investigation.

Staff can escalate a concern by reporting their concern directly to Pearson's Global Director of Safeguarding or the Safeguarding Manager. If after escalation they remain concerned, they should report their concern via one of the following means:

- reporting to Children's Services or equivalent organization local to the local authority or region in which the learner is resident; or
- reporting to the NSPCC.

If a Learner Makes a Disclosure

It takes courage for someone to disclose that they are being or have been abused. It is essential that all victims are reassured that they are being taken seriously, regardless of how long it has taken them to come forward and that they will be supported and kept safe.

If a learner talks to you about any risks to their safety or wellbeing, you should:

- allow them to speak freely and do not be afraid of pauses or silences
- remain calm and avoid overreaction
- offer reassurance and general words of comfort
- not ask investigative questions, but rather prompt, if necessary, with open questions – where, when, what, tell, explain, describe etc. If appropriate, staff can ask learners if they have been harmed and what the nature of that harm was

- recognize that trauma can impact memory and so learners may not be able to recall all details or timeline of abuse
- explain at an appropriate time that, in order to help, the information must be passed on to relevant people in positions of responsibility
- not reprimand the learner for failing to disclose earlier; and
- establish next steps (agree to talk with the Designated Safeguarding Lead and let the learner know that someone will be in touch with them).

After a disclosure, seek support, if distressed. A learner should never be given the impression that they are creating a problem by reporting abuse. Nor should a learner ever be made to feel ashamed for making a report. Abuse that occurs online or outside of education should not be downplayed and should be treated equally seriously.

Securing Evidence

If an incident takes place, you have a concern, or disclosure is made, the following files should be secured:
- The recording of any online sessions relating to the concern
- Any written communication related to the incident online (chats, whiteboards etc.)
- A copy of any assessment or exam paper if relates to the concern
- Any emails related to the concern
- Any written reports

These files should be passed to the Designated Safeguarding Lead who will ensure they are copied onto the learner's Child protection file, which is separate to their personal/academic record.

Supporting our Learners

We recognise that learners who have experienced trauma, have a mental illness or have experienced or are at risk of abuse or neglect can find it difficult to develop a sense of self-worth and may feel helplessness, humiliation and/or a sense of self-blame. Our culture, ethos and policies are designed to provide an environment which will support our learners.

Missing Learners

We recognise that a learner going missing from education could be a potential indicator of abuse or neglect, including sexual abuse and sexual exploitation. Therefore, members of staff will respond promptly to absences. Missing is defined as anyone whose whereabouts cannot be established will be considered missing until located, and their well-being or otherwise confirmed. Any concerns that a learner is missing should be reported to the Designated Safeguarding Lead who will ensure all relevant parties are informed.

Prevent and Radicalisation

We recognise our duty to help prevent young people to be drawn into extremist viewpoints and radicalisation. In the UK, the Prevent Duty is the duty in the Counterterrorism and Security Act 2015 on specified authorities including providers to have due regard to the need to prevent people from being drawn into terrorism.

There is no single way of identifying an individual who is likely to be susceptible to radicalisation, but there are number of early indicators of radicalisation or extremism, which may include:
- showing sympathy for extremist causes
- glorifying violence, especially to other faiths or cultures
- making remarks or comments about being at extremist events or rallies

- evidence of possessing illegal or extremist literature
- advocating messages from illegal organizations or other extremist groups
- out of character changes in dress, behavior and peer relationships
- secretive behaviors including online searches or sharing extremist messages or social profiles
- intolerance of difference, including faith, culture, gender, race or sexuality
- artwork or writing that displays extremist themes
- attempts to impose extremist views or practices on others
- verbalizing anti-Western or anti-British views; and
- advocating violence towards others.

Members of staff who have concerns about a learner will make these concerns known to the Designated Safeguarding Lead (DSL) at the earliest opportunity. The Designated Safeguarding Lead (DSL) will then make a judgement as to the most appropriate course of action, which may involve informing the parent or guardian of the learner.

For learners in the UK, the Designated Safeguarding Lead (DSL) may make a referral to the Channel programme, which is a programme that focuses on providing support at an early stage to people who are identified as being vulnerable to being drawn into terrorism. For learners overseas, an equivalent organisation may be identified. We will work more generally to ensure the fundamental British values of democracy, rule of law, mutual respect and tolerance are celebrated and not undermined.

Non-emergency advice for staff is available via the DfE's helpline +44 (0)20 7340 7264 and by email at counter-extremism@education.gsi.gov.uk

Online Safety

Considering the 4Cs (content, contact, conduct and commerce) we provide a range of interventions to keep learners safe online also taking into consideration the fact many learners have unlimited and unrestricted access to the internet via mobile phone networks. This access means some learners could be at risk of sexually harassment and/or bullying and can control others via their mobile and smart technology, share indecent images consensually and non-consensually (including via large chat groups) and view and share pornography and other harmful content.

- We communicate the importance of learners being safe online.
- We share what learners are being asked to do online, including the sites they will asked to access and be clear who they are going to be interacting with online.
- We ensure appropriate filters and monitoring systems are in place and regularly review their effectiveness.
- Leaders consider the age range of our learners, the number of learners and how often they access the IT system
- We ensure we have the appropriate level of security protection procedures in place in order to safeguard our systems, staff and learners and we review the effectiveness of these procedures periodically to keep up with evolving cyber-crime technologies.
- We carry out regular reviews of our approach to online safety, supported by risk assessments that consider and reflect the risks our learners face.

Guest Speakers

We welcome different insights and perspectives from guest speakers. On occasions where external guest speakers will be invited to address learners, our external speakers are briefed in advance with regards to our expectations of what is suitable and advised not to encourage any form of extremism or radicalisation.

Speakers are reminded that learners are impressionable and that the speakers need to be respectful of our support of British values. Where appropriate, we will request that visiting speakers provide copies of materials they will use in advance of the talk. Staff arranging such talks should speak with the Designated Safeguarding Lead (DSL) if they have any reservations about the appropriateness of a speaker. A risk assessment may be drawn up, as appropriate, and while most speakers will be invited to speak in live sessions, speakers deemed high risk may be invited to speak in recorded sessions which can be reviewed before release.

Anti-Bullying

We will make sure our response to incidents of bullying considers:
- research and resources around bullying and harassment
- the needs of the person displaying bullying behaviour
- needs of any bystanders
- our organisation as a whole

We seek to prevent bullying through:
- Our codes of conduct
- Holding regular discussions with staff, volunteers, learners, young people and families who use our organisation about bullying and how to prevent it
- Providing support and training for all staff on dealing with all forms of bullying, including racist, sexist, homophobic, transphobic, and sexual bullying

Recruiting the Right People

Step 1	• Up to date recruitment and selction policy
Step 2	• Up to date Safeguarding and Child Protection policy
Step 3	• Up to date job descriptions and person specification
Step 4	• Appropriate advertisement prepared
Step 5	• Job application pack
Step 6	• Scrutinise applications by shortlisting panel
Step 7	• Carry out pre-employment checks
Step 8	• Invitation to interview (standardised)
Step 9	• Complete face to face interview (online or in person) ensuring one person on the interview panel has completed safer recruitment training
Step 10	• Ask specific questions at interview around safeguarding, address any gaps on the application
Step 11	• Make selection of candidate based on suitability for the role
Step 12	• Offer of employment conditional on receiving satisfactory information for all necessary checks

Confidentiality and Data Sharing

We recognise that all matters relating to child protection are sensitive and confidential. Information is shared only on a 'need to know, what and when' basis. Concerns about individuals should never be discussed elsewhere, inside or outside the educational provision, unless in confidential meetings for the purpose of safeguarding. This is not only to respect any individuals involved but also to ensure that information released into the public domain does not compromise evidence.

Child protection information will be stored and handled in line with the Data Protection Act 2018 principles. Information is processed for limited purposes; is adequate, relevant, and not excessive. It is accurate; kept no longer than necessary; processed in accordance with the data subject's rights; and secure. Learner protection records will be stored securely online in a partitioned limited access area of the network and only made available to relevant individuals. Learner protection records are normally exempt from the disclosure provisions of the Data Protection Act. This means that learners and parents do not have an automatic right to see them. If a member of staff receives a request from a learner or parent to see learner protection records, they will refer the request to the DSL who will be guided by advice from the Data Privacy Officer.

Whistleblowing

Employees can raise concerns when they suspect past, present, or imminent wrongdoing, or an attempt to conceal wrongdoing. Officially this is called 'making a disclosure in the public interest'. We encourage all employees who have concerns about wrongdoing or malpractice involving any aspect of our work, to feel able to come forward and voice these without fear and in confidence. It is important that concerns are raised at the earliest time possible as this will allow the opportunity to address and resolve any concerns quickly.

The concern should, in most instances, be raised with the employee's line manager though it is important that the concern is raised with the person best placed to deal with the matter and with whom the employee feels most comfortable. There may be certain rare occasions, however, when it would be inappropriate to raise the concern with the line manager because, for example, the concern:

- may implicate the manager in some way
- is about a senior manager within the line management chain or somewhere else in the department
- is particularly serious and needs to be dealt with as a matter of urgency.

Once a concern has been raised by an employee meeting may be arranged with them to determine how the concern should be taken forward. All investigations will be conducted sensitively, as quickly as possible, and under this procedure. The investigation should be concluded within three months of the matter being raised, though some scenarios may result in a longer timeframe.

Concerns or Allegations Relating to Staff

When an allegation is made against a member of staff or a concern expressed about their conduct relating to learners, set procedures must be followed. It is rare for a learner to make an entirely false or malicious allegation, although misunderstandings and misinterpretations of events can happen, and a learner may make an allegation against an innocent party because they are too afraid to name the real perpetrator.

Reporting concerns
A member of staff who is concerned about the conduct of a colleague towards a learner must remember that the welfare of the learner is paramount. No member of staff will suffer a detriment for raising a genuine concern.

Allegations or concerns against members of staff including the DSL should be reported directly to the Pearson Global Director of Safeguarding or a Global Safeguarding Manager. Staff may also report any allegations or concerns directly to the police if they believe direct reporting is necessary to secure action and they feel a crime has been committed. Staff may additionally use the NSPCC whistleblowing helpline number, 0800 028 0285, if they feel that staff conduct may not have passed the threshold for a criminal offence but raises concerns which are not being addressed within the internal reporting mechanisms. Allegations against a former member of staff no longer working for us should be referred to the police.

Reports can be made verbally but should be supported by a dated and timed note of what has been disclosed or noticed, said or done.
The case manager who will be the Director or a Manager in Global Safeguarding must log the incident, before the end of the day. It is vital that expressions of concern that do not necessarily amount to 'allegations' are reported, particularly if there are repeated reports of such concerns and/or questionable conduct.

It may be that the concern expressed has been raised by another party. If there are repeated reports of such concerns and/or questionable conduct, a pattern of unacceptable behaviour may be identified.

Threshold for concerns
We accept that some professionals can pose a serious risk to learners, and we will act on every allegation or concern that a person working with or who is in contact with learners may have:
- 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 or learners in a way that indicates he or she may pose a risk of harm to learners; and/or
- behaved or may have behaved in a way that indicates they may not be suitable to work with learners (including behaviour that might have happened outside of learning environment).

Responding to low level concerns
A low-level concern is when behaviour is inconsistent with the staff code of conduct, including inappropriate conduct outside of work, but when this behaviour does not meet the harm threshold set out above. Examples of such behaviour could include, but are not limited to:
- being over friendly with learners
- having favourites
- engaging with a learner on a one-to-one basis without recording the meeting; and/or
- using inappropriate sexualised, intimidating or offensive language.

Sharing low level concerns is vital to create and embed a culture of openness, trust and transparency in which our values and expected behaviour, as set out in the staff code of conduct, are constantly lived, monitored and reinforced by all staff. Sharing concerns includes self-referral, where, for example, a staff member may have found themselves in a situation which could be misinterpreted, might appear compromising to others, and/or on reflection they believe they have behaved in such a way that they consider falls below the expected professional standards.

Where a low-level concern is raised, this will be dealt with promptly and appropriately and a record of the concern kept allowing any patterns of unacceptable behaviour to be identified. To address low level concerns, we will:

- ensure staff are clear about what appropriate behaviour is, and are confident in distinguishing expected and appropriate behaviour from concerning, problematic or inappropriate behaviour, in themselves and others
- encourage staff to share any low-level safeguarding concern(s)
- address unprofessional behaviour and support the individual to correct it at an early stage
- provide a responsive, sensitive and proportionate handling of such concerns when they are raised; and
- monitor low-level concerns to help identify any weakness in the safeguarding system.

Responding to crimes that reach the threshold

If an allegation meets the criteria listed above under the section 'Threshold for Concerns', it will be dealt with according to the statutory guidance set out in Keeping Learners Safe in Education (DfE, September 2022).

Staff, parents, and members of the Governing Body are reminded not to investigate the matter themselves, not to make assumptions or offer alternative explanations for behaviours, or to promise confidentiality to the alleged victim(s).

On receiving a reported concern, the case lead will proceed as follows:
- If there is no written record, write a dated and timed note of what has been disclosed or noticed, said or done.
- Notify the Local Authority Designated Officer (LADO) within 24 hours and send copies of any documentation concerning the allegation.
- Liaise with the LADO and co-operate with the investigating agencies as appropriate.
- Consider employment issues and possible disciplinary action where the investigating agencies take no further action.

The Education Act 2011 prohibits the publication of material that may lead to the identification of a member of staff who is the subject of an allegation. 'Publication' includes verbal conversations or writing, including content placed on social media sites. We will always comply with the provisions of the Act.

Managing Allegations

Upon receiving an allegation or concern about a staff member, the case manager will immediately discuss the allegation with the LADO. The purpose of an initial discussion is for the LADO and the case manager to consider the nature, content and context of the allegation and agree a course of action.

In the process of this liaison, the case manager and LADO will:
- share what information is available, both from the source of the allegation and from Personnel files
- identify what other information might be needed
- consider whether the alleged perpetrator should continue working or remain in contact with learners
- consider whether suspension is appropriate
- decide what information and/or advice is to be given to the case manager, including whether the member of staff should be informed of the allegation at this stage; and
- decide what action is needed, and who needs to be involved and informed (including the Disclosure and Barring Service [DBS] and/or Teaching Agency).

Decisions about the course of action are taken on a case-by-case basis, bearing in mind the paramount importance of the safety of any learner(s) involved but also remembering that the member of staff, against

whom an allegation has been made, has the right to remain anonymous and to expect any allegations to be investigated as expeditiously as possible.

Any course of action is subject to a risk assessment. Decisions would also follow the guidance of the LADO and/or police. If the parties involved in these discussions consider it necessary, a Strategy Meeting is arranged, usually by Social Services, which will involve representatives from the LADO, the police and the provider (e.g., the Principal, DSL or Chair of Management Board, as appropriate).

From the above discussions, there are three possible courses of action:
- It may be the subject of a police force and/or joint police and Social Services investigation and possible action through the courts; or
- It may be the subject of a disciplinary investigation; or
- The matter may be remitted to the provider to be dealt with.

The following definitions will be used when determining the outcome of allegation investigations:
- Substantiated: there is sufficient evidence to prove the allegation
- Malicious: there is sufficient evidence to disprove the allegation and there has been a deliberate act to deceive
- False: there is sufficient evidence to disprove the allegation
- Unsubstantiated: there is insufficient evidence to either to prove or disprove the allegation; the term, therefore, does not imply guilt or innocence
- Unfounded: to reflect cases where there is no evidence or proper basis which supports the allegation being made.

If Social Services and the police decide to take no action, we will still need to consider what further investigation is necessary. If there is a case to answer, a disciplinary hearing will be called, which could lead to dismissal.

Where a criminal investigation has taken place and either (i) a trial has resulted, (ii) the investigation has been closed without charge or (iii) a decision has been taken not to prosecute a case after charge, the case manager will discuss with the LADO what, if any, further action is required as regards the member of staff concerned and the sharing of information obtained by the agencies involved in assisting any further action to be taken by us.

Where a disciplinary investigation is required, the investigation should be conducted in accordance with our disciplinary procedure. 'Settlement agreements' (by which contract a person agrees to resign, we agree not to pursue disciplinary action, and both parties agree a form of words to be used in any future reference), will not be used in these cases.

Supporting those involved
Every effort will be made to maintain confidentiality and guard against publicity while an allegation is being investigated or considered. Apart from keeping the learner(s), parent(s)/guardian(s) and the person about whom the allegation has been made (in cases when this would not place the learner at further risk) up to date with progress of the case, information should be restricted to those who have a need to know in order to protect learners, facilitate enquiries or manage related disciplinary processes. As an employer, we have a duty of care towards our employees. We provide effective support for anyone facing an allegation and provide staff members with a named contact if they are suspended.

Social contact with colleagues will not be prevented, unless there is evidence to suggest that it is likely to be prejudicial to the gathering and presentation of evidence. Parent(s) or guardian(s) of a learner involved will be told about the allegation if appropriate as soon as possible, if they do not already know of it. They will also be kept informed about the progress of the case and told the outcome where there is not a criminal prosecution. However, where a strategy discussion is required, or police or other agencies need to be involved, this should not take place unless or until those agencies have been consulted and have agreed what information can be disclosed to the parent(s)/guardian(s). That includes the outcome of any disciplinary process. The deliberations of a disciplinary hearing, and the information taken into account in reaching a decision, cannot normally be disclosed, but the parent(s)/guardian(s) of the learner will be told the outcome.

Action upon conclusion of a case
We will refer to the DBS (following consultation with the LADO) any person who has been removed from working (paid or unpaid) in regulated activity, or would or might have been so removed had he/she not resigned or left of his/her own accord, and it believes the person may have harmed, attempted to harm, incited another to harm or put a learner at risk of harm or if there is reason to believe the person may have committed one of a number of offences listed under the Safeguarding Vulnerable Groups Act (Prescribed Criteria and Miscellaneous Provisions) Regulations 2009. 'Removal from working' for these purposes will include dismissal, non-renewal of a fixed term contract, no longer using a supply teacher engaged directly or supplied by an agency, terminating the placement of a trainee or volunteer, no longer using staff employed by a contractor and resignation or voluntary withdrawal from any of the above.

In cases where it is decided on the conclusion of the case that a person who has been suspended can return to work, we will consider how best to facilitate this. We appreciate that most people would benefit from some help and support when returning to work after a very stressful experience. Depending on the individual's circumstances, a phased return and/or the provision of a mentor to aid and support in the short term may be appropriate. We will also consider how the person's contact with the learners who made the allegation can best be managed if they are still attending the educational provision.

If an allegation is determined to be false, the case manager may refer the matter to Children's Services to determine whether the learner concerned needs services or may have been abused by someone else. If an allegation is shown to have been deliberately invented or malicious, we will consider whether any disciplinary action is appropriate against the learner or member of staff who made it. For learners, this may include permanent exclusion, and for staff members, this may include dismissal.

A referral will be made to the Teaching Regulation Agency (TRA) via the GOV.UK website where a teacher has been dismissed (or might have been dismissed had he/she not resigned) and a prohibition order may be appropriate. The reasons such an order would be considered are 'unacceptable professional conduct', 'conduct that may bring the profession into disrepute' or a 'conviction, at any time, for a relevant offence'.

Records
A central record of all allegations and concerns (and connected documents) against members of staff will be kept securely, separate from normal staff and learners' records, and with access limited to the DSL and DDSL, as well as Pearson Human Resources representatives and officers who may be key workers for cases. The only exception to this requirement for permanent recording is where allegations have been found to be malicious. In such cases, all records will be removed from staff personnel files.

The record of allegations may provide clarification in cases where a future DBS disclosure reveals information from the police about an allegation that did not result in a criminal conviction. It will also help

to prevent unnecessary re-investigation if, as occasionally happens, an allegation re-surfaces after a period. The record will be retained at least until the member of staff involved has reached normal retirement age, or for a period of 10 years from the date of the allegation if that is longer. An allegation which was proven to be false, unsubstantiated or malicious will not be included in references for staff. Where there have been concerns about a member of staff and he or she leaves us to work elsewhere, the Pearson Global Director of Safeguarding it will consider the question of passing the concerns to the new employer or authority. We will pass allegations or concerns affecting a learner on to his or her next provider, if applicable.

Learner Code of Conduct

We expect that all learners are responsible for their behaviour. Our expectation is that all learners will participate positively in their educational provision and gain from the experience. All learners are expected to:
- ensure a neutral background when on video
- treat staff and their peers with respect and fairness
- not make any improper suggestions towards staff or their peers during their sessions or through their online communications
- not send a 'friend' or 'follow' request to their staff via social media. They will refrain from asking staff to disclose their personal information such as their personal address or personal phone number; and
- be responsible for the security of their login details to the platform and any communication that are sent from this address. They must not share their username and password and must not let someone else log into their account assuming their identity.
- If a learner feels their login details have been compromised, they must immediately change their password and report the situation.
- Learner on Learner abuse will not be tolerated.

Learners should always access their educational provision in a way that shows consideration and respect. It is not acceptable to use obscene, profane, threatening, or disrespectful language. These behaviours will result in sanctions, and where appropriate Safeguarding procedures will be initiated:
- sending or posting discriminatory, harassing, or threatening messages or images
- stealing, using, or disclosing someone else's code or password without authorization
- sending or posting confidential material
- violating copyright law
- participating in the viewing or exchange of pornography or obscene materials
- sending or posting messages that defame or slander other individuals
- using the platform for the purposes of promoting radicalisation or any sort of gambling
- refusing to follow our rules
- recording any session and transmitting it
- not dressing appropriately (examples: dressed in revealing clothes, dressed in clothes with inappropriate sayings); and
- participating in cyber bullying and/or harassment.

Staff Code of Conduct

We expect that all staff are responsible for their behaviour. Our expectation is that all staff will always model professional behaviours. The safeguarding of Learners is paramount and takes precedence over all other considerations. All staff members are expected to:
- identify a suitable environment for meetings and any online interactions

- discourage, where possible, learners from making video calls from their bedroom
- insist on appropriate clothing for all participants
- ensure none of their personal items are visible in the background in online meetings
- ensure distractions and disturbances are minimised
- be conscious of confidentiality when working online
- not engage in conduct (including other employment) which could reasonably be expected to damage the reputation and standing of the organisation
- complete all relevant safeguarding training provide
- treat all learners fairly and without prejudice, and treat learners and other staff with respect
- not make any improper suggestions towards any learner during their sessions or through their communications
- not share their personal contact details with learners including their personal mobile number, personal email address or social media or gaming accounts. Staff should therefore not accept any 'friend' or 'follow' requests from learners on their social media accounts; and
- Staff should not share the link to an online meeting with anyone other than the learners involved in the session.
- Staff are responsible for the security of their login details to the platform and any communication that are sent from their work address. They must not share their username and password and must not let someone else log into their account assuming their identity.
- If staff are concerned their login details may have been compromised, they must immediately change their password and report the situation to the Designated Safeguarding Lead with the relevant details.
- Any instances where a member of staff feel their actions, or the actions of others, may have compromised the organisation, or their own professional standing, should be recorded and reported to the Safeguarding Director.

Although this Code of Conduct gives advice and instruction on how to deal with specific situations, it should not replace professional common sense and good judgement. In all matters relating to learner/staff relationships, staff must bear in mind how an action might reasonably be regarded by a third party

Accessing, Storing, and Retaining Learner Protection Records

Child protection records refer to records relating to concerns about a learner's safety and welfare, and/or concerns about possible risks posed by people working with learners, young people, and vulnerable adults. These documents will be stored separately from a learner, young person and vulnerable adults' general documents and will be up to date and relevant to the purpose for which they are held. These will only be kept for as long as is necessary and will be destroyed when they are no longer relevant.

The files will only be accessed by those involved in safeguarding procedures the organisation. They will be made available to safeguarding agencies/the Police and to the Designated Safeguarding Lead if necessary. In England, Scotland and Wales, the file should be kept for 7 years or until the learner is 25 (this is seven years after they reach the provider leaving age) (Information and Records Management Society (IRMS), 2019) In Northern Ireland, the government recommends that learner protection files should be kept until the learner's 30th birthday (Department of Education, 2016).
If concerns have been raised about an adult's behaviour around learners, the general rule is that we keep the records in their personnel file at least until they reach their normal retirement age or for 10 years. We keep records for the same amount of time regardless of whether the allegations were unfounded. However, if we find that allegations are malicious, we destroy the record immediately.

Training and Development

We consider Safeguarding training as essential for ensuring all Learners are protected. As such, all staff will:

- receive Safeguarding training in their induction (this will include the use of the functionality of any online delivery platforms, and specific online Safeguarding practices)
- receive Prevent training
- read and understand Part 1 of Keeping Children Safe in Education
- read and understand our Safeguarding and Child Protection statement
- receive regular emails and other communications updating them on new information, legislation etc
- undergo Safeguarding update training; and
- receive training and workshops around specific themes

Designated Safeguarding Leads will complete the additional training below:

- Specialist Designated Safeguarding Lead training
- Topic specific training

Recruiting managers

- All interview panels will contain at least one member who has been trained in Safer Recruitment

Organisational Structure and Governance

We have the following roles and responsibilities in relation to Safeguarding:

All staff must:

- provide a safe environment where learners can learn
- be prepared to identify learners who may benefit from early help; and
- follow the Safeguarding procedure when they have a Safeguarding concern.

The Designated Safeguarding Lead must:

- take the lead for Safeguarding
- make the necessary links and referrals to other agencies and professionals
- support and advise other staff relation to Safeguarding
- raise awareness of Safeguarding
- encourage a culture of listening to learners and taking account of their wishes and feelings in any measure put in place to protect learners; and
- be available during our operating hours for staff to discuss their Safeguarding concerns.

In addition to the above, all staff can consult with Pearson's Global Director of Safeguarding and/or Pearson's Safeguarding Manager(s), regarding any issue of Safeguarding.

Admission of students under the age of 18 years

Our courses are designed for professional adult learners, as a result of this POLS does not admit students who are under the age of 18 years.