

# Our Guide to includED

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## Our Guide to includED – Purpose

includED is our brand which encompasses four key areas:

- Equality and inclusion
- Safeguarding
- Prevent
- E-safety

We visually represent includED across all Knovia group businesses through the use of the includED logos.



Through all includED activity Knovia enacts its statutory and legislative responsibilities under the following key pieces of legislation and statutory guidance:

- The Rehabilitation of Offenders Act 1974
- The Children Act 1989
- The Equality Act 2010
- Safeguarding Vulnerable Groups Act 2006
- Counter-Terrorism and Security Act 2015
- Female Genital Mutilation 2003
- Serious Crime Act 2015
- Care Act 2014
- Mental Capacity Act 2005
- Domestic Abuse Act 2021
- Sexual Offences Act 2003
- Education Act 2002
- Apprenticeships, Skills, Children and Learning Act 2009

### Scope

This guide applies to all colleagues, including senior managers and the Board, paid colleagues, volunteers and part-time workers, agency colleagues, contractors, learners/Apprentices or anyone working on behalf of Knovia, and extends to all Knovia operating businesses. It outlines our approach to the four includED areas and explains the responsibilities that we all have to promote the welfare of our learners/Apprentices and each other. It describes what Knovia will do to ensure that learners/Apprentices in our care are kept

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safe, receive an appropriate and relevant social education and how we will respond to concerns or risks of harm.

All those that act on behalf of Knovia are expected to enact the principles contained within this guide. This includes our clients (employers), learners/Apprentices and partners.

As new operating businesses come on board within the Knovia group due diligence will be undertaken to inform an includedED action plan and an Annex to this policy which then outlines how they will deliver the core principles of Our Guide to **includedED** during the transition period.

The Knovia **includedED** standard, guide, principals and brand will be applied consistently across the Knovia Group. All businesses will be assessed to the Leaders in Safeguarding standard, aspiring and working to Gold standard.

## Partners

Our partner organisations will be provided with a copy of this guide to enable them to understand how Knovia approaches equality and inclusion, safeguarding, Prevent and E-safety with its learners/Apprentices.

It is expected that our partners are committed to our **includedED** ethos and achieve the standards outlined within this guide when engaging with our learners/Apprentices. A self-study resource for managers covering all aspects of **includedED** is available for our partner organisations on request.

Partners/subcontractors will be supported through the provision of timely **includedED** advice and guidance and, where relevant, access to training and continuing professional development. Where provision is subcontracted the sub-contractor is provided with access to the **includedED** resource bank, **includedED** snippets, **includedED** factsheets and safeguarding guides via a regular newsletter.

All Knovia clients are provided with **includedED** updates to keep them abreast of matters related to equality, safeguarding, E-safety and Prevent with these being provided via our employer newsletter – Pulse. Any specific support provided to clients (employers) of the operational businesses are business specific and described within the relevant annex.

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## Key contacts

The safeguarding team at Knovia are the key contacts for all matters relating to this guide.

Safeguarding role	Name	Job role	Contact details
Designated Safeguarding Lead (DSL) Senior mental health lead	Andrew Johnson	People Director	andrew.johnson@knovia.co.uk 07794 067731
Designated Deputy Safeguarding Lead (DDSL) Prevent lead Mental health lead	Niki Husher	Safeguarding and People Business Partner	niki.husher@knovia.co.uk 07971 306967
Safeguarding Lead (SL) Mental health lead	Jakki Ashford	People Business Partner	jakki.ashford@knovia.co.uk 07811 052291

Each operating business will have a named Senior Safeguarding Lead/Designated Deputy Safeguarding lead, Safeguarding Leads and Safeguarding Managers. For details of the safeguarding lead structure within the operating businesses see the relevant annex.

## Associated policies and documentation

The following policies and documentation should be read alongside Our Guide to [includED](#):

- [Part One – Keeping Children Safe in Education 2024](#)
- [Our Guide to Safer Recruitment \(Knovia\)](#)
- [Supporting looked after children \(Knovia\)](#)
- [Colleague handbook \(including whistleblowing\) \(operating business\)](#)
- [Complaints policy \(operating business\)](#)
- [Our guide to low level concerns \(Knovia\)](#)
- [Data Protection policy \(operating business\)](#)

## Monitoring and review

The Safeguarding Leads will review this guide at least annually to assess its implementation and effectiveness both across Knovia and its operating businesses. This is in line with statutory requirements.

Overall responsibility for this guide, the associated operating businesses appendices and its implementation lies with the Knovia Board. In order to ensure that they are able to monitor the implementation and effectiveness of this guide, a bi-annual Board report will be provided to them containing input from each of the operating businesses.

Signed:



Mark Botha - Chief Executive

Date: October 2024

<b>January</b> Board report Safeguarding induction session Safeguarding data analysis Prevent risk assessment review	<b>February</b> Board report Safeguarding induction session Snippets Safeguarding guide includED bi-annual Board update Safer recruitment audit
<b>March</b> Board report Safeguarding induction session Prevent bi-annual board update Safeguarding Leads meeting	<b>April</b> Board report Safeguarding induction session includED essentials content review Prevent risk assessment review
<b>May</b> Board report Safeguarding induction session Snippets includED action plan review Safeguarding guide Colleague annual disclosure exercise	<b>June</b> Board report Safeguarding induction session includED essentials allocation Prevent duty annual self-assessment Safeguarding Leads Meeting
<b>July</b> Board report Safeguarding induction session Review content of 'Our Guide to Citizenship' EDucation pack content review Prevent risk assessment review	<b>August</b> Board report Safeguarding induction session Snippets Safeguarding guide Our Guide to includED annual review exercise Safeguarding manager/safeguarding lead support call Safer recruitment audit
<b>September</b> Board report Safeguarding induction session Our Guide to Safer Recruitment annual review exercise Prevent bi-annual board update includED essentials allocation KCSIE colleague update Safeguarding leads meeting	<b>October</b> Board report Safeguarding induction session Our Guide to includED Board governance includED bi-annual Board update Safer recruitment training content review Prevent risk assessment review
<b>November</b> Board report Safeguarding induction session Our guide to includED roll out includED action plan review Safeguarding guide Safeguarding manager meetings – CPD focus	<b>December</b> Board report Safeguarding induction session Safer recruitment training roll out Safeguarding leads meeting

Knovia uses the **includED** brand in the following ways:

**Equality & inclusion**

- Equality for all – how we will enact equality and inclusion
- Recruitment and selection – how we will recruit colleagues fairly
- Impact – how we will assess what we do and its impact on individuals and under-represented groups
- Accessibility – how we will ensure our services are accessible
- Bullying & harassment – how we will approach and deal with complaints

**E Safety**

- IT usage – how we will monitor usage to identify risk
- Communication – how we will maintain professional standards
- Identify risk – how we will educate users to identify risk for themselves

**Safeguarding**

- Child and vulnerable adult protection – how we will respond to identified risks of harm
- Welfare support – how we will advise and guide those in need
- Safer recruitment – how we will recruit colleagues safely
- Teaching and learning – how we will develop learners’ personal behaviours
- Training and development – how we will develop colleague understanding
- Risk assessment – how we will manage safeguarding risk

**PREVENT**

- Protecting the vulnerable – how we will support those identified as at risk from radicalisation
- Teaching and learning – how we will support local and national priorities
- Responding to risk – how we will protect our colleagues and learners
- Partnership – how we will work with statutory bodies

**The learner perspective**

Safeguarding is about ensuring our safety and wellbeing

We expect those who work with us to:

- Treat us with respect
- Intervene appropriately to protect us
- Provide us with an appropriate social education

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## Equality and inclusion - our commitment

The public sector equality duty (PSED) is a legal duty that requires public bodies to have due regard to the need to eliminate discrimination, advance equality of opportunity and foster good relations between different people when carrying out their activities. The Equality Act 2010 (The Act) places responsibilities upon Knovia and its colleagues and the operating businesses to promote equality. We will extend this responsibility by encompassing the Prevent Duty and Safeguarding expectations within this guide with the view to work in ways which promote community cohesion, tackle inequality and minimise the risk of harm posed to vulnerable groups and individuals.

Knovia is committed to promoting equality, inclusion, dignity and respect for all through its culture and activities. We will embrace diversity by promoting and maintaining an inclusive and supportive environment where everyone can achieve their full potential. We are committed to monitoring diversity within our workforce and learner/Apprentice base through our [includED](#) impact measures (IIMs) across the group.

Being subjected to harassment, violence and or abuse, may breach an individual's rights, as set out in the Human Rights Act.

### Objectives

We will support our colleagues, customers and learners/Apprentices to recognise and meet the differing needs of people from diverse backgrounds within their day to day activities, and to embed and promote the principles of equality in all that they do. We will regularly review our progress in doing this and take swift action where gaps or inappropriate practice are identified.

### Equality Act 2010 definitions

The Act covers nine 'protected characteristics':

#### Age

The Act protects people of all ages. However, different treatment because of age is not unlawful direct or indirect discrimination if it can be justified that we are achieving a legitimate aim.

#### Disability

The Act has made it easier for a person to show that they are disabled and protected from disability discrimination. Under the Act, a person is disabled if they have a physical or mental impairment which has a substantial and long-term adverse effect on their ability to carry out normal day-to-day activities.

#### Gender reassignment

The Act says that you must not be discriminated against because you are transsexual - that is your gender identity differs from the gender assigned to

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you at birth. In the Act it is known as gender reassignment. All transsexual people share the common characteristic of gender reassignment.

## Race

For the purposes of the Act, race includes colour, nationality and ethnic or national origins.

## Religion, belief and non-belief

In the Act, the word religion includes all religions and faiths. It also includes a lack of religion where people have no religious belief at all.

## Sexual orientation

Protection by the Act is given to bisexual, gay, heterosexual, and lesbian people.

## Sex

Both men and women are equally protected by the Act. Discrimination on the grounds of sex is unlawful.

## Marriage or civil partnership

The Act protects those who are married or in a civil partnership against discrimination. Single people are not protected under the Act.

## Pregnancy and maternity

A woman is protected against discrimination on the grounds of pregnancy and maternity during the period of her pregnancy and statutory maternity leave. During this period, any discrimination cannot be treated as sex discrimination.

## Discrimination

There are a number of forms of discrimination. Knovia actively challenges all forms of discrimination and will work to ensure that our learners/Apprentices, colleagues and partners are aware of how discrimination can be tackled effectively.

## Direct discrimination

Direct discrimination occurs when someone is treated less favourably than another person because they have a protected characteristic.

## Indirect discrimination

Indirect discrimination occurs when a rule, policy, or practice that may disadvantage people who share a protected characteristic is imposed.

## Associative discrimination

Associative discrimination occurs when someone is treated less favourably because they are associated with someone who has a protected characteristic – this is a form of direct discrimination.

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## Perceptive discrimination

Perceptive discrimination occurs when someone is treated less favourably because someone thinks they may have a protected characteristic. It applies even if the person doesn't have a protected characteristic. This is a form of direct discrimination.

Failure to make reasonable adjustments may also be considered discrimination.

## Harassment

Harassment is unwanted conduct relating to a protected characteristic which has a purpose of upsetting or violating a person's dignity or creating an intimidating, hostile, degrading, humiliating or offensive environment for the individual. Harassment cannot be aimed at people on the grounds of maternity, pregnancy, marriage or civil partnership. Colleagues can make a formal complaint on the grounds of harassment if they find the action offensive and it wasn't directly aimed at them personally.

## Victimisation

Victimisation occurs when someone is treated badly because they have made or supported a complaint or grievance under the Equality Act 2010 or are suspected of doing so. Malicious or untrue complaints are not covered.

Discrimination, harassment and victimisation against colleagues, learners/Apprentices and partner colleagues will not be tolerated.

## Training

Initial training on equality and inclusion will be provided to all colleagues at induction through the completion of our self-study EDucation pack which covers all elements of **includED**. This will then be supported through the provision of regular **includED** Continuing Professional Development (CPD), tri-monthly **includED snippets** and via formal annual **includED** essentials self-study activity for learner facing colleagues, with non-learner facing colleagues completing this bi-annually. Regular training and CPD provided will focus on equality and inclusion related matters as well as providing information which empowers colleagues to challenge inequalities, to build their own resilience and that of our learners/Apprentices and have a positive impact upon community cohesion. Knovia group publications and quarterly equality focused digests will also bring this topic alive for colleagues, who will be instrumental in bringing the **includED** culture to life.

## Equality for all

We will value and make use of differences between colleagues to the benefit of both them and Knovia and provide a working and learning environment free from bullying, discrimination and harassment.

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We will thoroughly investigate and deal with any complaints raised regarding discrimination, harassment, victimisation or inequality.

Our approach to ensuring the equality of opportunity and the benefits of diversity will be understood by all colleagues.

We will not unlawfully discriminate against learners because of their protected characteristic and will take positive action, where proportionate, to deal with the disadvantages these learners face. For example, by making reasonable adjustments for disabled children and supporting girls if there is evidence they are being disproportionately subjected to sexual violence or harassment.

We recognise that learners/Apprentices with protected characteristics may be more at risk of harm. Our [includED](#) training will highlight this to all colleagues.

LGBTQ+ learners/Apprentices and colleagues may need additional spaces for them to speak out or share their concerns with colleagues whether these be about equality or safeguarding matters. We will utilise technology to provide such spaces.

All those involved in recruitment, selection or assessment of colleagues or job applicants will be given appropriate guidance to carry out their roles effectively – Knovia is an equal opportunities employer and the recruitment or promotion of any individual will be based on individual merit, skills and abilities relevant to the requirements of the role. All recruiting managers will receive training on recruiting safely and fairly prior to leading the recruitment and selection process. This training will be refreshed every two years.

Individuals will be able to recognise their responsibility for showing respect to their colleagues, working as a team and contributing positively to an environment where everyone has the same chance to develop and progress within Knovia.

We will provide learning materials which are free from cultural or other bias. Although primarily written in English, learning materials will be made available in alternative formats and in other languages where requested. Where technology allows, learning materials will be created in accessible formats.

Training programmes will be designed and delivered in a flexible manner, which takes account of the diverse needs, aspirations, prior achievements and prior experience of learners/Apprentices. Blended learning will ensure accessibility.

Any learners/Apprentices with additional support needs will be identified at the point of entry and arrangements will be made to provide them with

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appropriate support. We will use CognAssist, an online neurodiversity tool which looks at eight different brain functions, to provide support with any additional learning needs. All learners/Apprentices will be screened and provided with an opportunity to access this resource at the point of identified need.

We will make arrangements for learners/Apprentices with special assessment requirements to ensure that there are no unnecessary barriers to prevent them from achieving.

All procedures for assessment and testing will be free from cultural or other bias.

We will take positive action to ensure that minority groups are represented within our workforce and our learner/Apprentice community. Data will be monitored by our People Team to ensure that where action is needed this can be taken swiftly.

Our guide to [includED](#) will be constantly monitored to ensure that it is working and being applied consistently across the Knovia group. This will include utilising learner/Apprentice and Colleague Voice mechanisms and internal audits of the operating businesses.

## Levels of responsibility

This guide is under Board governance and is reviewed annually by the DSL and Knovia SL team, taking into account the impact of the policy and any lessons learned, together with any legislative or required process changes. Recommendations are then made to the Board for their approval and sign off.

The strategic direction for equality will be managed by the Director of People.

The Executive Team will monitor and review the impact of this guide on the operating businesses based on any Board report or operating business feedback.

The People Team will be responsible for advising Knovia group managers on the application of the guide and for ensuring that all training and documentation in connection with monitoring, recruitment, selection, training, promotion and relevant employment procedures are administered in accordance with the guide.

Knovia group Managers are provided with People Standards to assist them in meeting their responsibilities which include them ensuring that their colleagues have a clear understanding of equality and inclusion and how to enact their responsibilities. People Business Partners provide support and

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guidance to ensure managers enact these consistently across the operating businesses and Knovia.

All colleagues will:

- Challenge unlawful discrimination for all protected characteristics shown above
- Promote equality of opportunity for all
- Promote good relations between people of different races and cultures
- Promote equality of opportunity between disabled people and other people
- Challenge harassment and bullying of people that is related to their protected characteristic
- Follow safeguarding reporting procedures to protect individuals from any potential risk of harm
- Promote positive attitudes towards people with a protected characteristic
- Support the development of community cohesion
- Read all literature issued on equality, abiding by and ensuring the consistent application of this
- Call out and challenge hate speech
- Role model excellence in their interactions with learners, clients and partners
- Challenge language and behaviour that is being labelled as 'banter' and 'just having a laugh'. We have a zero tolerance to such behaviour being passed off as acceptable and will respond accordingly

Colleagues responsible for teaching will ensure that the learners/Apprentices for whom they are responsible have an understanding of equality and diversity. They will support their learners/Apprentices to have an appreciation of how this impacts them personally and of their own role in ensuring good practice. This will be done using the approved resources and will include self-study materials relevant to the level of learning. All key topics will be embedded throughout all curriculums to ensure learners are empowered to be resilient individuals of the community.

Colleagues responsible for teaching should ensure that their learners/Apprentices are aware of who to contact if they have a concern related to equality and inclusion. This will be covered with all learners/Apprentices during their induction and as a part of introducing our wider safeguarding procedures.

## Customers and partners

Customers and partners are responsible for ensuring equality within their own workplaces and for promoting equality of opportunity for their own learners/Apprentices and colleagues. Where an employer or partner does not understand their obligations under the Equality Act, Knovia will provide information, advice and coaching to help improve that knowledge for the benefit of their business. Where appropriate, this will include support to

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develop their own policies to tackle inequality within their workplace and the provision of training.

## Teaching and learning

Our operating businesses will support our learners/Apprentices to recognise and understand bullying, harassment and victimisation and provide them with skills to challenge this effectively with the view of developing their personal resilience and citizenship skills. They will broaden their understanding of British values and topical and relevant equality related matters through the delivery of **includED** teaching and learning sessions and the use of support resources. Safe space discussions will enable them to explore equality in a personalised way with the impact of this learning being checked and challenged throughout their Apprenticeship.

All learners/Apprentices will be provided with an appropriate level of self-study activity focusing upon equality as an additionality to their programme. This will ensure that they understand discrimination and harassment and how they can play their part in addressing this at work and in society in general. This understanding will be enhanced by the colleague responsible for teaching in one-to-one reflective discussions.

Apprentices/learners should feel safe and confident to speak to any Knovia group colleague if they are subject to any form of bullying, discrimination, harassment or victimisation.

## Colleague recruitment

Knovia is an equal opportunities employer and operates a People Standard on Recruitment which reflects the following commitments.

Safer recruitment practices are enacted by the Knovia Talent Team as a shared service and on behalf of the operating businesses. These cover new colleague risk assessment and DBS checking. Our Guide to Safer Recruitment outlines the steps that we take to mitigate risk to learners/Apprentices and includes information on the roles that require an exempted question to be asked under the Rehabilitation of Offenders Act.

Recruitment activity will not suggest that Knovia might take into account factors that would, or might, discriminate unlawfully. Recruiting managers receive recruitment training that includes unconscious bias and safer recruitment information with associated processes being free from discrimination.

Job descriptions and specifications will clearly set out the skills, experience and qualifications required for the post and will only stipulate justifiable requirements for the job. Job advertisements will not unlawfully preclude or discourage applications from specific individuals or groups. We will take

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active steps to attract diverse talent and provide a welcoming and supportive environment.

The selection criteria used will reflect the standards required with screening being undertaken against the person specification for the role. Initial screening will be undertaken by our Talent Team ensuring a consistent and unbiased approach that is based purely on suitability.

Consideration will be given to formal flexible working arrangements such as hybrid, remote or variable working hours, part-time and term-time working and job sharing for all that would wish to be considered for such arrangements. Knovia and its operating businesses provide a flexible and supportive environment designed to support the health and wellbeing of all colleagues.

## Transgender

As a safe and tolerant employer, we welcome applications from transgender or transitioning candidates and we work to ensure that our recruitment process, including data collection processes are inclusive.

Disclosing trans status is not an expectation at the initial recruitment stage however trans applicants are encouraged to highlight their gender to the Talent Team during the recruitment process. This is to facilitate the checking of identity and document checks and recognises the fact that often the names on a trans person's documentation (such as passport, driver's licence, utility bills or qualification certificates) do not tally. Such matters will be dealt with sensitively.

Applicants with disabilities will be given full and fair consideration for employment, having regard for their aptitudes and abilities and any reasonable adjustments that can be made. If an existing colleague becomes disabled, the objective should be the continued provision of suitable employment, either in the same or an alternative position, with appropriate training being given where necessary. Colleagues with disabilities will be actively supported to ensure that they share in opportunities for training, career development and promotion.

Reasonable adjustments will always be considered to ensure that colleagues are able to bring their best selves to work. We will work with partner organisations to help build their understanding and confidence in this area where required, such as access to work.

## Positive action

Knovia reserves the right to take positive action during shared service recruitment activity and to recruit a person that is needed to support us in our aim to provide a colleague base which reflects the ethnic or gender makeup of the communities that it serves. Our Talent Acquisition People Standard

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provides guidance to our recruiting managers, and this is supported by the '[Safer Recruitment the Knovia Way](#)' self-study for recruiting managers module.

## References and background checks

Two references will be required for all successful candidates. These are shared across the group where internal transfers occur.

Any employment references provided for ex-colleagues will be based on fact alone and will not contain any discriminatory information. Safeguarding information will be shared upon request for relevant roles or regulated environments.

Rehabilitation of offenders' information does not form a part of the initial process for screening candidates for interview. This information will only be consulted to ensure the suitability of a person to work in regulated activity, or for roles with frequent contact with children. Having a spent or unspent conviction does not preclude persons from working in these roles; the decision regarding the offer of employment will be based upon analysis of risk.

## Sensitive data

In accordance with the General Data Protection Regulation (GDPR), Knovia will collect, and process information related to learners'/Apprentices' and colleagues' age, gender, ethnicity and disability. This will be used to measure progress of underrepresented groups and to identify areas in which Knovia needs to improve its efforts in promoting equality and diversity in the workplace or training environment. It will be reviewed against local labour market intelligence and national benchmarks. This activity will form a part of our [includED](#) impact measures (IIMs) which are overseen by the People Team.

Data will be collected and stored with the express consent of the individual and stored and processed in line with the General Data Protection Regulation. Knovia may also pass data to partner organisations such as the funding body. This is done only with the express consent of the individual providing it.

## Marketing and recruitment of learners/Apprentices

We will provide marketing and advertising materials which reflect Knovia's commitment to equality and inclusion, challenge stereotypes and raise participation of underrepresented groups. All marketing and advertising materials will be written in English and, if required, will be made available through a range of sources. Wherever requested, marketing and advertising materials can also be made available in languages other than English or other accessible formats.

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## Bullying and harassment – colleagues

Knovia is fully committed to providing a working environment that is free from bullying, harassment and victimisation of any kind. We take seriously any allegations of bullying or harassment. Knovia expects everyone to understand and enact their responsibilities for keeping the workplace free of bullying, harassment and victimisation and to actively challenge inequality.

Concerns related to bullying, harassment and victimisation may be dealt with under a number of appropriate People Standards including Grievance, Disciplinary or the Capability Procedure.

Harassment can be described as unwanted behaviour, which a person finds intimidating, upsetting, embarrassing, humiliating, or offensive. It is important to note that it is not whether the behaviour was intended to be offensive that matters, rather whether the individual was offended. Sexual harassment is a significant workplace problem and can affect men as well as women, regardless of their age. It is, however, only one of several types of harassment.

People can be subject to harassment on a variety of grounds, including:

- Race, ethnic origin, nationality and skin colour
- Gender or sexual orientation
- Willingness to challenge harassment (leading to victimisation)
- Membership or non-membership of a trade union
- Disabilities or learning difficulties
- Status as an ex-offender
- Age
- AIDS/HIV
- Health
- Physical characteristics
- Personal beliefs / religious beliefs
- Political persuasion

This list is not exhaustive. Harassment can range from extremes such as violence to less obvious forms like ignoring someone. Examples of behaviour that can be considered as harassment include:

- Unwanted physical contact
- Jokes, offensive language, gossip, slander, sectarian songs
- Posters, graffiti, obscene gestures, flags and emblems
- Isolation or non-cooperation and exclusion from social activities
- Intrusion by pestering, spying and stalking either in person or via the internet in chat rooms

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Bullying is any persistent behaviour, directed against an individual, which is intimidating, offensive or malicious and which undermines the confidence and self-esteem of the recipient.

Examples of bullying include:

- Verbal or physical threats and intimidation
- Persistent negative comments
- Humiliating someone in front of others
- Unjustified persistent criticism
- Offensive or abusive personal remarks
- Constantly changing targets in order to cause someone to fail
- Making false allegations, gossiping or spreading rumours
- Cyber bullying
- Monitoring unnecessarily and obtrusively
- Unwanted banter

Legitimate, constructive, and fair criticism of a person's performance or behaviour from a manager is not bullying. Certain types of harassment and bullying are regarded as unfair discrimination and are therefore covered by the Equality Act 2010. The Human Rights Act 1998, implemented in October 2000, changed the way that Courts and Employment Tribunals deal with harassment and bullying and introduced the right not to be subjected to degrading treatment or punishment.

## Safeguarding - our commitment

### The learners'/Apprentices' perspective

Knovia's operating businesses will provide an environment where:

- The welfare of the learner/Apprentice is paramount
- All learners/Apprentices, 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
- Relationships with learners/Apprentices, partners, clients and with other agencies are developed which promote a safe learning environment
- Colleagues, learners/Apprentices, partners and clients have an understanding of safeguarding which then enables them to fulfil their statutory or moral obligations
- We contribute to 'Working Together to Safeguard Children' and adopt the principles as laid out in the statutory guidance 'Keeping Children Safe in Education' 2024
- Learners/Apprentices know how to seek support and are supported when making a disclosure, and those receiving this are free from judgement or bias
- Learners/Apprentices have access to safe spaces to express their views, be listened to and where appropriate be challenged

### Objectives

The purpose of this guide is to inform everyone connected with Knovia, and with whom we partner, of our position with respect to the safeguarding of learners/Apprentices. It explains how we respond to our statutory obligations laid out within Keeping Children Safe in Education (2024).

We believe that it is always unacceptable for a learner/Apprentice to experience abuse of any kind and recognise our responsibility to safeguard the welfare of all learners/Apprentices, through procedures and practices which protect and minimise potential harm. We will seek to mitigate the risk of harm posed to learners/Apprentices through the operating businesses action plans, day to day behaviours and processes.

Safeguarding is everybody's responsibility.

### Definitions

Safeguarding seeks to keep children and adults safe from a range of potential harm and looks at preventative action, not just reaction. It is directed by various legislation and statutory guidance including Working Together to Safeguard Children and Keeping Children Safe in Education (2024).

It means promoting the welfare of children and vulnerable adults and having approaches and procedures in place which define how we will seek to protect our learners/Apprentices. Safeguarding includes how we will respond

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to Child and Vulnerable Adult Protection concerns and how we will respond to disclosures of maltreatment and abuse. Safeguarding also includes protecting learners/Apprentices with vulnerabilities and mitigating risk through education. Apprentices/learners should feel safe and confident to speak to any Knovia group colleague if they are subject to any form of harm, abuse or bullying.

The term 'child' means anyone who has not yet attained the age of 18 and the term 'vulnerable adult' means a person aged 18 or over who is, or may be, in need of community care services by reason of disability, age or illness; and is or may be unable to take care or unable to protect themselves against significant harm or exploitation.

Other situations may render an adult 'vulnerable' such as domestic abuse, addiction, mental ill health, living in a drug-misusing family, living in areas of high crime, being likely to face racism or having caring responsibilities. With specified consent we extend our safeguarding approach to any such individual.

With Early Help it is possible to mitigate the risk of harm to a child. Colleagues should be particularly alert to the potential need for Early Help for a child who:

- Is disabled or has certain health conditions and has specific additional needs
- Has special educational needs (whether or not they have a statutory Education, Health and Care plan)
- Has a mental health need
- Is a young carer
- Is showing signs of being drawn in to anti-social or criminal behaviour, including gang involvement and association with organised crime groups or county lines
- Is frequently missing/goes missing from education, home or care,
- Has experienced multiple suspensions, is at risk of being permanently excluded from schools, colleges and in Alternative Provision or a Pupil Referral Unit.
- Is at risk of modern slavery, trafficking, sexual and/or criminal exploitation
- Is at risk of or is vulnerable to being radicalised or exploited
- Has a parent or carer in custody, or is affected by parental offending
- Is in a family circumstance presenting challenges for the child, such as drug and alcohol misuse, adult mental health issues and domestic abuse
- Is misusing alcohol and other drugs themselves
- Is at risk of so-called 'honour'-based abuse such as Female Genital Mutilation or Forced Marriage
- Is a privately fostered child

Operating businesses annexes will outline the process for accessing early help.

## Child protection

### Abuse

*Abuse*: a form of maltreatment of a child. Somebody may abuse, exploit or neglect a child by inflicting harm or by failing to act to prevent harm. 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 child or children. Abuse includes where they see, hear, or experience its effects.

*Physical abuse*: a form of abuse 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 adverse effects on the child's emotional development. It 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. It may include not giving the child opportunities to express their views, deliberately silencing them or 'making fun' of what they say or how they communicate. It may feature age or developmentally inappropriate expectations being imposed on children. These may include interactions that are beyond a child's developmental capability as well as overprotection and limitation of exploration and learning or preventing the child from participating in normal social interaction. It may involve seeing or hearing the ill-treatment of another. It may involve serious bullying (including cyberbullying), causing children frequently to feel frightened or in danger, or the exploitation or corruption of children. Some level of emotional abuse is involved in all types of maltreatment of a child, although it may occur alone.

*Sexual abuse*: involves forcing or enticing a child or young person to take part in sexual activities, not necessarily involving violence, whether or not the child is aware of what is happening. 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. They may also include 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. Sexual abuse is not solely perpetrated by adult males. Women can also commit acts of sexual abuse, as can other children.

**Neglect:** the persistent failure to meet a child's basic physical and/or psychological needs, likely to result in the serious impairment of the child's health or development. Neglect may occur during pregnancy, for example, as a result 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); or ensure access to appropriate medical care or treatment. It may also include neglect of, or unresponsiveness to, a child's basic emotional needs.

## Child on child abuse

Child on child abuse can take various forms and includes serious bullying, relationship abuse, domestic abuse, child sexual exploitation, harmful sexual behaviour, gender-based violence, upskirting and sexual harassment. It can take place face to face and online and happen in the workplace, in the Academy or in the wider community. Such behaviour is unacceptable and all reports or concerns around child on child abuse should be dealt with as a safeguarding matter.

Downplaying such behaviour as being 'banter', 'boys being boys' or 'children being children' is not acceptable. It is important to note that the alleged perpetrator of child on child abuse may also require safeguarding support and interventions.

Learners/Apprentices will be made aware of the nature of child on child abuse, the process to report this and who to report it to during their induction. They should feel confident to report such abuse and feel that their concerns will be taken seriously.

Our **includED** training will provide our colleagues with information on the signs and indicators of all forms of abuse and how to report concerns or disclosures of harm or abuse. This will ensure that colleagues understand their role in preventing and reporting abuse, including child on child abuse.

## Child criminal exploitation (CCE)

There is no legal definition of child criminal exploitation (CCE) through organised crime groups in England and Wales. Knovia defines the criminal exploitation of children and young people under 18 as:

“Where gangs target vulnerable children to get them to carry out criminal activity. County line gangs get children to deliver drugs around the country by using intimidation, debt bondage, violence and/or grooming. Gangs utilise children because they are cheaper, more easily controlled and less likely to get picked up by the Police. The fact that children are sent to different locations within the United Kingdom

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to carry out tasks for the gangs means that this type of CCE falls within the legal definition of trafficking in the Modern Slavery Act 2015.”

The child (or a third person or persons) receives ‘something’ (eg food, accommodation, drugs, alcohol, cigarettes, affection, gifts, money) as a result of them completing a task on behalf of another individual or group of individuals; this is often of a criminal nature. Child criminal exploitation often occurs without the child’s immediate recognition, with the child believing that they are in control of the situation. In all cases, those exploiting the child/young person have power over them by virtue of their age, gender, intellect, physical strength and/or economic or other resources. Violence, coercion and intimidation are common, with involvement in exploitative relationships being characterised in the main by the child or young person’s limited availability of choice resulting from their social/economical and/or emotional vulnerability.

## Child sexual exploitation (CSE)

The 2017 DfE publication Child Sexual Exploitation: Definition and Guide for Practitioners defines child sexual exploitation as follows:

“Child sexual exploitation is a form of child sexual abuse. It 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 or 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 through the use of technology.”

Children who are sexually exploited should be treated as the victims of child sexual abuse and their needs carefully assessed. They are likely to be in need of welfare services and in many cases protection under the Children Act 1989.

CSE can also include children who have been sexually abused through the misuse of technology, coerced into sexual activity by criminal gangs or the victims of trafficking.

## Child on child sexual violence and sexual harassment

Child on child sexual violence and sexual harassment can occur between children of any age. It can occur through a group of children sexually assaulting or sexually harassing a single child or group of children. Sexual violence and sexual harassment exist on a continuum and may overlap; they can occur online and face to face (both physically and verbally) and are

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never acceptable. As set out in Part one of Keeping Children Safe in Education (2024), all colleagues working with children are advised to maintain an attitude of 'it could happen here'. Ignoring such behaviour or accepting it as 'banter' or 'part of growing up' is not acceptable as this can lead to a culture of unacceptable behaviours and an unsafe environment for children. Any concerns should be reported in line with our 5 Rs ready for a risk assessment to be undertaken by the Designated Safeguarding Lead/Safeguarding Leads as to the required next steps. This may include external reporting to children's social care/the Police, the removal of learners/Apprentices from learning or the provision of early help.

Information on the signs and indicators of all forms of abuse are provided to colleagues through our mandatory [includED](#) training alongside the requirement to report any form of sexual harassment, sexual violence or sexual exploitation.

Both victims and alleged perpetrators will be supported and safeguarded in line with the departmental guidance Sexual Violence and Sexual Harassment Between Children at Schools and Colleges.

## Female Genital Mutilation

Female genital mutilation (FGM) is a procedure where the female genitals are deliberately cut, injured or changed, but there's no medical reason for this to be done. Information on the signs and indicators of FGM is provided to relevant colleagues through our mandatory [includED](#) training. It is a requirement to report concerns about FGM to a Designated Safeguarding Lead/Safeguarding Lead in line with the 5 R's. Further to this if a colleague responsible for teaching, in the course of their work in the profession, discovers that an act of FGM appears to have been carried out on a girl under the age of 18, they must personally report this to the police.

## Wider safeguarding

Knovia is committed to providing welfare support to all learners/Apprentices on the range of wider safeguarding considerations. This includes responding to a learner/Apprentice (of any age) via either direct intervention, advice and guidance or signposting where an issue exists within their day to day life (including the workplace) which could impact upon their ability to achieve. For learners/Apprentices under 18 this includes providing Early Help and working with external agencies and responding to claims of bullying, victimisation or harassment. Apprentices/learners should feel safe and confident to speak to any Knovia group colleague if they are subject to any form of harm, abuse or bullying.

Behaviours linked to issues such as drug taking and or alcohol misuse, unexplainable and or/persistent absences from education and consensual and non-consensual sharing of nude and semi-nude images and/or videos

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can be signs that children are at risk. We recognise that children with special educational needs or disabilities (SEND) or certain health conditions can face additional safeguarding challenges.

A child or young person being lesbian, gay, or bisexual is not in itself an inherent risk factor for harm, however, they can sometimes be targeted by other children. In some cases, a child who is perceived by other children to be lesbian, gay, or bisexual (whether they are or not) can be just as vulnerable as children who are.

Transitioning and gender questioning learners will be supported by considering the broad range of their individual needs, in conversation with the learner themselves.

Colleagues will endeavour to reduce the additional barriers faced and create a culture where all learners can speak out or share their concerns with them.

To support the development of our learners'/Apprentices' personal understanding of risk they will all be provided with an appropriate level of personal development activity focusing upon safeguarding and resilience with this being embedded into their programme. During their induction learners/Apprentices are also provided with information on our safeguarding procedures and who to speak to if they have a concern.

## Mental health

Experiencing mental ill health can often be a sign or an indicator of abuse or harm and all our colleagues responsible for teaching are trained to recognise the signs that someone is struggling with their mental health and wellbeing. Concerns for the mental wellbeing of a learner/Apprentice should be raised to a safeguarding manager and logged as a safeguarding concern. Each instance and report of a concern will be responded to proportionately and in line with our approach to supporting mental health; in most cases signposting to support services will be necessary. [Mental Health First aiders](#) are available to provide advice, guidance and direct interventions. A person's mental wellbeing can have a significant impact on their ability to make decisions to maintain their own safety. For this reason Knovia takes steps to train colleagues to recognise when someone is struggling with their mental health with the view to offer relevant support and signposting advice. All learner facing colleagues receive mental health awareness training as a minimum and are supported by a dedicated team of mental health first aiders and mental health first aid supervisors. Resources covering signposting and support for mental health and wellbeing are available for colleagues and learners/Apprentices.

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Further to this we have partnered with Shout, a crisis text messaging service, who are available 24/7 to offer support to anyone that needs it, via text messaging.

Learners/Apprentices are able to seek support for their mental health from the colleague responsible for teaching them, with support for those in mental health crisis being available via our partner organisation Shout. Shout provides a 24/7 crisis text messaging service to Apprentices and colleagues.

## Safeguarding reporting procedures

We will use the 5 Rs - Recognition, Response, Reporting, Recording and Referral when approaching safeguarding matters and require all colleagues to operate in line with this process. These have been developed with reference to 'What to do if you are worried a child is being abused – Advice for practitioners' 2015. How the 5 Rs are utilised across the group can be found in the relevant operating business annex.

All concerns about learner/Apprentice welfare must be logged, by the colleague identifying it, using the operating businesses safeguarding concern and incident report form, within 24 hours, and after discussion with the relevant safeguarding manager. This will enable a picture regarding any risks to be built and is used for 'stacking up' purposes ready to inform any requirement for Early Help for the learner/Apprentice. A link to the report form can be found within the operating businesses annex.

Disclosures of abuse or immediate risk of harm should be reported, by telephone, to a Safeguarding Lead.

Assessments regarding levels of risk undertaken by the safeguarding team will take into consideration the social circumstances of a learner/Apprentice alongside the educational context when considering the need to make a referral to children's or adults' services. Local threshold guidance will be consulted to help inform decision making.

Where an allegation of harm or abuse of a learner/Apprentice is aimed at a colleague employed by Knovia or one of the operating businesses, this must be reported immediately to the Director of People, Designated Safeguarding Lead, by phone on 07794 067731. This will be investigated by the Chief Executive Officer with the Director of People's support as outlined in [Our Guide to Safer Recruitment](#).

## Vulnerable and at risk learners/Apprentices

In recognition of the additional vulnerabilities faced by looked after children, Knovia has a [Supporting Looked After Children's Policy](#). This is aimed at supporting the achievement of this disadvantaged group and provides guidance for colleagues on supporting the needs of this priority group. This group is termed 'vulnerable learners/Apprentices'. It is the responsibility of

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social workers to advise whether a learner/Apprentice is in the defined vulnerable group; however we will take steps to access this information via learners/Apprentices themselves. Notifications should be sent to the operating businesses, the address for which can be found in the relevant annex.

A named safeguarding lead within the operational business will take on the role of nominated teacher for any 16 and 17 year old Looked After Child where a Personal Education Plan remains active. The contact details can be found in the relevant annex.

At risk/learners with vulnerabilities can be identified at any point during their programme. These are learners/ Apprentices that require additional support and intervention to keep them safe. By flagging these individuals to a Safeguarding Lead, further enhanced monitoring will be enacted to ensure that welfare concerns are stacked up and where the learner is under the age of 18 'Early Help' is provided, in partnership with local agencies, where required. Flagging of at risk learners/Apprentices is the responsibility of the Safeguarding Manager.

Apprentices/learners should feel safe and confident to speak to a colleague responsible for teaching if they are subject to any form of harm, abuse, exploitation or bullying.

Where schools or colleges are transferring child protection files these should be sent to the operating business, the contact details can be found in the relevant annex.

## Confidentiality

We will work to the following Privacy Statement with our learners/Apprentices:

"It is important that you feel safe and confident to discuss any issues that you may have with a member of the operating business' team. For this reason any information that you share will only be discussed with those who can directly help and support you, unless you tell us that either you or others are at risk of harm. In such cases we may have to share this information with external agencies such as social services or the Police. This will only be passed on with your knowledge."

We will introduce this to learners/Apprentices at induction and refer to it throughout the learning process.

Knovia takes its responsibilities to report crime seriously and as a result we will not afford confidentiality in the following situations:

- Where it is identified that a child or vulnerable adult is at risk of harm
- Where we are told that a serious crime has been committed or is about to be committed
- Where information regarding terrorism or drug trafficking is disclosed

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- Where we are instructed to disclose something by a court

Where a crime takes place within the Academy a decision will be made jointly by Academy management and a Safeguarding Lead regarding the involvement of the Police. While we would not wish to criminalise a learner/Apprentice or a colleague, a decision needs to be made that is proportionate to the situation and in the best interests of impacted parties.

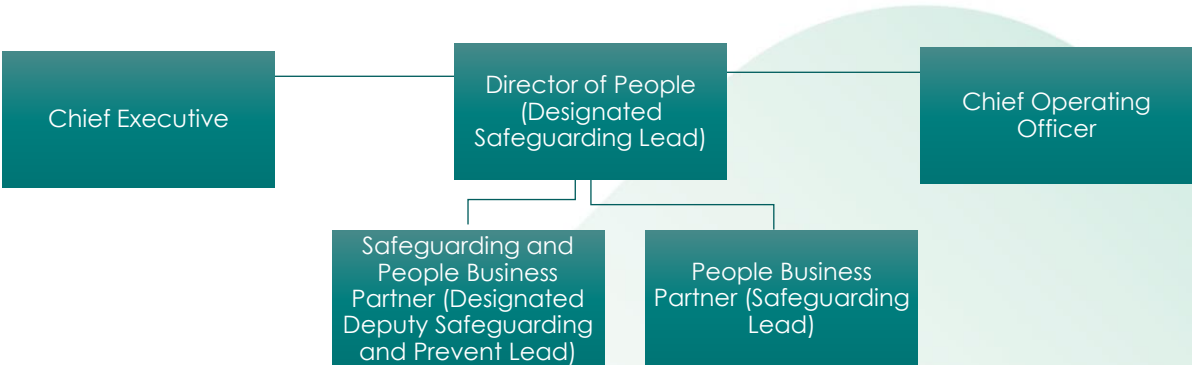
Decisions will be made in line with the relevant code of conduct and in line with the National Police Chiefs Council guidance – '[When to call the police, guidance for schools and colleges](#)'. It would be usual for the Safeguarding Lead to be responsible for making contact with the Police after consulting safeguarding records. Regardless of whether the Police are to be contacted, the victim in any incident should be supported and protected as a priority. Those suspected of being the offender will also need to be supported.

Where a learner/Apprentice is identified as being involved in criminal exploitation (including CSE) this will be addressed as a safeguarding matter, remembering that while they may be an alleged perpetrator of criminal activity they are also a victim and should be safeguarded accordingly.

## Levels of responsibility

This guide is under Board governance and is reviewed annually by the DSL and safeguarding team, taking into account the impact of the policy and any lessons learned together with any legislative or required process changes. Recommendations are then made to the Board for their approval and sign off.

Everyone has a responsibility to keep children and the vulnerable safe from harm and to educate them in the risks posed to them. The level of accountability for this will differ dependent on the role held and is laid out in operating business annexes.



All learner facing colleagues should ensure that their learners/Apprentices are aware of who to contact if they have a concern related to safeguarding. This will be covered with all learners/Apprentices during their induction and as a part of introducing our wider safeguarding procedures.

Our Safeguarding Leads group will meet quarterly with the following areas of focused being covered within the agenda:

	Month	Areas of focus
Full day	March/September	Prevent risk assessment review, safeguarding action plan review, vulnerable learners, internet filtering and monitoring
Half day	December/June	Vulnerable learners, serious case reviews, CPD review

### Whistleblowing

Knovia a whistleblowing procedure. This procedure should be used by any colleague, client, partner or learner/Apprentice where it is felt that we have failed to act to prevent harm from occurring to an individual. Details of this are contained within the operating businesses colleague handbook.

### Training

In line with KCSIE (2024) we are committed to providing colleagues with training and awareness raising activity around safeguarding specific to their roles and at a level and frequency as defined within legislation (Appendix one). We will record all colleagues' training using our HR software.

All colleagues in learner/Apprentice facing roles are required to read [Part one of KCSIE](#). This is read at induction and colleagues then receive a summary of the substantive changes as updates are made.

Colleagues in support roles are required to read [Annex A of KCSIE](#). This is read at induction and colleagues then receive a summary of the substantive changes as updates are made.

Colleague training and continuing professional development (CPD) will cover the elements defined within the statutory guidance including contextual safeguarding. The content of training will be reviewed on a regular basis by the Safeguarding Leads to ensure its appropriateness and relevance. Colleagues are responsible for logging their own safeguarding CPD on the HR software.

Initial training will be provided to all colleagues at induction during a face to face session. This will be supplemented by the completion of our self-study Education pack which covers all elements of [includED](#). All learner facing colleagues are provided with a [Field Guide](#) which acts as a day to day safeguarding aide-memoire.

We will provide frequent directed [includED](#) CPD to colleagues responsible for teaching through resources such as tri-monthly [snippets](#), [Safeguarding guides](#) and Connect the Dots delivered by safeguarding managers. This will ensure that they are kept up to date and given the confidence to address and respond to issues highlighted by our learners/Apprentices. The back catalogue of these CPD resources will be freely accessible to all colleagues, including those who work within partner agencies, and will be shared with new colleagues as they commence in post during their Safeguarding induction session. In addition to CPD resources, colleagues have access to a variety of factsheets which provide information and signposting on a range of matters including mental health.

The Designated Safeguarding Lead, Senior Safeguarding Leads (DDSLs) and Safeguarding Leads will attend externally provided accredited safeguarding training every two years. This will be cascaded to the safeguarding managers. Safeguarding Leads and managers will receive regular updates about a range of wider safeguarding matters, these will be led by the operational businesses Senior Safeguarding Lead (DDSL).

Formal annual refresher self-study activity will be provided to all colleagues as a part of wider [includED](#) refresher training activity.

In recognition of the impact of mental health and wellbeing upon safeguarding, all our colleagues will be provided with Mental Health Awareness training. For our line managers and our safeguarding managers this will include mental health first aid. As a part of this training colleagues learn how to undertake a suicide risk assessment. Our Safeguarding Leads and People Team will hold a level three in Supervising Mental Health First Aid. This training is available for partners on request.

Board members will receive safeguarding training at induction and thereafter every two years. This will enable them to fulfil their governance responsibilities and will provide them with the knowledge to ensure that our safeguarding policies and procedures are effective.

## Teaching and learning

Safeguarding is embedded throughout the curriculum for all learners/Apprentices at a level appropriate for their main qualification. This enables them to build an understanding of how to keep themselves and others safe and forms a part of our safeguarding culture. We will provide learners/Apprentices with opportunities to explore safeguarding in a safe environment and in a way that is relevant to their learning programme with the aim of improving their knowledge, confidence and awareness of safeguarding. This will be done using the approved resources and enhanced through safe space discussions.

Safeguarding education is personalised by the colleague responsible for teaching to ensure individual relevance and the promotion of learner/Apprentice welfare and contributes to developing a positive attitude and making positive choices.

## Safer recruitment

We operate our recruitment activity in accordance with [Our Guide to Safer Recruitment](#). This guide ensures that we recruit safely and fairly in line with the Disclosure and Barring Service code of practice, the Rehabilitation of Offenders Act (1974), the Safeguarding Vulnerable Groups Act (2006), and Keeping Children Safe in Education (2024).

We are committed to offering learners/Apprentices a safe, happy and healthy environment and will recruit colleagues who share in the belief that the welfare of the learner/Apprentice is paramount and promote this through all that they do.

All recruiting managers will undertake '[Safer Recruitment the Knovia Way](#)' training. All recruitment panels will include at least one colleague that has completed this self-study, and this will be refreshed every two years. This training is regularly reviewed to ensure it adheres to recognised good practice and statutory guidance.

DBS checks will be undertaken on all colleagues in regulated activity, those with frequent and unsupervised access to children, those that manage colleagues for whom a DBS is relevant and Senior Leadership Team members; these colleagues are defined as being in positions of trust. DBS checks are re-requested on a three yearly basis for learner facing colleagues with the details of these checks being recorded on a single central record (SCR). In addition to DBS checks, we undertake overseas checks where an applicant

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has lived outside of the UK in the last five years, right to work checks and probe gaps in employment.

There is a confidential DBS process specifically for trans applicants, who should contact the DBS sensitive applications line on 0151 676 1452 or email [sensitive@db.s.gsi.gov.uk](mailto:sensitive@db.s.gsi.gov.uk) for further advice about completing the form.

Where DBS checks are not in place or not required, colleagues will work to appropriate risk mitigations.

We will undertake annual self-declarations to inform individuals' suitability for all those in positions of trust within Knovia. We define positions of trust as all roles with frequent learner/Apprentice contact.

## Managing allegations against a colleague

Knovia commits to fully and sensitively investigate any concerns/allegations made against a colleague which might indicate they would pose a risk of harm to children or vulnerable adults. Colleagues have the right to confidentiality in such situations and steps will be taken to maintain this throughout. Suspension from regulated activity may be considered while an investigation occurs, with any investigation being managed in line with our disciplinary process and part four of KCSIE (2024). Suspension from learner/Apprentice facing duties will not be the default action. Any colleague under investigation will be allocated welfare support – this will be provided by a manager within the business but may not be their direct line manager. This approach is extended to colleagues considered to be exhibiting low level concerns.

Allegations will be discussed with the relevant local authority (LADO) and if the investigation identifies that a colleague has harmed a learner/Apprentice, there is evidence that they had planned to do so, or their actions put a learner/Apprentice at risk a referral will be made in line with the referral guidance to the [Disclosure and Barring Service](#).

In accordance with our contractual obligations any such referral will be notified to the ESFA via the Contact Form <https://www.gov.uk/government/organisations/education-and-skills-funding-agency>. Where an allegation of abuse is made against a Knovia group colleague to the LADO this will also be advised to the ESFA.

Allegations/concerns that do not meet the harms threshold are referred to as 'low level concerns'. Concerns may arise in several ways and from a number of sources. For example: suspicion; complaint; or disclosure made by a child, parent or other adult within or outside of the organisation; or as a result of vetting checks undertaken. The term 'low-level' concern does not mean that it is insignificant, it means that the behaviour towards a child does not meet the harm threshold. Our Code of Conduct outlines what may constitute a

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low-level concern. Any such concern should be reported to the Designated Safeguarding Lead, in line with [Our Guide to Managing Low-Level Concerns](#).

## Clients and partners

We will support clients with whom we engage to recognise their own safeguarding obligations to learners/Apprentices aged under 18. We will do this by providing timely information, advice and guidance and through employer [includED](#) email digests.

Knovia businesses deliver a range of qualifications within Child, Dental and Health and Social Care sectors meaning that our colleagues will come into incidental contact with children and vulnerable adults within these settings. We will therefore ensure that our learners/Apprentices follow their own employer's procedures for the management of safeguarding. Where this is not possible or appropriate, the learner/Apprentice should be guided towards their employer's whistleblowing procedures in line with statutory guidance.

## Managing and responding to risk

We will work with social care, the police, health services and other services to promote the welfare of children and protect them from harm and will allow access for children's social care from the host local authority and, where appropriate, from a placing local authority, for that authority to conduct, or to consider whether to conduct, a section 17 or a section 47 assessment.

We recognise that it is necessary to undertake safeguarding risk assessments and that safeguarding should be considered alongside other standard assessment of risk processes.

Risk assessments will be undertaken by individual operating businesses, these will then be stored centrally for access and use by all colleagues within that business.

At times it will be appropriate to risk assess individual or specific groups of learners/Apprentices or activities. Such circumstances should be discussed with an operational business safeguarding lead, in advance of the learner/Apprentice(s) commencing or as soon as a risk is highlighted.

Each operating business will have its own safeguarding action plan that is in place to respond to identified risks.

## Social media

There are notable benefits to using social media as communication and promotional tools as well as potential negative effects in terms of reputation and safeguarding. In order to use social media such as social networking sites and blogs in a safe and professional way we operate a social media guide; [Our Guide to Social Media](#).

Owing to the safeguarding implications surrounding the misuse of social media formats, any activities undertaken outside the boundaries of the guide will be dealt with in line with the Disciplinary People Standard.

## Extremism and radicalisation

The Prevent Duty identifies that young people pose a risk and as a result we recognise that our learners/Apprentices may be at risk of radicalisation.

Colleagues have a responsibility to recognise this potential risk and to identify learners/Apprentices that may be at risk of harm from radicalisation with the view to facilitate the support which Channel can offer.

Furthermore, we recognise that our colleagues and adult learners/Apprentices pose a risk and may themselves be at risk of radicalisation. We provide guidance and training to colleagues which will help them to identify vulnerable individuals ready for them to then be supported through Channel.

We have a Prevent guide in line with the requirements placed upon us under the Counter-Terrorism and Security Act (2015). This forms a part of this guide.

Our operating businesses have a defined Prevent Lead and deputy, the details of which are contained in the relevant annex.

## Local priorities

As a training provider which operates nationally, we recognise that each learner/Apprentice is an individual. Safeguarding priorities will differ across the country meaning that our safeguarding managers will take an interest in supporting their direct reports to understand the safeguarding priorities for the localities in which they engage with learners/Apprentices.

Information will be sought and gathered from the DfE Prevent Coordinators and shared with safeguarding managers through the provision of a risk and threat map. Owing to the sensitivity of its content this will be provided as read only. Safeguarding managers will then share this information with their direct reports so that they in turn can understand and respond to the needs of the community in which they operate. Each operating business will define how this is shared and distributed.

Colleagues responsible for teaching will prepare learners/Apprentices to understand any particular risk and threats that they may personally face based on this information and any other available local knowledge. Where the operating business is listed by safeguarding partnerships as a statutory partner we will work in line with defined arrangements.

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## Record keeping

All records regarding a learner's/Apprentice's welfare will be clear, use straightforward language, be concise, accurate in fact and stored confidentially and securely in line with the DPA/UKGDPR. The regulations allow for the safe storage and sharing of information for safeguarding purposes, including information which is sensitive and personal, and should be treated as 'special category personal data'. Any judgements, interventions or decisions made will be carefully recorded to facilitate further professional judgements to be made should this be necessary.

Information sharing is vital in identifying and tackling all forms of abuse and neglect, and in promoting children's welfare, including their educational outcomes. GDPR is not a barrier to sharing information for the purposes of safeguarding the individual. Any information shared will be done so in line with the '[Information Sharing: Practitioners' guide](#) (HM Government, March 2015) document. Fears about sharing information must not be allowed to stand in the way of the need to promote the welfare and protect the safety of children. Data will be shared with relevant statutory partners to ensure that the safety of vulnerable individuals is maintained.

Records of safeguarding issues will be kept centrally by the safeguarding team within the relevant operating business. These will be chronological, factual and kept in accordance with data protection regulations and only accessible by the operating businesses safeguarding leads and Knovia's DSL and DDSL. Where relevant, a reference to the record will be logged on (but not stored on) the learner's/Apprentice's file. Records will be destroyed after three years or transferred to another education provider securely where a learner/Apprentice transfers directly from the operating business, in accordance with information sharing guidelines.

All records are kept to facilitate 'stacking up'. In line with statutory guidance a Safeguarding Lead will pass on child protection records to educational establishments to which a learner/Apprentice progresses, where this transfer is notified.

## CCTV and content filtering monitoring software

We will use CCTV and content filtering and blocking software throughout our buildings to enhance the measures taken to safeguard learners/Apprentices and colleagues. Learners/Apprentices will be informed of how internet access is monitored within the Academy and the purpose of this as a part of their induction.

We will not use CCTV in toilets, showers or changing facilities.

We will use CCTV and content filtering software on company owned devices and networks to monitor colleagues and learners/Apprentices usage with the view to actively safeguard individuals and respond to any identified risks. This

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will be done in accordance with the GDPR by the Head of IT thought content blocking and inappropriate access reporting. Any learners/Apprentices identified as at risk owing to their internet access will be supported as a safeguarding matter with concerns identified from filtering and monitoring reports being raised with a safeguarding lead within 24 hours of identification.

Access reports can be utilised to identify risk and threat to children, young people and the vulnerable. A filtering and blocking report will therefore be provided bi-annually for all operating businesses to the safeguarding leads to enable any risks or threats to be identified. The output of this exercise will be used to target safeguarding learning and development for learners/Apprentices.

The safeguarding leads group will receive and scrutinise filtering and monitoring reports bi-annually to identify patterns of access that may highlight risk and with the view to monitor the filtering system's effectiveness.

## Prevent - our commitment

The purpose of this guide is to provide everyone connected to Knovia with a clear outline of our position with respect to the safeguarding of learners/Apprentices and colleagues under the Prevent Duty.

Prevent is a strand of the Government's counter-terrorism strategy CONTEST. Via its levels of engagement with learners/Apprentices of all ages and from a variety of cultural and ethnic backgrounds, Knovia is able to contribute towards the aim of preventing individuals from being drawn into terrorism or extreme violence.

As a group of market leading Independent Training Providers Knovia will enact the statutory duty to prevent people being drawn into terrorism under the Counter-Terrorism and Security Act (2015). We meet these obligations through considering radicalisation and extremism as a safeguarding matter. We provide training to our colleagues and support partners to recognise where learners/Apprentices or peers may be at risk of being drawn into radical or extreme behaviour as part of our overall approach to safeguarding and deliver proactive safeguarding solutions to those identified as being susceptible to radicalisation and extremism.

### Objectives

As part of Knovia's approach to equality and inclusion, safeguarding and the promotion of fundamental British values, we will:

- Take steps to identify and safeguard individuals that are vulnerable to extremism and radicalisation
- Provide support, advice and guidance for learners/Apprentices and colleagues who may be at risk of radicalisation. This may include referral to safeguarding hubs or Channel, the process by which multi-agency support is provided to individuals who are at risk of being drawn into terrorism. This forms part of our safeguarding arrangements
- Promote fundamental British values by ensuring that there is a culture of equality and inclusion within our delivery and curriculum
- Provide the opportunity for learners/Apprentices to explore what British values mean to them
- Facilitate safe space discussions which enable our learners/Apprentices to develop their own knowledge and understanding of British values
- Challenge segregation, radicalisation and discrimination and promote cohesion and build learners'/Apprentices' resilience with the aim of our learners/Apprentices and colleagues contributing actively to an inclusive society
- Operate a clear and consistent anti-bullying approach which challenges harassment and discrimination and enables learners/Apprentices and colleagues to feel safe and supported

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- Ensure that colleagues, learners/Apprentices, partners and clients are aware of their roles and responsibilities in preventing radicalisation and extremism of all forms
- Have leadership teams within our operational businesses which actively promote the core values of shared responsibility and wellbeing for learners/Apprentices and colleagues by ensuring that these are at the heart of everything that we do
- Utilise operational business specific Prevent risk assessment processes which inform a Prevent action plan. These will be reviewed and updated quarterly with bi-annual updates being provided to the Knovia Board. These risk assessments will be overseen by the Safeguarding Leads with the Senior Leadership Teams and Colleague Voice taking an active role in its review

## Definitions

### Radicalisation

Radicalisation is the process through which an individual changes from passiveness or activism to become more revolutionary, militant or extremist, especially where there is intent towards, or support for, violence. It is the process of a person legitimising support for, or use of, terrorist violence.

A person can be radicalised through direct or indirect contact with someone who has extreme views ie face to face or online, where that individual is attempting to persuade or convince as to the benefits of their message or extreme views.

Radicalisation is the safeguarding risk dealt with by Prevent. It is this terminology that we use with learners/Apprentices.

### Extremism

Extremism is the vocal or active opposition to our fundamental values, including democracy, the rule of law, individual liberty and the mutual respect and tolerance of different faiths and beliefs. This also includes calling for the death of members of the armed forces.

### Terrorism

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

## Levels of responsibility

This guide is under Board governance and is reviewed annually by the DSL team. The process of developing, reviewing and updating the risk register is used to inform lessons learned. These lessons learned, along with a review of legislative requirements and changes and best practice, form the basis of the

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annual review of the Prevent duty and procedures. Recommendations are then made to the Board for their approval and sign off.

Knovia's Safeguarding and People Business Partner is the company's Prevent Officer. Safeguarding Leads will deputise as required. Each operating business will have their own defined Prevent lead and these will be defined in the relevant annex.

Safeguarding managers are responsible for understanding the Prevent priorities in the areas in which their teams operate and appraising their team of this information through quarterly updates. They will build their own understanding and local knowledge through the information provided to them through Connecting the Dots and (where available/proportionate) having direct access to the Counter Terrorism Local Profile (CTLP) documents.

The Prevent Officers and Safeguarding Leads within the operational businesses are responsible for making all decisions regarding referrals for consideration under Channel panels using [the national referral process and form](#).

Channel focuses on providing support at an early stage to people who are identified as being susceptible to being drawn into terrorism. The programme uses a multi-agency approach to protect vulnerable people. Panels are held at local authority level. The panel is made up of statutory partners who decide the best route for supporting the individual who has been referred to them as being susceptible to extremism. Where a referral is adopted cooperation with Channel Panels will form a central part of safeguarding the identified as being susceptible to risk.

All colleagues should be vigilant to extremist behaviour as a wider part of their safeguarding duties and report their concerns to the safeguarding team in line with our wider safeguarding reporting procedures

- Learner facing colleagues will deliver teaching and learning which reflects fundamental British values
- We will seek to actively safeguard all learners/Apprentices and provide welfare support at the point of need for learners/Apprentices identified to be at risk of harm as defined within Keeping Children Safe in Education (2024)
- We will implement anti-bullying strategies and challenge discriminatory behaviour. We will challenge banter and recognise this as the potential to be child on child abuse
- We will respond to identified community needs
- We will actively narrow the achievement gap between different groups of learners/Apprentices
- We will promote a culture of vigilance and operate a whistleblowing procedure which includes reference to the Prevent agenda

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Learner facing colleagues should ensure that their learners/Apprentices are aware of who to contact if they have a concern related to radicalisation or extremism, including online harms. This will be covered with all learners/Apprentices during their induction and as a part of introducing our wider safeguarding procedures.

## Teaching and learning

Knovia provides a curriculum that promotes fundamental British values and raises awareness of radicalisation and risk, with the view to encourage learners/Apprentices to participate in their local communities and use their voice to make positive changes. This will be done through the provision of **includED** themed materials within Elevate, self-study materials and by using the approved resources and will actively promote the fundamental British values of democracy, the rule of law, individual liberty, and mutual respect and tolerance of those with different faiths and beliefs, and promote principles that support equality of opportunity for all.

The colleagues responsible for teaching will take every available opportunity to match our curriculum to both local and national priorities while offering learners/Apprentices the opportunity to develop critical thinking skills. They will use topical and relevant examples to stimulate thinking and actively tackle discrimination and radicalisation.

We will ensure that risks and threats information forms a part of the curriculum:

1. **Curriculum Reviews:** When updating our curriculum, we'll follow the template included in the Elevate programme to ensure safeguarding units explicitly mention local risks and threats. We'll include guidance for colleagues responsible for teaching to facilitate research tasks for learners on this topic.
2. **Workshops:** We can incorporate research tasks into workshops, allowing learners to explore and understand local risks and threats in a structured environment.
3. **Tutor Guidance:** Ultimately, it's the responsibility of those responsible for teaching to effectively manage these discussions. We'll provide clear guidance and resources to support them in addressing this sensitive topic. The updated review process will also help incorporate this into sessions with learners, providing another opportunity for meaningful conversations.

Learners/Apprentices will be encouraged to explore fundamental British values in a safe and supportive environment, without fear of discrimination via safe space discussions. All learners/Apprentices will be provided with an appropriate level of self-study activity focusing upon the risk posed by radicalisation and extremism as an additionality to their programme. This will

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be enhanced and personalised for them by the colleague responsible for teaching.

All learner facing colleagues are provided with access to a [Field Guide](#) which acts as a day to day Prevent and British Values aide-memoire.

Use and monitoring of information and communication technology (ICT) ICT equipment provided to both colleagues and learners/Apprentices is subject to monitoring to enable us to enact our safeguarding responsibilities. In addition to monitoring, filters are applied to Knovia systems which will restrict access to harmful content. A log will be kept and reviewed to enable patterns of inappropriate access to be identified and challenged. This log will be overseen by the Head of IT and shared with group safeguarding leads bi-annually. Areas of immediate concern raised will be with the operational businesses safeguarding team.

Colleagues identifying inappropriate use will report this to a safeguarding manager to enable this to be investigated for safeguarding purposes.

Knovia operates an E-safety guide which reflects the requirements placed upon us by the Prevent Duty, this forms a part of this guide.

## Managing and responding to risk

We will ensure that there is a shared understanding amongst colleagues and learners/Apprentices as to the risks posed within the training environment by extremist behaviour. We will raise awareness through formal induction training for all colleagues as a part of wider [includED](#) self-study activity, annual refresher self-study activity, through Prevent focused Safeguarding guides and snippets publications.

Steps will be taken to mitigate the risk posed to colleagues/learners/Apprentices by individuals susceptible to radicalisation on a case by case basis through the risk assessment process.

Referrals to Channel will be made on a case by case basis and with consideration being made to the need for a multi-agency approach in advance of any referrals. The relevant local authority safeguarding team will be consulted, along with the DfE Prevent Coordinator in advance of any referrals to Channel. Where a referral is made relating to concerns that a colleague is susceptible to being drawn into terrorism, or that there has been an incident related to them being radicalised this will be notified, in line with our contractual obligations, to the ESFA using the reporting form [www.gov.uk/government/organisations/education-and-skills-funding-agency](http://www.gov.uk/government/organisations/education-and-skills-funding-agency).

We will operate a critical incident management plan in dealing with terrorist related incidents across Knovia group. This will form part of our Disaster

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Recovery Plan and ensure that there are plans in place which respond to any direct threats within our buildings. Key colleagues will be trained in ACT (Action Counters Terrorism). Our colleagues will be briefed on how to behave in the event of an act of terror to safeguard themselves and others.

Operating businesses will have external speaker policies, the details of which are to be found in the relevant annex.

We have zero tolerance to racism, discrimination, religious or cultural intolerance and indifference. Incidents, or patterns of incidents, which undermine the promotion of fundamental British values will be viewed as a safeguarding concern with support being sought from the relevant DfE Prevent Coordinator to address these; these will also be reported to the ESFA via [www.gov.uk/government/organisations/education-and-skills-funding-agency](http://www.gov.uk/government/organisations/education-and-skills-funding-agency) in line with our contractual obligations.

Relevant display materials, including externally produced leaflets and posters, will promote fundamental British Values and have due consideration to the Equality Act. We will promote this ethos with our clients and partners.

Bookable spaces will be made available in our Academy for contemplation or prayer. These will be monitored to ensure that they are being used for appropriate purposes.

Knovia will only promote its services within organisations that share its values for the need to safeguard, promote equality and prevent extremist behaviour. Where required, risk assessments will be undertaken to consider the appropriateness of the business before agreements are made to provide training to individuals within that organisation. We will risk assess all external speakers and sub-contractors to ensure that they are compliant with this guide.

The culture of vigilance extends to our external relationships. Where customers with whom Knovia is engaged are found to be either in breach of the Equality Act or advocating extremist views or behaviour, this will be addressed as a safeguarding issue by a safeguarding manager with support from a Safeguarding Lead. Where a breach of legislation is identified the local authority will be advised.

Apprentices/learners should feel safe and confident to speak to any Knovia group colleague if they are subject to any form of radicalisation.

## Training

The Safeguarding Leads will complete Home Office online and Channel Awareness training. Directed CPD will be provided to safeguarding managers and formal annual refresher self-study activity will be provided to all colleagues through our [includED](#) essentials package.

New colleagues will undertake Home Office Prevent awareness online training as part of their EDucation pack when they commence with Knovia. This will be refreshed annually and supported by directed CPD delivered by safeguarding managers at team meetings through resources such as [includED](#) tri-monthly [snippets](#) and our dedicated Prevent focused [Safeguarding guides](#) which where relevant are accompanied by interactive knowledge consolidation activities. The content of this will be shared with partners through an email update.

Mandatory safeguarding training will equip colleagues with the ability to recognise signs that a learner/Apprentice or colleague is susceptible to radicalisation and outline the process by which concerns should be raised. This will be delivered face to face as part of the Corporate Induction.

All training will be refreshed annually or as required by legislation.

Knovia will actively promote our Prevent Duty to colleagues and learners/Apprentices alike and ensure that a wide range of colleagues are involved in Prevent risk assessment.

### Customers and partners

Where Knovia operates within a Prevent priority area, information sharing relationships will be developed with Prevent partners via the relevant operational business; this will include where possible accessing Counter Terrorism Local Profile information.

The Designated Deputy Safeguarding Lead will gather information provided by DfE Prevent Coordinators and disseminate this to the group to raise awareness of risk and threat. The operational businesses annex will outline how this information is to be utilised and shared with customers and partners.

Multi-agency support will be sought as part of our approach to Early Help for any individual felt to be at risk from or susceptible to extremism.

Partners and clients will be kept up to date on emerging risk information via a regular [includED](#) features within employer Pulse.

## **E-safety - our commitment**

Knovia recognises the benefits and opportunities which new technologies offer to teaching, learning and business execution. We provide ICT and internet access to learners/Apprentices and colleagues and encourage the use of technologies in order to enhance skills, promote achievement and enable lifelong learning.

### Objectives

This guide explains the overarching principles that guide our approach to E-safety to ensure that we operate in line with our safeguarding values when using the internet and delivering/attending learning remotely. Our guide to E-safety ensures the safety and wellbeing of our learners/ Apprentices and colleagues. It recognises that the accessibility and global nature of the internet and different technologies available mean that it is essential that colleagues, clients and learners/Apprentices are aware of potential risks and challenges associated with internet use.

Our approach is to implement appropriate safeguards within the Academy and wider operation, while supporting colleagues and learners/Apprentices to identify and manage risks independently and with confidence through training and development.

Furthermore, we expect our partner organisations to demonstrate practices and culture which meet with the standards laid out within this guide. We believe this can be achieved through a combination of security measures, training, guidance, implementation of our wider policies and information sharing.

### Use of ICT

Knovia is committed to achieving the principles of the GDPR. Information Communication Technology (ICT) and Information Technology (IT) systems will be provided which contribute towards these aims. Further information on the steps enacted by Knovia to protect the data provided to us by data subjects can be found in our Data Protection policy.

Colleagues and learners/Apprentices are not permitted to download software or install any software onto the company's computer system except on advice from a member of the IT department. Virus protection procedures seek to prevent the introduction of virus contamination into the Knovia network. Unauthorised software including public domain software, magazine cover discs/CDs, USB memory sticks, external hard drives, or internet/world wide web downloads must not be used.

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Much of the material on the internet is protected by copyright laws and therefore the company, the colleague and the learner/Apprentice could be liable under civil and criminal law for any unauthorised copying. It is expected therefore that individuals are mindful of copyright when undertaking to use the internet. Learners/ Apprentices are reminded of this within their self-study activity.

Knovia has the right to review all files and records and the right to periodically monitor, audit or review network, workstation, internet and e-mail use on the company network. This extends to both colleagues and learners/Apprentices and is notified to users via a privacy statement.

Where an employer of a learner identifies inappropriate IT usage, or on-line behaviour that would highlight risk of vulnerability this should be communicated to a safeguarding manager.

## Use of the internet

The use of the internet is an integral part of our day to day operation and it is regularly utilised for learning purposes. It is recognised as a source of up-to-date information and provides guidance on a number of business and vocational related matters. We believe that learners/Apprentices should be able to use the internet for education and personal development confidentiality and without fear of discrimination or abuse and should understand how to raise concerns and seek support should they feel uncomfortable online.

Internet access within our buildings is provided for business and learning purposes only, not personal use. The IT department will review internet activity and analyse usage patterns within our Academy to identify any potential risks of harm and may choose to perform detailed analysis of this data. Further to this, the IT department may access records of sites accessed on home networks where this has been done on Knovia equipment.

Knovia prohibits the use of unauthorised sites on its networks or equipment. If colleagues find the network accidentally connected to a site that contains sexually explicit, radical, extremist or offensive material, they must disconnect from that site immediately, regardless of whether that site has previously been deemed acceptable by any screening or rating program. All such circumstances must be reported to a line manager.

Use of the internet and ILT (instructor led training) by our learners/Apprentices forms a part of our Elevate programmes. Knovia provides internet access to learners/Apprentices within the Academy and access to web based learning management systems to further their learning and development through the provision of learner/Apprentice networks and bring your own device (BYOD) approaches. Knovia also promotes independent study and workshop attendance through the internet for all learners/Apprentices. We will provide

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appropriate education to ensure that our learners/ Apprentices have the tools to protect themselves from potential risks of harm when undertaking online learning or research. This education will also extend to teaching learners/Apprentices how to stay safe online in their own lives.

Where learners/Apprentices access the internet through a learner/Apprentice network they will do so using personalised log-ons. Monitoring of the usage of the learner/Apprentice network will allow for at risk learners/Apprentices to be identified based upon their internet access; this however only takes into consideration a small proportion of learners/Apprentices. For this reason we will risk assess all teaching activity and seek to embed good practice to educate learners/ Apprentices who use the internet for their studies.

## Levels of responsibility

This guide is under Board governance and is reviewed annually by the DSL team, taking into account the impact of the policy and any lessons learned together with any legislative or required process changes. Recommendations are then made to the Board for their approval and sign off.

All colleagues are responsible for ensuring the safety of learners/Apprentices and should report any general concerns about their E-safety in line with our Safeguarding procedures to a safeguarding manager. Disclosures of online abuse or significant risks of online harm should be reported to a Safeguarding Lead.

Learner facing colleagues should ensure that their learners/Apprentices are aware of who to contact if they have a concern related to E-safety. This will be covered with all learners/Apprentices during their induction and as a part of introducing our wider safeguarding procedures.

The E-safety Officer is the operating businesses Senior Safeguarding Lead (DDSL) the E-safety Officer is responsible for keeping up to date with new technologies and their use, as well as attending relevant training and the dissemination of E-Safety information to colleagues.

## Managing and responding to risk

Colleagues should be particularly mindful that technology is used by young people who are at risk of harm or engaging in criminal or risk taking behaviours. This includes viewing sexualised imagery of children, county lines activity, viewing or engaging in extremist narrative, grooming behaviour and taking, viewing and distributing self-produced nude images; where such circumstances are identified this should be viewed as a safeguarding concern and raised with a safeguarding manager.

We have a responsibility to help keep learners/Apprentices safe online, whether or not they are using our devices, network or system devices.

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Learners/Apprentices, regardless of age, disability, gender reassignment, race, religion or belief, sex or sexual orientation, have the right to equal protection from all types of harm or abuse. Learners/ Apprentices will be told who to speak to if they have a concern.

Disclosures of online abuse should be made using the Safeguarding reporting procedure, including where this is highlighted by an employer. If online abuse occurs this will be dealt with in line with our wider safeguarding approach. This will include ensuring that the needs of the person experiencing abuse, any bystanders and our organisation as a whole are taken into account. Where online abuse or harm has occurred that has resulted in the availability of sexual abuse imagery this should be reported immediately to the DSL. Colleagues themselves should never view or download such imagery to their own devices.

Apprentices/learners should feel safe and confident to speak to a colleague responsible for teaching if they are subject to any form of online harm, abuse or bullying.

## Use of personal social networking

Personal social networking should be used by colleagues with due diligence. Colleagues should not engage with learners/Apprentices via social media unless this has been directly authorised by a senior manager.

Information once published, eg photographs, blog posts, is impossible to control and may be manipulated without consent, used in different contexts, or further distributed.

Colleagues should ensure appropriate security settings are applied so access to their profile is limited to those explicitly given access to do so.

Colleagues should also refer to Our Guide to Social Media.

## Systems and network usage

Knovia operates clear Codes of Conduct, and these are contained within the operating businesses colleague handbook. Violations of this may subject the individual to disciplinary and/or legal action as may be deemed necessary. Unauthorised or inappropriate use of the ICT systems may result in disciplinary action which could lead to dismissal.

Learners/Apprentices must act safely and responsibly at all times when using the ICT and ILT provided to them by Knovia. We will provide them with an education which develops their ability to meet this requirement.

For learners/Apprentices learning within our Academy, they will be expected to sign an online usage agreement. Alongside this, learners/Apprentices using BYOD or the learner/Apprentice network will be issued with a privacy

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statement and acceptable usage guidance on internet use with which they are expected to comply. They will be made aware that their usage is being monitored for safeguarding purposes.

We operate safe surfing and monitor and restrict access to harmful sites within our Academy. Academy based learners/Apprentices will be introduced to such E-safety mechanisms as a part of their induction. This will include a privacy statement outlining how personal data will be used for the purposes of safeguarding.

## Teaching and learning

Learners/Apprentices are responsible for participating in E-safety education as part of the curriculum. This will be delivered using the approved resources. All learners/Apprentices will be provided with an appropriate level of self-study activity focusing upon E-safety as an additionality to their programme. This will cover how to keep themselves safe, build their resilience to online risk and provide advice and guidance on how to show respect for others online.

Learners/Apprentices will be briefed on safeguarding reporting procedures and encouraged to report any concerns that they may have about themselves or another learner/Apprentice in relation to E-safety.

All learners/Apprentices must know what to do if they have E-safety concerns and who to talk to. In most cases, this will be the colleague responsible for teaching.

## Training

To support colleagues to safeguard the learner/Apprentice and in addressing E-safety matters with learners/Apprentices as part of **includED**, they will be provided with training and directed Continuing Professional Development in E-safety matters. This will be embedded into **includED** induction training for new colleagues and into the formal **includED** annual refresher self-study activity. Colleagues will also receive regular **includED** CPD and learning consolidation activities on E-safety matters through tri-monthly snippets and Safeguarding guides delivered by safeguarding managers at team meetings.

## Appendix one - safeguarding training and accountabilities

Position	Accountabilities	Training provided
Directors and Board members	<ul style="list-style-type: none"> <li>To ensure that robust policies and procedures are in place which seek to minimise the risk of harm posed to learners/ Apprentices across the group</li> </ul>	<ul style="list-style-type: none"> <li>Introductory briefing</li> <li>Annual update</li> <li>ETF Board safeguarding training every two years</li> </ul>
Director of People (Designated Safeguarding Lead)	<ul style="list-style-type: none"> <li>To undertake the strategic responsibilities as laid out in <a href="#">annex A of Keeping Children Safe in Education (2024)</a> at Senior Leadership Team level</li> <li>To brief the Board</li> <li>To receive disclosures of abuse or risks of harm or to a learner's/Apprentice's welfare and to seek to mitigate these risks through a process of investigation and risk management</li> <li>To report any allegation of abuse by a Knovia colleague to the CEO</li> <li>To lead the internal investigation into any allegations of abuse by a Knovia colleague</li> <li>To mentor safeguarding managers</li> </ul>	<ul style="list-style-type: none"> <li>Introductory briefing</li> <li>EDucation pack</li> <li>Level three in First Aid for Mental Health</li> <li>Annual EDucation pack</li> <li>External DSL training every two years</li> <li>Safeguarding level three every three years</li> <li>Regular personal CPD</li> <li>Regular CPD</li> </ul>
Safeguarding and People Business Partner (Designated Deputy Safeguarding Lead)	<ul style="list-style-type: none"> <li>To undertake the day to day responsibilities laid out in annex A of Keeping Children Safe in Education (2024) on behalf of Knovia</li> <li>To report any allegation of abuse by a Knovia colleague to the Director of People</li> <li>To support the internal investigation into any allegations of abuse by a Knovia colleague</li> <li>To write and deliver safeguarding training, CPD and support to colleagues at all levels across the group</li> <li>To mentor operational businesses senior safeguarding leads where required</li> <li>Vigilance</li> </ul>	<ul style="list-style-type: none"> <li>Introductory briefing</li> <li>EDucation pack</li> <li>Level three in First Aid for Mental Health</li> <li>Annual EDucation pack</li> <li>External DSL training every two years</li> <li>Safeguarding level three every three years</li> <li>Regular CPD</li> </ul>

## Appendix two - Safeguarding Governance Terms of Reference

### Purpose

To scrutinise the overall performance and effectiveness of safeguarding across the activities of Knovia, enabling the Board to discharge their duties in safeguarding.

To continually improve the quality of safeguarding practice by having an increased emphasis on proactive monitoring arrangements.

To be the link between Knovia's Board and safeguarding practice.

### Structure

Knovia has a Safeguarding Governor at Board Level, a Designated Safeguarding Lead (DSL) at Senior Leadership Level and a Designated Deputy Safeguarding Lead whose role it is to drive included across the group.

Within each operational business a senior safeguarding lead provides strategic direction, and acts as the Designated Deputy Safeguarding Lead whilst safeguarding leads provide advice and guidance and external reporting advice and support. A team of safeguarding managers to provide day to day first line safeguarding support and information to colleagues.

### Governance arrangements

The safeguarding Leads from each of the operating businesses meet quarterly. Knovia's Safeguarding Governor will be in attendance bi-annually. A standing agenda will ensure that any quality assurance activities undertaken since the previous meeting are analysed, with areas of strength and areas for improvement being recognised. The DSL will meet with the Safeguarding Governor after this session to review any required actions for improvement.

The DSL will report to the Board on a monthly basis to ensure that they have an oversight of safeguarding practices. This will provide a safeguarding overview from each operating business and may include an overview of data, areas of strength and development and any concerns, or may concentrate on a particular area of focus.

A safeguarding audit will be undertaken every two years by an external safeguarding consultant (Leaders in Safeguarding) to provide external moderation of the safeguarding ways of working at Knovia.

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## Safeguarding Governor - key responsibilities

- Challenge appropriately to ensure overall effectiveness of safeguarding policy and practice at leadership and operational level
- Ensure impact of safeguarding approaches and policy by reviewing case management
- Provide an external perspective and offer best practice considerations to safeguarding challenges
- Have an oversight of data and ensure that all actions and practices have an impact
- Ensure accountability across senior leaders and the Board
- Ensure accountability for positive safeguarding practices across the Knovia operation
- Offer leadership, information, advice and guidance across safeguarding practices

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