Education Development Trust

Global Safeguarding Policy

Maintenance

Policy owner	Head of Safeguarding
Review	November 2024
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Version Control

Version Number	Date
Version 4	November 2024 – Corporate Safeguarding Committee (CSC) approved

If you have questions about how to interpret this policy, please ask the Policy Owner – As above.

1. Scope

As an international organisation, Education Development Trust's (EDT) duty to safeguard children and adults applies both to our work in the UK and internationally where children and adults may face different or additional risk of exploitation, abuse, and harassment.

EDT's Global Safeguarding Policy is informed by a set of principles derived from the United Nation's Convention on the Rights of the Child (UNCRC), the Human Rights Act,1998, and the Equality Act, 2010, and other international conventions and legislation listed below under resources and links, in this document.

This policy applies to everyone working for, or associated with, EDT. It encompasses the whole of the organisation and its programmes, and includes without limitation:

- trustees
- employees at all levels: international and UK
- EDT partners: these include volunteers, consultants and sub-contractors, and employees and/or representatives of partner organisations who have contact with our students, programme participants and the communities that we work in, and who may also be party to child and adult sensitive data while working for, or with us
- visitors: including family members, associates of EDT employees, clients, journalists, researchers, media, and celebrities, who may come into contact with beneficiaries and the communities that we work in

2. Policy

This policy articulates our moral commitment and, legal and regulatory responsibilities to safeguarding and protecting children and adults from all forms of exploitation, abuse, and harassment and particularly, sexual exploitation, abuse, and harassment (SEAH). It makes clear to all in the organisation and those who come into contact with us the acceptable attitudes and actions that are required to protect our employees, beneficiaries, and the community members that we come into contact with, through the course of our work.

EDT upholds a zero-tolerance approach to Sexual Exploitation, Abuse and Harassment (SEAH), as outlined in our Protection from Sexual Exploitation, Abuse and Harassment (PSEAH) policy which is informed by FCDO's CAPSEAH. Organisations working with vulnerable groups have an increased risk of some staff exploiting their positions of power. To mitigate this, EDT's approach to PSEAH emphasises accountability, transparency and survivor centred responses which ensure the dignity, rights and safety of victim-survivors are always prioritised.

Taking a holistic approach to the protection of children and adults, safeguarding is embedded throughout EDT's operational policies and procedures, ensuring a comprehensive and consistent approach throughout the organisation.

EDT's safeguarding commitment is informed by, but not limited to, the following principles:

For this policy, the term employees include interns, sub-contractors and their staff, partner staff and volunteer

Zero-tolerance

Education Development Trust maintains a zero-tolerance policy against actual or attempted acts of all forms of exploitation, abuse, and harassment, including SEAH, perpetrated by employees/partner staff toward members of its workforce, beneficiaries, and community members. EDT also maintain a zero-tolerance policy towards inaction in reporting or responding to SEAH concerns.

Accountability

Safeguarding legal accountability rests with the Board of Trustees, delegated to the Chief Executive with clear lines of incident reporting and compliance monitoring procedures via the Corporate Safeguarding Committee (CSC). EDT takes a proactive risk management approach to safeguarding that includes mitigation of both inherent and emerging risks, a continuous improvement assessment process and prompt survivor-centred responses that prioritise the dignity, rights and safety of victims.

Responsibility

All trustees and employees act with integrity, acknowledging that **safeguarding is everyone's responsibility** and we each have a role to play in ensuring a vigilant and safe culture by participating in the following procedures:

- mandatory Safeguarding e-Learning and recertification process
- Safe recruitment, including induction and probation and CPM processes
- training and awareness raising activities
- serious incident/concern reporting
- risk management and, abiding by the:
  Code of Conduct and the safeguarding requirements for direct and indirect contact with beneficiaries, community members and colleagues

Transparency

All employees commit to promptly reporting safeguarding incidents or concerns to EDT via their local safeguarding leads or designated safeguarding lead/s (DSLs) so that immediate action can be taken to:

- eliminate further harm to the individual/s
- refer to statutory child/adult protection agencies, including the police when a potential crime has occurred
- report to regulatory authorities and donors/clients
- instigate the case management procedure

EDT will provide prompt reports to statutory agencies, regulators, and donors, sharing information in an honest and transparent manner.

3. Management

Safeguarding is embedded throughout the organisation's governance structure and safeguarding management procedures, which include the following:

- Triannual Corporate Safeguarding Committee (CSC) meetings
- corporate and programme-specific expert capacity and resource
- action plans for continuous improvement
- internal annual evaluation and report to the CSC and Board of Trustees
- central monitoring and reports to the CSC and Board of Trustees
- outsourced internal audit on corporate arrangements
- operational safeguarding action plans governed by the principle of continuous improvement in both compliance and best practice
- operational frameworks
- partner/sub-contractor due diligence
- Risk management including corporate risk log
- risk management including programme-specific risk logs
- safe recruitment procedures, including criminal record checks and references
- Induction and continuous/every 18 months mandatory training provision via the LEARN platform. Training will cover prohibited behaviours, reporting obligations, and how to maintain appropriate boundaries with beneficiaries
- serious incident reporting to statutory and regulatory agencies
- MyConcern online reporting and case management system and central log
- incident/case management and review
- safeguarding whistleblowing

4. Roles and responsibilities

- **Board of Trustees** is ultimately accountable for ensuring that the organisation has appropriate structures, processes, and resources in place to ensure safeguarding is integrated throughout the organisation and its programmes
- **Chief Executive (CE)** is the senior accountable officer for all aspects of safeguarding across the organisation
- **Executive Team (ET)** is responsible for the leadership of safeguarding in their directorates
- **Senior Management Group (SMG)** is responsible for the operational management of safeguarding in their respective business areas
- **Line Managers** are responsible for ensuring that all direct reports complete the mandatory Safeguarding awareness module via the LEARN platform in a timely manner **Corporate Safeguarding Committee (CSC)** a sub-committee of the Board of Trustees, comprising the CE, members of ET and SMG, and chaired by the Safeguarding Trustee, who reports directly into the Board of Trustees on the strategic and operational work of the committee
- **Head of Safeguarding** coordinates the strategic and operational work of the CSC, reporting to it on compliance and practice throughout the organisation. The Head of Safeguarding is also responsible for coordinating incident/allegation management relating to staff and beneficiaries and implementing the annual evaluation cycle and reporting process to the CSC.
- **Corporate Safeguarding Officer (CSO)** Under the leadership of the Head of Safeguarding, the CSO is also responsible for responding to child/adult protection concerns and coordinating the annual evaluation cycle.
- **Designated Safeguarding Leads (DSLs)** responsible for implementing local operational child/adult protection procedures and complying with internal reporting procedures and external referral mechanisms

- **Programme-specific safeguarding officers** responsible for developing, implementing, and maintaining programme-specific frameworks and implementing the corporate reporting procedures and external referral mechanisms
- **Safeguarding Focal Person** responsible for accepting incident reports at field/local level and escalating to programme safeguarding officers or DSLs, as applicable
- **Safeguarding Champions** responsible for ensuring that safeguarding remains a priority issue in all aspects of work in their respective business area/team
- **All employees** responsible for recognising potential signs and indicators of exploitation, abuse, and harassment, and promptly reporting incidents/concerns to their DSL or field-based focal person/s in their respective business area or programme

5. Related documents

Safeguarding is a cross-cutting issue, intersecting with many aspects of EDT's operational management policies and procedures demonstrated by its links to, and specific provisions in, the following documents:

- Code of Conduct
- Consultancy Recruitment and Selection Policy
- Data Protection Policy
- Digital Safeguarding Policy
- Dignity at Work Policy
- Disciplinary Policy and procedures
- Disclosure and Barring Service (DBS) Policy and procedure
- Inclusion and Diversity Policy
- Programme safeguarding frameworks and school operating safeguarding policies and procedure
- Recruitment and Selection Policy
- Risk Management Policy
- Safeguarding Code of Conduct
- Use of Social Media Policy
- Whistleblowing Policy
- Protection from Sexual Exploitation, Abuse and Harassment (SEAH) policy with connection to anti slavery

Implementation and Monitoring

The monitoring and adherence of this policy is the responsibility of the Head of Safeguarding and Inclusion to which the corporate Safeguarding Committee will report on the level of assurance it has received to the board trustees. The Corporate Safeguarding team must report all serious incidents or breaches to this policy to the Chief Executive and Board of Trustees.

The Corporate Safeguarding Committee delegates the annual review of this policy to the Corporate Safeguarding team together with the annual review of all local safeguarding policies and procedures and updating associated policies in alignment with this policy; the Corporate Safeguarding team will present the reviewed policy on an annual basis to the CSC and Board of Trustees for approval.

EDT Trustees retain accountability for the safeguarding and child/adult protection procedures/ processes of the Trust and will review this policy annually.

Versions

This policy can be translated with the consent of, and verification by, the Corporate Safeguarding Committee, and will be subject to their approval, prior to dissemination.

This policy will be posted on the organisation's website and made readily available, to all employees.

6. Resources

EDT's internal SharePoint safeguarding page is a repository for all safeguarding policies and procedures, information, training materials and links, including but not limited to:

- table of signs and indicators of child abuse
- table of signs and indicators of adult abuse
- international definition of terms – child and adult abuse
- table of serious reportable incident examples to report to Charity Commission
- links to current UK government safeguarding statutory guidance and advice
- link to the UK's Care Act, 2014, which sets out adult protection procedures
- EDT's safer recruitment process
- Corporate Safeguarding Committee Terms of Reference

Links

- Committee on the Elimination of Discrimination against Women (https://www.ohchr.org/en/treaty-bodies/cedaw)
- Common Approach to Protection from Sexual Exploitation, Sexual Abuse and Sexual Harassment (CAPSEAH) (https://capseah.safeguardingsupporthub.org/)
- The Equality Act, 2010 (Equality Act 2010 | EHRC)
- The Care Act, 2014 (https://www.legislation.gov.uk/ukpga/2014/23/contents)
- The Children Act, 1989 (https://www.legislation.gov.uk/ukpga/1989/41/contents)
- The International Child Safeguarding Standards (https://www.keepingchildrensafe.global/resources/international-child-safeguarding-standards/)
- The misconduct disclosure scheme (https://misconduct-disclosure-scheme.org/)
- UN Convention on the Rights of Persons with Disabilities (https://social.desa.un.org/issues/disability/crpd/convention-on-the-rights-of-persons-with-disabilities-articles)
- UN Convention on the Rights of the Child (https://www.unicef.org.uk/wp-content/uploads/2016/08/unicef-convention-rights-child-uncrc.pdf)
- Universal declaration of Human rights (https://www.un.org/sites/un2.un.org/files/2021/03/udhr.pdf)

7. Appendices

- Appendix i: Child protection
- Appendix ii: Adult protection
- Appendix iii: Serious incident reporting procedures and routes of escalation
- Appendix iv: Whistleblowing safeguarding concerns
- Appendix v: UK PREVENT procedures
- Appendix vi: Template declaration

Appendix i: Child Protection

Child protection

The United Nations Convention on the Rights of the Child (UNCRC) defines a child as any person under the age of eighteen, regardless of whether a nation's laws recognise adulthood earlier.

Safeguarding and promoting the welfare of children is a proactive approach and encompasses a range of measures EDT has put in place to protect children from potential dangers and risks of exploitation, abuse, and neglect.

Child protection is defined as the activities, interventions and systems put in place to safeguard children from suffering, or being likely to suffer, significant harm caused by exploitation, abuse, neglect or harmful practices. At EDT this includes :

- Taking action to prevent risks of harm, through training and awareness raising activities.
- Reporting concerns, making referrals to statutory services, and providing an immediate response to disclosures.
- Ensuring that children who have experienced harm receive the necessary medical, psychological, and legal support.
- Establishing safeguarding policies and reporting procedures that promote the safety and protection of children, and holding those responsible for harm accountable.

Operational child protection procedures are child centered and provide early help, which is more effective in promoting the welfare of children than reacting later. Early help means providing support as soon as a problem emerges at any point in a child's life, from the foundation years through to the teenage years and early adulthood.

The UK's legislation, The Children Act, 1989 Section 47, introduced the concept of significant harm as the threshold that justifies compulsory intervention in family life, in the best interest of the child. The Children's Act defines a child as anyone who has not reached the age of eighteen. The local authority is under a duty to make enquiries and to provide services where a child is suffering or likely to suffer significant harm. Similar procedures exist internationally and are detailed in programme/ regional child protection reporting procedures.

UK statutory guidance, Working Together to Safeguard Children, defines safeguarding and promoting the welfare of children as:

- providing help and support to meet the needs of children as soon as problems emerge
- protecting children from maltreatment, whether that is within or outside the home, including online
- preventing impairment of children's mental and physical health or development
- ensuring that children grow up in circumstances consistent with the provision of safe and effective care

The United Nations defines violence against children as, 'all forms of physical or mental violence, injury and abuse, neglect or negligent treatment, maltreatment or exploitation, including sexual abuse'. EDT's safeguarding arrangements aim to protect all children that we work with from all forms of maltreatment and harm in line with local legislation and child protection frameworks, where they exist. Where they do not exist or are weak, arrangements will be made with bona fide organisations (NGOs/INGOs/Civil Society Organisations) who provide child protection services and support.

Exploitation, abuse, and neglect are all forms of maltreatment of a child. Somebody may abuse or neglect a child by inflicting harm or by failing to act to prevent harm. Children may be abused in a family, institutional or community setting by those known to them or by others (e.g., via the internet). They may be abused by an adult or adults, or another child or children. Children and young people may be exploited or abused regardless of their age, gender, religious belief, racial origin or ethnic identity, culture, class, disability, or sexual orientation.

Digital safeguarding

As digital technology continues to play an integral role in our work, EDT recognises the unique safeguarding risks associated with digital spaces. Our Digital Safeguarding Policy outlines specific procedures to mitigate risks associated with the use of digital platforms. This includes risks related to content, contact, conduct, and commerce, as well as technology based gender violence. In addition, we recognise the risks posed by the misuse of artificial intelligence (AI) and other emerging technologies.

All digital safeguarding concerns must be reported promptly to the appropriate Designated Safeguarding Lead (DSL) or the corporate safeguarding team, following the procedures outlined in the Digital Safeguarding Policy.

Gender-based violence and inequality

Gender-based violence refers to the continuum of emotional, psychological, economic, physical, and sexual abuse, which is experienced disproportionately by women and children, and perpetrated predominantly by men.

It includes, but is not limited to, domestic abuse, child sexual abuse, rape and sexual assault, sexual harassment, so-called honour crimes, and commercial sexual exploitation. Discrimination in relation to ethnicity, disability, sexual orientation, poverty, age, migrant or refugee status, and those who speak out about gender-based violence, can increase and intensify vulnerability to abuse.

Gender-based violence is also an issue in online spaces, where girls are pressured to leave online platforms, or self-censor to avoid abuse, putting the onus on girls to change their behaviour, rather than perpetrators being challenged.

EDT promotes non-violent, respectful, positive gender equitable relationships for all those who come into contact with the organisation though the course of our

work, including the most vulnerable and excluded members of society.

More details on our policy and procedures to address gender-based violence are contained in our Protection from Sexual Exploitation, Abuse and Harassment Policy and procedures.

A gender responsive strategy is embedded in our international programmes, addressing societal norms that uphold gender-based violence and procedures to support a victim of gender-based violence.

Potential signs and indicators of abuse

Recognising indicators of potential abuse is complex and there is no simple checklist which allows easy recognition. There are potential warning signs to be alert to, but they should be assessed with care, and assumptions of abuse must not be made.

Equally, it is important not to dismiss concerns or ignore any signs of abuse; these should be discussed with the DSL as soon as possible to help decide the most appropriate course of action.

A table of signs and indicators of child abuse is signposted under *resources* and provides a reference guide to some of the potential signs and indicators of abuse. The reference guide is not exhaustive and should be utilised with an understanding of regional cultural norms such as female apparel.

Child disclosure

If a child tells an employee/partner that abuse is taking place they should be acknowledged, taken seriously, and listened to. The child may feel unsafe, so it is an opportunity for the employee to provide immediate support and understanding. An employee must never promise confidentiality but must advise the child that they will need to tell at least one other adult so that they can be helped and protected. If a child does not proceed with the disclosure, the employee must make a prompt report to the DSL for advice.

Child protection process

1. the employee/partner should promptly report their concern or an incident to their local DSL or deputy DSL
2. the DSL will assess the report and liaise with the Corporate Safeguarding team on the most appropriate course of action, including external reporting and referral to statutory authorities
3. the DSL will retain a chronology of the matter on MyConcern until a satisfactory conclusion resulting in the safety of the child is implemented
4. each child protection case will be monitored and reviewed by the Corporate Safeguarding team to ensure that timely and effective action has been taken by the DSL and local staff

Appendix ii: Adult Protection

Adult protection

UK legislation, The Care Act, 2014, defines adult protection as, 'Protecting an adult's right to live in safety, free from abuse and neglect. It is about people and organisations working together to prevent and stop both the risks and experience of abuse or neglect, while at the same time making sure that the adult's wellbeing is promoted including, where appropriate, having regard to their views, wishes, feelings and beliefs in deciding on any action. This must recognize that adults sometimes have complex interpersonal relationships and may be ambivalent, unclear, or unrealistic about their personal circumstances'.

An adult at risk of exploitation, abuse, and harassment, is any person who is aged 18 years or over or who may be at risk of exploitation, abuse, and neglect because of their needs for care or support, be they acute or continual because of disability or long-term illness.
There are many types of abuse (some of which are criminal offences and should be reported to the police, ideally with the consent of the individual/s concerned, and after an assessment of potential re-victimisation has been undertaken):

- physical abuse
- domestic violence or abuse
- violence towards women (gender-based violence)
- sexual abuse (including exploitation and harassment by a person in a position of power/trust)
- psychological or emotional abuse
- financial exploitation and abuse
- modern slavery
- discriminatory abuse
- organisational or institutional abuse
- neglect or acts of omission

EDT applies the following six principles to protect individual adults that we work with around the globe:

1. empowerment – people being supported and encouraged to make their own decisions and informed consent
2. prevention – it is better to take action before harm occurs
3. proportionality – the least intrusive response appropriate to the risk presented
4. protection – support and representation for those in greatest need
5. partnership – local solutions through services working with their communities. Communities have a part to play in preventing, detecting, and reporting neglect and abuse
6. accountability – accountability and transparency in safeguarding practice

In the UK, there are six categories of people who fall within the definition of regulated activity i.e., employees providing the services below who must undergo a DBS criminal records check and Adult Barred List check prior to commencing

role:

1. providing health care
2. providing personal care
3. providing social work
4. assistance with cash, bills and/or shopping
5. assistance in the conduct of a person's own affairs
6. conveying/transporting an adult

All cases of sexual exploitation, abuse and harassment by staff/partner staff must be promptly reported to the DSL for assessment, who will respond in line with EDT's Protection from Sexual Exploitation, Abuse and Harassment Policy and local reporting and referral procedures.

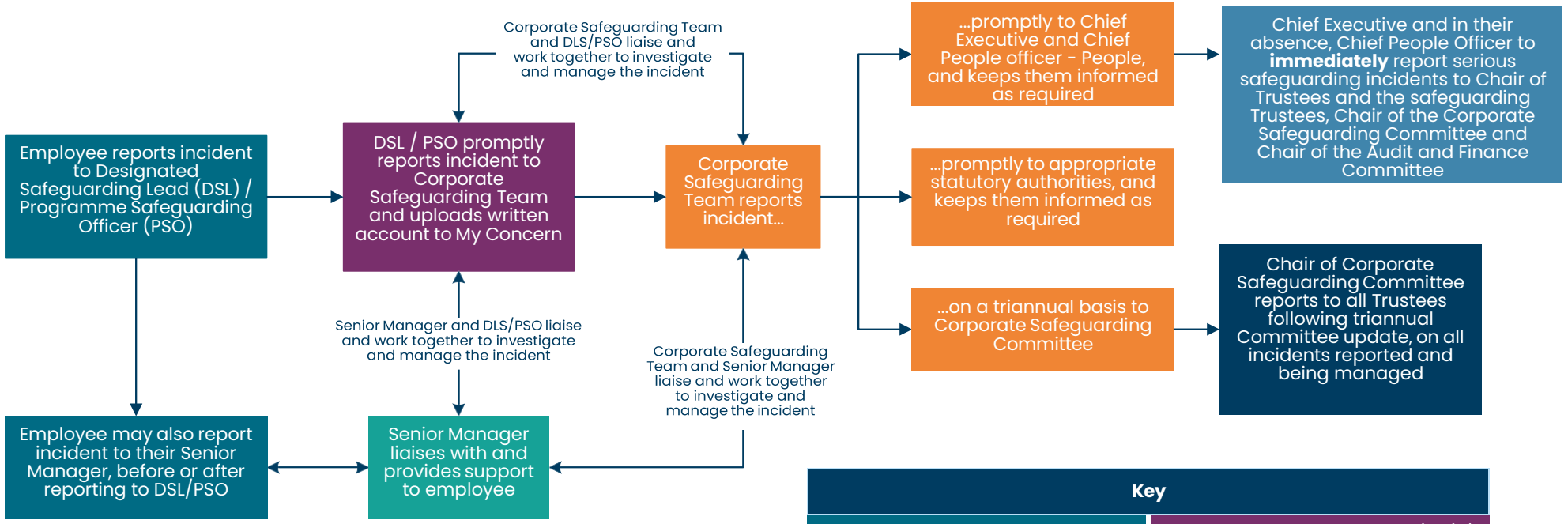
Other adult protection incidents and concerns must be reported to the local DSL who will assess the report and assist with reporting/referring to the appropriate statutory authorities/agencies, or the police, if an adult is at immediate risk of harm or poses a risk of harm to themselves.

The DSL will maintain a record of the adult concern, actions taken, including reporting and referrals to statutory authorities/agencies on MyConcern, ensuring that a case is satisfactorily closed, and the immediate needs of an adult have been met.

Staff working with adults will undergo relevant training to enable them to recognise the signs and indicators of adult abuse, a table of which is signposted under *resources.*

Appendix iii: Serious safeguarding incident reporting to the Board of Trustees

Flowchart 1: Serious safeguarding incident reporting to the Board of Trustees



The Chief Executive reports to the Chair of the Board of Trustees immediately upon receipt of reportable serious incident report

All safeguarding serious incident reporting outcomes are reported to the Charity Commission. A report of all serious safeguarding incidents and staff safeguarding allegations and investigation outcomes is made to the Audit and Finance Committee on a triannual basis.

Serious safeguarding incident reporting

All serious safeguarding incidents are promptly reported to the Chief Executive and the following members of the Board of Trustees:

- Chair of the Board of Trustees
- Safeguarding Trustee/Chair of the Corporate Safeguarding Committee
- Chair of the Audit and Finance Committee
- Director and/or senior manager of relevant business area

The above will receive regular updates whilst an initial risk assessment and fact-finding enquiries are made by the Corporate Safeguarding team and members of the allegation management team (flowchart 2 below) to ensure that correct action is undertaken and required reporting is promptly made.

Where an incident meets the reporting threshold to our regulator, the Charity Commission, a prompt report will be submitted by the Corporate Governance Manager and the Head of Safeguarding, subject to approval by the Chief Executive and Safeguarding Trustees.

Reporting to the police

Where a crime has been committed or where a potential crime has been committed, a prompt report will be made to the police for their investigation. The Corporate Safeguarding team and local DSL will co-operate with statutory enquiries, sharing information and co-operating with enquiries and investigations.

In some countries where EDT works, it may be assessed as unsafe to report certain alleged crimes to the police. Whilst the wishes of those affected by crime are considered, and where revictimisation and risk of harm/retribution is assessed as low, a report will be made to the police. All assessments that reach an outcome to not report, will be retained on record.

Donor mandatory reporting

Prompt reports will be made by the corporate safeguarding team in line with client and donor contractual requirements, including the Foreign, Commonwealth and Development Office (FCDO) via their reporting inbox: reportingconcerns@fcdo.gov.uk or telephone number: +44(0)1355 843747

Referrals to statutory child protection agencies

If a child is suffering significant harm or is likely to do so, a referral must be made promptly to the appropriate statutory children's agency. If an employee has a concern about a child, they should inform their local DSL/safeguarding lead, who will co-ordinate a report to the appropriate local statutory authority, which in England, is the local authority's Children's Social Services.

Referrals and reports to statutory adult protection agencies

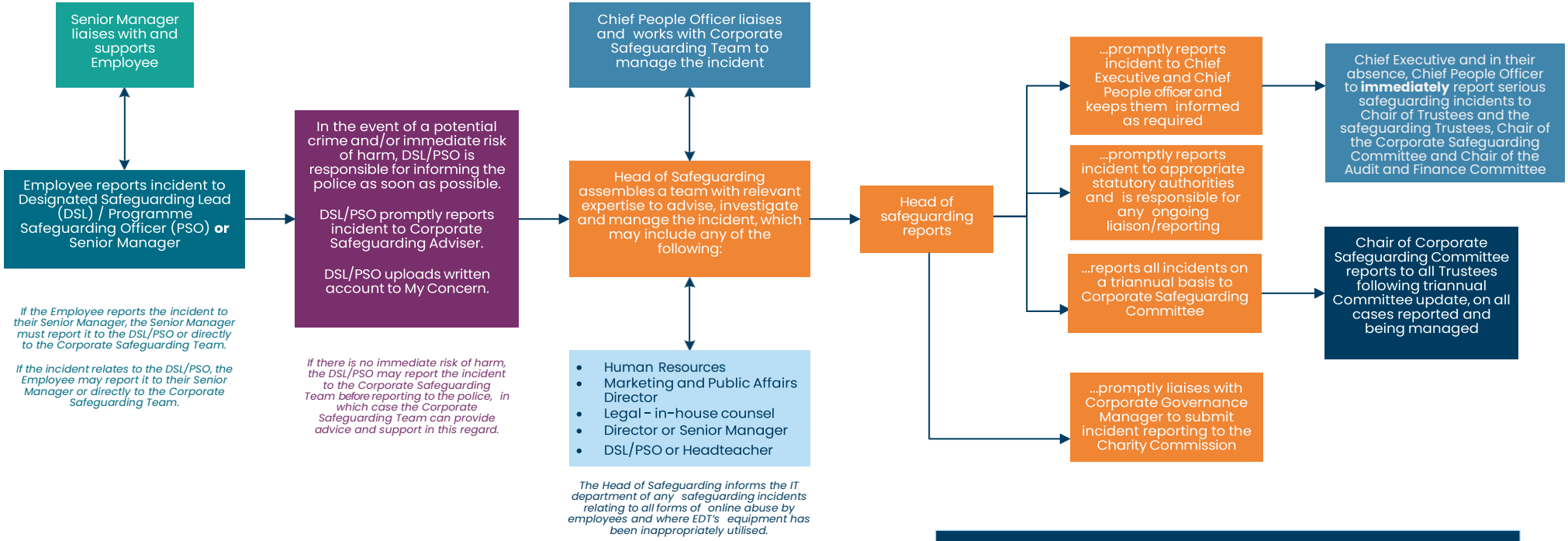
Consent to report or refer to a statutory authority will be first sought but in the event of a crime or where an adult is at continuing risk of harm, the DSL will make a report to the police, so long as doing so does not endanger the individual any further.

The DSL will arrange either signposting to an appropriate agency who can support the individual and in the case of abuse perpetrated by a staff member, will ensure that the adult has access to effective care and support, in line with local procedures and provisions.

International programmes

Each international programme has their own safeguarding framework, local policy, and external reporting procedures, detailing the local routes of reporting to statutory agencies, which should be followed by employees, partners and the DSL, to ensure that prompt help is provided to a child or adult who has been harmed or is at risk of harm.

Flowchart 2: Employee safeguarding incident management



The Chief Executive reports to the Chair of the Board of Trustees immediately upon receipt of reportable serious incident report

All staff safeguarding allegations and investigation outcomes are reported to the Charity Commission. A report of all reportable serious safeguarding incidents and staff safeguarding allegations and investigation outcomes are made to the Audit and Finance Committee on a triannual basis.

Employee safeguarding Incident/allegation management

All employees

All safeguarding incidents/allegations involving or potentially involving a criminal offence **must be immediately** reported to the police either by the DSL or their senior manager, who will also make a prompt report via MyConcern or directly to the head of Safeguarding.

The Corporate Safeguarding team is responsible for initial fact finding to assess whether an allegation or incident requires further convening of an allegation management panel with support from HR.

The Corporate Safeguarding team, together with the assistance of the Corporate Governance Manager, will report the allegation promptly to EDT's regulator, the Charity Commission, providing prompt updates and a final report.

The Corporate Safeguarding team will report progress and the outcome of the allegation management procedure to the Corporate Safeguarding Committee, which will include a detailed report in the quarterly safeguarding report to the Board of Trustees.

The serious incident report to the Audit and Finance Committee will include all employee dismissals made on safeguarding grounds and subsequent reports to other external regulatory authorities, including the Disclosure and Barring Service and other regulatory authorities.

International employees

For all international employees and international teachers, referrals to relevant authorities in their country of origin will also be made, where applicable. Records of all substantiated and unsubstantiated allegations are retained for reference purposes.

UK school employees

Concern and allegation management of all school employees will follow DfE statutory guidance, 'Keeping Children Safe in Education', including prompt reporting by the school's headteacher to the applicable local authority's designated officer (LADO).

Allegations made against the headteacher will be reported by the DSL or member of the school's leadership team to the Head of UK Independent Schools/Corporate Safeguarding team, who will escalate the report to the Chief Executive. The Corporate Safeguarding team will coordinate a case management team and oversee the process, liaising with relevant statutory authorities, including the LADO.

The Head of UK Independent Schools and the Head of safeguarding will report all school staff allegations and concerns to the Chief Executive who will inform the Safeguarding Trustees.

All allegation outcomes

The outcome of all school employee allegation investigations (police and organisational) and subsequent disciplinary procedures will be reported to the Charity Commission.

Substantiated allegations

In the event of a school employee being dismissed on safeguarding grounds, they will be referred to the Disclosure and Barring Service.

In the event of a teacher/headteacher being dismissed on safeguarding grounds, they will be referred

to The Teaching Regulation Agency.

All safeguarding and SEAH concerns/allegations/self-disclosures throughout the organisation will continue to be investigated to conclusion despite resignation or if the individual/s ceases to provide their services; these actions will not prevent thorough follow up and the outcome being reported to appropriate authorities, as required and appropriate to do so.

Appendix iv: Whistleblowing Safeguarding Concerns

Whistleblowing safeguarding concerns

EDT is committed to developing a culture where it is safe and acceptable for all employees and stakeholders to raise concerns about poor or unacceptable practice and misconduct. The purpose of the **Whistleblowing Policy** is to assist employees who believe they have discovered malpractice or impropriety in making a disclosure.

EDT encourages employees and all persons associated with the organisation who discover information which is believed to show malpractice or wrongdoing within the organisation, to disclose such information as soon as possible. EDT recognises that making disclosures can take a lot of courage and confidence and is committed to supporting those who report throughout the process.

Safeguarding misconduct concerns about staff relating to children or adults (including programme participants and community members)

EDT is committed to providing excellent service to the children and adults we work with and safeguarding their interests is of paramount importance. However, as an organisation we recognise that concerns may arise in respect of employees/partner conduct towards children or adults that we work with, and other adults who may come into contact with us through our work.

Concerns about safeguarding misconduct towards children or adults should, in the first instance, be directed to the local DSL/safeguarding officer or line manager. However, if the concern involves the DSL/safeguarding officer or senior staff, including the Corporate Safeguarding Officer or Head of Safeguarding, then a disclosure should be submitted to the Trust's whistleblowing email box at: confidentialconcerns@educationdevelopmenttrust.com.

Please refer to the **Whistleblowing Policy** for details.

Procedure

A small team made up of legal, safeguarding and HR expertise will investigate all safeguarding concerns reported via the Whistleblowing Policy to ensure that prompt and effective action is taken; all concerns are managed to a satisfactory conclusion and confidentiality maintained.

Unsubstantiated whistleblowing concerns/incidents and allegations

It is important to raise all safeguarding concerns that impact anyone who comes into contact with EDT and may also impact the reputation of the organisation. However, if you raise a concern or make an allegation in good faith that is then not confirmed by an investigation, the case will be closed and treated with the utmost confidentiality. However, if you make an allegation frivolously, maliciously or for personal gain, it will result in appropriate action being taken against you, including disciplinary action.

Appendix iv: UK PREVENT procedures

PREVENT is part of the UK Home Office and the police counter-terrorism strategy CONTEST and aims to stop people from becoming terrorists or supporting terrorism by working with individuals and communities to address issues before they become a criminal matter to stop people moving from extremism into terrorist-related activity. PREVENT primarily focuses on addressing the ideological drivers of radicalisation ,particularly those that may contribute to terrorism.

People of any age, but in particular young people, are potentially vulnerable to engagement with extremist ideologies or to targeting by extremist organisations. Radicalisation is the process through which an individual changes from passivity or activism, to become more revolutionary, militant, or extremist, especially where there is intent towards, or support for, violence. Driving factors behind radicalisation can include:

- lack of integration and/or polarisation
- identity crisis and/or isolation
- political and/or democratic disenfranchisement
- discrimination
- foreign policy and/or international crises or disputes
- political movements
- ideologies or faiths

There is no stereotype for people who hold extremist views, but vulnerability, isolation and personal grievances added to strong political, religious, or social views, can result in a person searching for a cause. There is no typical gender, age, religion, or background that extremists will target, but they use a sense of duty (belonging to a specific group), status (need for reputation) and 'spiritual rewards' (test of faith), as a way of drawing a person in.

Potential signs of radicalisation resemble other concerning behaviour and attitudes that a vulnerable child, young adult, or vulnerable adult may exhibit including:

- emotional: anger, mood swings, a new-found arrogance
- verbal: expression of opinions that are at odds with generally shared values
- physical: changes in appearance and route

<u>What to do if you believe a staff member to be at risk of radicalisation:</u>

If you notice any changes in behaviour, attitudes, or appearance in staff, promptly raise your concern with the:

- Designated Safeguarding Lead (DSL) and/or your senior manager
- Should your concern relate to the DSL/senior manager/Corporate Safeguarding Officer, promptly report your concern to the Head of Safeguarding or HR
- Should your concern relate to the Head of Safeguarding, promptly report your

concern to the Director, People

The DSL and/or senior manager will discuss concerns with the corporate safeguarding team and HR and an informed decision will be made to contact the applicable police PREVENT team for advice and appropriate action will follow.

EDT carry out strict due diligence checks on all partner organisations, ensuring that we do not partner with organisations that may legitimise or support extremism.

What to do if you believe a child or adult programme participant to be at risk of radicalisation:

The DSL and/or senior manager will discuss concerns with the corporate safeguarding team and an informed decision will be made to contact the applicable police PREVENT team or children's social services if the concern relates to a child. All schools in the UK, including the Trust's UK independent school group, have local operating procedures for PREVENT, setting out local statutory agencies' contact details and DSL contact details. All staff must follow local operating procedures where they have a concern about a beneficiary at risk of radicalisation.

All DSL and corporate safeguarding team contact details are available and maintained on the UK Safeguarding SharePoint page.

Appendix vi: Safeguarding Declaration

Template Declaration

Adherence to this policy and associated policies is required and all new employees will acknowledge their commitment to all EDT operating policies and procedures. Where online systems are not currently in use, this template declaration statement must be replicated and disseminated during induction to all new employees to sign, and a copy retained with their personnel file (hard copy on file or uploaded to a database system, as applicable).

Template:

Declaration Statement by Education Development Trust Employees

I state that I understand, and will abide by, the contents of EDT's Global Safeguarding Policy and associated policies referenced in the Global Safeguarding Policy:

Name: ……

Role: ……

Signature: ……

Date: ……