

Policy Document ●●●

Safeguarding & Prevent

Introduction

The Reed Group comprises Reed Global Limited and its subsidiaries, including Reed Specialist Recruitment Limited, Reed in Partnership, Reed Learning Limited, Reed Online Limited and Reed Business School. The Group is owned by the Reed family and is committed to the following values:

- We are fair, open and honest
- We take ownership
- We work together

These values are the cornerstones to the Group policies and to the policies applied by Reed Business School. Reed Business School is committed to providing a positive work and study experience for all our co-members and students. We are committed to providing a safe environment for all our students/learners and staff.

Document Control

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Purpose of the Policy

The purpose of this policy is to ensure that everyone associated with Reed Business School and Reed Learning, including co-members and sub-contractors, understands our safeguarding measures for learners, particularly those at risk of radicalisation and potential involvement in terrorist activities. This policy defines our approach to safeguarding children, young people, and adults at risk, as well as our Prevent duty. It clarifies the terminology used and outlines our responsibilities under this policy. Our commitment is to ensure the safety and wellbeing of all learners and co-members by establishing clear procedures for preventing, identifying, and responding to safeguarding concerns.

Scope

This policy applies to all learners, co-members, tutors, learning coaches, contractors, external professionals/partners, volunteers, and any other adults who are involved with Reed Business School and Reed Learning, ensuring safeguarding responsibilities are upheld across all areas.

Objectives

The objective of the Safeguarding and Prevent Policy is to provide an environment where:

- The welfare of the learner is paramount.
- All learners, regardless of age, disability, gender, racial heritage, religious belief, sexual orientation or identity, have the right to equal protection from all types of harm or abuse.
- The learning environment is safe and fundamental British values are promoted.
- Co-members, learners and stakeholders understand safeguarding which then enables them to fulfil their statutory obligations; they are aware of their roles and responsibilities in preventing radicalisation and extremism. This may include referral to Channel, the process by which multi-agency support is provided to individuals who are at risk of being drawn into terrorism.

Legal Responsibilities

Reed Business School and Reed Learning acknowledge their duty of care to all learners, with specific legal responsibilities towards those under 18 years and adults at risk. We take our responsibility to safeguard and protect the welfare of all children, young people, and adults at risk very seriously and are committed to full compliance with all statutory safeguarding guidance.

The key pieces of legislation that inform safeguarding policies

This policy has been developed in accordance with the following legislation, statutory guidance and government requirements:

- General Data Protection Regulation (GDPR) 2018 and the Data Protection Act 2018
- The Care Act 2014
- The Children Act 1989 and Children Act 2004
- Working Together to Safeguard Children (2023)
- Counter-Terrorism and Security Act 2015 (Prevent Duty)
- Modern Slavery Act 2015
- Equality Act 2010
- Human Rights Act 1998
- Sexual Offences Act 2003
- Serious Crime Act 2015
- Safeguarding Vulnerable Groups Act 2006
- Education and Training (Welfare of Children) Act 2021
- Keeping Children Safe in Education (KCSIE) 2026
- Prevent Duty Guidance: England and Wales
- Working Together to Improve School Attendance (Statutory Guidance)
- UK General Data Protection Regulation (UK GDPR)

We also recognise the wider indications of abuse, neglect, exploitation, online safety risks, including the risks of misinformation, disinformation, and generative AI as outlined by the statutory guidance document – Keeping Children Safe in Education – September 2026.

Confidentiality must be respected under General Data Protection Regulations (GDPR); however, Data protection law allows you to share information when required to safeguard learners. Fears about sharing information must not be allowed to stand in the way of the need to promote welfare and protect the safety of children and adults at risk.

In accordance with Keeping Children Safe in Education 2026, the organisation recognises emerging safeguarding risks including artificial intelligence (AI) and deepfake technology, online exploitation, violence against women and girls, misogyny, prejudice-based harm, radicalisation, mental health concerns, criminal exploitation, county lines activity and child-on-child abuse. Appropriate procedures, staff training and learner awareness activities are in place to identify and respond to these risks.

For the purposes of this Policy the definitions are as follows:

Learners: any person registered to study with either Reed Business School or Reed Learning.

Co-members: any person employed by Reed Business School or Reed Learning.

Contractors: any person undertaking work for Reed Business School or Reed Learning under the terms of a contract for services who are not employed by either Reed Business School or Reed Learning.

Safeguarding

Safeguarding is the action taken to protect children, young people and adults at risk from harm, abuse, neglect, exploitation and radicalisation. It is underpinned by legislation and statutory guidance, including Keeping Children Safe in Education (KCSIE) 2026.

Safeguarding is everyone's responsibility and requires a culture of vigilance where staff understand their duties, act on concerns and place the learner's welfare at the centre of all decision-making. Learners should know how to seek help and feel safe, supported and listened to.

Safeguarding and Child Protection

- **Safeguarding** is the preventative work undertaken to promote the welfare and safety of all learners.
- **Child Protection** refers to the actions taken when there is concern that a child is suffering, or is at risk of suffering, significant harm. The organisation recognises that safeguarding concerns can include abuse, neglect, exploitation, online harms, radicalisation, mental health concerns, child-on-child abuse and other emerging risks.

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The following six key principles underpin all adult safeguarding:

- **Empowerment:** people being supported and encouraged to make their own decisions and give informed consent
- **Prevention:** it is better to act before harm occurs
- **Proportionality:** the least intrusive response appropriate to the risk presented
- **Protection:** support and representation for those in greatest need
- **Partnership:** local solutions through services working with their communities – communities have a part to play in preventing, detecting and reporting neglect and abuse
- **Accountability:** accountability and transparency in safeguarding practice

At risk

- **Child:** Anyone under the age of 18 is defined as a child

Harm

In safeguarding, harm is defined as any harmful conduct that causes physical or psychological harm to a person. It can also include the impairment of a person's mental or physical health.

- Conduct which causes physical harm.
- Conduct which causes psychological harm (for example by causing fear, alarm, or distress).
- Unlawful conduct which appropriate or adversely affects property, rights, or interests (for example theft, fraud, embezzlement, or extortion).
- Conduct which causes self-harm.

Adult at risk

An adult at risk is someone who cannot protect themselves from harm, abuse, or neglect. This vulnerability may arise from disability, mental health condition, illness, or other factors.

- They are 16 years of age or older
- They are unable to look after their own well-being, property, or rights
- They are more vulnerable to harm than others
- They are experiencing or at risk of abuse or neglect
- They have needs for care and support

Abuse

Abuse is a form of maltreatment of a child, young person or adult at risk, causing harm or distress. Somebody may abuse or neglect a child or young person by inflicting harm or by failing to act to prevent harm. Children or young people may be abused in a family or in an institutional or community setting by those known to them or by others and online. Abuse can take place wholly online, or technology may be used to facilitate offline abuse. They may be abused by an adult or adults or by another child/young person or children/young people (also known as child-on-child abuse).

Abuse can be:

- physical abuse
- emotional abuse
- sexual abuse/harassment; and/or
- neglect

Abuse can come in many forms, such as: physical or verbal maltreatment, injury, assault, violation, rape, unjust practices, crimes, or other types of aggression. Abuse can be emotional, physical, sexual, or financial.

- The abuser can be a partner, ex-partner, family member, community leader or member, a friend, someone at work or a stranger.
- It can happen to anyone: an adult or a child, female or male.
- It can happen at home or in a public place like a community centre, school, or work.
- It can be in person, or through technology and online.

Physical abuse

Physical abuse is physical force or mistreatment of one person by another which might or might not cause physical injury. This type of abuse includes:

- hitting
- pushing
- rough handling
- exposure to heat or cold
- force-feeding
- improper administration of medication
- denial of treatment
- misuse or illegal use of restraint
- not being allowed to go where you wish, when you wish

Signs of physical abuse are:

- fractures
- bruising
- burns
- pain
- marks
- not wanting to be touched

Sexual abuse

Sexual abuse is unwanted sexual activity or sexual behaviour that happens without consent or understanding. Sexual violence and abuse can be physical contact or non-contact sexual activities, such as:

- indecent exposure
- stalking
- grooming
- forced to look at or be involved in producing sexually abusive material
- forced to watch sexual activities

Possible signs are:

- genital itching, soreness or having a sexually transmitted disease
- using bad language
- not wanting to be touched
- behaving in a sexually inappropriate way
- changes in appearance

Psychological or emotional abuse

Psychological or emotional abuse is harmful behaviour that can cause mental distress. It can involve both verbal and non-verbal abuse which can scare, humiliate and isolate a person.

This may include:

- threats
- humiliation or ridicule
- provoking fear of violence
- shouting, yelling and swearing
- blaming
- controlling
- intimidation
- coercion

Signs of psychological or emotional abuse are:

- being withdrawn
- too eager to do everything they are asked
- showing compulsive behaviour
- not being able to do things they used to
- not being able to concentrate or focus

Other forms of abuse associated with adults at risk include:

- **Financial abuse** – this could include:
Undue pressure, duress, threat or undue influence put on the person in connection with loans, wills, property, inheritance or financial transactions, theft of money or possessions or misuse of benefits.
- **Discriminatory abuse** – this could include:
Unequal treatment based on age, disability, gender reassignment, marriage and civil partnership, pregnancy and maternity, race, religion and belief, sex or sexual orientation (known as ‘protected characteristics’ under the Equality Act 2010)
- **Institutional abuse** – this could include:
Not offering choice or promoting independence, failure to respond to abuse appropriately or abusive and disrespectful attitudes towards people using the service.

Exploitation

Exploitation refers to the unfair or harmful treatment of vulnerable individuals for personal gain, often through manipulation, coercion, or abuse of power. This can involve taking advantage of someone’s vulnerability due to age, disability, mental health, or other factors, to use them for financial, sexual, labour, or emotional benefit.

Exploitation can take many forms, including:

- Sexual exploitation
- Financial exploitation
- Labor exploitation
- Emotional exploitation

Child criminal exploitation (CCE)

Child criminal exploitation is when someone uses a child (under 18 years old) to commit crimes on their behalf. This may involve forcing a child to work on a cannabis farm, or targeting, grooming, coercing and exploiting a child to sell drugs in county lines operations.

Child criminal exploitation can involve bribery, intimidation, violence and/or threats. The child does not need to have met whoever is exploiting them – children can be exploited via the internet or using mobile phones. They can also be targeted via social media platforms and gaming forums. People who exploit children use the fact that they have power over children, because of an age difference or some other factor like gender, intelligence, strength, status or wealth.

Child sexual exploitation (CSE)

Child sexual exploitation involves situations, contexts or relationships in which a person under 18 is given something, such as food, accommodation, drugs, alcohol, cigarettes, affection, gifts or money in return for performing sexual activities or having sexual activities performed on them. It can also involve violence, coercion and intimidation, with threats of physical harm or humiliation. CSE can affect any child who has been coerced into engaging in sexual activities. This includes 16- and 17-year-olds who can legally consent to have sex.

Child-on-child abuse

Everyone should be aware that children can abuse other children. Child-on-child abuse can happen both inside and outside of a setting, face-to-face and online.

Child-on-child abuse is most likely to include but not limited to: Inappropriate behaviours between children that are abusive in nature including physical, sexual, or emotional abuse, exploitation, sexual harassment, all forms of bullying, coercive control, hazing/initiation rituals between children and young people, both on and offline (including that which is within intimate personal relationships).

Keeping children safe in education 2026: September 2026

We should remember that child-on-child abuse is harmful to both the perpetrator and the victim. Children or young people who harm others may have additional or complex needs (e.g., significant disruption in their lives, exposure to domestic abuse, witnessing or suffering abuse, educational underachievement, or being involved in crime). Adults might have also experienced this abuse as children.

It is important to challenge inappropriate behaviours between students that are abusive in nature. Example dismissing sexual harassment as “just banter”, “just having a laugh”, “part of growing up” can lead to a culture of unacceptable behaviours, an unsafe environment, normalising inappropriate behaviour, and not coming forward to report it.

Identifying exploitation

Exploitation is the deliberate maltreatment, manipulation or abuse of power and control over another person. It is taking advantage of another person or situation usually, but not always, for personal gain.

Exploitation comes in many forms, including:

- slavery
- being controlled by a person or a group
- forced labour
- domestic violence and abuse
- sexual violence and abuse
- human trafficking

Neglect

Failure to provide medical or physical care, access to a doctor or other services, or denying someone medication, food or heating, privacy or dignity, self-neglect.

Signs to look out for:

- Not having their basic needs met, such as adequate food or heating
- Not being provided with adequate information about their rights or entitlements, or being misinformed
- The adult at risk not receiving appropriate care, which would protect them from harm

Violence Against Women and Girls (VAWG)

As a training provider we recognise that violence against women and girls (VAWG) encompasses a range of harmful behaviours, including sexual harassment, sexual violence, coercive and controlling behaviour, stalking, online abuse and gender-based violence.

Reed Business School adopts a zero-tolerance approach to misogyny, sexual harassment, sexual violence and harmful gender-based behaviours. All concerns or disclosures will be taken seriously, recorded appropriately and managed in line with safeguarding procedures.

Vulnerable groups

Vulnerable groups are individuals who may be at increased risk of harm, abuse, or exploitation due to factors such as age, disability, mental or physical health conditions, or social or economic circumstances. These groups often include children, the elderly, people with disabilities, those with mental health issues, or individuals facing social exclusion. In safeguarding, special attention is given to identifying and protecting members of these groups to ensure their safety and well-being.

Modern slavery

Encompasses slavery, human trafficking, forced labour and domestic servitude. Traffickers and slave masters use whatever means they have at their disposal to coerce, deceive and force individuals into a life of abuse, servitude and inhumane treatment.

The effects of abuse are wide-ranging and will vary according to the type of abuse and duration, but can include:

- behavioural problems
- mental health problems
- educational problems
- relationship problems
- drug and alcohol problems
- self-harm
- suicide
- in extreme cases, death following abuse.

The Modern Slavery Act 2015 ("the 2015 Act") consolidated previous legislation criminalising offences of slavery and trafficking for all forms of exploitation.

[Modern Slavery Act 2015](#)

Mental Health

Mental health problems can, in some cases, be an indicator that a child, young person or adult at risk has suffered or is at risk of suffering abuse, neglect or exploitation. Only appropriately trained professionals should attempt to make a diagnosis of a mental health problem. Reed Business School and Reed Learning co-members, tutors and learning coaches are well placed to observe students and identify those whose behaviour suggests that they may be experiencing a mental health problem or be at risk of developing one.

We recognise that mental health concerns do not automatically indicate the presence of a safeguarding issue. However, poor mental health may be an indicator of abuse, neglect, exploitation, trauma, online harm, radicalisation, or other safeguarding risks.

Learners will be provided with information on how to access wellbeing and mental health support, both within the organisation and through external services. The organisation promotes a culture where learners feel safe to seek help and discuss concerns without fear of stigma.

Where a learner's mental health gives rise to concerns about their safety or the safety of others, safeguarding procedures will be followed without delay.

Where concerns are identified, staff should report them to the Designated Safeguarding Lead (DSL) or Deputy DSL. The DSL will determine the most appropriate course of action, which may include:

- Internal wellbeing support
- Referral to mental health services
- Engagement with employers, parents or carers where appropriate
- Referral to children's social care or adult safeguarding services
- Emergency intervention where there is an immediate risk of harm
- All actions will be recorded in accordance with safeguarding and data protection procedures.

Cyberflashing

Cyberflashing refers to the unsolicited sending of explicit images or videos of a sexual nature to individuals via digital communication channels such as text messages, social media platforms, or messaging apps. This behaviour often occurs without the recipient's consent, causing distress, discomfort, and feelings of violation. Cyberflashing can have serious psychological and emotional impacts on victims, and it is considered a form of online sexual harassment or abuse.

Female genital mutilation (FGM)

Female genital mutilation (FGM) comprises all procedures that involve partial or total removal of the external female genitalia, or other injury to the female genital organs for non-medical reasons. The practice of FGM is recognised internationally as a violation of the human rights of girls and women. Where it is discovered that an act of FGM appears to have been carried out on a girl who is aged under 18, they should personally report it to the police.

Mandatory reporting of female genital mutilation: procedural information - GOV.UK

How to respond to signs or suspicions of abuse

All Reed Business School and Reed Learning co-members should report any concerns to a member of their Safeguarding Team.

The following '5R' process MUST be followed by all co-members:

- Recognise the signs of abuse
- Respond and react accordingly
- Record the facts of the disclosure
- Report the disclosure to the Designated Safeguarding Lead (or Deputy Safeguarding Officer) immediately.
- Refer to the emergency services or social services or through the Channel process in situations where an individual may be at risk of immediate harm – and ensure that the information is reported to the Designated Safeguarding Lead (or Deputy Safeguarding Officer) immediately.

How to respond to a child/young person or adult telling you about abuse

There are some basic principles in reacting to suspicions, allegations, and/or disclosures of abuse.

What to do:

- stay calm
- listen, hear and believe
- ask open ended questions for clarification only
- give the child/young person/adult time to say what they want
- reassure and explain that they have done the right thing in telling
- explain that only those people who need to know will be informed
- act immediately in accordance with the procedure in this policy
- record in writing what was said as soon as possible
- report to the Designated Safeguarding Officer or a member of the safeguarding team
- record the events in a 'safeguarding concerns report'
- consider their immediate safety

What not to do:

- do not over-react. It is extremely unlikely that the child/young person/adult is in immediate danger
- do not probe for more information, questioning the child/young person/adult may affect how their disclosure is received later
- do not make assumptions, paraphrase and do not offer alternative explanations
- do not promise confidentiality to keep secrets or that everything will be ok (it might not)
- do not try to deal with it yourself
- do not make negative comments about the alleged abuser
- do not 'gossip' or disclose any information with colleagues about what has been said to you
- do not make the child/young person/adult repeat the story unnecessarily

Neurodiversity

Neurodiversity is a term used to describe a range of neurological differences including:

- Dyslexia
- Dyspraxia (also called Developmental Coordination Disorder, or DCD)
- Dyscalculia
- Attention Deficit Hyperactivity Disorder (ADHD)
- Autism

Neurodivergent children and young people may need an adapted and more individually tailored approach to keep them safe. Neurodivergent children and young people can be more vulnerable to abuse, self-harm, mental health issues, substance abuse, self-neglect or radicalisation. A child or young person might be more vulnerable or at risk of harm due to communication difficulties, struggling with a sense of identity, feeling socially isolated, tendency to hyperfocus on specific topics or limited understanding of risk. The term "autism spectrum disorder" has been updated to "autism" to align with the SEND code of practice in Keeping Children Safe in Education 2026.

Prevent Duty and Channel

The Prevent duty is a statutory requirement in the United Kingdom that aims to prevent people from becoming terrorists or supporting terrorism. It's part of the Counter-Terrorism and Security Act 2015. The Prevent Duty requires all education providers 'to have due regard to the need to prevent people from being drawn into terrorism. This includes safeguarding children, young people and adult learners from extremist ideologies and radicalisation.

Prevent operates in a pre-criminal space, providing support and re-direction to vulnerable individuals at risk of being groomed into terrorist activities before any crimes are committed. It is therefore considered a safeguarding issue and thought of alongside the wider safeguarding agenda.

Contest

Contest is the Government's Counter Terrorism Strategy. The aim of the strategy is 'to reduce the risk from international terrorism, so that people can go about their lives freely and with confidence.' CONTEST' consists of four 'P' workstreams:

- **Prevent:** to stop people becoming terrorists or supporting terrorism.
- **Pursue:** to stop terrorist attacks.
- **Protect:** to strengthen our protection against a terrorist attack.
- **Prepare:** to mitigate the impact of a terrorist attack.

Channel is an early intervention process which will gather information as to determine whether there is a specific risk of radicalisation and whether the threat is malicious.

The local authority Prevent coordinator, and the police Channel coordinator will identify the type of support required and refer to a Multi-Agency Channel Panel. As part of the Prevent duty it's important that we show we are working in partnership with the local authority.

To comply with the Prevent duty, further education independent training providers must show evidence of:

- productive co-operation, with local Prevent co-members, the police, and local authorities.
- co-ordination through existing multi-agency forums.

As part of this duty Reed Business School and Reed Learning agree to contact and build partnerships with these bodies in our region:

- Local authority Prevent lead
- Local authority Prevent education officer
- [Regional Prevent education coordinators - GOV.UK](#)
- Local authority children or adult services
- Safeguarding children partnership
- Local policing team

Terrorism

The specific actions included are:

- serious violence against a person.
- serious damage to property.
- endangering a person's life (other than that of the person committing the action).
- creating a serious risk to the health or safety of the public or a section of the public; and
- action designed to seriously interfere with or seriously to disrupt an electronic system.

Radicalisation

Radicalisation is the process of adopting extreme views that can lead to violence and support for terrorism. It can involve individuals or groups adopting extreme political, social, or religious views.

- Radicalisation can be influenced by people who don't have the best interests of the individual at heart.
- The ideas of society at large can shape the outcomes of radicalisation.
- Radicalisation can lead to violence and support for terrorism.

How can radicalisation be prevented?

- The Prevent program aims to stop people from becoming terrorists or supporting terrorism.
- The Prevent program offers interventions to people who are susceptible to radicalisation.
- The Prevent program also works to protect communities from radicalising influences.

What can you do if you are concerned about radicalisation?

- You can call the Anti-Terrorism Hotline on 0800 789 321.
- You can contact the local police by dialling 101 and ask for the PREVENT team.
- You can report illegal or harmful information, pictures, or videos on the GOV.UK website.

Extremism

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

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

Source [New definition of extremism \(2024\) - GOV.UK](#)

Behaviour against a group, or members of it, that seeks to negate or destroy their rights to live equally under the law and free of fear, threat, violence, and discrimination.

Including:

- Using, threatening, inciting, justifying, glorifying or excusing violence towards a group in order to dissuade them from using their legally defined rights and freedoms.
- Attempts to undermine, overturn, or replace the UK's system of liberal parliamentary democracy and democratic rights.

Violent extremism is when a person or group uses fear, terror, or violence to try and achieve change.

Extremist influences could include, but are not limited to:

- Family members having direct contact or involvement with extremist or terrorist groups.
- Members of an education or community setting promoting an extremist ideology.
- Peers promoting an extremist ideology or sharing extremist material.
- Access or exposure to online extremist material via social media or the internet – for example, propaganda including pictures, videos, blogs, and fake news.
- Exposure to extremist, terrorist, or other violent activity in overseas settings.
- Access or exposure to extremist leaflets, magazines or stickering.
- Exposure to extremist groups hosting marches, protests, or stalls.

Reed Business School and Reed Learning recognise that extremism can lead to radicalisation, harm individuals and communities, undermine democratic values and increase vulnerability to terrorism. Staff will remain vigilant to signs that a learner may be vulnerable to extremist influences, whether online or offline, and will report concerns in accordance with safeguarding and Prevent procedures.

Radicalisation and Online Extremism

Reed Business School and Reed Learning have a duty under the Prevent Duty to have due regard to the need to prevent people from being drawn into terrorism. Learners may be exposed to extremist ideologies through social media, online forums, gaming platforms, messaging applications and AI-generated content.

Staff will remain alert to indicators of radicalisation and extremist narratives, including conspiracy theories, misinformation and disinformation that may place learners at risk of harm. Concerns will be referred to the Designated Safeguarding Lead and managed through appropriate safeguarding and Prevent procedures.

Risk factors

Push and pull factors can make a child, young person, or adult learner at risk of extremism or radicalisation. Often there are several risk factors present that, seen together, can cause concerns.

Push factors

Push factors may include a child, young person or adult learner feeling:

- Isolated
- They do not belong
- They have no purpose
- Low self-esteem
- Their aspirations are unmet
- Anger or frustration
- A sense of injustice
- Confused about life or the world
- Real or perceived personal grievances

Pull factors

Pull factors could include an extremist or terrorist group, organisation or individual:

- Offering a sense of community and a support network
- Promising fulfilment or excitement
- Making the child, young person or adult learner feel special and part of a wider mission.
- Offering a very narrow, manipulated version of an identity that often supports stereotypical gender norms.
- Offering inaccurate answers or falsehoods to grievances
- Encouraging conspiracy theories
- Promoting an 'us vs. them' mentality
- Blaming specific communities for grievances
- Encouraging the use of hatred and violent actions to get justice.
- Encouraging ideas of supremacy

Misogyny and Harmful Attitudes

We recognise that misogynistic language, harmful gender stereotypes and discriminatory attitudes may contribute to abusive behaviours and unsafe environments.

A zero-tolerance approach will be adopted towards misogyny, sexualised bullying, harassment and behaviour that undermines equality, dignity and respect. Staff will actively challenge inappropriate attitudes and behaviours whenever identified

British Values

The five British Values are:

- Democracy
- Rule of law
- Individual liberty
- Mutual respect
- Tolerance

As a training provider we are committed to promoting British values, including democracy, the rule of law, individual liberty, and mutual respect and tolerance of those with different faiths and beliefs. Any concerns relating to extremism, radicalisation or terrorism will be referred to the Designated Safeguarding Lead (DSL) and managed in line with Prevent Duty requirements.

Freedom of Speech

Freedom of speech is the right to express ideas and opinions without fear of punishment or censorship. It's a fundamental right in democratic societies.

What are the limits of freedom of speech?

- Speech that is unlawful, such as harassment or discrimination, is not protected.
- Speech that violates the rights of others is not protected.
- Speech that advocates hatred or incites violence or discrimination is not protected.

In January 2025 the Education Secretary confirmed that key provisions of the Higher Education (Freedom of Speech) Act 2023 will be brought into force, defending the free-speech rights of students, academics and speakers. Under the Act, universities and higher education institutions won't be allowed to silence people who raise complaints of sexual misconduct, abuse, harassment or bullying by using non-disclosure agreements. The main duties for universities, colleges, and constituent institutions include:

- a duty to take reasonably practicable steps to secure freedom of speech within the law
- a ban on the use of non-disclosure agreements to silence victims of bullying, harassment or sexual misconduct on campus
- a requirement for all universities to have codes of practice to ensure the protection of free speech
- a duty to promote the importance of freedom of speech in higher education.

Martyn's Law

Reed Business School recognises its responsibilities under the Terrorism (Protection of Premises) Act 2025 (Martyn's Law) and is committed to maintaining a safe environment for learners, staff, visitors and stakeholders. Appropriate measures will be taken to assess terrorism-related risks, develop emergency response procedures, ensure staff awareness and training, and support a culture of preparedness and vigilance.

Where appropriate, we will review its emergency evacuation, lockdown, business continuity, and incident response arrangements to ensure they remain effective and proportionate to identify risks. Any concerns relating to terrorism, extremist activity or suspicious behaviour will be managed through safeguarding, Prevent and security procedures.

County Lines

As set out in the Serious Violence Strategy, published by the Home Office, 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 phone lines or other form of 'deal line'. They are likely to exploit children and adults at risks to move and store the drugs and money, and they will often use coercion, intimidation, violence (including sexual violence) and weapons. We recognise that children and young people can be exploited by criminal groups and gangs. Criminal exploitation may involve county lines activity, drug trafficking, violence, coercion, debt bondage, financial exploitation or other criminal behaviour.

Staff will be alert to signs that a learner may be at risk, including unexplained absences, changes in behaviour, unexplained money or possessions, association with older individuals or evidence of intimidation. Concerns will be referred immediately through safeguarding procedures.

Gender-Questioning Learners

We recognise that learners who are questioning their gender may experience additional vulnerabilities, including bullying, discrimination, mental health difficulties and social isolation. Staff will consider the individual needs, wishes, safety and wellbeing of the learner. Support will be provided sensitively and appropriately, with safeguarding concerns managed in accordance with statutory guidance and organisational procedures.

Our responsibilities under this policy

Reed Business School and Reed Learning take the responsibility to safeguard learners very seriously. We do not tolerate any form of bullying or harassment (includes cyber or social media bullying), learners should always feel safe whilst attending learning in person or online and should not feel threatened by the environment or by other people in it. Reed Business School and Reed Learning also recognise statutory legislation and the wider indications of abuse, neglect and exploitation as outlined by the statutory guidance – Keeping Children Safe in Education – September 2026, and our responsibility to act on any safeguarding concerns. Co members have been made aware of the newly updated content.

The Designated Safeguarding Lead at Reed Business School and Reed Learning is ultimately responsible for Safeguarding.

The key responsibilities include:

- Lead and develop the implementation of safeguarding policy and procedure through effective management of the Safeguarding team.
- Develop strong working partnerships with external agencies.
- Liaise with the Safeguarding team to inform them of high severity/high risk issues, incidents or cases of concern.
- Report cases to and liaise with Local Authority Designated Officer (LADO) concerning staff member(s).
- Act as a source of support, advice and expertise for all co-members to ensure safeguarding is always a key consideration.

Our Commitment to Safeguarding

Reed Business School and Reed Learning will:

- Provide co-members, associates, employers, and other stakeholders with guidance on procedures they should adopt to minimise the risk of harm to learners, if they suspect an individual may be experiencing or be at risk of harm, to offer guidance on appropriate action (including update briefings on safeguarding issues including the Prevent strategy).
- Create an ethos which upholds core values of shared responsibility and wellbeing for all learners, co-members, associates, and visitors promoting respect, equality and diversity and understanding.
- Maintain an ongoing action plan for the management of safeguarding and Prevent within Reed Business School and Reed Learning.
- Work closely with local and statutory agencies to understand the local issues and will inform stakeholders appropriately on risks posed via numerous sources.
- Work together with our three safeguarding partners (Local authority, Clinical Commissioning Group and Chief of Police for our LA area) to safeguard and promote the welfare of learners, including identifying and responding to their needs.
- Share this policy with all co-members, associates, learners, and employers.
- All staff will read and understand KCSIE 2026 Part One annually and confirm this through the organisation's safeguarding training process.
- Operate a zero tolerance of abuse and any other harmful behaviour.
- Put systems in place, and well promoted, easily understood and easily accessible for learners to confidently report abuse, knowing their concerns will be treated seriously, and knowing they can safely express their views and give feedback.
- Share information about concerns with agencies who need to know and involve all stakeholders appropriately.
- Ensure that the Disclosure and Barring Service, in accordance with their guidelines, runs checks on all co-members and associates with responsibility for children and where necessary those deemed "at risk".
- Make all new co-members and associates aware of procedures and policies.
- Identify at least one Designated Safeguarding Lead (DSL) for Reed Business School, and for Reed Learning, Naomi Metcalfe, with the responsibility for overseeing the implementation of this policy.
- The Designated Safeguarding Leads for Reed Business School and Reed Learning will monitor and review this policy in accordance with changes in legislation and guidance on the protection of children and adults at risks.
- Appoint Deputy Safeguarding Leads or Safeguarding officers for Reed Business School and Reed Learning and ensure all appointed Safeguarding team members are trained in relevant safeguarding procedures and competent in fulfilling their duties, to enable any concerns to be reported in accordance with our procedures.
- Review our policy and good practice towards safeguarding and Prevent at least annually.

- Recruit co-members and associates safely through an effective safer recruitment process.
- The recruitment process for Reed Business School employees including tutors and learning coaches, will include a thorough level 3 screening process through Reed Screening and a DBS (Disclosure and Barring Service) Check. Reed Business School and Reed Learning will ensure all DBS certificates are renewed regularly for best practice and DBS checks carried out every three years.
- Reed Business School will ensure a safe and secure environment including on site security. This includes a robust CCTV monitoring system, security gates and perimeter walls, keypad locked student accommodation, screening of visitors and deliveries, co-members and tutors wearing photo identity badges, signing in procedures for co-members and visitors on site (including visitor and contractor badges).

Our Commitment to Training and Implementing Safeguarding and Prevent

The training and sharing of information are recognised as an integral part of promoting safeguarding and Prevent to ensure all co-members, associates, learners, employers, and other stakeholders have a clearly developed understanding of relevant issues.

Reed Business School and Reed Learning are committed to ensuring:

- Safeguarding and Prevent information and relevant training are shared with learners as part of their induction process to promote their own personal health, well-being and safety including their safety online.
- Co-Member training commences at induction and ensures all co-members are fully aware of their responsibilities for safeguarding learners and responding to and reporting abuse or neglect of young or adults at risks.
- Undertaking Safeguarding Training on a yearly basis for all other co-members.
- The Designated Safeguarding Leads for Reed Business School and Reed Learning will complete appropriate DSL training, which should be updated at least every 2 years.
- All co-members and associates have mandatory training in safeguarding and Prevent to ensure that disclosures made are dealt with quickly, sensitively, and appropriately. This includes, but is not limited to, on-line safeguarding training resources incorporating tests and understanding of their role and how to act upon the following safeguarding practices.
 - Recognition
 - Response
 - Reporting
 - Recording
 - Referral
- Co-members are aware of the Channel Referral process as this forms part of their training in Prevent.
- This will include training for co-members and associates in how to exemplify and promoting of British Values to all learners.

- Co-members and associates have read and understand Part One and Annex A of Keeping Children Safe in Education 2026.
- Refresher training and updates for all co-members and associates are carried out annually, unless legislation dictates sooner, and any updates or safeguarding issues are discussed at regular safeguarding team meetings.
- An effective process in place to review and manage all safeguarding reports and concerns including regular safeguarding team meetings.

Promoting the Safeguarding and Prevent Policy

Reed Business School and Reed Learning will publish and promote the following:

- A confidential email address where all safeguarding and/or Prevent concerns can be reported by learners, co-members, associates, employers, and other stakeholders.
- The contact details for Reed Business School or Reed Learning safeguarding officers on all email signatures to learners, employers, and other stakeholders.
- The contact details for Reed Business School and Reed Learning safeguarding officers on the website. Associated materials and visuals displayed throughout Reed Business School in the Manor and throughout the accommodation.
- To communicate to all employers their responsibilities and how to identify potential concerns and possible warning signs.
- This policy is shared with learners during the induction process and onboarding activities.
- This policy is available to all employers, learners, and the public via the Reed Business School and Reed Learning website.

Procedure for Raising, Recording, and Investigating concerns

- It is the duty of anyone who works with children/young people/ adults to report and record disclosure of abuse or any other safeguarding concern. (Reporting a Safeguarding Incident Flowchart Annex A)
- It is not for co-members to decide whether a suspicion or allegation is true. All suspicions or allegations must be taken seriously and dealt with accordingly to this procedure. If the disclosure is made by a parent/guardian/carer, you should follow the same procedure and refer them to the Designated Safeguarding Lead (DSL).
- No member of co-members should give a learner their personal phone numbers, email address or home address or have a social media link with a learner.

If a Co-Member or associate receives a disclosure from a learner, or notices signs or symptoms of abuse or harm, the following procedure must be followed:

- The priority is to ensure that the learner is not in any immediate danger.
- Designated co-members will seek medical attention if the learner is suffering from a serious injury.
- Listen carefully to what is said.
- Make notes as soon as possible writing down exactly what was said using the individual's own words as far as possible. All notes must be timed, dated, and signed.
- Ask open questions such as: 'Tell me what happened?'; or 'Please explain what you mean when you say.....?'
- Do not ask questions which may be considered to suggest what might have happened, or who has perpetrated the abuse, e.g. 'Did your partner hit you?'
- The learner may be asked to repeat the disclosure they have made. Every effort will be made to communicate with the learner in a way that is appropriate to their age, understanding and preference. This is especially important for learners with a disability or those whose preferred language is not English.
- Report immediately to the Designated Safeguarding Lead (DSL) to log the concern about a learner's safety and welfare using the learner's words as far as possible.
- Individual co-members should never deal with abuse disclosures in isolation and should always refer to a Designated Safeguarding Lead with responsibility for child/adult protection.
- The Designated Safeguarding Lead will make an initial assessment of the allegation; consult with the co-members involved and other designated co-members as appropriate.
- The decision whether to report suspected abuse to Social Services or the Police will be made collectively by the Safeguarding Team.
- The learner will be spoken to and if relevant asked if there are younger children or any other adults who might also be at risk.
- A written account will be made of the disclosure and the context, and the learner may be asked to sign it.
- If the learner wishes to take the allegation forward, the Designated Safeguarding Lead should support the learner in contacting Social Services, the Police or the NSPCC. When a learner is not sure about taking the allegation forward, the Designated Safeguarding Lead can, without necessarily identifying the person in question, discuss concerns with Social Services or the Police, so that an informed decision can be reached.
- Following consultation, the Designated Safeguarding Lead asks for the learner's views, if they can understand the significance and consequences of a referral to Social Services or the Police (or Forced Marriage Unit or Counter-Terrorism Team).
- All concerns, discussions, decisions made and reasons for those decisions will be recorded. Written records will be kept confidential and in accordance with the Data Protection Act/GDPR. However, where the police are involved, and a crime has been committed, then such records may need to be disclosed.

- There may be instances where more than one member of the designated co-members will be involved in a particular disclosure. On occasion, they may work collaboratively to deal with a case.
- Reported concerns will be discussed and followed up during safeguarding meetings.
- The Designated Safeguarding Lead will liaise with the mental health first aider, and where available the Mental Health Support Team, where safeguarding concerns are linked to mental health.

Confidentiality

The safety and well-being of the child or adult at risk is paramount. Co-members may have access to confidential information about learners to undertake their everyday responsibilities. In some circumstances, co-members may be provided with highly sensitive or private information. They should never use confidential or personal information about a learner or his/her family for their own or others' advantage. Information must never be used to intimidate, humiliate, or embarrass a learner.

- The Designated Safeguarding Lead (or Deputy Designated Safeguarding Lead) will disclose personal information about a learner to other employees on a need-to-know basis only.
- All co-members must be aware that they have a professional responsibility to share information with other agencies to safeguard children/young people and adults at risk, in consultation with the Designated Safeguarding Lead (or Deputy Designated Safeguarding Lead).
- All safeguarding records are subject to the Freedom of Information Act and the Data Protection Act. If there is any doubt as to the rights of any party to access information, Reed Business School or Reed Learning may seek legal advice prior to releasing any information.
- All co-members must be aware that they cannot promise confidentiality of a child, young person or adult at risk, which might compromise the safety or well-being of the learner, or that of another.

Whistleblowing

All co-members should feel able to raise concerns through the Whistleblowing procedure about poor or unsafe practice and potential failures in Reed Business School or Reed Learning's safeguarding regime and know that such concerns will be taken seriously.

Allegations of abuse made against members of Reed Business School, Reed Learning co-members or an employer

Any allegation made against a member of co-members, employer or another learner will be treated seriously and investigated immediately. The Designated Safeguarding Lead will report to the Senior Leadership Team or Directors, and appropriate action will be taken.

Low level concerns

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

- Is inconsistent with the co-members code of conduct, including inappropriate conduct outside of work.
- Does not meet the allegations threshold or is not considered serious enough to refer to the local authority designated officer (LADO).
- Low-level concerns should be reported to the Designated Safeguarding Lead or a deputy. If there are concerns about a Designated Safeguarding Lead, these should be reported to the principal or member of the senior management team.

Procedure

- The Designated Safeguarding Lead must log concerns, raised directly and/or via the confidential email address.
- External Referrals or Police and/or Channel Referrals must be reported to the Designated Safeguarding Lead (DSL) immediately.
- The Designated Safeguarding Lead must record on the log the action(s) taken against each incident and who is responsible for completion.
- Written records and referrals of safeguarding concerns will be maintained centrally. All personal data will be processed in accordance with the requirements of the Data Protection Act 2018, the General Data Protection Regulation (GDPR) and Data Protection Policy.
- All incidents are monitored and reviewed during safeguarding team meetings.
- Access to safeguarding records is restricted to authorised personnel, and all records are kept securely in line with data protection regulations.
- The Designated Safeguarding Lead is responsible for ensuring that the appropriate action has been taken.

Online Safety and Security

Information Technology (IT) plays an important role in the everyday lives of children, young people and adult and is now an essential resource to support learning and teaching. Reed Business School and Reed Learning recognises the importance of online safety, and that learners are aware of all the risks. Updates to Keeping Children Safe in Education 2026 includes online safety risks associated with misinformation, disinformation, and conspiracy theories. More information is now provided on the risks associated with generative artificial intelligence (AI).

Online safety is an integral part of safeguarding. Learners may be at risk from online abuse, exploitation, cyberbullying, grooming, fraud, coercion, sextortion, harmful content and inappropriate online relationships.

We will provide learners with education on safe online behaviours and maintain appropriate filtering and monitoring arrangements. Staff must recognise that safeguarding incidents can occur both online and offline and may occur simultaneously.

IT covers several resources including web-based and distance learning. Technologies are currently used both inside and out of the learning environment. Examples of these include websites, virtual Learning Environments (VLE), Mobile/smartphones with text, video and/or web functionality, social networking websites, chat rooms, email and instant messaging, social networking websites and video/music broadcasting.

To ensure that learners are protected against unnecessary risks, all co-members must ensure learners are not accessing inappropriate material, discourage raw image searches when working with young people and always observe copyright laws. The Online Safety Act 2023 aims to protect children and adults online by making social media companies and search services more responsible for user safety.

Artificial Intelligence (AI), Deepfakes and Synthetic Content

As a training provider we recognise that artificial intelligence (AI) technologies can be used to create, manipulate and distribute harmful content. This includes AI-generated images, deepfakes, nudification applications, impersonation, online grooming and misinformation. Learners may be exposed to, create, or become victims of AI-generated abuse.

Staff must report concerns regarding AI-generated content through established safeguarding procedures. Allegations involving image-based abuse, coercion, exploitation or harassment will be treated as safeguarding concerns and responded to proportionately.

IT Filtering and Monitoring

Filtering and monitoring are both important parts of safeguarding learners and co-members from potentially harmful and inappropriate online material. To aid effective safeguarding of learners Reed Business School and Reed Learning employs the following technologies and processes:

- Reed Business School and Reed Learning procured filtering and monitoring systems, and effectiveness of provision is reviewed with IT support to meet the needs of our settings.
- Internet and email monitoring solution activity is monitored and recorded in line with the relevant UK law
- Internet access is controlled through an appropriate web filtering service
- Co-members and learners are made aware that email and internet activity can be monitored and explored further if required
- If learners or co-members discover an unsuitable site, the incident should be reported immediately to a member of co-members or a member of the management team
- Co-members understand their responsibilities, know how to follow policies processes and procedures and report concerns
- Learners and co-members are not permitted to download programs or files on centre-based IT facilities
- If there are any issues that are related to viruses or anti-virus software, then the Reed IT Team should be informed immediately.
- Filtering and monitoring reports are monitored, and safeguarding concerns reported to the DSL
- Filtering and monitoring arrangements will be reviewed at least annually to ensure they remain effective in identifying safeguarding concerns.

Online Radicalisation

Children, young people, and adult learners are at risk of accessing inappropriate and harmful extremist content online. This could include downloading or sharing terrorist material, which could be a criminal act. The internet and social media make spreading divisive and hateful narratives to millions of people easy.

Extremist and terrorist groups and organisations use social media (for example, apps, forums, blogs, chat rooms) to identify and target vulnerable individuals.

You do not need to be an online expert to understand when a child, young person or adult learner is at risk of harm. You should deal with harmful online behaviour in the same way as offline activity.

The organisation recognises that learners may be exposed to extremist narratives through social media, AI-generated content, gaming platforms, messaging applications and other online environments.

Safeguarding Contact Information

Reed Business School

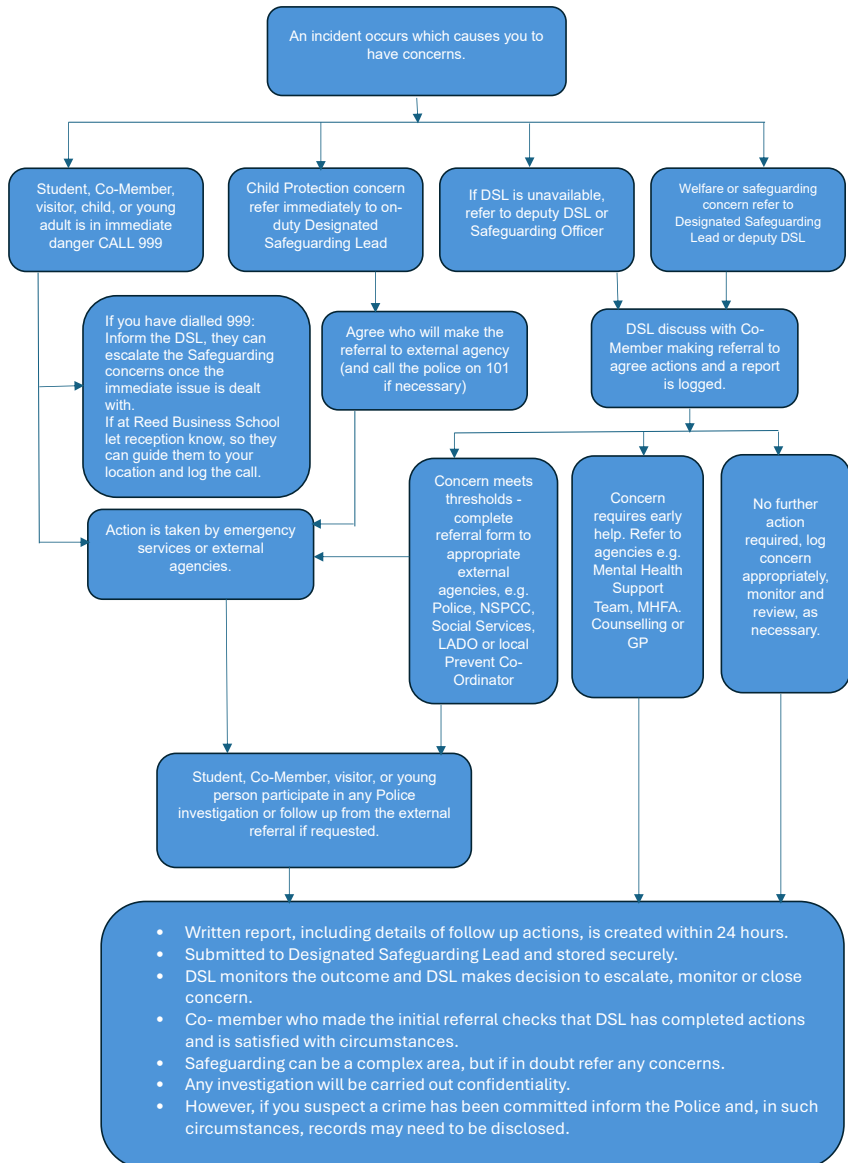
Designated Safeguarding Lead (DSL)	Naomi Metcalfe	020 7932 2760
Deputy Designated Safeguarding Lead	Desiree Rooker	01608 674224
Prevent Officer	Desiree Rooker	01608 674224
Mental Health First Aider	Sam Dean	01608 674224
Out of hours Night Porter	Phil Edwards	07977 582326
E-mail to raise concerns	safeguarding.reed@reedbusinessschool.co.uk	

Reed Learning

Designated Safeguarding Lead (DSL)	Naomi Metcalfe	020 7932 2760
Deputy Safeguarding Officer	Isabella Angileh	020 4558 9820
Prevent Officer	Naomi Metcalfe	020 7932 2760
E-mail to raise concerns	safeguarding@reedlearning.com	

If you are in immediate danger or a life-threatening emergency, you should call 999.

Reporting a Safeguarding Incident Flowchart



Terms & Conditions
www.reed.com/learning/terms-and-conditions

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