

Safeguarding & Child Protection Policy with COVID Addendum

This policy relates to Let Me Play Ltd which trades as LMP Education, Inspire ATA Ltd and LMP Action C.I.C, known as “LMP Group” or “The Company”. The policy applies to all three companies and is the standard by which we adhere to.

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Purpose

The purpose of this policy is to ensure that all parties are aware of and understand their responsibility towards creating and contributing to our culture of concern towards safeguarding. This includes: -

- To protect children, young people, vulnerable adults, and learners who may be at risk of harm. This also includes adults who use the LMP Group’s services.
- To provide employees and volunteers, as well as children and young people and their families, with the overarching principles that guide our approach to child protection and safeguarding.
- This policy applies to anyone working on behalf of LMP Group, including senior managers, the Advisory Board, employees, volunteers, sessional workers, agency employees and learners.

- For the purposes of this Safeguarding Policy, a child or young person refers to an individual under the age of 18. Consideration is also given to a participant who is over 18 and may be identified as a vulnerable adult.

Legal Framework

This policy has been written based on legislation, policy and guidance that seeks to protect those who are part of, delivering, visiting, or using service within the LMP Group. Below is a summary of the key legislation.

- **Working together to safeguard children 2023 (Government Website)**
<https://www.gov.uk/government/publications/working-together-to-safeguard-children--2>
- **Keeping children safe in education 2023 (Government Website)**
<https://www.gov.uk/government/publications/keeping-children-safe-in-education--2>
- **Prevent (Government Website)**
<https://www.gov.uk/government/publications/prevent-duty-guidance>

Our safeguarding policy also has the following legislation incorporated into the policy:

- **The Children Act 1989 guidance and regulations (Government Website)**
https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/1000549/The_Children_Act_1989_guidance_and_regulations_Volume_2_care_planning_placement_and_case_review.pdf
- **What to do if you're worried a child is being abused (Government Website)**
https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/419604/What_to_do_if_you_re_worried_a_child_is_being_abused.pdf

Introduction

Every person that takes part in the Company's activities should be able to do so in an environment where they are safe and protected from risk of harm. Child protection is of paramount importance to all at LMP Group.

1. LMP Group's Child Protection Statement

This Safeguarding Policy applies to all LMP Group's employees, sub-contractors, associates, and volunteers who come into contact with learners and children/young people in any setting organised by or held under the authority of and/or any other body affiliated, or representative of the LMP Group. As part of the LMP Group's commitment to best practice in the care of young people and adults, LMP Group expects all employees to comply with the Policy and the regulations contained within it. For the purposes of this Safeguarding Policy, a child or young person refers to an individual under the age of 18. Consideration is also given to a participant who is over 18 and may be identified as a vulnerable adult.

LMP Group believes:

- That the safety and welfare of children, young people and vulnerable adults should always be of paramount importance, whatever the circumstances.

- That everyone who has a role in working with children, young people, learners and vulnerable adults has a moral, and a legal responsibility, to safeguard and promote an individual's welfare, particularly when it comes to protecting from abuse.
- That special care is needed in dealing with children, young people, learners and vulnerable adults whose age, inexperience or mental/physical state makes them particularly vulnerable to abuse.

LMP Group has therefore adopted this Safeguarding Policy to ensure that the welfare and safety of children, young people, learners, vulnerable adults, and employees is always a primary consideration.

The LMP Group 'Culture of Concern' follows the six principles of safeguarding:

1. **Empowerment** – Being supported and encouraged to make own decisions and informed consent.
2. **Prevention** – It is better to act before harm occurs.
3. **Proportionality** - The least intrusive response appropriate to the risk presented.
4. **Protection** – Support and representation for those in greater need.
5. **Partnership** – Forming partnerships with local communities to support playing a part in preventing, detecting, and reporting concerns.
6. **Accountability** – Accountability and transparency in safeguarding practice.






Safeguarding is the term used to ensure measures are in place to prevent harm, and child protection is the way in which response is provided when harm has taken place.

At LMP Group we ensure children, young people, learners, vulnerable adults, employees, and visitors are safe by:

- Adopting the safeguarding policy and understanding the procedures and guidelines in place.
- Respecting, listening, and valuing the information that maybe shared. The Children Act 1989 (as amended by The Children Act 2004) states that anyone who is involved in the care of children should "do what is reasonable in the circumstances for the purpose of safeguarding or promoting the child's welfare".
- Ensuring there is a robust safer recruitment process, to include all the necessary suitability checks.
- Information sharing with relevant employees, partners and agencies when required. Always considering confidentiality.
- Employees' training is a key focus from the onboarding of new LMP Group employees, continuing with awareness and ongoing CPD opportunities. All LMP Group employees have responsibilities to ensure they are up to date with their training.
- Monitor and manage concerns raised or incidents that occur with the support of the Head of Safeguarding and Designated Safeguarding Officers.

2. Key Contacts

LMP Group is committed to providing an environment where all parties can feel safe in our culture of concern. As part of our duty of care we have a nominated designated safeguarding lead and divisional designated safeguarding officers to support the safeguarding processes.

 LMP GROUP LMP Group – Head of Safeguarding Anita de Villiers 07589 902 111 safeguarding@lmp-group.co.uk Anita@lmp-group.co.uk		
LMP Divisional Safeguarding Network		
 LMP EDUCATION	 LMP ACTION <small>COMMUNITY INTEREST COMPANY</small>	 INSPIRE ATA <small>APPRENTICESHIPS</small>
<p>DSO Jacob Salt-Berryman 07746 315 682</p> <p>Operations Managers - Apprentices Deb Camozzi - 07874 067686 Nicky Steele – 07355 330240 Tracey Hilton – 07751 597071 Karen Livsey – 07519 791580</p> <p>Operations Director - Lisa Kilgallon</p> <p>AEB Jubair Miah 07707 116589</p> <p>Sales Mark Pearce 07713 244780</p>	<p>DSO LMP Action – Bev Emmett 07756 632 401</p> <p>LMP Action – Lauren Macey 07874 837 993</p> <p>LMP Action HAF/Camps – Natalie Glasby 07931 401 450</p> <p>LMP Action HAF/Camps – Lou Lear 07923 892 396</p>	<p>DSO Jules Williamson 07845 822 464</p> <p>Emily Nicholson 07547 156 784</p> <p>Jonathan Mvita 07562 770 708</p> <p>Kirsty Haden-Collier 07927 565 834</p> <p>Klaudia Kubajewska 07873 402 073</p> 

For good governance, the Head of Safeguarding will always have a direct point of contact on the Group’s Advisory Board, and it is this nominated Advisory Board Member that will take responsibility to understand our processes and practices and to offer challenge and scrutiny, and to further advise on how we can do things better.

3. Scope

LMP Group’s priority is to ensure the safety and protection of all its learners, children and young people, employees, and tutors taking part in direct provision or by contractors. All LMP Group employees have a duty to safeguard learners and participants in any activity. They have a duty to be alert to signs of abuse and act where abuse is reported or there has been a safeguarding concern or incident. LMP Group has developed its own policy which follows the most up to date government guidance in the **Working Together to Safeguarding Children** and **Keeping Children Safe in Education** documents (see above links to these documents).

Definition of Terms	
Children & Young People	Anyone under the age of 18 years
Adults at Risk	Anyone over the age of 18 who is: <ul style="list-style-type: none"> • In need of community care services • Unable to care for themselves • Unable to protect themselves against significant harm or exploitation. • Has a physical or sensory disability • Is physically frail or has a chronic illness • Has a mental illness or dementia • Has a learning difficulty

	<ul style="list-style-type: none"> • Miss-uses drugs and/or alcohol • Has social and/or emotional issues • Exhibits challenging behaviours
Employees	Anyone working for, or on behalf of LMP Group – whether paid or voluntary
Child Protection and Safeguarding	The process of protecting children, young people, and vulnerable adults from abuse: preventing impairment of individuals health and development, and ensuring they are learning in a safe and effective environment.
Learners	Individuals of any age who attend a LMP Group course, provision, or training programme.

4. Statement of Policy

LMP will provide guidance to all employees, contractors, and volunteers to ensure robust procedures are in place to cover the points outlined below. We will closely monitor compliance for children, young people, learners, and vulnerable adults in the following areas:

- Promote the Health, Safety and Welfare providing opportunities for them to undertake their training safely.
- Respect and promote the rights, wishes and feelings.
- Promote and implement appropriate procedures to safeguard the well-being.
- Protect from abuse.
- Employees are aware of how to instruct how to be safe online.
- Employees are given awareness to recognise signs of extremism and radicalisation including how to raise concerns.
- Recruit, train, and support employees to adopt good practice to safeguard and protect from abuse and to minimise the risk to themselves.
- Ensure staff are aware of the low-level concerns policy and the importance of reporting low level concerns.
- Respond to any allegations of misconduct or abuse in line with this guidance document and the procedures set within as well as implementing, where appropriate, the relevant disciplinary and appeals procedures. Ensure, thorough safer recruitment and selection processes, DBS checks and references that refer to candidates' suitability to have substantial access to children, young people, learners, and vulnerable adults are taken up for all appropriate posts.
- Deal with complaints of abuse, harassment and bullying promptly, sensitively, and confidentially and where appropriate to share this information in line with this policy.
- Provide an environment where employees and participants/learners are safe and confident.
- Ensure education establishments, contractors and employers' premises comply with health and safety regulations as outlined by the LMP Group's Health and Safety policy.
- Ensure learners receive a full induction and understand the Safeguarding Policy, awareness of responsibility to KCSIE Part 1 and how to seek help if there is a concern.
- Review and evaluate this policy annually or should an update be required, including any updates on policies (internally and externally) regularly.

5. Communication

This policy will be issued to all employees on commencement of their employment with the LMP Group. Employees should refer to the latest copy of the policy (stored in the relevant Safeguarding folder on MS Teams). Employees will also be issued this policy following completion of the LMP Group's Safeguarding Induction, along with a copy of the latest KCSIE Part One. The policy can also be accessed via the LMP Group's website [[Key Policies - LMP \(lmp-group.co.uk\)](https://www.lmp-group.co.uk)]

6. Safer Recruitment

LMP Group undertake a range of safer recruitment practises during the recruitment process. As part of SEG, the recruitment follows enhanced processes. This includes: -

- Advertising
 - A link is placed on all advertisements to advise applicants of LMP Group's commitment towards safeguarding and promoting the welfare of children, including an overview of the checks that will be made if successful in the application.
 - Job descriptions include safeguarding responsibilities.
- Application Forms
 - LMP Group require a current CV along with an application form, for all posts that involve regulated activity.
- Shortlisting
 - Carrying out an online search as part of diligence, which may support identifying any incidents or issues that are publicly available online, which may require a discussion with the applicant.
- Pre-appointment vetting checks & DBS
 - Confirmation in an interview of employment history. Noting any breaks in the history.
 - Two suitable reference checks
 - Enhanced DBS or confirmation of Enhanced DBS if on the update service for anyone who is working within regulated activity.
 - Right to work in the UK

All information on LMP Group staff can be found in the internal platform Bamboo HR and held in the SCR (Single Central Record).

Training for all LMP Group staff will be carried out in line with the company's training requirements towards Safeguarding.

7. Roles and Responsibilities

LMP Group have a culture of concern - safeguarding is everyone's responsibility. This is led by the Senior Executive Board (SEB) members. LMP Group have a designated Safeguarding & Health & Safety Manager, whose role is to:

- Actively promote the consistent use of this safeguarding policy and these guidelines across LMP Group and sub-contractors.
- Act as a professional adviser for LMP employees on the protection of children, young people, learners, and vulnerable adults.
- Ensure that any necessary local training is provided, along with awareness of 'Hot Topics' and national trends.
- Provide and arrange for support of employees, and others on how to follow these guidelines and procedures.
- Contribute to the ongoing review of this policy and guidance to procedures, along with the identification of associated training needs.
- Ensure that all incidents are reported to the SEB.
- Produce a monthly report to the SEB outlining themes, instances, trends and actions to ensure the SEB are kept up to date and can act on the information provided accordingly.
- Produce an executive summary report which is published to the Advisory Board.
- Retain a central record (Safeguarding Log) of all incidents and allegations including records of the actions taken.
- Ensure copies of reports and notes will be always kept secure but will be shared in accordance with LMP Group's Confidentiality Policy.

- Be aware of locality of LMP Group employees, learners, and employers to support local awareness.

LMP employees also have responsibilities towards maintaining the culture of concern regarding safeguarding, including:

- Having a responsibility to protect children, young people, learners, and vulnerable adults. *They are not responsible for deciding whether abuse is taking place.*
- Being aware of this policy, LMP Group's Health & Safety policy and the LMP Group's Equal Opportunities Policy.
- Attending appropriate safeguarding training every 2 years if their role involves regular access to children, young people, or vulnerable adults. This training will form part of the overall employees training plan managed by the Head of People & Talent.
- Should NOT begin any unsupervised activity involving substantial access to children, young people, learners, or vulnerable adults prior to LMP Group carrying out our safer recruitment process and receiving a satisfactory return of a DBS check.
- Being aware of appropriate and inappropriate behaviour for employees in charge of children, young people, vulnerable adults, or learners.
- Know who the DSL and DSOs are as referred to at the start of this policy, as well as where to find this information relating to safeguarding & prevent can be found. (LMP Group's website & Safeguarding Teams folder).
- Having a responsibility to inform the departmental DSO or DSL of any concerns, signs or allegations of abuse, incidents or well-being concerns using the LMP Group referral process.
- Have a responsibility to highlight any concerns or risks to the safeguarding and protection of children, young people, learners, and vulnerable adults.

8. Employee Training

All LMP Group employees will be required to complete appropriate training, regardless of their role and responsibilities. The level of on-going training will be in accordance with the responsibility of the post.

For new employees training is provided at 'Induction', followed by a specific 'Introduction to Safeguarding' training session. This session provides an overview of how LMP Group continue to develop the culture of concern towards safeguarding. This induction includes:

- Safeguarding overview – including key staff contacts and including 'Whistleblowing' & Low-Level Concerns.
- Statutory & advisory guidance documents including:
 - Keeping Children Safe in Education (KCSIE 2023)
- Forms of Abuse – Overview included of Harmful Sexual Behaviours
- Staying Safe Online
- Awareness of Extremism and Radicalisation
- Mental Health
- British Values, Equality and Diversity
- Safeguarding Data
- Impact on Learners
- How to Report a Concern

All LMP Group staff also complete additional CPD via the Education & Training Foundation (ETF) programmes: -

- Side by Side – British Values
- Side by Side – Who you can trust
- Side by Side – Staying Safe online
- Side by Side – Radicalisation & Extremism

- WRAP – Workshop to Raise Awareness of Prevent

The LMP Group Safeguarding Induction is completed by new employees, with refresher training for existing staff taking place from September each year. LMP Group support contractors by offering the opportunity to complete the training, to support their own development and awareness.

LMP Group employees attend a weekly 'Hot Topic' session. This helps to ensure a national approach, giving awareness of relevant trends across the country. There are also sections in the LMP Group's internal employees' newsletter, as well as in the learner newsletter with relevant safeguarding & Prevent topics.

The information shared via the weekly Hot Topics is disseminated to learners and where appropriate to employers during sessions. Resources are kept in the Safeguarding Teams folder to ensure LMP Group employees always have access to it.

9. Recognising Signs of Abuse

It needs to be understood that the term '**abuse**' can be subject to wide interpretation. The starting point for a definition is the following statement:

'Abuse is a violation of an individual's human and civil rights by any other person or persons.'

Abuse may consist of a single act or repeated acts; it may be physical, verbal, or psychological. It may be an act of neglect or an omission to act, or it may occur when a vulnerable person is persuaded to enter a financial or sexual transaction to which he/she/they has not consented or cannot consent. Abuse can occur in any relationship and may result in significant harm to, or exploitation of, the person subjected to it.

Below are examples of safeguarding areas of concern:

- Bullying including cyberbullying - [Click Here](#)
- Child sexual exploitation - [Click Here - page 8](#)
- Contextual safeguarding - [Click Here](#)
- Criminal child exploitation - county lines - [Click Here](#)
- Domestic violence/abuse - [Click Here](#)
- Drug abuse/misuse - [Click Here](#)
- Fabricated or induced illness - [Click Here](#)
- Faith abuse - [Click Here](#)
- Female genital mutilation – [Click Here](#)
- Financial abuse - [Click Here](#)
- Forced marriage - [Click Here](#)
- Gangs and youth violence - [Click Here](#)
- Gambling - [Click Here](#)
- Gender-based Violence (GBV) - [Click Here](#)
- Homelessness - [Click Here](#)
- Mental health - [Click Here](#)
- Mental Health 2 - [Click Here - Young Persons](#)
- Modern day slavery - [Click Here](#)
- Parental alienation - [Click Here](#)
- Peer on peer abuse - [Click Here](#)
- Physical abuse - [Click Here - Page 10](#)
- Prevent & radicalisation - [Click Here](#)
- Psychological abuse - [Click Here - Pages 11, 14, 24](#)
- Online safety - [Click Here](#)

- Online safety – sharing content & sexting - [Click Here](#)
- Run, Hide & Tell - [Click Here](#)
- Sexual violence & sexual harassment between children in schools & colleges* - [Click Here](#)
- Sexual harassment - [Click Here](#)
- Honour-based Violence (HBV) - [Click Here](#)
- Substance misuse – [Click Here](#)
- Trafficking - [Click Here](#)
- Up-skirting - [Click Here](#)
- Verbal abuse - [Click Here - Pages 103 & 150](#)
- Violence against women and girls (VAWG) - [Click Here](#)

*' Part of the statutory KCSIE23 guidance.

Any or all these types of abuse may be perpetrated as the result of deliberate intent, negligence, or ignorance. LMP Group employees are provided with a copy of 'Keeping Children Safe in Education Part One' which includes 'Sexual Violence and Sexual Harassment between Children in Schools and Colleges' to support their knowledge on types, areas of concerns, signs, and symptoms of abuse.

10. Raising, Recording and Monitoring a Referral

When a concern or incident raised requires reporting, LMP Group have two ways to report concerns, this includes MyConcern an online system and a QR code process, both allow a referral to be made directly to the DSL. Depending on how the concern has been raised it is important that best practice is followed when a disclosure is made:

- React calmly so as not to frighten the child, young person, learner, or vulnerable adult.
- Listen to the child, young person, learner, or vulnerable adult.
- Empathise with the individual and show that you believe them.
- Tell the child, young person, vulnerable adult, or learner that he/she/they is not to blame and that he/she/they was right to tell.
- Take the information seriously, recognising the difficulties in interpreting what a child, young person, vulnerable adult, or learner says.
- Always avoid projecting your own reactions.
- Keep questioning to a minimum to ensure clear and accurate understanding of what has been said.
- Listen but do not probe, speculate, or ask for additional information.
- Use open-ended and non-leading questions. Good examples include *who, what, why, when and tell me, explain to me, describe to me.*
- Do not introduce personal information from your own experiences.
- Reassure the child, young person, vulnerable adult, or learner.
- Do not approach an alleged abuser.
- Do not guarantee confidentiality.
- Make the individual aware that the information shared will be passed on to the DSL.

Reporting a concern or incident

The referral process is open to all persons regardless of connection to LMP Group. LMP Group have adopted MyConcern, online software to support the reporting and recording of any concerns. Internal staff have a log in for MyConcern, which allows a referral to be made. For new staff an account is issued once the Safeguarding Induction has been completed. Existing staff will have an account created by the DSL. There will be ongoing training open to all users on MyConcern.

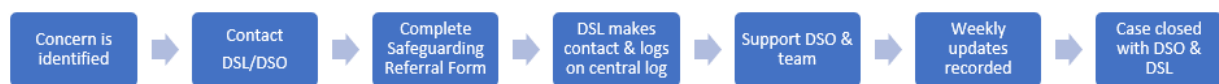
To report a concern or incident, the user will log into the MyConcern platform, completing the relevant boxes with the information required detail. A notification will be sent to the safeguarding

email address, allowing the DSL to triage the concern, allocating a case owner, confirming the risk, and contenting with the person who made the concern, and putting in place relevant interventions.

The DSL will clarify the basic facts to establish whether there is a reasonable cause to suspect or believe that misconduct has occurred. If the basic facts support a suspicion of misconduct by an employee, the matter will be dealt with in accordance with the allegations against employees, with the understanding that there may be the need to also engage disciplinary procedures.

[Click Here](#)

The below process is followed once a referral has been raised:



Allegation against an employee

When reporting an allegation, the DSL should be informed immediately. In the event of the allegation being related to a DSL or Company Director, the employee should contact the LADO directly.

The DSL will contact the Local Authority Designated Officer (LADO) **immediately** for advice and if the employee should be suspended. Notification of the suspension and reasons will be conveyed in writing to the employee in accordance with LMP Group disciplinary procedures.

There will be no internal investigation before interaction with the LADO and LMP will act accordingly on the advice provided.

Low-level Concerns

LMP Group have a Low-Level concern policy, which supports any concern, no matter how small, that needs to be raised, regarding an adult working within the LMP Group. This could be as an example: -

- Is inconsistent with the LMP Group policy & procedures.
- It does not meet the allegations threshold or considered serious enough to refer to LADO.

Examples of low-level concerns could be: -

- × Being over friendly with a child or learner.
- × Having favourites.
- × Engaging with a child or learner on a one-to-one basis behind closed doors or arranging to meet out of hours, for social purposes.
- × Offering to support financially.
- × Using inappropriate sexualised, intimidating, or offensive language.

Reporting Low-level concerns should be done, by following LMP Group's safeguarding reporting process, using MyConcern. The full policy can be downloaded here [[LMP Group Policies](#)]

11. Safe Learner Environment

LMP Group and its contractors will ensure all learners are briefed and supported in all areas of the following stages:

- Induction – Safeguarding awareness is completed.
- Progression – Reviews will include Hot Topics which can cover Safeguarding, Health & Safety, Equality, Inclusion and Diversity and Prevent.
- The safe learning environment.
- Change in circumstances (examples) return to training, centre, new work placement, new employer, new role, new work area/practice, or new learning activity.

Prior to a learning activity or placement, LMP Group will consider the following inputs:

- **Environments** – This means that the learner/employee's member should be accommodated in a safe, healthy, and supportive learning environment. When they start in their learning/work environment they should be made to feel welcome.
- **Initial Assessment** – All learners/employees must have identified their health, safety and welfare needs and any additional help or support that they may require.
- **Individual Learning Plan where appropriate** – The results of the initial assessment should be used to develop an individual learning plan which must include the learner's initial and on-going health, safety, and welfare training needs.
- **Supervision** – Supervision levels must be appropriate to the risks identified and the individual's capability, needs and experience.

A safe learner will be able to demonstrate the following:

- **Hazard awareness** – Safe learners will be aware of hazards within their environment, their activities and the work being carried out around them and their responsibilities to others.
- **Understanding** – Safe learners will understand the concepts of hazard and the risk measures that are required to control risks.
- **Confidence** – Safe learners will be confident, not only in their ability to learn and work safely, but also to challenge any situation or instruction that could be unsafe to them or other people. Safe learners will know their limitations and when to seek further advice.
- **Safe set of behaviours** – Safe learners will have developed a safe set of behaviours to enable them to play an active part in the learning process and acquire practical, value-added, and transferable skills from their experience.

External Speakers Process

Time to time there will be a requirement to have external speakers or trainers' complete sessions to support further learning. LMP Group, have in place an 'External Speakers Policy', this also includes a requirement for a checklist/risk assessment to be completed prior to the session going ahead.

All external speakers/trainers will also be provided with a copy of the External Speakers Code of Conduct. The code of conduct exists to ensure that all speakers taking part in an event or activity facilitated via LMP Group and its subcontractors, act in accordance with the External Speaker Policy.

It is the responsibility of the staff organiser to ensure:

- This Code of Conduct is communicated to all external speakers.
- That all reasonable steps are taken to ensure the requirements within it are upheld during the running of the event or activity.
- Delivery content has been checked in advance of any learner interaction.
- The speaker has read and understood the External Speaker Policy, and approach to the Prevent Duty (as outlined within the Safeguarding and Prevent Policy).
- Any possible learner contact has been vetted in accordance with KCSiE, and current Safeguarding policies and procedures.

Conduct - All external speakers must act in accordance with the law and not to discriminate against or infringe the rights and freedoms of others.

Head of Safeguarding will confirm along with the risk assessment the suitability of the speaker/trainer. This will be recorded as a profile in MyConcern.

12. Online Strategy

LMP Group deliver qualifications, accredited vocational qualifications, and life skills courses to learners via three categories:

- Face-to-face learning
- Remote learning
- Remote learning alongside face-to-face learning

Remote learning

All learners will work towards their qualification from the workplace or home. The course curriculum has been devised to allow learners the option to attend sessions remotely. This will be delivered as a tutor/coach lead session, or a pre-recorded session supported with independent learning. There is also a consideration of the requirements of the course content.

LMP Group will:

- Teach planned and well sequenced remote education and training programmes to give learners the best chance to build their knowledge and skills.
- Use a range of platforms and technology such as Zoom & Teams, with live streamed lessons with tutor interaction, recorded lessons, workbooks and direct support through email, post, and phone.
- Have systems in place to check attendance and put systems in place for persistent non-attendance or lack of engagement with remote learning.
- Undertake regular scheduled assessments to manage and track progress.
- Regularly communicate with learners through the online platforms used including Smart Assessor as example, information will also be shared through employer or placement updates.
- Ensure learners who are considered vulnerable or have special educational needs are provided with relevant and accessible topics and activities and are supported in their learning. Will be identified where needed to the Group Safeguarding & Health & Safety Manager.
- LMP staff will ensure backgrounds are suitable and cameras are turned on, to display a above the shoulder view.
- Our Quality Manager, Jacob Salt-Berryman has overarching responsibility for the quality and delivery of remote education.

Learners Expectations:

- To maintain high attendance.
- To communicate if not able to attend a remote session, with a valid reason to why. This then can be logged appropriately.
- To fully participate in all online activities with the camera feature on.
- To keep channels of communication open with LMP staff.
- To abide by the 'Code of conduct and remote learner guidelines' (see below)

Support and Guidance

- LMP Group will provide guidance and resources to assist all learners in getting online to take part in their sessions.
- Where possible LMP Group will assist participants in being able to access devices and the internet to be able to participate in online learning.
- LMP staff will continue to ensure the LMP Group Safeguarding guidelines are implemented and that staff and participants receive support should a learner be considered vulnerable or at risk. Contact safeguarding@lmp-group.co.uk
- LMP Group can provide welfare and pastoral support if required.

Remote Learner Guidelines

- The learner is responsible for joining the remote sessions online and should inform the session tutor if they are not able to join on time.
- This should be done at least one hour prior to start of the training session to the session using the tutors email address.
- When attending a remote session, the learner should aim to position themselves in an environment with as few distractions as possible.
- There must not be any inappropriate or offensive behaviour, including foul and abusive language in verbal, gesture, or written form.
- The learner must be dressed appropriately.
- Participants should follow the tutor's instructions and communicate if the instructions can't be followed.
- All participants of the remote session should treat each other with respect.
- All participants to have their cameras and microphones turned on for every session, unless advised otherwise by the session tutor.
- All participants to engage and contribute throughout each session.
- Should a session need to be recorded, all participants will be asked for permission to record. If permission is not recorded, then the session should not be recorded and reused.
- Should a participant feel unsafe at any time they will be encouraged to make the tutor aware, or they can contact safeguarding@lmp-group.co.uk

Filtering & Monitoring

Effective technical security depends not only on technical measures, but also on appropriate policies and procedures and on good user education and training. This is informed by the Department for Education (DfE) guidance, [Keeping Children Safe in Education](#), and the [Digital and Technology Standards](#) and therefore applicable for schools and colleges in England.

LMP Group is responsible for ensuring that the company infrastructure/network is as safe and secure as is reasonably possible and that:

- Users can only access data to which they have right of access.
- Access to personal data is securely controlled in line with the school's personal data policy.
- System logs are maintained and reviewed to monitor user activity.
- There is effective guidance and training for users.
- There are regular reviews and audits of the safety and security of school computer systems, including filtering and monitoring provision.

Responsibilities

Education settings are directly responsible for ensuring they have the appropriate level of security protection procedures in place in order to safeguard their systems, staff and learners and review the effectiveness of these procedures periodically to keep up with evolving cyber-crime technologies. The management of technical security is the responsibility of the Directors, supported in this by the Designated Safeguarding Lead, and IT Service Provider. IT equipment is only provided and used by LMP Group staff, no equipment is supplied to employers or learners.

The filtering of internet content provides an important means of preventing users from accessing material that is illegal or is inappropriate in an educational context. The filtering system cannot, however, provide a 100% guarantee that it will do so, as online content changes dynamically and new technologies are constantly being developed. It is important, therefore, to understand that filtering is only one element in a larger strategy for online safety and acceptable use.

Monitoring user activity on LMP devices is an important part of providing a safe environment for staff. Unlike filtering, it does not stop users from accessing material through internet searches or

software. Should this be raised as a concern, in regard to a staff members conduct, this will be dealt with in line with HR and Safeguarding procedures.

13. Prevent Strategy

Prevent is a strand of the Government counter terrorism strategy. The UK faces a range of terrorist threats. All the terrorist groups who pose a threat to us seek to radicalise and recruit people to their cause. The Prevent strategy seeks to:

Prevent: to stop people becoming terrorists or supporting terrorism

Pursue: to stop terrorist attacks

Protect: to strengthen our protection against a terrorist attack

Prepare: to mitigate the impact of a terrorist attack

Prevent has its own objective and they are to:

- Tackle the ideological causes of terrorism.
- Intervene early to support people susceptible to radicalisation.
- Enable people who have already engaged in terrorism to disengage and rehabilitate.

A system of threat level has been created which represents the likelihood of an attack in the near future. The five levels are:

1. **Critical**- an attack is expected imminently.
2. **Severe** – an attack is highly likely.
3. **Substantial** – an attack is a strong possibility.
4. **Moderate** – an attack is possible but not likely.
5. **Low** – an attack is unlikely.

The current threat level from international terrorism in the UK is **SUBSTANTIAL** which means that a terrorist attack is a strong possibility.

For up-to-date information on Terrorism & National Emergencies [Click Here](#)

LMP Group understands that we have a part to play in fostering shared values and promoting cohesion. LMP Group will focus on the risks of violent extremism, which represents the greatest threat at national level, while recognising that other forms of violence and extremism can and do manifest themselves within training settings.

The guidance sets out the expectations, requirements, and recommendation in the sector, this are:

1. Leadership and partnership
2. Capabilities
3. Reducing permissive environments

Leadership

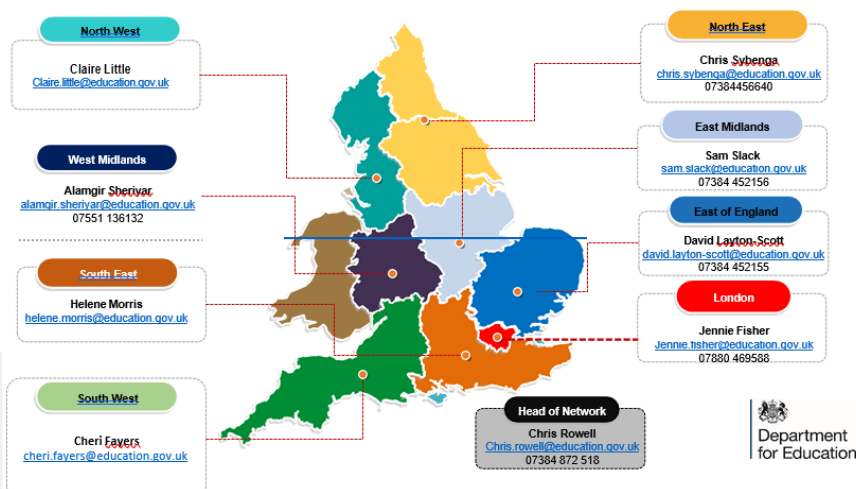
At LMP Group leadership in delivering Prevent is demonstrated by:

- ✓ Head of Safeguarding – Lead Prevent Officer.
- ✓ Directors, Senior team members understand their responsibility towards Prevent, ensuring this is part of the culture.
- ✓ Ensuring staff understand the risk of radicalisation that results in support for terrorism or involvement in terrorism by making sure they can access training resources and further guidance.
- ✓ Building and promoting the capabilities to deal with radicalisation concerns, such as a formal pathway to escalate concerns and refer through to Prevent.
- ✓ Promoting the importance of Prevent and the role staff play in countering terrorism.

Partnership

Effective partnership is a key component of delivering Prevent. To demonstrate compliance with the duty, LMP Group work with local & national Prevent leads, the police, and local authorities where applicable. This is facilitated through multi-agency forums, such as local, regional and national strategic Prevent boards. In addition, working with the FE DoFE Prevent Leads, attending updates across the regions.

FE/HE Regional Prevent Co-Ordinator's



Capabilities

LMP Group have develop and maintain appropriate capabilities to have due regard to the need to prevent people from being radicalised into terrorism. LMP Group do so by having capabilities for:

- ✓ Understanding risk
- ✓ Managing risk
- ✓ Sharing information

Understanding risk

Training and induction – LMP Group demonstrate an awareness and understanding of the risk of radicalisation by ensuring and recording that appropriate staff undertake training, which covers radicalisation.

By understanding this risk, as well as how to raise a concern, those under the Prevent duty play a role in ensuring that people who are at risk of being radicalised can have their views challenged where appropriate, receive suitable support, and be diverted away from terrorism.

LMP Group staff undertake the government training on Prevent, in addition also attend internal CPD sessions, where there are updates shared by the Head of Safeguarding.

Managing risk

As well as ensuring that staff are appropriately trained, LMP Group understands their risks regarding radicalisation. A risk assessment is in place and can be shared when requested. This is reviewed in line with updates as well with the relevant LMP Group staff.

Sharing information

LMP Group may need to share information about people to ensure, for example, that a person at risk of radicalisation is given appropriate support, such as on the Channel programme. When sharing personal data, specified authorities must comply with the requirements of data protection legislation as it applies to them. A comprehensive list of local resources is available.

LMP understands the importance of data protection legislation, sharing any personal data will be done lawfully and with appropriate safeguards in place. Information sharing will be done on a case-by-case basis.

Reducing permissive environments

At LMP Group there is a culture of concern which ensures that we tackle the ideological causes of terrorism, by limiting exposure to radicalising narratives, both online and offline, and to create an environment where radicalising ideologies are challenged and are not permitted to flourish.

LMP Group understand that radicalisers create and take advantage of permissive environments to promote or condone violence and to spread poisonous ideologies that undermine our values and society. Therefore, it is important that LMP Group, ensure children, learners, vulnerable adults and staff are made aware of how radicalisers use extremist ideas and narratives to encourage people into participating in or supporting terrorism. This includes in instances where the exact ideology is unclear. Established terrorist narratives exhibit common themes such as antisemitism, misogyny, anti-establishment, anti-LGBT grievances and religious or ethnic superiority.

LMP Group will ensure that any encouragement of terrorism, including glorifying the commission or preparation of acts of terrorism, fundraising for the purposes of terrorism, and inviting support for a proscribed terrorist organisation, will be reported as these may be considered as criminal offences.

Teaching and Learning

LMP Group provides curriculum which promotes knowledge, skills and understanding to build the resilience of learners, by undermining extremist ideology and supporting the learner voice. This is achieved through:

- Embedding equality, diversity and inclusion, wellbeing, and community cohesion.
- Promoting wider skill development such as social and emotional aspects of learning.
- A curriculum adapted to recognise local needs, challenge extremist narratives, and promote universal rights.
- Teaching and learning strategies which explore controversial issues in a way which promotes critical analysis and pro social values.
- Use of external programmes or groups to support learning while ensuring that the input supports LMP's goals and values.
- Encouraging active citizenship and learner voice.

Learner Support

LMP Group ensures that employees are confident to take preventative and responsive steps working with partner professionals, families, and communities. This will be achieved through:

- Establishing strong and effective learner support services.
- Listening to what is happening within LMP and the community.
- Implementing anti-bullying strategies and challenging discriminatory behaviour.
- Helping learners and employees know how to access support in LMP Group and or through community partners.
- Supporting problem solving and repair of harm.
- Supporting at risk learners through safeguarding and crime prevention processes.
- Focussing on narrowing the attainment gap for all learners.
- Support for LGBTQ+ learners have access to the DSL who will be able to signpost, provide further education for employers and a safe space when needed. In addition, staff awareness training is also provided to all LMP Group staff.

Reporting a PREVENT Concern

- If LMP Group's employees and sub-contractors have a concern about a particular person, they should follow the usual safeguarding procedures, including discussing with the DSL/DSO, and where deemed necessary, with any relevant agencies if the individual is known as listed below:
 - Prevent Lead from the Local Authority - in Prevent priority areas, the local authority will have a Prevent lead who provides support.
 - Local police force or dial 101 (the non-emergency number) who provides confidential support.
- Contact the Department for Education's Dedicated Helpline: 020 7340 7264 – this will enable LMP Group to raise concerns relating to extremism directly. Concerns can also be raised by email: counter.extremism@education.gsi.gov.uk

(The helpline is not intended for use in emergency situations, such as a child being at immediate risk of harm or a security incident, in which case the normal emergency procedures should be followed)

More information here about the Prevent Duty and advice for schools and childcare providers: [Click Here](#)

14. Emergency Contact Details

The following people/organisations contact list:

- | | |
|--|---------------------------------|
| • Co-Founder & Director | Matthew Lord 07855 792939 |
| • Co-Founder & Director | Amy Lalla 07930 663307 |
| • Sales Director | Jamie McVey 07817 208226 |
| • Quality Director | Kathryn Osborn 07947 352464 |
| • Operations Director | Lisa Kilgallon 07912 942826 |
| • Head of Safeguarding & Health & Safety | Anita de Villiers 07598 902111 |
| • Associate Business Director | Kim Gotts 07597 286117 |
| • Information Commissioner's Office | ico.org.uk |
| • Health and Safety Executive (HSE) | hse.gov.uk |
| • Police, Ambulance, Fire Service, | Emergency 999 |
| • Insurer: Trainsure Insurance | Policy Number: 100723387BDN/349 |
| • ESFA | 0370 0002288 |
| • Ofsted | 0300 1231231 |
| • Prevent Dept of Education | 020 7340 7264 |

15. Pandemic Safeguarding: COVID-19 Addendum

Scope and definitions

This addendum applies during the period of business restrictions within LMP Group, due to COVID-19, and reflects updated advice from the government & safeguarding partners.

It sets our changes to LMP Groups normal safeguarding policy in light of the Department for Education's guidance **Coronavirus (COVID-19): Safeguarding in schools, colleges and other providers** [Click Here - Guidance was Removed July 2020 - Sign Posting to KCSIE 2020/2021](#)

LMP Group Safeguarding policy will be supported by this COVID-19 Addendum.

The Department for Education's (DFE's) definition of 'vulnerable children & young people' includes those who:

- Have a social worker, including children:
 - With a protection plan
 - Assessed as being in need
 - Looked after by the local authority
- Have an education, health, and care (EHC) plan.

Core safeguarding principles

LMP Group will still have regard to the statutory safeguarding guidance, Keeping Children Safe in Education. During the pandemic and lockdown, LMP Group will operate in a different way to normal, ensuring that keeping our focus on safeguarding our employees and learners is paramount whilst following these important safeguarding principles:

- The best interests of our participants/learners must come first.
- If anyone has a safeguarding concern about a participant, learner or employees member, they should continue to act on the information immediately by reporting it to the DSL (designated safeguarding lead) safeguarding@lmp-group.co.uk or using the referral form.
- The DSO and DSL's should always be available to support learner safeguarding & PREVENT concerns during this period.
- Delivery employees should continue to ensure that participants/learners are best equipped to protect themselves while delivering teaching and learning sessions.

Reporting a concern or incident

This will be completed in line with the reporting requirements as set out in section 9 of this policy. [Click Here to Make a Referral](#)

DSL arrangements

LMP Group DSL's will continue to work in line with their roles of DSL. In the event of the DSL's not being contactable, please refer your concern to your line manager. If for any reason, there is a double absence required by the DSL's employees & learners will be contacted by informed by email/text. The DSL's will continue to review all cases on the safeguarding log and will have increased communication with the reporting person to the concern on any further developments.

Working with other agencies

LMP Group will continue to work with a participant/learner's required agency as well as the learner's employer, should there be a requirement. This addendum will be updated where necessary, to reflect any updated guidance.

Monitoring attendance

Learners - It will be the responsibility of the LMP Groups delivery teams to ensure that the learner is attending their sessions, if there are any concerns about the learner's engagement then it is advised this is logged in the learner's record and if relevant discuss the concern with the DSL. If a learner had a change in employment, such as furloughed or working from home, then this should also be noted in the learner's record.

Employees – Regular check ins with the LMP Groups line manager for those employees who are working remotely. This will be undertaken in many forms, to include one to ones, group calls and team meetings including the LMP Group all employee's broadcast. This can now be carried out face to face or via an online platform (Microsoft Teams, Zoom)

1. Concerns about an employee

- LMP Group will continue to follow the principles set out in the document *Keeping Children Safe in Education [Allegations of abuse made against teachers & other employees] page 53 – 64 - [Click Here](#)*

LMP Group employees should continue to act on any concerns they have immediately. This includes if the concern involves the learners COVID-19 situation. DSL's will continue to refer adults who have harmed or pose a risk of harm to a child or a vulnerable adult to the Disclosure and Barring Service (DBS).

Safeguarding all

LMP Group are aware that this current situation has increased potential risk to all. LMP Group employees will continue to be alert to any signs of abuse, or effects on a participant/learner's mental health or increase risk to abuse via the internet. It is essential that any concerns are reported in line with the LMP Group Safeguarding Policy.

With remote working for all, it is important to look out for signs that may cause a concern, such as: -

- Learner - Not completing assigned work or logging on to agreed platform or not responding to communications sent to them
- Employees – Missing deadlines, check ins, director updates.

During this time there will be more time spent online than normal for both learners and employees, and so the LMP Group's approach to online safety should be always adhered to.

Online Safety

LMP Group will continue to have appropriate filtering and monitoring systems in place with the IT equipment LMP employees use. It is important that all employees fully shut down their laptops at least 3 times a week to allow the firewall software to be fully efficient. Any concerns regarding IT equipment, software issues, unusual or suspect emails should be raised with the IT support team and investigated immediately. Confirmation of suspicious emails /phishing

should be raised with the LMP Group employee's manager and where appropriate an alert should be communicated to the LMP Group via the 'all employees' email group.

Remote teaching – where tutors are interacting with learners online, they will be expected to continue to conduct their behaviour in line with company expectations and work in line with the LMP Groups IT & Safeguarding policies that are in place.

LMP Group employees will continue to be alert to signs that a learner may be at risk of harm online, and act on any concerns immediately, following the LMP Group process for raising a concern.

Learners are provided with eLearning CPD, to enhance their understanding to the risks. This is provided in the following platforms: -

- Education Foundation Trust - Stay Safe - [Click Here to Access eLearning](#)

During this time there is also a high risk to employees and learners being exposed to radicalisation and extremism views, this would include those from the far right. LMP Group employees need to raise any concerns on a learner's changed views or interests in this area to the DSL as a Safeguarding/PREVENT concern or incident. When this occurs, the DSL will contact the local PREVENT coordinator.

All safeguarding concerns will be recorded on the LMP Safeguarding Log.

Mental Health

Mental health remains a focus for LMP Group for all employees and learners. This support will include, checking of wellbeing in all 121 sessions, delivery of awareness of mental health and sharing resources.

There is a catalogue of resources in place to support signposting all learners, employees, and employers to support good mental health currently and moving forward. Summary below:

- NHS – Every Mind Matters
- MIND
- Time to Change
- Mental Health Foundation
- Content in learner/employee's newsletter

During this time there also maybe other areas of concern that will be linked to mental health and LMP Group will make every effort to be able to signpost learners and employees in these matters. For example:

- Homelessness
- Debt
- Wellbeing

There will be regular contact made with learners and employees who have been placed on the Safeguarding Log, to ensure there is a good level of support and signposting has been provided.

Mental Health Links

[Click Here - NHS - Mental Health](#)

[Click Here - MIND](#)

[Click Here - Time to Change](#)

[Click Here - Mental Health Organisation](#)

LMP Group Employees Recruitment, Training, and Induction

LMP Group continues to recognise the importance of robust safer recruitment procedures, so that adults who work within the LMP Group are safe to work with all learners. LMP Group will continue to follow the LMP Safer Recruitment procedures, and Annex A of Keeping Children Safe in Education. Interviews, suitable employment checks to include DBS and references, are in place and this will be monitored for best practice and quality assurance. All information is stored within the LMP Group's Single Central Register.

LMP Group's Lead DSL (Group Safeguarding and Health and Safety Manager) is required to continue to undertake regular CPD. All CPD is recorded within the companies People HR record system, along with the impact the session will have on the LMP Group and Safeguarding/PREVENT well-being. This is also reviewed by their line manager and evidenced in their monthly SEB report.

All new LMP Group employees' members undergo a company induction, this will follow the same induction in place prior to this addendum. During this induction there will be several documents shared to include:

- Company Handbook.
- Company policies & procedures
- LMP Group Safeguarding Induction.
- Who the DSL and DSOs are, how to contact and how to raise a concern/incident.
- eLearning to include: -
 - Education Foundation Trust – Four Modules
 - Stay Safe - <https://www.gov.uk/government/news/act-awareness-elearning>

Any changes to policy are shared with all LMP Group employees and are signed for accordingly.

Monitoring arrangements

This policy addendum is reviewed in line with the government guidance, Department of Education, Local Authority, HSE and members of the SEB at LMP Group.

Links with other policies

This policy addendum links with the following LMP Group documents:

- Safeguarding Policy
- IT Policy
- Health & Safety Policy
- LMP Handbook

2. Introduction of the Learner Support Policy for Covid-19 Overview and Rationale

The health, safety and wellbeing for our whole community is our top priority; this includes learners, employees, and families around us. We acknowledge the collective national interest in coming together currently for the greater good and continued containment of the COVID-19 outbreak.

LMP Group acknowledge we have a new 'normal' to deal with and are adjusting to ensure we continue to support learners at this time of uncertainty and difficulty. Many have expressed their anxiety at this time; it is our responsibility to safeguard them and be part of the solution.

Our delivery has been adapted to provide some face-to-face support; whilst the majority remains remote. This allows us to continue to support our client base of participants, learners, schools, councils, and businesses.

The LMP Group in all its delivery aims to "create a safe, disciplined and positive environment within the provider and the impact this has on the behaviour and attitudes of learners" (Further Education & Skills Handbook, page 51, 192.).

The challenges include:

1. Adapting to working from home and the many challenges this might bring:

- a. Having to look after children or elderly parents.
- b. Having to look after people that become sick or unwell.
- c. Not having a quiet space to work.

2. Mental-health issues:

- a. These are very difficult and scary times; therefore, a lot of people are feeling very anxious.
- b. With less human interaction, people will feel lonely and isolated. This can exacerbate any sort of depression or negative thoughts.

- c. Feelings of worthlessness. People generally want to have a sense of purpose and want to be productive. Quarantine and isolation limits this considerably.
- d. Less exercise - People in self-isolation are going to do far less exercise. Individuals that regularly exercised at the gym or local swimming pool will no longer be able to do so.
- e. Routine - People will find themselves without a daily routine.
- f. People with long-standing mental-health issues will need further support.

3. Adapting to having to use technology more than ever before:

- a. Learners are being forced to use technology more so than ever before. They may have to engage fully with online delivery, online courses, webinars, etc.
- b. Some learners may not have smart phones, laptops or PCs which poses a further challenge.

4. Self-discipline:

- a. Working from home is not easy for everyone. There are different distractions and different demands on everyone, depending on their circumstances.
- b. People will need to work out how to discipline themselves to work, study, exercise, eat, sleep, and look after their mental wellbeing.

In response to COVID-19 LMP Group implemented a Learner Support Policy. This policy is in line with the ESFA guidelines and aims to provide adjustments and where appropriate loan IT equipment to individuals who may not have access to any. This may include the loan of a secure LMP Group Laptop (which contains relevant security software) and is maintained by LMP Group's IT provider. Any learner loaning an LMP Group laptop must adhere to the LMP Group's IT policy.

Useful Links

[Click Here for Statutory guidance: Revised Prevent duty guidance: for England and Wales - Current](#)
[Click Here for Coronavirus \(COVID-19\): safeguarding in schools, colleges and other providers - Withdrawn](#)
[Click Here for Supporting vulnerable children and young people during the coronavirus \(COVID-19\) outbreak - Withdrawn](#)
[Click Here - Coronavirus \(COVID-19\): guidance for educational settings - Withdrawn](#)

Employee Illness

In the event of mass employee's illness, head office will be closed and deep cleaned. The office will only re-open once most illnesses have been cleared. This decision will be made by the SEB and communicated to the LMP Group via the regular communication channels.

Other Threats

The following other threats are covered considered in the Company's Business Continuity Plan (BCP):

- Cyber Attack
- Data Breach
- Phone and ICT Communications Loss
- Bad weather - prolonged
- Terrorist attack or threat
- Finance Process Breakdown – payments to employees and suppliers fail
- Utilities / Energy Supply failure
- Service Delivery Loss of General Nature
- Fire
- Evacuation due to nearby incident

Learner delivery

Any learner delivery in progress at an LMP Group venue, employer premises or third-party will be subject to the event of a situation demanding the invoking of the BCP. Any interrupted training will be rescheduled if it cannot continue at the time.

All learners learning platforms that are essential to delivery or the administration of delivery are stored on cloud-based services ensuring that remote access will be available 24/7 for learners and delivery/administration employees.

Training delivery cessation

If the LMP Group can no longer deliver the agreed training. LMP Group will ensure there is continued access to the learners learning platform (cloud based), including all learning resources.

Monitoring and Evaluation

LMP Group plans will be reviewed annually by the operations team to ensure that they remain fit for purpose and reflect the outcomes of any incidents that have occurred over the year. Once a year the SEB may decide to run a Business Continuity Drill, to practice the response to one or more of the emergency or disaster scenarios. The review will be reported to the SEB and Advisory Board.

In the event of a significant incident, Emergency Services should be called on 999 without hesitation.