

Safeguarding, Welfare and Prevent Policy

1. Introduction

This policy sets out Portland Training's approach to Safeguarding and promoting the welfare of all its learners, staff, volunteers and visitors. The Managing Director, Senior Management Team (SMT) and staff recognise that a safe environment combined with clear lines of communication and decisive action ensures the best outcomes for all learners.

This policy is bolstered by the inclusion of these sub-policies in support of learner, staff and stakeholder safety and welfare.

- Prevent Strategy
- Preventing Extremism and Radicalisation
- Whistleblowing Policy
- Freedom of Expression
- E-Safety and Social Media
- Acceptable Use of IT
- Learner Code of Conduct
- Anti-Slavery
- Wellbeing and Pastoral Concern

This policy supports Portland Training's Inclusion Strategy and Support, Inclusivity and Ethics Policy by ensuring that safeguarding arrangements actively reduce barriers to participation, protect learner wellbeing and enable all learners to make progress from their starting points.

Portland Training is committed to ensuring that its:

- Provides a safe environment for learners to undertake their courses
- Takes appropriate steps to ensure work placements are adequately equipped to support the learner in their training and safeguard the learner's welfare
- Has a robust system of reporting that engages with appropriate agencies who are able to fully support the learners' wellbeing and safety
- Actively promotes safe practices and encourages learner to identify potential risks

In pursuit of these aims, the SMT and Safeguarding Teams will:

- Raise awareness of issues relating to the welfare of learners and ensure they know how to protect themselves from all forms of risk, including but not limited to, grooming, radicalisation, bullying, extremism, forms of abuse and cyber-crime.
- Identify more vulnerable learners and those at risk of potential harm
- Adhere to the safe recruitment of staff and safe use of contractors
- Promote culture of openness where reporting lines are clear
- Promote culture that values the opinions of learners
- Review policies and procedures and ensure they are communicated

- Engage effectively with external agencies/partners
- Establish clear reporting lines and accountability through the Safeguarding Team.

1.1 Definition of Safeguarding

Portland Training uses definitions of the term 'safeguarding' from statutory guidance.

Safeguarding children is defined in [Working together to safeguard children](#) as:

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

Safeguarding vulnerable adults is defined in the [Care and support statutory guidance](#) issued under the Care Act 2014 as:

- protecting the rights of adults to live in safety, free from abuse and neglect
- people and organisations working together to prevent and stop both the risks and experience of abuse or neglect
- people and organisations making sure that the adult's wellbeing is promoted including, where appropriate, taking fully into account their views, wishes, feelings and beliefs in deciding on any action
- recognising that adults sometimes have complex interpersonal relationships and may be ambivalent, unclear or unrealistic about their personal circumstances and therefore potential risks to their safety or well-being.

1.2 Definition of Young People and Vulnerable Adults

- A child is defined as under the age of 18 years; for the purpose of this policy, in the context of a post 16 environment, children are referred to as young people
- Vulnerable Adult is defined as someone 18 years of age or over who is or may be unable to protect him or herself against significant harm or exploitation.

1.3 Radicalisation and Acts of Terrorism

The Counter-Terrorism and Security Act 2015 imposes a duty on Post 16 Providers to have due regard to the need prevent people from being drawn into terrorism. This is known as the Prevent Duty. In order to comply with the duty Post 16 Providers are expected to work in close partnership with agencies such as the police and local authority; have procedures in place with regard to external speakers; take a risk assessed approach to Prevent with action plans in place to manage risk; have procedures in place with regard to the use of IT facilities and access to the web; and provide staff training and development to enable tutors and those supporting the curriculum to utilise learning opportunities to educate and challenge extremism and for all staff to exemplify British values.

In addition to statutory duties, Portland Training will endeavour to adopt best practice wherever possible by adhering to Government guidance (issued at national or local level) and also the requirements of any enforcement or regulatory authority that has a vested interest in the safeguarding of vulnerable Individuals.

3. Scope of the Policy

This policy applies to:

- All learners
- All staff, volunteers and partners carrying out activity on behalf of Portland Training
- All Portland Training activity.

4. Aim of the Safeguarding and Prevent Policy

Portland Training ensures all learners are safeguarded by:

4.1 Prevention and Promotion

- Robust staff recruitment;
- Policies and procedures that support safeguarding and the promotion of British Values;
- Close working relationships with partners who share a common purpose with regard to safeguarding; Social Care; Police; Local Authority Safeguarding teams; schools; health services; referral agencies
- Staff awareness – how to promote welfare and safety of young people and vulnerable adults, inclusive of mandatory, annual training.
- Implementation of the Acceptable Use of ICT Policy and e-Safety and Social Media Policy;
- Implementation and monitoring of Portland Training's Prevent Strategy;
- Raising the awareness of safeguarding amongst learners through induction, learner information, promotional materials and our curriculum offer.

4.2 Protection and Support

- Portland will identify young people and adults who are suffering or likely to suffer significant harm, including those at risk of radicalisation.
- Portland Training will ensure all staff understand their role in identifying those at risk. Definition of abuse and signs of abuse can be found on DFE;
<https://www.gov.uk/government/publications/what-to-do-if-youre-worried-a-child-is-being-abused--2>
- Portland Training carries out risk assessments of learners who declare a prior criminal conviction.
- Where a young person or vulnerable adult is suffering significant harm, immediate action will be taken in accordance with the **Children Act 1989**.
- Action will also be taken to protect the welfare of learners where it is recognised that additional support is needed, even if the learner is not at immediate risk of harm.

- The development of skills to enable learners to keep themselves safe, through teaching and learning opportunities as part of the broad curriculum.

4.3 Allegations of abuse against members of staff

- Portland Training will act in accordance with the DfE guidelines 'Dealing with allegations of abuse against Teachers and other Staff, 2011, published March 2012. <https://www.gov.uk/government/publications/allegations-of-abuse-against-teachers-and-non-teaching-staff>

5. Responsibility for Safeguarding

The Managing Director is ultimately responsible for the safeguarding of young people and Vulnerable Individuals whilst they are on programme. The Managing Director ensures the Safeguarding Policies and Processes are adhered to by all staff. The Managing Director forms part of the Safeguarding Team and is the Designated Safeguarding Lead. This policy applies to all Portland Training employees as the organisation recognises that safeguarding is everyone's responsibility.

The SMT ensures that Portland Training works closely with the relevant Safeguarding Boards and other agencies in line with statutory guidance.

Portland Training's SMT and staff determine how to promote the welfare of learners so they understand and respond to risk effectively including knowing where to get support. All staff and volunteers actively promote a culture of mutual respect and tolerance and are vigilant for signs of abuse.

5.1 The Designated Safeguarding and Prevent Lead, broad areas of responsibility are:

- Implementation of the Prevent duty;
- The Safeguarding and Prevent Policy and Procedures;
- Ensure that Portland Training's policies are disseminated and implemented consistently;
- Monitoring effectiveness of the policies and actions taken
- Oversee the referrals of cases of abuse to SCSB and RCSB;
- Support designated Safeguarding Representatives;
- Inter-agency working with Local Authorities, Social Care, police; schools and referral agencies.
- Referral to and working with Local Authority Designated Officer (LADO) where allegations against staff have been made;
- Referral to the Police where a crime has been committed;

- Ensure training and development for safeguarding complies with the statutory guidance; **DFE Keeping Children Safe in Education for School and College September 2025 Part 1 [Keeping children safe in education 2025](#)**
- Ensure the publication of the Safeguarding Policy and Procedures on Portland Training's website;
- Ensure the Recruitment Policy is effective in protecting young people;
- Act as a source of support, advice and expertise to staff on matters of safeguarding.
- Provide face to face training to staff or delegate to other staff/external partners where appropriate

5.2 The designated Deputy Safeguarding and Prevent Lead, broad areas of responsibility are:

- To deputise for the Safeguarding and Prevent lead, as above; except where there are allegations against members of staff, in which case these will be referred to the HR Team;
- Inform staff working with individual learners of known potential risk to the individual, other learners or staff (the consent of the individual learner will be sort in all cases, although there may be occasion where information may be shared without the consent of the individual, in which case the learner will be told what information is to be shared);
- Act as a point of referral for Prevent issues; reporting to the Prevent Lead;
- Risk assess the disclosure of learner criminal convictions;
- Support the designated Safeguarding Lead on the review of policies and procedures;
- Advise the leadership team of key safeguarding issues;
- Produce a monthly report of open Safeguarding cases to the Designated Safeguarding Lead;
- Act as a source of support, advice and expertise to staff on matters of safeguarding;
- Raise awareness of staff and learners locally;
- Liaise with JC+/probation/referral agencies to receive information about individual learners and ensure appropriate arrangements are in place to safeguard those learners;
- Maintain appropriate, confidential, and accurate records of safeguarding referrals, actions and concerns and Portland Training's confidential safeguarding electronic and paper records.

5.3 Other staff within the Safeguarding Team

- A number of additional staff are identified to support individuals who may be at risk of harm and to promote the welfare of individual learners. These staff will act as first point of call for learners.
- Safeguarding staff will receive regular training on safeguarding and maintain strong links with external and internal supportive organisations.

- They will refer to the Designated Safeguarding Lead for all cases where significant harm has been disclosed and/or where the potential for significant harm is likely to escalate.

5.5 All Portland Training staff

Safeguarding is 'Everyone's Responsibility' - All staff receive an induction and regular updates. A safeguarding organisation chart is provided in Appendix A.

5.6 Safeguarding Team Responsibilities

- To demonstrate a practice attitude in assessing safeguarding risks and swiftly, taking actions to prevent them;
- To raise awareness among staff of safeguarding issues and increasing vigilance and acting on learners' concerns;
- To ensure that clear and robust reporting procedures remain in place for the safeguarding of learners' welfare and wellbeing;
- Safeguarding representatives will provide support to peers, advice to learners and colleagues on signposting to appropriate support agencies and will contribute to the evaluation and review of policies and procedures.

Main Areas of Focus:

- Promoting all forms of equality, ensuring learners and staff are protected from harassment, bullying and discrimination;
- Promoting British Values;
- Regularly evaluating of the effectiveness of safeguarding practice, including the prevention of radicalisation of learners and compliance with the Prevent Duty;
- Supporting delivery staff to promote equality, raise awareness of diversity and tackle discrimination, victimisation, harassment, stereotyping, radicalisation and bullying in their training sessions;
- Providing strategies and guidance on how to educate learners on how to protect themselves from the risks associated with radicalisation, extremism, forms of abuse, grooming and bullying, including through the use of the internet, and how well they understand the risks posed by adults or young people who use the internet to bully, groom or abuse other people, especially children, young people and vulnerable adults;
- Providing guidance to delivery staff on how to educate learners on how to keep themselves fit and healthy, both physically and emotionally.

6. Information Sharing and Record Keeping

- Information sharing is vital to safeguard young people and vulnerable adults. There can be significant and occasionally life threatening consequences to not sharing

information. Therefore, where there has been significant harm or there is potential for significant harm staff are required to share information;

- Safeguarding staff use professional judgement regarding the potential for significant harm, keeping the needs of the individual young person paramount. Consent to share information will be sought, however, there are occasions where information is shared without consent. Guidance for information sharing for safeguarding purposes are found in Appendix B;
- Safeguarding records are kept securely by the Safeguarding Team via a secure Sharepoint;

7. Safer Recruitment

- Portland Training adopts recruitment, selection and pre-employment vetting procedures in line with legislation and best practice available. The majority of Portland's activity is 'non-regulated activity' as set out in <https://www.gov.uk/government/publications/dbs-workforce-guidance>
- Portland Training has a robust process of risk assessment for positive DBSs or where staff should need to commence employment prior to their DBS being received back;
- Portland Training is committed to rechecking individuals DBSs every 3 years;
- Portland Training holds a single central register for all staff and volunteers, which lists the checks that have been carried out and the date they were completed.

7.1 Volunteers

Whilst not a legal duty, Portland Training does require supervised volunteers that are undertaking frequent supervised activity to provide an enhanced DBS certificate. Portland Training will not require a barred list check.

8. Learner Recruitment

Safer recruitment extends to learners as well. Portland Training requests all prospective learners to disclose whether they have a criminal conviction. Following disclosure, the Designated Safeguarding Lead and/or Deputy Designated Safeguarding Lead assess the risk to others and identify any support for the individual.

9. Health and Safety

- Portland recognises that learners and staff want to feel safe in their learning and working environment.
- Our sites have intercom access and the external doors will be shut at all time with access only being gained when staff have confirmed identity and allowed it.
- Where we use temporary accommodation to deliver training, a risk assessment will be carried out beforehand to ensure learner and staff safety.
- Thorough risk assessments are carried out on all premises. Further details are available in Portland Training's Health & Safety Policies and Procedures.

- Portland requires all staff to wear an identity card during working hours.

10. Online Safety

The digital revolution has transformed the way that people now have the opportunity to learn using the internet and mobile technologies. Portland Training is committed to the availability of digital technology in order to enhance the learning experience. However, with these new technologies (particularly internet based) comes risks associated with invasion of privacy, cybercrime and safeguarding/prevent issues. It is imperative that a dynamic approach is used in order to adapt to the rapidly changing digital landscape, and that a balance is struck between guaranteeing learner safety whilst still ensuring availability of quality digital provision. Full details of how Portland Training safeguard learners online can be found in Portland Training's e-Safety and Social Media Policy.

11. Staff Training

- All staff must familiarise themselves with: Keeping Children Safe in Education, Part 1: [Keeping children safe in education 2025](#)
- All new employees are required, as part of their induction, to complete an on-line safeguarding course, and an on-line Prevent awareness course; the exception being if alternative face to face training is provided.
- Established staff receive regular updating; through on-line refresher courses or in house training; by designated Safeguarding staff; regular emails; external training
- They are also required to update their issues led knowledge, i.e Child Sexual Exploitation. Designated staff are expected to organise and/or deliver sessions to raise awareness of emergent issues.

12. Developing Learner's Skills and Awareness

- Portland Training has a duty to develop learner's abilities to keep themselves safe and to recognise when others are at risk, as well as to know how to report concerns and access support.
- All learners must agree to adhere to the expected levels of behaviour whilst at Portland Training.
- Portland Training raises the learners' awareness of safeguarding at induction, through information given to them and through the use of promotional materials and campaigns.
- Safeguarding is an important aspect in the delivery of the curriculum.
- Portland Training uses a wide range of resources to deliver safeguarding, approved by the designated leads, and teaching staff are expected to use opportunities as they arise to develop the learners understanding.

13. Monitoring and Evaluation

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13.1 Safeguarding incidents, actions taken and staff training are monitored regularly through:

- Monthly Safeguarding Team meetings

13.2 The effectiveness of the policy is evaluated through:

- Learner feedback;
- Monthly Safeguarding Team meetings;
- Review of the safeguarding policy and processes;
- Quality Improvement Plan;
- Ofsted inspection.

Appendix A

Safeguarding Organisation Chart

<u>Designated Safeguarding and Prevent Lead</u>	Hollie Warren Hollie@portlandtraining.co.uk
<u>Deputy Designated Safeguarding Lead</u>	Victoria Sendall Victoria.Sendall@portlandtraining.co.uk
<u>Safeguarding Representative</u>	Andy Ferguson Andy.Ferguson@portlandtraining.co.uk

Appendix B

Information Sharing for Safeguarding Purposes Guidance

- All staff are provided with training at induction and receive regular updates. All staff should be familiar with the signs of abuse.
- Safeguarding is the responsibility of everybody. If staff have any concerns that a learner is at risk of, or is being abused, they **MUST** report this.
- This also applies if staff have concerns that somebody is being bullied or is a Safeguarding risk due to other factors i.e. homelessness, exploitation, financial crisis, mental or physical health etc
- All Safeguarding concerns must be reported to a member of the Safeguarding team either face to face or by completing a Safeguarding Cause for Concern form.

If a learner tells you about possible or actual abuse:

You must:

- Stay calm and reassuring
- Listen, let the learner speak unprompted and take what the learner is saying very seriously
- Explain that you must involve other people and why
- Make a written record and then complete the SG Cause for Concern Form or SG Incident Form found of the Staff Portal

- Inform any designated member of Safeguarding Staff as soon as possible, or if in an emergency or there is a risk of serious or immediate harm, anyone can make a referral to Social Services or the police
- Speak to Safeguarding staff if you require support yourself

Do not:

- Promise to keep it confidential
- Make promises or reassurances you cannot keep
- Investigate further
- Keep the information to yourself

If the allegation of abuse is against a member of staff, inform the Designated Safeguarding Leads.

Prevent Strategy

Purpose

Portland Training's Prevent Strategy aims to create a safe and secure environment for all staff and learners, free from extremist views. The strategy is based on the organisations commitment to safeguarding and promoting the welfare of individuals, in line with statutory duties outlined in the Education Act 2002. It draws upon various government guidance documents and acts, including the Prevent Duty, Counter Terrorism and Security Act 2015, and Channel guidance.

Key aims

1. Promote, implement and monitor Portland Training's responsibilities under the Prevent Duty to all learners, staff, stakeholders and visitors.
2. Embed British values into the organisations procedures and curriculum.
3. Utilise this strategy, objectives, risk assessment and our action plan to achieve the Prevent Duty.
4. Foster Portland Training's ethos and values.
5. Promote inclusivity and engagement among different learner groups, breaking down segregation.
6. Ensure learner and staff safety.
7. Cultivate a culture of non-bullying, non-harassment, and non-discrimination.
8. Provide support and guidance to staff or learners at risk of radicalisation.
9. Raise awareness among learners and staff about their roles and responsibilities in preventing radicalisation and extremism.

Initiatives

1. Collaborate with relevant stakeholders, including, leaders, managers, police, local support agencies and prevent specialists to actively engage in preventing extremism.

2. Adhere to our policies and procedures, and risk assessments ensuring these are clear and visible for all.
3. Monitor staff and learner behaviour, including disclosures, online activity, changes in behaviour, reports from partner organisations and authorities.
4. Challenge and address any extremist views, discrimination or derogatory language.
5. Monitor and restrict internet access, in line with our policies and procedures to prevent the exposure to extremist material.
6. Stay updated with national priorities, current threats, and government guidance on preventing extremism and radicalisation.
7. Continue to monitor the effectiveness of our teaching approaches that build resilience to extremism, promote critical thinking skills and create a space for dialogue.
8. Continue to develop a positive sense of identity and reinforce citizenship, safeguarding, equality and diversity policies through teaching and learning activities.
9. Ensure all staff are equipped to recognise and challenge extremism through our learning centred approach. inclusive of mandatory, annual staff training pertaining to: Prevent in FE, Run, Hide, Tell and Awareness Counters Terrorism (ACT)
10. Ensure our Prevent Strategy remains embedded within Portland Training's ethos and promote safe and acceptable behaviour in relation to extremism and radicalisation.

By implementing these measures, Portland Training aims to create a secure environment that promotes tolerance, diversity, and well-being of its staff and learners while actively preventing extremism and radicalisation.

Preventing Extremism and Radicalisation Safeguarding Policy

Introduction

The Portland Training Company Limited ("Portland Training") is committed to providing a secure environment for all staff, visitors, volunteers and learners, where they feel safe and are kept safe. All staff at Portland Training recognise that safeguarding is everyone's responsibility irrespective of the role they undertake or whether their role has direct contact or responsibility for customers and learners or not. When operating this policy, Portland Training uses the following accepted Governmental definition of extremism which is:

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

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

In adhering to this policy and procedures staff, visitors, partners and suppliers will contribute to Portland Training's commitment to safeguard all staff, visitors, volunteers and learners.

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This Preventing Extremism and Radicalisation Safeguarding Policy is one element within Portland Training's overall arrangements to safeguard and promote the welfare of all in line with our statutory duties set out within the Education Act 2011.

Portland Training's Preventing Extremism and Radicalisation Safeguarding Policy also draws on:

- DfE Guidance "Keeping Children Safe in Education, September 2025"
- DfE's "Teaching Approaches that help Build Resilience to Extremism among Young People"
- Education and Training Foundation – Prevent for further education and training – complying with the Prevent Duty
- Counter Terrorism and Security Act 2015
- Channel guidance at Gov.uk
- Regional Prevent Coordinator routine updates

The full Government Prevent Strategy can be viewed at:

[Prevent duty guidance: England and Wales \(2023\) - GOV.UK](#)

There is no place for extremist views of any kind in Portland Training, whether from internal sources (customers, learners, staff, non – executives or associate tutors) or external sources (Portland Training's wider communities, external agencies or individuals). Our customers and learners see our programme environments (training, work place training, employability programmes) as a safe place where they can explore controversial issues safely and where our staff encourage and facilitate this – we have a duty to ensure this happens.

As an organisation we recognise that extremism and exposure to extremist materials and influences can lead to poor outcomes for all and so should be addressed as a safeguarding concern as set out in this policy. We also recognise that if we fail to challenge extremist views, we are failing to protect our customers and learners.

Extremists of all persuasions aim to develop destructive relationships between different communities by promoting division, fear and mistrust of others based on ignorance or prejudice and thereby limiting the life chances of young and vulnerable people.

Education is a powerful tool against this; equipping people with the knowledge, skills and critical thinking, to challenge and debate in an informed way.

At Portland Training we therefore aim to provide a broad and balanced curriculum, delivered by skilled professionals, so that our customers and learners are enriched, understand and become tolerant of difference and diversity and also to ensure that they thrive, feel valued and not marginalized.

Furthermore, at Portland Training we are also aware that young and vulnerable people can be exposed to extremist influences or prejudiced views from an early age which emanate from a variety of sources and media, including via the internet, and at times customers and

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learners may themselves reflect or display views that may be discriminatory, prejudiced or extremist, including using derogatory language.

Portland Training will be alert to changes in the circumstances of staff whereby they may be more vulnerable to the risk of radicalisation and will act swiftly where signs of radicalisation are displayed to ensure this does not cause risk to learners. Staff internet usage is monitored for staff as for learners and accessing or attempting to access sites known to be used by radical groups will be reported to senior management. Learning environments are monitored to ensure display material is appropriate and session content is observed frequently, ensuring learner guidance is clear and reduces the risk of radicalisation for the learners.

Any prejudice, discrimination or extremist views, including derogatory language, displayed by customers, learners or staff will always be challenged and where appropriate dealt with in line with Portland Training's Behaviour Policy as outlined in our learner handbook. Where misconduct by a member of staff either through Portland Training or one of its partners is proven the matter will be referred to the Police for their consideration as to whether to a further action is warranted.

Extremism, Radicalisation, Terrorism and the Prevent Agenda and Duty

The Government's Prevent Agenda is one of the four elements of CONTEST, the government's counter-terrorism strategy. The four elements are Pursue, Prevent, Protect and Prepare. CONTEST aims to stop people becoming terrorists or supporting terrorism.

The Government's Prevent strategy:

- Responds to the ideological challenge we face from terrorism and aspects of extremism, and the threat we face from those who promote these views.
- Provides practical help to prevent people from being drawn into terrorism and ensure they are given appropriate advice and support.
- Works with a wide range of sectors (including education, criminal justice, faith, charities, online and health) where there are risks of radicalisation that we need to deal with.

The strategy covers all forms of terrorism, including far right extremism and some aspects of non-violent extremism.

The Counterterrorism and Security Bill seeks to place a duty on specified authorities including schools, colleges and universities to 'have due regard, in the exercise of its functions, to the need to prevent people from being drawn into terrorism'.

Portland Training has developed a culture of safety and respect for its learners, staff, stakeholders and visitors. As part of this ethos Portland Training has considered the Prevent Duty and the importance of collaborative working between staff, local authorities, police, other educational institutions, policy makers and health providers to identify, detect and safeguard vulnerable people throughout the organisation.

The Prevent Duty

The Prevent Duty requires further education institutions to:

- Work in partnership with, and actively engage with Governors, Principals, managers and leaders, (from the community, mosques etc), and other partners including the police, local support agencies, Prevent staff and liaison officers. They will need to make sure that all have undertaken appropriate training or development and share information across relevant curriculum areas.
- Have clear and visible policies in place for both staff and learners with regard to risk assessment. This should also include policies for events that may take place by staff, learner, visitors, external bodies and community organisations. They will also need to be aware of places or areas of learning where learners/staff may be in contact with, or possibility to get involved with terrorism.
- Have sufficient support available for welfare and pastoral care according to the individual requirements of each institution. There will also have to be clear guidance and policies available to all on the use of prayer room and other faith-related facilities, and any issues that may occur from the use of these facilities.
- Have policies in place for the use of information technology on the premises and for the use of research in curriculum areas.

Objectives

- To promote, implement and monitor Portland Training's responsibilities under the Prevent Duty to all learners, staff, stakeholders, board members and visitors.
- To promote and embed British Values into the organisation's procedures and curriculum offer.
- To set a strategy, objectives and an action plan to achieve the Prevent Duty.
- To promote Portland Training's ethos and values.
- To break down segregation among different learner groups and to engage all learners in having a full and active role with wider engagement in society.
- To ensure learner and staff safety.
- To ensure that Portland Training promotes a culture of non-bullying, non-harassment and non-discrimination.
- To provide support for learners who may be at risk and develop appropriate sources of advice and guidance.
- To ensure that learners and staff are aware of their roles and responsibilities in preventing violent extremism and radicalisation.

Responsibilities

The Home Secretary's Strategic Policing Requirement sets out threats to national security, public safety, public order and public confidence that are of such gravity as to be of national importance, or can only be effectively countered by national policing capabilities.

These are:

- Terrorism
- Serious and organised crime (including the trafficking of drugs, people and firearms, organised illegal immigration, large-scale and high volume fraud and other financial

crimes, counterfeit goods, organised acquisitive crime and cyber-crime, most often for financial gain)

- A national cyber-security incident
- Threats to public order or safety that cannot be managed by one force alone
- Civil emergencies
- Child sexual abuse (whilst not a threat to national security, it is a threat of national importance).

British Values

Portland Training will ensure that all learners are aware of British Values, and these will be acknowledged and promoted throughout the course of learning. Democracy; Rule of Law; Individual Liberty; Mutual Respect for and tolerance of those with different faiths and beliefs and for those without faith, are fundamental to enable learners to succeed in their chosen course, in life and also at work, and acceptable behaviours will be monitored and reported on during the course.

Attendance at Prevent Regional Events

Portland Training are in receipt of regular updates from all regions Prevent Co-ordinators, Department for Education, cascading as appropriate.

- Current threats:
- Daesh Inspired Violence /Extreme Right Wing
- Lone actors
- Travel for extremist purposes
- Syria Returnees
- Online Extremism
- Al Muhajiroun (ALM)
- National Action

Awareness of national priorities which may affect ASF and other work-based learners outside the organisational base area.

- Portland's Designated Safeguarding Lead and Officers will monitor wider geographical threats and feed information to members of the SMT for dissemination to the delivery and support staff.
- Regular updates will be shared from the prevent lead, along with national government guidance in a timely manner.

As part of wider safeguarding responsibilities our staff will be alert to:

- Disclosures by customers and learners of their exposure to the extremist actions, views or materials of others outside of the training or programme environment, such as in their homes work places or community groups, especially where customers and learners have not actively sought these out.
- Graffiti symbols, writing or art work promoting extremist messages or images.
- Customers and learners accessing extremist material online, including through social networking sites.

- Parental, family or employer reports of changes in behaviour, friendship or actions and requests for assistance
- Partner organisations, local authority services, and police reports of issues affecting customers and learners in other settings
- Customers and learners voicing opinions drawn from extremist ideologies and narratives
- Use of extremist or 'hate' terms to exclude others or incite violence
- Intolerance of difference, whether secular or religious or, in line with our equalities policy, views based on, but not exclusive to, gender, disability, homophobia, race, colour or culture
- Attempts to impose extremist views or practices on others
- Anti-Western or Anti-British views

Social media

Learners, customers and staff access to our internet connection, regardless of location, is heavily restricted and monitored, using approved and kite marked systems and guidance provided by government. All use of our internet connection is logged and can be reviewed on request. Use of our internet connection is actively monitored for any customer, learner or staff member on request.

Portland Training will closely follow any locally agreed procedure as set out by the Local Authority and/or local Safeguarding Children Board's (LSCBs) agreed processes and criteria for safeguarding individuals vulnerable to extremism and radicalisation.

Teaching Approaches

We will all strive to eradicate the myths and assumptions that can lead to some young and vulnerable people becoming alienated and disempowered, especially where the narrow approaches some customers and learners may experience elsewhere may make it harder for them to challenge or question these radical influences. In our programmes this will be achieved by good teaching, promotion of citizenship, reinforcement of safeguarding and equality and diversity policies and through effective staff input.

In every programme there is a specific focus on preventing radicalisation and extremism through the following 1 or more of these integrated and embedded areas for free discussion, identified within the scheme of learning as 'Thematic Study Breaks':

- What is an extremist?
- What causes extremism? Free speech and right to religion
- Crime and Punishment
- Extremism lesson in Community Cohesion
- Peace and Conflict
- Religious Experience
- Fundamentalism

In addition to the above, Portland Training also adopts the methods outlined in the Government's guidance 'Teaching approaches that help build resilience to extremism among young (and vulnerable) people' DfE 2011.

We will ensure that all of our teaching approaches help our customers and learners build resilience to extremism and give them a positive sense of identity through the development of critical thinking skills. We will ensure that all of our staff and partners are equipped to recognize extremism and are skilled and confident enough to challenge it.

We will be flexible enough to adapt our teaching approaches, as appropriate, so as to address specific issues so as to become even more relevant to the current issues of extremism and radicalisation. In doing so we will follow 3 key principles:

- Making a connection with young and vulnerable people through good [teaching] design and a learning centred approach.
- Facilitating a 'safe space' for dialogue, and
- Equipping our customers and learners with the appropriate skills, knowledge and understanding and awareness of resilience.

Therefore this approach will be embedded within the ethos of our organisation so that Learners, customers, staff and partners know and understand what safe and acceptable behaviour is in the context of extremism and radicalisation. This will work in conjunction with Portland Training approach to the spiritual, moral, social and cultural development of learners and customers and will include the further promotion of this rounded development of our participants on all programmes.

Portland Training's goal is to build mutual respect and understanding and to promote the use of dialogue, not violence as a form of conflict resolution. We will achieve this by using a curriculum that includes:

- In depth induction onto all programmes including relevant Prevent support and guidance themes
- Open discussion and debate
- Work on anti-violence and a restorative approach addressed throughout curriculum
- Focussed training programmes
- Collaboration with stakeholders

We will also work with local partners, wider stakeholders and communities in our efforts to ensure our organisation understands and embraces our local context and values in challenging extremist views and to assist in the broadening of our participant's experiences and horizons. We will help support those who may be vulnerable to such influences as part of our wider safeguarding responsibilities and where we believe any learner or customer is being directly affected by extremist materials or influences we will ensure that that they are offered support. Additionally in such instances we will seek external support from the Local Authority and/or local partnership structures working to prevent extremism.

Portland Training will promote the values of democracy, the rule of law, individual liberty, mutual respect and tolerance for those with different faiths and beliefs. We will teach and encourage all participants to respect one another and to respect and tolerate difference, especially those of a different faith or no faith. It is indeed our most fundamental responsibility to keep our learners and customers safe and prepare them for life in modern multi-cultural Britain and globally.

Use of External Agencies, Partners and Speakers

At Portland Training we encourage the use of external agencies or speakers to enrich the experiences of our participants on all programmes; however we will positively vet those external agencies, individuals or speakers who we engage to provide such learning opportunities or experiences for our customers and learners, to ensure that we do not unwittingly use agencies, partners and suppliers that contradict each other with their messages or that are inconsistent with, or are in complete opposition to our values and ethos. Our organisation will therefore assess the suitability and effectiveness of input from external agencies or individuals to ensure that:

- Any messages communicated are consistent with the ethos of the organisation and do not marginalise any communities, groups or individuals
- Any messages do not seek to glorify criminal activity or violent extremism or seek to radicalise through extreme or narrow views of faith, religion or culture or other ideologies
- Activities are properly embedded in the curriculum and clearly mapped to schemes of work to avoid contradictory messages or duplication.
- Activities are matched to the needs of all participants
- Activities are carefully evaluated to ensure that they are effective

Whistle Blowing

Where there are concerns of extremism or radicalisation customers, learners, partners and staff will be encouraged to make use of our internal systems to Whistle Blow or raise any issue in confidence. Staff should use the Portland Training's Whistleblowing Policy which has been communicated through a number of linked policies and directly to all staff. Partners are also able to use this policy should the need arise.

Training

Whole organisation training will be organised for staff, partners and all non-executive directors on an annual basis and will comply with the prevailing arrangements agreed by the Local Authority and the Local Safeguarding Board.

The Designated Safeguarding Lead will attend training courses as necessary at least once every two years, again this will include training on extremism and radicalisation and its safeguarding implications.

Signposting safeguarding concerns related to radicalisation and extremism

- In the first instance, any concerns should be referred to a member of the Safeguarding Team;

- The Safeguarding Officer will meet with the customer or learner to discuss the concerns and make a professional judgement that is factually recorded about the appropriate course of action;
- If the Safeguarding Officer is satisfied that the customer or learner has not been radicalised and is not involved in extremist activities then any underlying issues (e.g. social isolation) will be dealt with in accordance with the safeguarding policy and where necessary external agencies will be informed by the Designated Safeguarding Lead.
- If the Safeguarding Officer, believes that the customer or learner is involved in radicalisation or extremist activities then they will refer the matter to the local channel panel, or the police.

CHANNEL Procedure

The Police Authority has a CHANNEL procedure in place.

The Police CHANNEL procedure is a partnership focused structure and is similar to existing, successful initiatives which aim to support individuals and protect them from harm - such as involvement in drug, knife or gun crime.

CHANNEL is about supporting those most at risk of being drawn into violent extremism is about diverting people away from potential threat at an early stage - which prevents them from being drawn into criminal activity.

Partnership involvement ensures that vulnerable individuals have access to a wide range of support from diversionary activities through to providing access to specific services such as education, housing and employment.

Each multi-agency panel varies according to local circumstances but partners (who are all signed up to an Information Sharing Protocol) can include:

- Statutory partners such as education, NHS, probation, housing and the police service
- Social Care Children's services (e.g. Common Assessment Framework co-ordinators)
- Youth offending services
- Credible and reliable members of the community

Portland Training will engage in the CHANNEL process as necessary and will contact the Prevent contact should it have any concerns about a learner, member of staff, Board Member or visitor.

Definitions

- An ideology is a set of beliefs.
- Radicalisation is the process by which a person comes to support terrorism and forms of extremism leading to terrorism.
- Safeguarding is the process of protecting vulnerable people, whether from crime, other forms of abuse or from being drawn into terrorism-related activity.

- Terrorism is an action that endangers or causes serious violence damage or disruption and is intended to influence the government or to intimidate the public and is made with the intention of advancing a political, religious or ideological cause.
- Vulnerability describes factors and characteristics associated with being susceptible to radicalisation.
- Extremism is the promotion or advancement of an ideology based on violence, hatred or intolerance, that aims to:
 - negate or destroy the fundamental rights and freedoms of others; or
 - undermine, overturn or replace the UK's system of liberal parliamentary democracy and democratic rights; or
 - intentionally create a permissive environment for others to achieve the results in (1) or (2).

The types of behaviour below are indicative of the kind of promotion or advancement which may be relevant to the definition, and are an important guide to its application. The further context can be sought in the following link.

The definition of extremism comes from the March 2024 Government update: [New definition of extremism \(2024\) - GOV.UK \(www.gov.uk\)](https://www.gov.uk/government/publications/new-definition-of-extremism-2024)

Useful links

National Prevent Strategy

https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/97976/prevention-strategyreview.pdf

National Channel Guidance

https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/118194/charitable-giving-guidance.pdf

Whistleblowing Policy

1. About this policy

1.1 We are committed to conducting our business with honesty and integrity and we expect all staff to maintain high standards. Any suspected wrongdoing should be reported as soon as possible.

1.2 This policy covers all employees, officers, consultants, contractors, volunteers, interns, casual workers and agency workers.

1.3 This policy does not form part of any employee's contract of employment and we may amend it at any time.

2. What is whistleblowing?

2.1 Whistleblowing is the reporting of suspected wrongdoing or dangers in relation to our activities. This includes bribery, facilitation of tax evasion, fraud or other criminal activity,

miscarriages of justice, health and safety risks, damage to the environment and any breach of legal or professional obligations.

3. How to raise a concern

3.1 We hope that in many cases you will be able to raise any concerns with your manager. However, where you prefer not to raise it with your manager for any reason, you should contact the Managing Director. Contact details are at the end of this policy.

3.2 We will arrange a meeting with you as soon as possible to discuss your concern. You may bring a colleague or union representative to any meetings under this policy. Your companion must respect the confidentiality of your disclosure and any subsequent investigation.

4. Procedure Part 1 - Qualifying Disclosures and Relevant Failures

4.1 Only certain disclosures are prescribed by law as 'qualifying disclosures'. These disclosures are protected if in your reasonable belief such disclosures are in the public interest. While a wide range of public interests are covered you are only protected where the act, about which you are concerned, falls within the range of qualifying disclosures summarised here. Disclosures are qualifying disclosures when made to an appropriate person (not "the media") and where it can be shown that the Company commits a 'relevant failure' by:

- (a) Committing a criminal offence
- (b) Failing to comply with a legal obligation
- (c) A miscarriage of justice
- (d) Endangering the health and safety of an individual
- (e) Environmental damage
- (f) Concealing any information relating to the above.

4.2 These acts can be in the past, present or future, so that, for example, a disclosure qualifies if it relates to environmental damage that has happened, is happening, or is likely to happen.

Part 2 – Steps You Should Take

4.3 If you so wish, you should in the first instance, report any concerns you may have to your manager in writing who will treat the matter with complete confidence. You will receive a response in writing. If you are not satisfied with the explanation or reason given to you, you should raise the matter with the appropriate organisation or body. The bodies ("prescribed persons") are set out in legislation.

4.4 If you have good reason to believe that you would suffer detriment by reporting your concerns to your manager then you should report them to a Director.

4.5 We will take every reasonable care to avoid revealing your identity and will not reveal your name to others without your permission.

4.6 Anyone who reveals your name without permission or victimises you for raising genuine concerns will be subject to disciplinary action.

4.7 If you have good reason to believe that you would suffer detriment by reporting your concerns to a Director then you may take them direct to the appropriate organisation or body.

5. Confidentiality

5.1 We hope that staff will feel able to voice whistleblowing concerns openly under this policy. Completely anonymous disclosures are difficult to investigate. If you want to raise your concern confidentially, we will make every effort to keep your identity secret and only reveal it where necessary to those involved in investigating your concern.

6. External disclosures

6.1 The aim of this policy is to provide an internal mechanism for reporting, investigating and remedying any wrong doing in the workplace. In most cases you should not find it necessary to alert anyone externally.

6.2 The law recognises that in some circumstances it may be appropriate for you to report your concerns to an external body such as a regulator. We strongly encourage you to seek advice before reporting a concern to anyone external. Protect operates a confidential helpline. Their contact details are at the end of this policy.

7. Protection and support for whistleblowers

7.1 We aim to encourage openness and will support whistleblowers who raise genuine concerns under this policy, even if they turn out to be mistaken.

7.2 Whistleblowers must not suffer any detrimental treatment as a result of raising a genuine concern. If you believe that you have suffered any such treatment, you should inform the director immediately. If the matter is not remedied you should raise it formally using our Grievance Procedure.

7.3 You must not threaten or retaliate against whistleblowers in any way. If you are involved in such conduct you may be subject to disciplinary action. In some cases the whistleblower could have a right to sue you personally for compensation in an employment tribunal.

7.4 However, if we conclude that a whistleblower has made false allegations maliciously, the whistleblower may be subject to disciplinary action.

7.5 Protect operates a confidential helpline. Their contact details are at the end of this policy.

8. Contacts

Managing Director – Portland Training

Hollie Warren

07427158632

hollie@portlandtraining.co.uk

Protect (Independent whistleblowing charity)

Helpline: 0203 117 2520

E-mail: whistle@pcaw.co.uk

Website: www.pcaw.co.uk

Freedom of Expression Policy

Policy Statement

Portland Training Recognises that 'Freedom of Expression' is a fundamental right under both British and European Law. The right to express views and ideas freely, without fear of interference or persecution, is an essential part of democracy. Respectful debate and conversation helps us challenge discrimination, get rid of intolerance and harmful attitudes, and build strong, positive communities. The company will endeavour to promote learner's and employee's rights of expression tempered by our responsibilities to prevent violence, radicalisation, abuse, and discrimination.

Article 10 of the European Convention on Human Rights is a qualified, not an absolute right which means that the rights of the individual must be balanced against the interests of society. Article 10 allows for restrictions to be placed for specific purposes.

Purpose

Portland Training's responsibilities to promote freedom of expression and the circumstances in which freedom of expression may be legally limited.

Section 43 of the Education (No 2) Act 1986, places a positive duty on Further and Higher Education establishments to ensure that freedom of speech within the law is secured for learners and employees and for visiting speakers.

As an Independent Training Provider (ITP), we are expected to allow open debating of challenging ideas. Any controversial materials used, or ideas expressed should be challenged by employees, especially regarding radicalisation, promotion of hate, discrimination of individuals or groups protected under the Equality Act 2010.

This policy relates to both virtual and face to face activities.

Policy Implementation

British Values

Portland Training has a duty to promote fundamental British values. These are: i. democracy
ii. the rule of law iii. individual liberty iv. mutual respect v. tolerance of those of different faiths
and beliefs

Prevent Duty (see also Prevent Strategy and Safeguarding and Prevent Policy)

As both prime and a subcontractor for partner organisations the company has statutory duties under the Counter Terrorism and Security Act 2015, to prevent people from being drawn into terrorism.

Limitation to rights of expression

Freedom of expression does not protect statements that unlawfully discriminate against or harass, or incite violence or hatred against, other persons and groups, particularly by reference to their race, religious belief, gender or sexual orientation, nor does it limit or undermine the human rights of others. Portland Training, its employees, contractors, and learners must have due regard to the need to promote good relations between different communities protected by equality law. This may require the company, its employees, contractors, and learners to actively challenge the use of offensive communication and hate speech. Hate speech is generally understood to describe forms of expression which incite violence, hatred or discrimination against other persons and groups, particularly by reference to their ethnicity, religious belief, gender or sexual orientation, language, national origin or immigration status. Under The Equality Act 2010, Portland Training has a duty to have due regard to the need to:

- Eliminate unlawful discrimination, harassment and victimisation and other prohibited conduct
- Advance equality of opportunity between people of different groups

External Speakers and Events

Portland Training is subject to regulation by Ofsted and legislation and statutory guidance relating to safeguarding children and vulnerable adults and advancing equality of opportunity. Whilst Portland Training will always endeavour to promote Freedom of Expression, we reserve the right to monitor any activity associated within our delivery, on its premises or elsewhere, to ensure that it supports our values and behaviours. Prevent Duty requires that the company has oversight of the content of any speeches or presentations by visiting speakers. Organisers of a visiting speaker presentation should complete a risk assessment with the Health & Safety Officer which will include any concerns re content of presentations. This risk assessment must be approved by the Lead Safeguarding Officer. While challenging and controversial content can be allowed, Portland Training is responsible for ensuring that such views are challenged during a presentation. This may necessitate the presence of a Portland Training employee at any such presentation, who has a right to halt the presentation at any time.

Responsibilities

All employees and contractors and learners within Portland Training have a responsibility to uphold the commitments in this policy, to promote freedom of expression whilst challenging offensive and discriminate behaviour whilst adhering to the Preventing Extremism and Radicalisation Safeguarding Policy.

Other responsibilities include:

- **Managers** – responsible for implementing, communicating and explaining this policy to employees and contractors; for taking positive action to prevent violence, discrimination and radicalisation, ensuring incidents are reported and satisfactory solutions are applied; for addressing incidents promptly and making referrals where necessary.
- **Managing Director** – responsible for supporting managers and Safeguarding Team in dealing with challenging behaviours and ensuring that risks are effectively assessed, and incidents appropriately escalated.

Monitoring and Review

The policy will be regularly monitored by the Managing Director and HR Officer to ensure that it is achieving its aims and that managers and employees are confident about its application through consultation and case reviews.

This policy will be reviewed annually to ensure it continues to meet current legislative requirements, adopts emerging best practice, and continues to be effective and relevant to the wider business. The Managing Director and HR Officer will report back to the Board on the performance of the policy with recommendations for improvement if required.

e-Safety and Social Media Policy

Portland Training is committed to the availability of digital technology in order to enhance the learning experience. However, with these new technologies (particularly internet based) comes risks associated with invasion of privacy, cybercrime and safeguarding/prevent issues, we are committed to keeping learners, staff and customers safe online. Please refer to our E-Safety and social media Policy and Acceptable Use of IT Policy.

Learner Code of Conduct Policy

Purpose

Portland Training is committed to delivering a high-quality learning experience that supports every learner in successfully achieving their qualification. This policy outlines the standards of behaviour expected from all learners and the responsibilities they share in creating a respectful, inclusive, and productive learning environment.

Training Expectations

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As a learner at Portland Training, you are required to:

- **Participate fully in the induction process**, including completing all enrolment paperwork and initial assessments.
- **Agree to a Learning Plan** that sets out your goals, timelines, and the support you will receive from Portland Training.
- **Work to agreed timescales and objectives**, including submitting assignments and coursework by the deadlines. If you are unable to attend a planned session or submit work on time, you must inform your tutor as soon as possible.
- **Attend all scheduled tutor sessions and reviews**, and proactively offer alternative dates if you are unavailable for any planned sessions.

Unacceptable Conduct

The following behaviours are considered unacceptable and may result in disciplinary action:

- **Refusing to work or co-operate** with Portland Training staff, or engaging in behaviour that disrupts the learning of others.
- **Abusing staff or learners**, whether verbally or physically, or attempting to influence others to conform to personal beliefs or values in a coercive or inappropriate manner.
- **Behaving in a way that demeans, demoralizes, or endangers others**, including any form of harassment, bullying, or discrimination.

Maintaining a Positive Learning Environment

All learners are expected to:

- Treat others with respect and courtesy, regardless of background, identity, or opinion.
- Communicate in a professional and constructive manner, both in person and online.
- Take responsibility for their own learning and behaviour, and contribute positively to the learning community.

Consequences of Misconduct

Failure to adhere to this Code of Conduct may result in:

- Notification to any referrer (e.g. JCP)
- Temporary suspension from training
- Permanent exclusion from the course
- Referral to external authorities if necessary

Acknowledgment

All learners will be asked to sign a declaration confirming they have read, understood, and agree to abide by this Code of Conduct as part of the enrolment process.

Anti-Slavery and Human Trafficking Policy

1. Policy Statement

Portland Training are committed to preventing modern slavery and human trafficking in all aspects of our adult education provision. We operate a zero-tolerance approach to slavery and exploitation and uphold the principles of the Modern Slavery Act 2015.

2. Scope

This policy applies to:

- All staff, volunteers, contractors, and suppliers
- Learners and service users
- Any third-party partnerships or agencies involved in our provision

3. Our Commitments

- Ensure all recruitment practices are fair, transparent, and compliant with UK employment law.
- Conduct due diligence on suppliers and contractors to assess risks of modern slavery.
- Provide training to staff on identifying and reporting signs of exploitation.
- Promote awareness among learners about their rights and support services.

4. Risk Assessment and Due Diligence

We will:

- Regularly assess risks in our supply chain and service delivery.
- Require suppliers to confirm compliance with anti-slavery legislation.
- Monitor working conditions and employment practices across our provision.

5. Reporting and Whistleblowing

Any concerns about modern slavery or human trafficking can be reported confidentially through our safeguarding lead or designated whistleblowing channels. We ensure protection from retaliation for whistleblowers.

6. Training and Awareness

We will:

- Provide annual training for staff on modern slavery awareness.
- Share resources with learners to help them recognize and report exploitation.
- Collaborate with local agencies and charities to support victims.