



**PROSPERO
GROUP**



**PROSPERO
TEACHING**



PROSPERO
HEALTH & SOCIAL CARE



**PROSPERO
INTEGRATED**

Safeguarding Children & Adults at Risk Policy

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Approved by:

Rob Grays – Chief Executive Officer

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Introduction

Safeguarding is everyone's responsibility. Prospero Group acknowledges the duty to safeguard and promote the welfare of Children and Adults at Risk; and is committed to ensuring safeguarding practice that reflects statutory responsibilities, government guidance and complies with best practice requirements. All Children and Adults, 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.

This policy applies to all Internal Employees and Temporary Workers and, will be widely promoted and be mandatory for everyone involved in Prospero Group. Failure to comply with this policy and Prospero Group's safeguarding procedures may result in disciplinary action being taken, including termination of employment and/or contract.

All Temporary Workers placed by Prospero Group are expected to familiarise themselves with arrangements for safeguarding Children and Adults at Risk in the organisation where they are placed and to have a clear understanding regarding abuse and neglect in all forms; including how to identify, respond and report.

Prospero Group expect all Internal Employees and Temporary Workers to follow and promote good practice in safeguarding. In order to do so, they should:

- Read, understand, accept and act in accordance with this policy.
- Be vigilant and follow professional codes of conduct to maintain professional boundaries and safe working practices.
- Report any concerns or disclosures related to the protection and safety of Children and Adults at risk.
- Undertake mandatory safeguarding training and awareness sessions where provided.
- Help educate learners/service users in placements regarding matters of keeping safe, including acting as a good role model.

Definitions

Client – an organisation, which engages with Prospero Group to purchase Work-Finding Services. This includes, amongst others: Schools, Local Authorities, Care Homes, Universities, Parents/Carers and Private Sector organisations.

Internal Employee – is defined to mean a full or part-time employee of Prospero Group.

Prospero Group – is comprised of three entities: Prospero Teaching, Prospero Health & Social and Prospero Integrated.

Temporary Worker – an individual receiving Work-Finding Services, delivered by Prospero Group. This includes, amongst others: Teachers, Tutors, Teaching Assistants, Care Assistants, Support Workers and Nurses.

Work-Finding Services – taken to mean recruitment activity, advertising of roles and provision of work-related training, provided by Prospero Group.

According to the Children Act 1989, a '**Child**' is anyone who has not yet reached their 18th birthday. The fact that a child has reached 16 years of age, is living independently or is in further education, is a member of the armed forces, is in hospital or in custody in the secure estate for children and young people, does not change his or her status or entitlement to services or protection under current legislation.

In this policy, the terms 'child' and 'young person', or 'children' and 'young people', are used interchangeably to refer to any individual under the age of 18.

The Care Act 2014 defines an '**Adult at Risk**' as an adult who:

- has needs for care and support (whether or not the local authority is meeting any of those needs) and
- is experiencing, or at risk of, abuse or neglect; and
- as a result of those care and support needs is unable to protect themselves from either the risk of, or the experience of abuse or neglect.

Abuse and neglect are forms of maltreatment. Somebody may abuse or neglect a child/vulnerable adult by inflicting harm, or by failing to act to prevent harm.

The Children Act 1989 defines '**harm**' as "ill-treatment or the impairment of health or development". 'Development' means physical, intellectual, emotional, social or behavioural development; 'health' means physical or mental health; and 'ill-treatment' includes sexual abuse and forms of ill-treatment which are not physical. As a result of the Adoption and Children Act 2002, the definition of harm also includes "impairment suffered by hearing or seeing the ill-treatment of another"

Abuse may be perpetrated by an individual from the child or adult's school, college, day centre, community, family, those in a position of trust or another child/vulnerable adult.

All staff should be aware that children can abuse other children (often referred to as child-on-child abuse). This is most likely to include but may not be limited to: bullying (including cyberbullying), physical abuse, sexual violence, sexual harassment, up-skirting, sexting (also known as youth produced sexual imagery); and initiation/hazing type violence and rituals.

Categories of abuse - Children

Child abuse can be one of four different categories as set out in Working Together to Safeguard Children (2018):

- **Physical Abuse:** Physical abuse is 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 persistent 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 participating in normal social interaction. It may involve seeing or hearing the ill-treatment of another. It may involve serious bullying (including cyber bullying), 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, though it may occur alone.
- **Sexual Abuse:** Sexual abuse involves forcing or enticing a child or young person to take part in sexual activities, not necessarily involving a high level of violence, whether or not the child is aware of what is happening. The activities may involve physical contact, including assault by penetration (e.g. 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 (including via the internet). Sexual abuse is not solely perpetrated by adult males. Women can also commit acts of sexual abuse, as can other children.
- **Neglect:** Neglect is 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 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.

For detailed guidance on the signs which may indicate abuse and neglect see '[What to do if you're worried your child is being abused \(2015\)](#)'.

Categories of abuse - Adults at risk

The categories of adult abuse are set out in the Care Act 2014 and are as follows:

- **Physical Abuse:** including assault, hitting, slapping, pushing, misuse of medication, restraint, inappropriate physical sanctions.
- **Domestic Violence:** including psychological, physical, sexual, financial, emotional abuse; so-called 'honour' based violence.
- **Sexual Abuse:** including rape, indecent exposure, sexual harassment, inappropriate looking or touching, sexual teasing or innuendo, sexual photography, subjection to pornography or witnessing sexual acts, indecent exposure and sexual assault or sexual acts to which the adult has not consented or was pressured into consenting.
- **Psychological Abuse:** including emotional abuse, threats of harm or abandonment, deprivation of contact, humiliation, blaming, controlling, intimidation, coercion, harassment, verbal abuse, cyber bullying, isolation or unreasonable and unjustified withdrawal of services or supportive networks.
- **Financial or Material Abuse:** including theft, fraud, internet scamming, coercion in relation to an adult's financial affairs or arrangements, including in connection with wills, property, inheritance or financial transactions, or the misuse or misappropriation of property, possessions or benefits.

- **Modern Slavery:** encompasses slavery, human trafficking, forced labour and domestic servitude. Traffickers and slave masters use whatever means they have at their disposal to coerce, deceive and force individuals into a life of abuse, servitude and inhumane treatment.
- **Discriminatory Abuse:** including forms of harassment, slurs or similar treatment; because of race, gender and gender identity, age, disability, sexual orientation or religion.
- **Organisational Abuse:** including neglect and poor care practice within an institution or specific care setting such as a hospital or care home, for example, or in relation to care provided in one's own home. This may range from one off incidents to on-going ill-treatment. It can be through neglect or poor professional practice as a result of the structure, policies, processes and practices within an organisation.
- **Neglect and Acts of Omission:** including ignoring medical, emotional or physical care needs, failure to provide access to appropriate health, care and support or educational services, the withholding of the necessities of life, such as medication, adequate nutrition and heating.
- **Self-neglect:** this covers a wide range of behaviour neglecting to care for one's personal hygiene, health or surroundings and includes behaviour such as hoarding.

Further information can be found at <https://www.gov.uk/government/publications/adult-safeguarding-statement-of-government-policy>.

Commitment to Safeguarding

This policy is designed to meet the above principles by ensuring that:

- Prospero Group has robust safer recruitment processes that ensures that those who are known to be a risk to Children or Adults at Risk, do not gain access to them; those whose actions suggest that they are a risk to Children or Adults at Risk are detected at the earliest stage and prevented from continuing to work with Children or Adults at Risk; and that those who intend to do harm are prevented at every possible stage from entering the workforce.
- Internal Employees and Temporary Workers understand their roles and responsibilities in respect of safeguarding and are provided with appropriate learning opportunities to recognise, identify and respond to signs of abuse, neglect and other safeguarding concerns relating to Children and Adults at Risk.
- There is an open and transparent culture which enables Internal Employees and Temporary Workers to raise concerns around Children/Adults at Risk, those that work with Children/Adults at Risk, and processes within Prospero Group.
- It is as simple as possible for an individual to report concerns about harm or risk and clear procedures are implemented where safeguarding and Child/Adult at Risk protection issues arise. Where concerns are reported Prospero Group will ensure that individuals are supported.
- Prospero Group has robust policies and procedures in place, which are reviewed and updated at least every 12 months.
- Prospero Group stays up to date with developments on safeguarding best practice, reporting and auditing safeguarding activities annually and addressing any areas for improvement.
- Prospero Group will report any concerns regarding any individual, or any potential safeguarding situation that it becomes aware of as soon as practicable to the appropriate authority and will co-operate in any ongoing investigations or assessments.
- Prospero Group will work in partnership with other services (including local authority children's and adult social care) to ensure that those who are identified as being at risk of abuse are protected.
- Confidential, detailed and accurate records of all safeguarding concerns are maintained and securely stored.

Relevant Legislation and Guidance

The principal legislation and guidance governing this policy is:

- Working Together to Safeguard Children 2018 (HM Government)
- Keeping Children Safe in Education 2023 (Department for Education)
- The Children Act 1989
- The Children Act 2004
- The Care Act 2014
- Care and Support Statutory Guidance 2023 (Department of Health and Social Care)

- Information Sharing: Guidance for practitioners and managers. HM Government (2018)
- Rehabilitation of Offenders Act 1974
- Disqualification under the Childcare Act 2006 - Update 2018 (Department for Education)
- Counter Terrorism and Security Act 2015 (including the 'Prevent Duty')
- The Prevent Duty, Departmental, Advice for Schools and Child Care Providers 2015 (Department for Education)
- Modern Slavery Act 2015
- Human Rights Act 1998
- Local Safeguarding Partners/Arrangements/Local Safeguarding Adult Board
- Guidance for safer working practice for those working with Children and Young people in Education settings 2022 (Safer Recruitment Consortium)

This policy should be read in conjunction with our other relevant safeguarding policies, including:

- Allegations and Misconduct Policy
- Complaints Policy
- Online Safety Policy
- Safer Recruitment Policy
- Temporary Worker Code of Conduct
- Whistleblowing Policy

Recruitment and Selection Process

Prospero Group is also committed to protecting Children and Adults at Risk through a careful recruitment and selection process (Safer Recruitment Policy), a Whistleblowing Policy and guidance on appropriate behaviour (Temporary Worker Code of Conduct). These policies should be read alongside this policy.

Prospero Group's rigorous procedures, following ASPCo's Compliance + process ensures that any Temporary Worker found to have a history of unacceptable conduct or practice, will not be placed.

Designated Safeguarding Lead/Officers (DSL/DSO)

The role of Prospero Group's DSL/DSO includes:

- Ensuring that all relevant Internal Employees and Temporary Workers have received at induction safeguarding and child protection training (including online safety which, amongst other things, includes an understanding of the expectations, applicable roles and responsibilities in relation to filtering and monitoring) appropriate to their role and continue receiving training to enable the development of skills and good practice when working with Children/Adults at Risk.
- Receiving and responding appropriately to all reports of safeguarding issues or abuse which are raised by Internal Employees, partner agencies, Temporary Workers or any other third party.
- Ensuring that confidential, detailed and accurate records are kept of any concerns, reports or referrals related to Temporary Workers or Children/Adults at Risk that they work with.
- Liaising with Designated Safeguarding Leads/Officers in partner organisations.
- Acting as a source of support, advice and expertise for Internal Employees and Temporary Workers with concerns and liaising with other agencies and professionals.
- Supporting Internal Employees and Temporary Workers involved in safeguarding incidents and assisting them in challenging or reporting poor or unsafe practice.
- Referring any allegations of abuse or safeguarding concerns to the relevant children or adult social care and if relevant, the police and/or the Local Authority's Designated Officer (LADO). In order to do this, the DSL/DSO will need to consult the Local Safeguarding Partnership Arrangements/Local Safeguarding Adult Board for the area in which the organisation is located. Further details on referral routes are located in Working Together to Safeguard Children (2018), Care and Support Statutory Guidance 2022, and in Keeping Children Safe in Education (2023).

- Reporting concerns to the Disclosure and Barring Service (DBS), this may be where an Internal Employee or Temporary Worker has been dismissed or left, where serious concerns have been raised about their conduct or behaviour, and Prospero Group believes they pose a risk to Children/Adults at Risk. The DSL/DSO will complete the necessary referral documents to the DBS and liaise with them thereafter if they have any further questions regarding the Internal Employee and Temporary Worker.
- Keeping senior management apprised of any safeguarding incidents and their outcome.
- Liaising with Prospero Group's Head of Compliance & Safeguarding and senior management regarding training and skill development programmes available to Internal Employees and Temporary Workers.
- Policy development (or overseeing this, including ensuring that all policies are updated as and when needed, but in any event on an annual basis.

Prospero Group's DSL/DSO's

Designated Safeguarding Lead: Danni Sleet (Prospero Group)
 Contact details: danni@prosperogrp.com
 07464 548985

Designated Safeguarding Officer: Haley Holman (Prospero Group)
 Contact details: haleyh@prosperogrp.com
 07502 081479

Designated Safeguarding Officer: Simone Fawdon (Prospero Teaching – London)
 Contact details: simone@prosperoteaching.com
 020 7404 6383

Designated Safeguarding Officer: Kate Marriott (Prospero Teaching – London)
 Contact details: kateM@prosperorecruitment.com
 020 7404 6383

Designated Safeguarding Officer: Kealeigh Benson (Prospero Teaching – London)
 Contact details: kealeigh@prosperoteaching.com
 020 7404 6383

Designated Safeguarding Officer: Rosie Biddiss (Prospero Teaching – Chelmsford)
 Contact details: rosieb@prosperoteaching.com
 01245 207 280

Designated Safeguarding Officer: Danusca Janowski (Prospero Teaching – Birmingham, Liverpool, Manchester & Stoke)
 Contact details: danusca@prosperoteaching.com
 0161 393 6725

Designated Safeguarding Officer: Leanne Pope (Prospero Teaching – Leeds, Newcastle & Sheffield)
 Contact details: leanne@prosperoteaching.com
 0113 887 2160

Designated Safeguarding Officer: Heather Brotherton (Prospero Health & Social Care)
 Contact details: heatherb@prosperohealthandsocial.com
 0161 470 0999

Designated Safeguarding Officer: Rebecca Bennett (Prospero Health & Social Care - Birmingham, Leeds, Liverpool, Manchester & Newcastle)
 Contact details: rebeccab@prosperohealthandsocial.com
 0161 470 0999

Designated Safeguarding Officer: Jessica Wade (Prospero Health & Social Care – Bristol & Cardiff)
 Contact details: jessw@prosperohealthandsocial.com
 0292 010 4020

Designated Safeguarding Officer: Hannah Parfitt (Prospero Health & Social Care - Cardiff)
 Contact details: hannah.p@prosperohealthandsocial.com
 0292 010 4020

Reporting Safeguarding & Professional Conduct Concerns

All Clients, Internal Employees and Temporary Workers to report concerns to the appropriate individual / body.

Threshold	Who Do I Refer To?
Professional conduct concerns (Temporary Workers)	Prospero Group DSL/DSO (see above contact details)
Concerns or allegations that do not meet the harm threshold – referred to as 'low-level concerns' (Temporary Workers)	Prospero Group DSL/DSO (see above contact details)
Concerns or allegations that may meet the harm threshold (Temporary Workers)	Local Authority's Designated Officer (LADO), including Prospero Group DSL/DSO in referral (see above contact details)
Concerns about a Child or Adult at Risk	Local Social Care
Immediate risk of harm to Child or Adult at Risk	Local police by dialling 999 (emergency only)

Responding to Safeguarding Concerns

All Internal Employees have a responsibility to protect Children/Adults at Risk. This includes:

- Observing Prospero Group policies and processes.
- Attending the recommended training and keeping their skills and knowledge concerning safeguarding and safer recruitment up to date.
- Reporting any concerns arising from meeting Temporary Worker's or carrying out pre-placement checks to the DSL/DSO without delay and making a clear written record of all relevant information to be passed to the DSL/DSO.
- Reporting any concerns arising from organisation visits / placements to the DSL/DSO at the relevant organisation and confirming that this has been done to Prospero Group's DSL/DSO.
- Taking action, such as following the process detailed in the Whistleblowing Policy where there are concerns about practice.

All Temporary Workers working through Prospero Group are expected to keep Children and Adults at Risk safe by:

- Following Prospero Group's policies and Temporary Worker Code of Conduct.
- Following the Safeguarding Policy of each placement, including any Code of Conduct.
- Making the DSL/DSO at the placement aware of any concerns regarding any Children/Adults at Risk; or any adults caring for or working with those persons.
- Seeking advice and support from Prospero Group's DSL/DSO when they have reason to believe that their concerns have not been responded to appropriately or they have concerns about practice in the placement.

Dealing with allegations of abuse made against Temporary Workers

All Temporary Workers placed on assignment are responsible for supporting safe behaviour and have responsibility to follow the guidance laid out in this policy and related policies, such as the Code of Conduct.

In accordance with the Care Act (2014), Working Together (2018) and Keeping Children Safe in Education (2023), where an organisation has received an allegation that a volunteer, supply staff or member of staff who works with Children/Adults at Risk has:

- behaved in a way that has harmed a Child/Adult at Risk, or may have harmed a Child/Adult at Risk;
- possibly committed a criminal offence against or related to a Child/Adult at Risk;
- behaved towards a Child/Adult in a way that indicates he or she may pose a risk of harm to Children/Adults at Risk; or
- or behaved or may have behaved in a way that indicates they may not be suitable to work with Children/Adults at Risk,

a referral should be sent to the LADO within one working day, giving as much detail as possible.

Details regarding allegations that meet the harms threshold and concerns that do not meet the allegations threshold (referred to as 'low level concerns'), including who will take responsibility for this once a Temporary Worker is placed, are set out in Prospero Group's Allegations & Misconduct Policy, which should be read alongside this policy.

FGM

FGM involves cutting or injuring the female genital organs for non-medical reasons. It is a practice that is not condoned by any religion and can leave physical and mental scars on the girl involved. Since 1985, it has been illegal in the UK, but many young girls are sent abroad to have the procedure carried out.

The age at which girls undergo FGM varies enormously according to the community in which they live. The procedure may be carried out when the girl is new-born, during childhood or adolescence, just before marriage or during the first pregnancy. However, many cases of FGM are thought to take place between the ages of 5 to 8 years and therefore girls within that age bracket are at a higher risk.

Reporting

Since October 2015, there is a requirement on doctors, nurses, teachers and other professionals to report known cases of FGM in under-18s, to the police. A known case is where there has been visual identification (this usually applies to healthcare professionals) or direct verbal disclosure.

If a child discloses that they have undergone FGM, you must ring the non-emergency 101 number within 48 hours. It is important to make a note of your actions and record the police reference number as evidence that you have complied with the duty.

The duty does not apply if the person has reason to believe that another person working in that profession has previously made an FGM notification in connection with the same act of mutilation.

If you are in any doubt, you should speak to Prospero Group's DSL / DSO (remember the duty is individual not organisational). Once you have made your report via the 101 number, you have met the duty.

County Lines

County Lines is applicable to all Temporary Workers and Internal Employees.

Prospero maintain the following expectations in line with NCA Guidance (referenced below).

County Lines is where illegal drugs are transported from one area to another, often across police and local authority boundaries (although not exclusively), usually by children or vulnerable people who are coerced into it by gangs. The 'County Line' is the mobile phone line used to take the orders of drugs. Importing areas (areas where the drugs are taken to) are reporting increased levels of violence and weapons-related crimes as a result of this trend.

A common feature in county lines drug supply is the exploitation of young and vulnerable people. The dealers will frequently target children and adults - often with mental health or addiction problems - to act as drug runners or move cash so they can stay under the radar of law enforcement.

In some cases the dealers will take over a local property, normally belonging to a vulnerable person, and use it to operate their criminal activity from. This is known as cuckooing.

People exploited in this way will quite often be exposed to physical, mental and sexual abuse, and in some instances will be trafficked to areas a long way from home as part of the network's drug dealing business.

As we have seen in child sexual exploitation, children often don't see themselves as victims or realise they have been groomed to get involved in criminality. So it's important that we all play our part to understand county lines and speak out if we have concerns.

Signs of County Lines

Some signs to look out for include:

- An increase in visitors and cars to a house or flat
- New faces appearing at the house or flat
- New and regularly changing residents (e.g different accents compared to local accent)
- Change in resident's mood and/or demeanour (e.g. secretive/ withdrawn/ aggressive/ emotional)
- Substance misuse and/or drug paraphernalia
- Changes in the way young people you might know dress
- Unexplained, sometimes unaffordable new things (e.g clothes, jewellery, cars etc)
- Residents or young people you know going missing, maybe for long periods of time
- Young people seen in different cars/taxis driven by unknown adults
- Young people seeming unfamiliar with your community or where they are
- Truancy, exclusion, disengagement from school
- An increase in anti-social behaviour in the community
- Unexplained injuries

Reporting

The best advice is to trust your instincts. Even if someone isn't involved in county lines drug dealing, they may be being exploited in some other way, so it's always worth speaking out.

If you are in any doubt, you should speak to Prospero Group's DSL / DSO, your local police by dialling 101 (in an emergency 999) and/or the independent charity Crimestoppers on 0800 555 111.

Filtering & Monitoring

In accordance with Keeping Children Safe in Education, Prospero Group will provide a safe environment for students to learn and work, including when online. Prospero Group understand that filtering and monitoring are both important parts of safeguarding pupils and staff from potentially harmful and inappropriate online material.

As part of this responsibility, Prospero Group will:

- Ensure that all Internal Employees and Temporary Workers understand their role, are appropriately trained (Prospero's introduction to tutoring course), follow policies, processes and procedures and act on reports and concerns.
- Not provide devices for use by pupils and Temporary Workers.
- Hold tuition sessions via a secure, online platform which can only be accessed by a direct login.
- Ensure access to harmful and inappropriate content is blocked, without unreasonably impacting teaching and learning.
- Ensure Temporary Worker resources are from approved sources such as Prospero Group's Tutor Resource Hub.
- Regularly conduct tuition session observations to identify any potentially harmful and inappropriate online material and any safeguarding / professional conduct concerns.
- Require any concerns to be raised via our secure, online platform, which are then reviewed by Prospero Group's DSL / DSO.

Prospero Group's DSL and Head of Children's Education Services are responsible for delivering and maintaining effective filtering and monitoring systems.

Reporting

If there is any doubt about filtering and monitoring and/or access to any potentially harmful and inappropriate online material, please refer to Keeping Children Safe in Education, Department for Education's filtering and monitoring standards and/or contact Prospero Group's DSL / Head of Children's Education Services.

Concerns can also be reported via Prospero Group's secure, online platform.

Duty to make a referral to the DBS

Where there is evidence that anyone has harmed, or poses a risk of harm, to a Child/Adult at Risk, there is a legal duty on Prospero Group to report that person to the Disclosure and Barring Service using their guidance available [here](#). The DBS has statutory authority to bar a person from working in regulated activity with Children and/or Adults at Risk in the UK.

A referral to the DBS will also be made if the person resigns prior to an investigation being carried out or reaching its conclusion. If the accused person resigns, or ceases to provide their services, this should not prevent an allegation being followed up in accordance with this guidance.

Prospero Group will not make any compromise/settlement agreement in the case of a person deemed unsuitable to work with Children/Adults at Risk. Any such agreement which contained a condition of not referring the case to the DBS would constitute a criminal offence.

Anyone who is concerned about a Child's or Adult at Risk's welfare or who believe that a Child or Adult at Risk may be at risk of abuse should pass any information to the DBS or other appropriate authority as soon as possible and no longer than 24 hours after the initial concern.

Whistleblowing

Individuals may find it difficult to raise concerns about colleagues, managers, people in placement or concerning how safeguarding concerns are responded to within a setting. Prospero Group has a specific Whistleblowing Policy which encourages individuals to raise concerns and also provides details of outside organisations that individuals can approach for support and advice. Prospero Group aims to have an open and honest culture where safeguarding is responded to effectively, and both Internal Employees and Temporary Workers feel safe, supported and able to voice any concerns that they have in the knowledge that they will be responded to.

Summary

Prospero Group will make this policy available to Clients and Temporary Workers by hosting it on our website and including within our booking confirmations.

Prospero Group will make this policy available to Internal Employees by hosting it on our shared drive, in the policies folder.

All Internal Employees and Temporary Workers must be aware that they have a professional duty to share information with other recruitment firms in order to safeguard Children/Adults at Risk. The public interest in safeguarding Children/Adults at Risk may override confidentiality interests. However, information will be shared on a need-to-know basis only, as judged by Prospero Group.

Enforcement

This policy will be enforced by Prospero Group's CEO, Managing Director, Operations Directors, Head of Compliance & Safeguarding, Head of HR and Data Protection Officer.

Failure to follow this policy may result in disciplinary action, which may include suspension, restriction of access, or more severe penalties up to and including termination of employment. Where illegal activities or theft of Prospero Group property (physical or intellectual) is suspected, Prospero Group may report such activities to the applicable authorities.

This policy is subject to change to updates and necessary. It is the responsibility of each Internal Employee and Temporary Worker to keep themselves up to date with any additional versions.

Appendix A - Tutor, Teacher or Teaching Assistant working with children, young people or vulnerable adults in 1:1, 3:1 and small group situations that are in addition to classroom working procedures

This appendix is in conjunction with Prospero Group's Safeguarding Children & Adults at Risk Policy.

This appendix covers any **Tutor, Teacher or Teaching Assistant** working with children, young people or vulnerable adults in 1:1, 3:1 and small group situations that are in addition to classroom working procedures.

Prospero Group is committed to ensuring the highest possible standard of safeguarding. The personal safety and wellbeing of each student and tutor using Prospero Group is paramount.

Tutors will ensure that group work sessions take place in a safe environment.

The following sets out procedures to be followed if an incident occurs:

- The safety and wellbeing of any student or other person using Prospero Group is paramount. These procedures aim to ensure a prompt response to any incident and to minimise any further harm to a student or other person.
- There are differing severities of behaviour that could be witnessed during a group session. Some behaviour would warrant only a report to Prospero Group; other behaviour maybe of a more serious nature where a direct report to the police may be necessary.
- Each section below sets out the recommended procedure to be followed. It is always the responsibility of the person alerted to the incident to take some action to protect the student or other person. Prospero Group will not be held responsible for any non-compliance with the recommended procedure.
- The procedures are not an exhaustive list; therefore if an incident occurs that is not covered in this document you are advised to contact Prospero Group, or the police if you believe that it may be a criminal matter.

Tutors

If a tutor sees/experiences:

Inappropriate language

The tutor will request, in a polite manner, that the student or other person using inappropriate language refrains from doing so during the session. If the language continues, the tutor will explain that they will terminate the session due to the language and will report the matter to Prospero Group who will decide on any further use of the service by the student or other person involved. The tutor will have no further contact with the student unless by mutual agreement with Prospero Group. Any unsolicited contact from the student or other persons following the termination of the session should be reported to Prospero Group.

Inappropriate behaviour

The tutor will request, in a polite manner, that the student or other person involved in the inappropriate behaviour refrains from the behaviour during the session. If the behaviour continues, the tutor will explain that they will terminate the session due to the behaviour and will report the matter to Prospero Group who will decide on any further use of the service by the student or other person involved. The tutor should have no further contact with the student unless by mutual agreement with Prospero Group. Any unsolicited contact from the student or other persons following the termination of the session should be reported to Prospero Group.

Inappropriate or abusive images

Any display of adult pornographic images whilst in the presence of a student may constitute an offence under UK law. Any tutor witnessing the display of adult pornographic images by or towards a student should explain that the images should not be displayed during a session, terminate the session and report the matter to Prospero Group.

Any display of child abuse images or indecent images of a child (for these purposes, a 'child' is defined as anyone under the age of 18 years) is an offence under UK law. Any tutor witnessing a display of indecent images of a child by or in the presence of a student should explain that due to the nature of the images they will terminate the session. The tutor should then inform the police.

The tutor should also inform Prospero Group of the incident to ensure any recordings can be preserved and made available for any police investigation. The tutor should have no further contact with the student or any other person involved in the incident.

Any unsolicited contact from the student or other persons following the termination of the session should be reported to both the police and Prospero Group immediately.

This action should be taken so that the correct authorities can be alerted and can deal appropriately with the incident.

The display of any other images perceived to be inappropriate, either due to the age of the student or the content of the image shall be reported to Prospero Group at the discretion of the parent/responsible adult.

Disclosure of/witness to abuse towards or in the presence of a student

Any physical or sexual abuse of a child is an offence under UK law. If a tutor receives information about such abuse from the student or other person, they should reassure the person that they can get assistance for them. It is the responsibility of the tutor to contact the police and report what has been witnessed.

If the tutor witnesses any such abuse at first-hand they should immediately contact the police and report the incident. The tutor should also inform Prospero Group of the incident to ensure any recordings can be preserved and made available for any police investigation. The tutor should have no further contact with the student or other person involved in the incident. Any unsolicited contact from the student or other persons following the termination of the session should be reported to the police and Prospero Group immediately.

Disclosure of inappropriate/sensitive information

During a session, sensitive information may be offered by a student or other person. If the information relates to any kind of abuse the tutor should refer to 'Disclosure of/witness to abuse towards or in the presence of a student', above. The student or other person should be discouraged, by the tutor, from disclosing sensitive information. If the information continues to be shared, the tutor will determine the impact of the information and decide whether to continue or terminate the session and report the incident to Prospero Group.

Any information disclosed regarding the safety of a child should always be reported immediately to the police.

Students

If a student sees/experiences:

Inappropriate language

The student will inform a parent/responsible adult that the tutor is using inappropriate language. The parent/responsible adult should ask the tutor to refrain from using inappropriate language during the session. If the language continues, the parent/responsible adult should explain that they will terminate the session and will report the matter to Prospero Group, who will decide on any further use of the service by the tutor. The student and parent/responsible adult should have no further contact with the tutor unless by mutual agreement with Prospero Group. Any unsolicited contact from the tutor after termination of the session should be reported to the Prospero Group.

If a parent/responsible adult is not present or readily available, the student should report the language as soon as possible to a parent/responsible adult, who will take the decision to report the incident.

Inappropriate behaviour

The student will inform a parent/responsible adult that the tutor is using inappropriate behaviour. The parent/responsible adult should ask the tutor to refrain from using inappropriate behaviour during the session. If the behaviour continues, the parent/responsible adult will explain that they will terminate the session due to the behaviour and will report the matter to Prospero Group, who will decide on any further use of the service by tutor. The student, parent/responsible adult should have no further contact with the tutor unless by mutual agreement with Prospero Group. Any unsolicited contact from the tutor after termination of the session should be reported to Prospero Group.

If a parent/responsible adult is not present or readily available, the student should report the behaviour as soon as possible to a parent/responsible adult, who will take a decision to report the incident.

If the behaviour is of a sexual nature towards a student by a tutor, the student should immediately inform a parent/responsible adult and terminate the session. The parent/responsible adult should inform the police and Prospero Group immediately.

Inappropriate or abusive images

Any display of adult pornographic images whilst in the presence of a student may constitute an offence under UK law. Any student witnessing the display of adult pornographic images by a tutor should immediately terminate the session and report this to a parent/responsible adult who should inform the police.

Any display of child abuse images or indecent images of a child (for these purposes, a 'child' is defined as anyone under the age of 18 years) is an offence under UK law. Any student witnessing a display of indecent images of a child should immediately terminate the session and report this to a parent/responsible adult, who should inform the police.

The parent/responsible adult should also inform Prospero Group of the incident to ensure that any recordings can be preserved and made available for any police investigation. The student, parent/responsible adult should have no further contact with the tutor involved in the incident. Any unsolicited contact from the tutor following the discontinuation of the session should be reported to the police and Prospero Group immediately.

This action should be taken so that the correct authorities can be alerted and can deal appropriately with the incident.

The display of any other images perceived to be inappropriate, either due to the age of the student or content of the image, shall be reported to Prospero Group at the discretion of the parent/responsible adult.

Disclosure of/witness to abuse

Any physical or sexual abuse of a person is an offence under UK law. If a student receives information about such abuse from the tutor or other person, they should immediately inform a parent/responsible adult. It is the responsibility of the parent/responsible adult to contact the police and report what was witnessed.

If the student witnesses any such abuse at first-hand, they should immediately contact a parent/responsible adult who should immediately inform the police. The parent/responsible adult should also inform Prospero Group of the incident to ensure that any recordings can be preserved and made available for any police investigation. The student, parent/responsible adult should have no further contact with the tutor involved in the incident. Any unsolicited contact from the tutor following the termination of the session should be reported to the parent/responsible adult immediately.

This action should be taken so that the correct authorities can be alerted and can deal appropriately with the incident.

Disclosure of inappropriate/sensitive information

During a session, sensitive information may be offered by a tutor. (If the information relates to any kind of abuse the student should refer to section 2.4 'Disclosure of/Witness to abuse'.) The tutor should be discouraged from disclosing sensitive information by the student, parent/responsible adult. The parent/responsible adult will determine the impact of the information and decide whether to continue or terminate the session and report the incident to Prospero Group.

Any information disclosed regarding the safety of a child should always be immediately reported to the police.

Any tutor reported by a parent/responsible adult will be suspended from the site until the incident has been investigated by the appropriate authority. The parent/responsible adult may be informed of the resolution if appropriate.

Schools, Teachers and Schools Representative

The teacher or school representative shall follow the procedures outlined in their school Safeguarding Policy and Procedure documents and will make these available to the tutor at least 24 hours before the first session.

The Safeguard Lead will identify themselves to the tutor and share the contact details for the safeguarding team.

The Safeguarding Lead will liaise with Prospero Group's Designated Safeguarding Lead/Officer should any concerns arise while tutors and students are working together.

Directors/Management

Prospero Group's Safeguarding Children & Adults at Risk Policy and Safeguarding Procedures are the responsibility of the Designated Safeguarding Lead, Company Directors and Management.

Any report of a contravention of Prospero Group's Safeguarding Children & Adults at Risk Policy and Safeguarding Procedures will be reviewed by Prospero Group, to ensure that an appropriate course of action is taken.

Any incident reported to Prospero Group will be reviewed as soon as possible, to ensure a timely resolution.

If a report concerns a minor breach of the Prospero Group's Safeguarding Children & Adults at Risk Policy and Safeguarding Procedures, Prospero Group will decide on appropriate action, which may include withdrawal of the individual's work-finding services.

If a report is received by Prospero Group which indicates any risk to the immediate safety of a student or any illegal activity during a session, Prospero Group are required by law to contact the police and report the incident.

Online Safety

Prospero Group acknowledge students are increasingly using electronic equipment on a daily basis to access the internet and share content and images via social media sites such as Facebook, Twitter, Instagram, Snapchat and online gaming.

Unfortunately, some adults and other children use these technologies to harm children. The harm might range from sending hurtful or abusive texts or emails, to grooming and enticing children to engage in extremist or sexual behaviour, such as webcam photography or face-to-face meetings. Students may also be distressed or harmed by accessing inappropriate material such as pornographic websites or those which promote extremist behaviour, criminal activity, suicide or eating disorders.

Further information is set out in Prospero Group's Online Safety Policy. If there is any uncertainty, please speak to Prospero Group's Designated Safeguarding Lead/Officer.