

## Safeguarding Policy

Policy Number	1.9.4
Title	Safeguarding Policy

### Introduction

Complete Lean Solutions (CLS) makes it clear that we treat everyone with respect, we will not tolerate sexual misconduct, violence or abuse and we will take all reasonable steps to keep our learners and community safe. It is also a principle that “we” means all of us, students, and staff.

We recognise that we have a fundamental responsibility to provide an environment in which individuals of all ages, whether staff, student, or visitor, may work, learn, and develop in a safe environment. This responsibility includes an ethical and moral duty to safeguard children and Adults at Risk at any time when they are engaging with our staff and students in any activities, whether on or off our sites. This core value is at the heart of our interaction with our wider community and acknowledges that in all our interactions with children and Adults at Risk, their welfare is of paramount importance.

This policy goes beyond CLS basic legal obligations and seeks to reflect general safeguarding guidance and good practice relating to the higher education sector.

### The Purpose of this Policy

The purpose of this Safeguarding Policy and its associated guidance documents is to set out our responsibilities, processes and procedures and outline how we will:

- Provide a safe and supportive environment for children and Adults at Risk who engage with our staff and learners in the course of our work and activities.
- Ensure that staff and students facilitating or supporting programmes and activities working with children and Adults at Risk have defined responsibilities, as set out in the associated documents.
- Ensure that staff and students engaging with children and Adults at Risk receive relevant safeguarding training and understand their role and responsibilities.
- Ensure that there is a clear reporting and escalation route should staff or students become aware of a safeguarding concern.

### Scope

This Policy applies to staff and students engaging in activities whether on our site or elsewhere and covers our interaction with children and Adults at Risk who are current students, prospective students or who are otherwise participating in CLS related activities.

The policy provides guidance on our internal procedures but acknowledges that it may be appropriate in certain circumstances to report safeguarding concerns about children or Adults at Risk to a range of external agencies.

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CLS recognises that young people can be at risk of being drawn into extremist ideologies which can lead to a risk of radicalisation. In the context of the Safeguarding Policy, the risk of being drawn into extremist ideologies and radicalisation is considered to be a significant safeguarding concern which is of equal weight alongside other forms of abuse and mistreatment of children and Adults at Risk. A safeguarding concern of this nature would also fall within the scope of Prevent.

CLS recognises that the use of technology has become a significant component of many safeguarding issues. Child sexual exploitation, radicalisation, sexual predation.

Technology often provides the platform that facilitates harm. An effective approach to online safety establishes mechanisms to identify, intervene in, and escalate any incident where appropriate.

The breadth of issues classified within online safety is considerable, but can be categorised into three areas of risk:

- content: being exposed to illegal, inappropriate or harmful material; for example, pornography, fake news, racist or radical and extremist views.
- contact: being subjected to harmful online interaction with other users; for example, commercial advertising as well as adults posing as children or young adults; and
- conduct: personal online behaviour that increases the likelihood of, or causes, harm; for example, making, sending and receiving explicit images, or online bullying.'

If a CLS course is being hosted at another organisations site with their own facilities, the organisation's Safeguarding Policy and related procedures will normally take precedence, but members of CLS engaging in those programmes must also take note of, and act in accordance with the CLS Safeguarding Policy.

### Definitions

**Child:** References to "child" or "children" in this policy means anyone under the age of 18 years.

**Adult at Risk:** CLS bases its definition of an "Adult at Risk" on that used within the Data Protection Act 2018 and defines an Adult at Risk as someone over 18 years of age who (i) has needs for care and support; and (ii) is experiencing, or is at risk of, neglect, or physical, mental or emotional harm; and (iii) as a result of those needs is unable to protect themselves against neglect or harm, or the risk of it.

**Safeguarding Children:** In defining our approach towards children, CLS draws on the definition used by the DfE in Keeping Children Safe in Education 2024 (KCSE). While KCSE only applies to Schools and Colleges, we will play our part in:

- Protecting children from maltreatment.
- Preventing impairment of children's health or development.
- Ensuring that children are growing up in circumstances consistent with the provision of safe and effective care.
- Taking action to enable all children to have the best outcomes.

**Safeguarding Adults at Risk:** While CLS is not subject to the provisions of the Care Act 2014, CLS draws broadly on this act to inform its policy on safeguarding Adults at Risk. We will play our part to:

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- Ensure that the rights of Adults at Risk are protected to enable them to live in safety, free from abuse and neglect.
- Ensure that the wellbeing of the Adult at Risk is promoted and that in deciding on any action to be taken we will consider their views, wishes, feelings and beliefs, for example when considering whether to refer concerns to statutory bodies or when seeking support from charitable organisations.

However, we recognise that Adults at Risk sometimes have complex interpersonal relationships and may be ambivalent, unclear, or unrealistic about their personal circumstances and may not fully appreciate potential risks to their safety or well-being and therefore it may not always be possible to fully defer to their wishes when seeking the best way forward.

**“Work with children or Adults at Risk”:** Within this policy “Work with children or Adults at Risk” includes all engagement with children and Adults at Risk in a professional capacity in connection with the work of CLS.

### Safeguarding children and Adults at Risk

We have a responsibility to provide a safe environment in which children and Adults at Risk can live, learn, and develop. We understand that safeguarding and promoting the welfare of children and Adults at Risk is everyone’s responsibility and we all have a role to play in protecting them in so far as we are reasonably able to do so within the context of a training environment.

#### (a) Responsibilities of Individual Members of CLS

In line with CLS’ principles, we all have a duty to ensure that we treat everyone with respect, we should therefore report any concerns that we may have that children or Adults at Risk are being abused or mistreated and that children and Adults at Risk who engage with our staff, and students in the course of our work and activities, do so in a safe and supportive environment.

Individual members of CLS must:

- Ensure that children and Adults at Risk are treated with respect and supported whenever they engage in CLS’ activities.
- Undertake appropriate training before engaging in any CLS’ activities involving children or Adults at Risk.
- Hold a valid DBS certificate.
- Ensure that they are aware of how to report a safeguarding concern to their Designated Safeguarding Officer for activities involving children or Adults at Risk.

#### Safeguarding contacts

Safeguarding & Prevent designated person – Emma Stevens – Mobile: +44 (0)7525859222 –

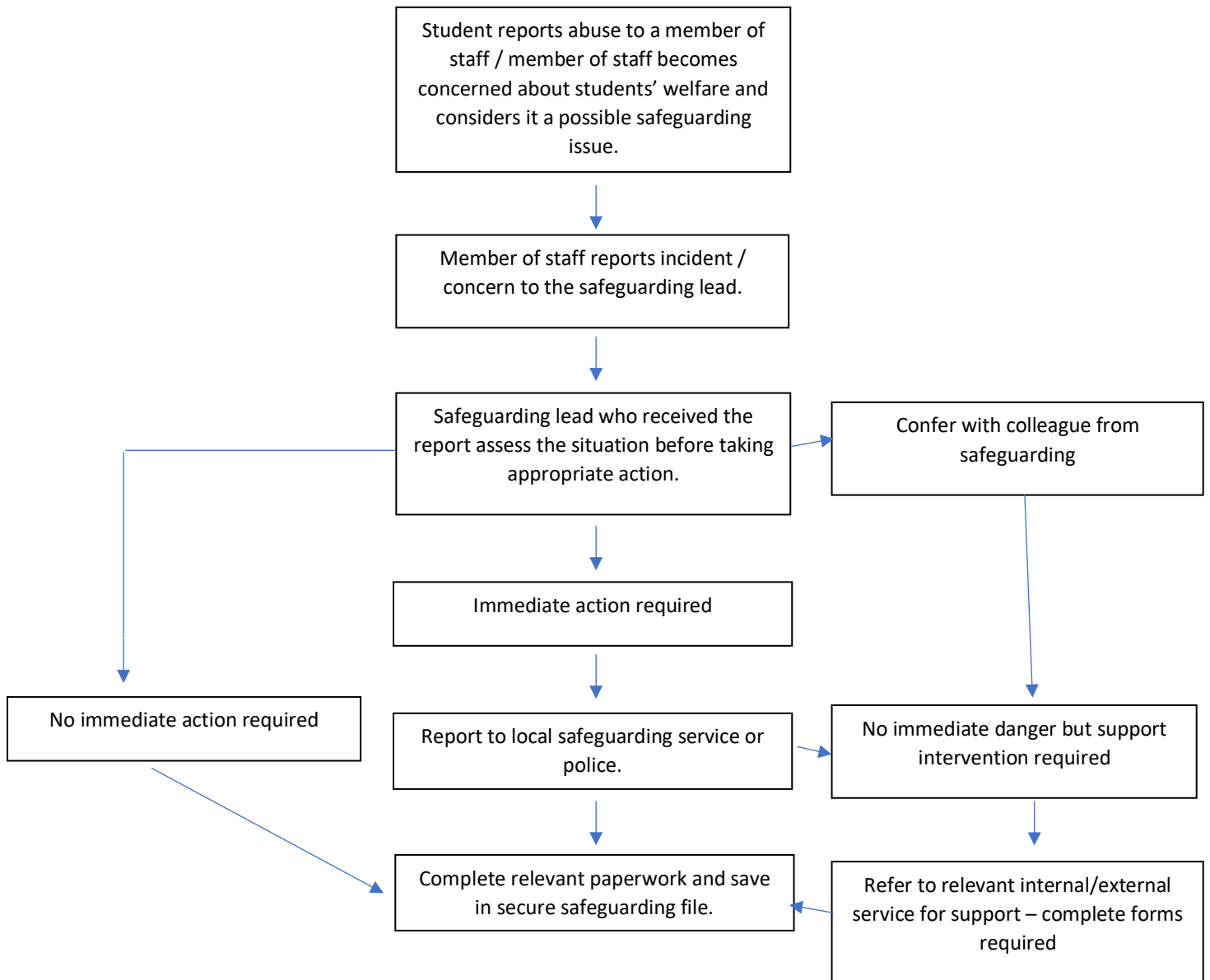
email: [estevens@completeleansolutions.com](mailto:estevens@completeleansolutions.com)

#### Guidance

This policy provides the overall framework and statement of principles regarding Complete Lean Solutions’ approach to safeguarding children and Adults at Risk.

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## Procedure flowchart



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### Safeguarding Incident Form

Please use this form to record an incident or concern of abuse, neglect, or potential vulnerability of any learner on your training programme. This includes any concerns for those learners who are /may be at risk of radicalisation or extremism. It is vital that CLS maintain records of any incidents and pass them to the required agencies.

<b>Name &amp; full contact details if possible.</b>
<b>Concern or Incident</b>
<b>Date, time &amp; Location</b>
<b>Action Taken</b>
<b>Follow up by CLS:</b>

**Name:**

**Signature:**

**Date:**

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Please retain a copy of this form for your records and pass the original copy to CLS.



HM Government

### The seven golden rules to sharing information

(Advice for practitioners providing safeguarding services to children, young people, parents and carers)

1. Remember that the Data Protection Act 1998 and human rights law are not barriers to justified information sharing but provide a framework to ensure that personal information about living individuals is shared appropriately.
2. Be open and honest with the individual (and/or their family where appropriate) from the outset about why, what, how and with whom information will, or could be shared, and seek their agreement, unless it is unsafe or inappropriate to do so.
3. Seek advice from other practitioners if you are in any doubt about sharing the information concerned, without disclosing the identity of the individual where possible.
4. Share with informed consent where appropriate and, where possible, respect the wishes of those who do not consent to share confidential information. You may still share information without consent if, in your judgement, there is good reason to do so, such as where safety may be at risk. You will need to base your judgement on the facts of the case. When you are sharing or requesting personal information from someone, be certain of the basis upon which you are doing so. Where you have consent, be mindful that an individual might not expect information to be shared.
5. Consider safety and well-being: Base your information sharing decisions on considerations of the safety and well-being of the individual and others who may be affected by their actions.
6. Necessary, proportionate, relevant, adequate, accurate, timely and secure: Ensure that the information you share is necessary for the purpose for which you are sharing it, is shared only with those individuals who need to have it, is accurate and up to date, is shared in a timely fashion, and is shared securely (see principles).
7. Keep a record of your decision and the reasons for it – whether it is to share information or not. If you decide to share, then record what you have shared, with whom and for what purpose.