



QAHE Limited Safeguarding Policy

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1. Introduction

This policy aims to outline the measures that underpin QA Limited's (QA Higher Education) commitment to safeguarding and promoting the welfare of children, young people, and vulnerable adults who engage with QA Higher Education and its activities. QA Higher Education is dedicated to fostering a culture of dignity and respect, recognising that safeguarding is a collective responsibility shared by all members of the QA Higher Education community.

This document serves as a resource for staff, students, and volunteers, offering guidance on the actions to take if they suspect that a child, young person, or vulnerable adult may be experiencing harm or is at risk of harm.

The Policy is informed by a collection of legislation and guidance, including but not limited to:

[Children Act 1989](#)

[Working Together to Safeguard Children, 2015](#)

[What to do if you're worried a Child is being Abused 2015](#)

[Care Act 2014](#)

[Data Protection Act 1998](#)

[Sexual Offences Act 2003](#)

[Safeguarding Vulnerable Groups Act 2006](#)

[Equality Act 2010](#)

[Protection of Freedoms Act 2012](#)

[Counter-Terrorism and Security Act 2015](#)

[Protecting Vulnerable Adults 2017](#)

[Prevent Duty](#)

Alongside this policy, the following QA Higher Education policies should also be considered:

Prevention of Bullying, Harassment, Sexual Misconduct and Relationship Abuse Policy

Student Respect for All Policy

QAHE Freedom of Speech Policy

External Guest Speaker Policy

Staff Disciplinary Policy

The Safeguarding Protocols are crafted to align with the Prevent Duty Guidance applicable to higher education institutions. All staff members are encouraged to familiarise themselves with this Safeguarding Policy, the related Protocols, and the available support at QA Higher Education and to utilise these resources appropriately when concerns arise.



2. Scope

This policy applies to the following:

- Activities that take place on QA Higher Education premises, as well as off-site activities for which QA Higher Education is responsible. This includes the delivery of activities that are part of collaborative provisions and off-site placements.
- All QA Higher Education students, both on and off QA Higher Education premises, and during all QA Higher Education-related activities. It includes disclosures regarding any person within the student's household where there may be any safeguarding concerns.
- All QA Higher Education staff, regardless of their appointment or engagement status.
- QA Higher Education alumni, insofar as they are engaged in QA Higher Education-related activities, events, mentoring schemes, or any formal contact facilitated or endorsed by QA Higher Education, and where safeguarding or Prevent concerns may arise.
- Consultants and contractors hired by, or associated with, QA Higher Education activities.

3. Key Principles

QA Higher Education's Safeguarding Policy aims to:

- Appoint a Designated Safeguarding Officer (DSO) who will hold strategic responsibility for safeguarding;
- Appoint a Prevent Lead tasked with ensuring compliance with the Prevent Duty;
- Assign Operational Leads who will oversee daily adherence to institutional policies and protocols, serving as central contacts for concerns regarding a child, young person, or adult at risk;
- Foster an environment that values listening, respects individuals' wishes and feelings, while prioritising the safety and well-being of children, young people, and adults at risk, in accordance with best practices and legal obligations;
- Establish clear connections with multi-agency departments to assure parents, guardians, and other stakeholders that QA Higher Education takes reasonable measures to manage risks and ensure the safety of children, young people, and



adults at risk;

- Take necessary actions to prevent and report any safeguarding concerns:
- Align safeguarding approaches with those used by statutory agencies;
- Ensure that all QA Higher Education staff, students, contractors, and visitors comprehend their roles and responsibilities regarding safeguarding and Prevent;
- Maintain proper governance and oversight of safeguarding arrangements, including the establishment of a Student Welfare Risk Panel and Prevent Risk Panel;
- Recognise staff with defined safeguarding responsibilities to ensure that individuals working with children, young people, and adults at risk do not present an unacceptable risk to vulnerable groups;
- Provide designated safeguarding staff with current and relevant training to support the implementation of the Safeguarding Policy and Protocols;
- Ensure appropriate measures are taken in response to any allegations or suspicions of harm to children, young people, or adults at risk due to interactions with QA Higher Education staff, students, or volunteers, regardless of whether the harm occurred on QA Higher Education premises;
- Offer up-to-date, high-quality advice and information about support and services designed to protect adults and children from abuse and harm, or to meet identified needs. This encompasses specialised safeguarding responses, general assistance, and targeted support aimed at reducing vulnerability and safeguarding incidents;
- Adhere to safe recruitment practices to prevent unsuitable individuals from working with children, young people, and adults at risk;
- Consider all relevant legislative measures, including the Children's Act (2004), Safeguarding Vulnerable Groups Act (2006), Working Together to Safeguard Children (2018), and Section 26 of the Counter-Terrorism and Security Act (2015), in relation to the obligation to prevent students from being drawn into terrorism;
- By undertaking all the above, fulfil our legal duty of care in safeguarding and ensure that reasonable steps are taken to protect children, young people, and adults who may be at risk, while implementing policies and processes designed to minimise the potential for harm.



4. Monitoring and Review

4.1. Governance

This policy will be monitored through update reports presented to QA Higher Education's Student Welfare Risk Panel by the Designated Safeguarding Officer (DSO). This Policy will be reviewed and updated where relevant, annually. The DSO will be responsible for ensuring QA Higher Education's Student Welfare Risk Panel understand and promote the Policy by ensuring they are regularly updated on internal and external safeguarding related information. The DSO will provide a monthly update for visibility and present a quarterly review of safeguarding services and effectiveness to QA Higher Education's Student Welfare Risk Panel.

4.2. Lessons Learned

A review of every high-risk case will be undertaken once closed to ensure any lessons can be taken forward. In addition, any themes or trends will be reviewed each quarter and presented to QA Higher Education's Student Welfare Risk Panel.

4.3. Student Surveys

All QAHE students will be surveyed on how safe they feel at QA Higher Education and on the effectiveness of support services. Feedback will be reviewed and actioned quarterly to ensure QA Higher Education complies with policy and that policy ensures and promotes the safety of student.

5. Whole Business Awareness

To maintain a high level of safeguarding awareness within the business, senior managers will be provided with a safeguarding representative who will provide a monthly update to them and their teams. This initiative provides an opportunity for timely updates and gives employees an open forum to discuss process etc. During 1-2-1's, if a training need has been identified by a manager from a skills gap perspective these are noted at the time, with the requirement shared with the Safeguarding representative to support the required improvement.

6. Responsibilities

QA Higher Education proudly hosts a diverse population of staff, students, and visitors, primarily within an adult learning environment. It is imperative to acknowledge that there are occasions when children, young people, and adults at risk interact with QA Higher Education staff and students. These interactions arise in various contexts, including but not limited to:

- Support of students, including library usage
- Outreach or widening participation activities, whether on or off campus
- Public events and conferences
- Placements and other professional engagements
- Field trips, excursions, and volunteering activities



QA Higher Education has a clear duty of care for its staff, students, and visitors. We are committed to ensuring that robust policies, procedures, guidance, risk assessments, action plans, and training are firmly established to safeguard children, young people, and adults at risk effectively. It is essential that we take every reasonable step to guarantee that contractors understand and accept their responsibilities regarding the conduct of themselves and their employees in relation to these vulnerable groups on QA Higher Education premises.

All individuals engaged in paid or unpaid roles at QA Higher Education must be fully aware of this policy and understand how to report safeguarding concerns promptly. QA Higher Education has appointed a Designated Safeguarding Officer (DSO) who is responsible for enforcing legal and regulatory compliance, as well as ensuring the rigorous implementation of this policy. Furthermore, specific Deputy Safeguarding Leads are designated for each campus to ensure that appropriate safeguarding measures are in place. When collaborating with external organisations, the Safeguarding team will ensure that policies are aligned and function cohesively to uphold our safeguarding commitments.

Statutory Guidance

All schools, organisations and providers are required to have a Designated Safeguarding Officer (DSO), who is assigned to act upon child and adults at risk protection concerns.

The DSO's Role

At QA Higher Education this person is called the Designated Safeguarding Officer (DSO) for safeguarding, and they are responsible for coordinating action within QA Higher Education and liaising with other agencies.

The QA Higher Education contacts for safeguarding are listed in appendix B at the end of this document. The DSO for safeguarding is required to know:

- How to identify the signs and symptoms of abuse and when to make a referral
- The local child and adult at risk protection procedures and the DSL's role within them
- The role and responsibilities of the investigating agencies and how to liaise with them
- The requirements of record keeping
- The conduct of a child protection conference* and how the DSL or other employees can make an appropriate contribution to it.
- (*The local authority will call a child protection conference when they have investigated concerns about child abuse and they believe the child is suffering, or likely to suffer, significant harm.)

7. Definitions of Terms

The Safeguarding Policy describes the support and protection procedures for all students.

The definition of a "child"

"Child" is defined as all young people under the age of 18, or in the case of those with learning difficulties under 25 years, in accordance with the 1989 Children Act.



The definition of an “Adult at Risk”

“An adult at risk”. An adult at risk of abuse or neglect is defined as someone who has needs for care and support, who is experiencing, or at risk of, abuse or neglect and because of their care needs - is unable to protect themselves.



8. Categories of Abuse

Children and adults at risk can be potentially abused within the family, community, and in QA Higher Education by employees (including those employed to promote their welfare and protect them from abuse), volunteers, visitors, and fellow students. The following are broad categories of abuse.

Type of Abuse	Detailed Definition	Applies To
Bullying (including Cyberbullying)	Bullying is the repetitive, intentional hurting of one person or group by another. It can be physical, verbal, or relational and may occur in person or online. Cyberbullying includes using digital platforms to harass, threaten, or humiliate others.	Children and Adults at Risk
Child Criminal Exploitation (CCE)	CCE involves exploiting children for criminal purposes, such as drug trafficking, theft, or other illegal activities. It often includes grooming and manipulation, with children being coerced into offending on behalf of others, particularly in 'County Lines' drug operations.	Children
Child Sexual Exploitation (CSE)	CSE is a form of sexual abuse where children are manipulated or forced into sexual activity, often in exchange for money, gifts, affection, or status. It frequently involves coercion and grooming and can take place in person or online.	Children
County Lines	County Lines is a form of criminal exploitation where gangs and organised criminal networks exploit children and vulnerable adults to move drugs and money across the country, often using coercion, intimidation, and violence. Victims are frequently used to transport drugs from urban areas to rural or coastal towns using dedicated mobile phone lines.	Primarily Children, but also Adults at Risk



Type of Abuse	Detailed Definition	Applies To
<p>Discriminatory Abuse</p>	<p>Discriminatory abuse involves unfair or prejudicial treatment based on characteristics such as race, gender, age, disability, religion, or sexual orientation. It includes harassment, slurs, and hate crime, and can result in emotional distress, isolation, and marginalisation.</p>	<p>Primarily Adults at Risk</p>
<p>Domestic Abuse</p>	<p>Domestic abuse is a pattern of incidents involving controlling, coercive, threatening, degrading, or violent behaviour. It can occur between intimate partners or family members regardless of gender or sexuality. This type of abuse often includes physical violence, emotional abuse, financial control, sexual abuse, and coercive control. Exposure to domestic abuse is considered child abuse when children witness or are affected by it.</p>	<p>Children and Adults at Risk</p>
<p>Emotional or Psychological Abuse</p>	<p>Emotional or psychological abuse is the persistent maltreatment that affects emotional development or mental health. It includes verbal abuse, threats, intimidation, rejection, constant criticism, humiliation, blame, controlling behaviour, and coercive control. This type of abuse can severely undermine a person's sense of worth and self-esteem.</p>	<p>Children and Adults at Risk</p>
<p>Fabricated or Induced Illness (FII)</p>	<p>FII occurs when a parent or carer exaggerates, fabricates, or induces illness in a person under their care. It is a form of physical and emotional abuse that can have severe psychological and medical consequences.</p>	<p>Children (primarily), but can apply to Adults at Risk</p>

Type of Abuse	Detailed Definition	Applies To
<p>Female Genital Mutilation (FGM)</p>	<p>FGM is the deliberate cutting or altering of the female genitalia for non-medical reasons. It is illegal in the UK and is considered a form of physical and sexual abuse. It can lead to severe physical and psychological consequences.</p>	<p>Children and Adult Women</p>
<p>Financial or Material Abuse</p>	<p>This involves the illegal or improper use of a person's money, property, or assets. Examples include theft, fraud, coercion regarding wills or property, misuse of benefits, or restricting access to financial resources. This is particularly relevant for adults at risk who may rely on others for financial management.</p>	<p>Adults at Risk</p>
<p>Forced Marriage</p>	<p>A forced marriage occurs when one or both individuals do not give full and free consent, often under duress, threat, or coercion. It is distinct from arranged marriage and is illegal in the UK. Forced marriage is considered a safeguarding issue.</p>	<p>Children and Adults at Risk</p>
<p>Gang Involvement</p>	<p>Being involved in a gang can expose individuals to various forms of exploitation and abuse, including violence, criminal activities, and coercion. Young people may be pressured into joining gangs and participating in illegal acts, often resulting in long-term harm to their wellbeing and safety.</p>	<p>Primarily Children, but also Adults at Risk</p>
<p>Hazing or Initiation Abuse</p>	<p>Hazing is a form of abuse where individuals are forced to engage in humiliating, degrading, or dangerous activities to be accepted into a group. It is common in sports teams, clubs, or gangs and can involve physical, emotional, or sexual abuse.</p>	<p>Children and Adults at Risk</p>



Type of Abuse	Detailed Definition	Applies To
Modern Slavery	Modern slavery encompasses slavery, human trafficking, forced labour, and servitude. Victims are often controlled by threats, violence, coercion, or deception and may be forced into work or sexual exploitation. It is a serious violation of human rights and can affect children and adults alike.	Children and Adults at Risk
Neglect (or Acts of Omission)	Neglect is the persistent failure to meet a person's basic physical and psychological needs. In children, this can result in serious impairment of health or development and includes lack of adequate food, clothing, supervision, or medical care. For adults, it can include failing to provide necessary care or assistance, ignoring medical or personal care needs, and withholding essential services.	Children and Adults at Risk
Online Abuse (Cyber Abuse)	Online abuse includes any type of abuse that happens on the internet. It may involve grooming, bullying, sextortion, or the sharing of explicit images without consent. Both children and adults can be victims, often through social media, gaming, or messaging platforms.	Children and Adults at Risk
Organisational (Institutional) Abuse	This type of abuse happens in care settings where routines, systems, and care standards prevent people from receiving appropriate or person-centred care. It includes neglect, lack of dignity, over-medication, restrictive practices, and environments where individuals are treated as a task rather than a person.	Primarily Adults at Risk



Type of Abuse	Detailed Definition	Applies To
Peer-on-Peer Abuse	Peer-on-peer abuse occurs when a child is harmed by another child or young person. It can include bullying, sexual violence or harassment, physical abuse, initiation/hazing rituals, and online abuse. Schools and organisations have a duty to respond to this under safeguarding policies.	Children
Physical Abuse	Physical abuse involves the deliberate infliction of physical harm or injury. This can include hitting, slapping, punching, shaking, burning, biting, poisoning, drowning, suffocation, or any other act that causes physical pain or injury. It may also involve fabricated or induced illness, and inappropriate or excessive use of physical restraint.	Children and Adults at Risk
Radicalisation	Radicalisation refers to the process by which individuals come to support terrorism or extremist ideologies. It is often a gradual process and may occur through social media, peer influence, or direct contact with extremist groups. It is a safeguarding concern under the Prevent Duty in the UK.	Children and Adults at Risk
Self-Neglect	Self-neglect refers to situations where an individual fails to care for their own health, hygiene, or living conditions. This may include hoarding, neglecting personal hygiene, refusing medical treatment, or not maintaining a safe living environment. It becomes a safeguarding concern when the person's ability to protect themselves is compromised.	Adults at Risk



Type of Abuse	Detailed Definition	Applies To
Sexual Abuse	Sexual abuse includes forcing or enticing a person to take part in sexual activities, whether or not the individual is aware of what is happening. This can involve physical contact (such as rape, assault by penetration, or inappropriate touching) as well as non-contact activities (such as involving someone in looking at sexual images, watching sexual activities, or encouraging sexual behaviour). Grooming and exploitation also fall under this category.	Children and Adults at Risk
Spiritual or Ritual Abuse	Spiritual abuse involves coercion, manipulation, or control by exploiting a person's faith, beliefs, or spiritual practices. It can include using religious or spiritual authority to intimidate, shame, or isolate individuals, often preventing them from seeking help.	Children and Adults at Risk
Trafficking	While part of modern slavery, trafficking deserves specific mention. It involves the recruitment, transportation, transfer, harbouring or receipt of persons for the purpose of exploitation. Trafficking can be domestic or international and includes sexual exploitation, forced labour, and organ harvesting.	Children and Adults at Risk



9. Staff Training

Role	Module	Platform	Frequency
Designated Safeguarding Officer and Safeguarding team	Safeguarding L3	Highfield training	Annually
Pathway teams	Safeguarding in Further Education	QA365	2 yearly
Pathway teams	Our Safeguarding Offer and Keeping Children Safe in Education	QA365	2 yearly
Pathway teams	Keeping Children safe in Education 2024	QA365	2 yearly
Pathway teams	Safeguarding Assessment – 2025	QA365	2 yearly
All staff	ACT in Education	QA365	Annually
All staff	SCAN in Education	QA365	Annually
All staff	Safeguarding in Higher Education	QA365	Annually
All staff	Safeguarding, Referrals and Maintaining Professional Boundaries	TEAMS	Annually
All staff	Understanding the Prevent Duty, spotting the signs and how to refer	TEAMS	Annually

10. When and how to respond safeguarding concerns

10.1. Raising a concern

As soon as you suspect or become aware of any abuse involving a child or an adult at risk, you must immediately inform the QA Higher Education Safeguarding Team. This can be done via Microsoft Teams, by telephone, or through the Safeguarding Referral Form (see Appendix C).

It is essential that you report concerns even if you have only heard rumours, or if you have suspicions without firm evidence. Your responsibility is to share these concerns with the Safeguarding Team, who will take appropriate action. Please remember that your duty extends to any suspicion of abuse in a child or adult's life and is not limited to incidents within the QAHE learning environment.

10.2. Historical Concerns

You must also inform the QA Higher Education Safeguarding Team if you know or suspect that an employee or student has a history of abusing children and/or adults at risk.

If you become aware of any allegations made against an employee, this must always be escalated to the QA Higher Education People Team without delay. The team can be contacted via email at QAHEpeople.team@QA.com or by telephone on 01753 898 660 (Option 2).



10.3. Providing Evidence

If escalation is required, the individual who raised the concern must prepare a written email report using the provided proforma. This report must be submitted to the Designated Safeguarding Officer (DSO) on the same day that the DSO requests it. A written report is essential to ensure an accurate record and to avoid any misrepresentation of the facts.

The report should be:

Factual: Avoid including personal opinions or interpretations.

Detailed: Record as much relevant information as possible, including:

Any visible physical signs of abuse.

The circumstances that led to your suspicions.

The exact account of what was disclosed to you by the child or adult, in their own words where possible.

Details of any witnesses, if applicable.

Accurate: Capture the information as precisely as you are able.

Signed and dated: Ensure the report is completed in full, signed, dated, and securely stored.

If you are unsure about what to include, you should seek guidance from the DSO before finalising the report.

10.4. Listen and validate

When a student discloses a safeguarding concern, it is vital that your response is supportive, sensitive, and non-judgemental. The way you listen and respond can significantly impact how safe the student feels and their willingness to continue sharing information.

Active listening: Give the student your full attention, listen without interrupting, and allow them to share their concerns in their own words

Reassurance: reassure the student that they are not to blame and it's not their fault

Validate feelings: acknowledge and validate their feelings, showing empathy and understanding

Avoid leading questions: Ask open-ended questions to clarify, but avoid leading questions that might influence their response

10.5. Explain confidentiality

Any safeguarding concerns need to be reported to the DSO or one of the safeguarding team on the same day of the disclosure or initial concerns.

If the student is on campus they should be accompanied to the Safeguarding, Student Life and Wellbeing Office. If the student is showing any signs of distress, please contact one of the Safeguarding team for advice. The team's contact details can be found in Appendix B.

If the student is not on campus, but concerns have been raised on a call, email, or during an online session, please contact one of the Safeguarding team (appendix B) to discuss next steps.



Once you have spoken with the Safeguarding team, you will also need to complete a Safeguarding referral form (Appendix C) and this should be sent to qahe.safeguardingalerts@qa.com

10.6. Completing a Safeguarding referral form

If escalation is required, the individual who raised the concern must prepare a written email report using the provided proforma. This report must be submitted to the Designated Safeguarding Officer (DSO) on the same day that the DSO requests it. A written report is essential to ensure an accurate record and to avoid any misrepresentation of the facts.

The report should be:

Factual: Avoid including personal opinions or interpretations.

Detailed: Record as much relevant information as possible, including:

Any visible physical signs of abuse.

The circumstances that led to your suspicions.

The exact account of what was disclosed to you by the child or adult, in their own words where possible.

Details of any witnesses, if applicable.

Accurate: Capture the information as precisely as you are able.

Signed and dated: Ensure the report is completed in full, signed, dated, and securely stored.

10.7. Students or Third parties who wish to report of Safeguarding Concern

Students

Students can report a safeguarding concern relating to themselves, another student, or a staff member by speaking with a member of the Safeguarding, Student Life and Wellbeing Team.

The team is available on campus Monday–Thursday, 9:00am–6:00pm, and Friday, 9:00am–5:00pm. They can also be contacted by telephone on 0203 921 0163.

Outside of these hours, and in cases of emergency, students should email qahe.welfare@qa.com or speak with any member of staff on campus.

If you or someone else is at imminent risk of harm, you must call 999 immediately.

Third parties

Any family members, friends or other third parties who wish to report a safeguarding concern relating to one of our students or staff members should email qahe.safeguardingalerts@qa.com. Please ensure that you provide your contact number and confirm your relationship with the student or staff member

If you or someone else is at imminent risk of harm, you must call 999 immediately.



10.8. What Happens Next

Taking into account all available information, the Designated Safeguarding Officer (DSO) or their deputies will determine the appropriate next steps. This may include deciding that no further action is required.

In most cases, the DSO will consult with the Local Authority Designated Officer (LADO) or the relevant Multi-Agency Safeguarding Hub (MASH) to agree on the necessary course of action. Depending on the circumstances, this may involve:

- Seeking further advice from Safeguarding Partners.
- Undertaking further investigation under the direction of the LADO, or supporting an investigation led by the Safeguarding Partners.
- Making a referral to the appropriate agency, as signposted.
-
- Reporting the incident to a designated Social Worker, as signposted.
- Reporting the matter to the police if a crime is suspected.

Where a referral is made, it must be confirmed in writing to the relevant agency within 24 hours.

10.9. Staff Support

Staff wellbeing is supported through the QA Wellness Strategy, which provides guidance on accessing the Employee Assistance Programme and other wellness tools.

In addition:

QA Higher Education employees experiencing difficulties with their mental health, housing, finances, or other personal challenges may seek advice and signposting from the QAHE Safeguarding, Student Life and Wellbeing Team.

Employees experiencing work-related issues should contact the QA Higher Education People Team for assistance.

All support will be treated confidentially, except in situations where there is a risk of harm to self or others.

If an employee is in crisis, they should contact the QA Higher Education People Team or the QA Higher Education Safeguarding Team, or, if urgent, call 999.

11. Recruitment And Employment of Staff/DBS Checks of Staff and students

QA Higher Education is registered with the Disclosure and Barring Service and will ensure that any University members who engage in regulated activity with children, young people or adults at risk will be checked for relevant criminal convictions upon appointment.

Please refer to the Employee Screening and Vetting Policy and the Student Screening Policy for further details.



12. Prevent and Protection from Radicalisation

QAHE Limited (QA Higher Education) recognises its responsibility to safeguard students and staff who may be vulnerable to radicalisation and is committed to meeting its obligations under the Prevent Duty, as set out in the Counter-Terrorism and Security Act 2015 and relevant statutory guidance.

QA Higher Education adopts a safeguarding-led approach to Prevent. The aim is to protect individuals who may be susceptible to being drawn into terrorism or extremist ideologies, while supporting a safe, inclusive, and respectful learning environment. QA Higher Education also recognises the importance of upholding freedom of speech and academic freedom within the law, and acknowledges that the expression of lawful political, religious, or philosophical views does not in itself constitute evidence of radicalisation.

Radicalisation is the process through which an individual comes to support terrorism or extremist ideologies associated with terrorism. It can affect individuals from any background and may occur through personal relationships, social networks, or online engagement.

QA Higher Education undertakes regular Prevent risk assessments and maintains an action plan to ensure that its approach to preventing radicalisation remains effective, proportionate, and aligned with legal and regulatory expectations.

Understanding Radicalisation

Radicalisation is the process through which an individual comes to support terrorism, extremist ideologies, or violent behaviour. It is important to acknowledge that:

- Radicalisation can affect individuals from any background, regardless of race, ethnicity, religion, social status, or academic achievement.
- The process of radicalisation is often comparable to grooming, whereby individuals are manipulated or exploited by others with extremist intentions.
- Students and staff may be exposed to extremist ideas both in person and online, making vigilance across all environments essential.

12.1. Possible Indicators of Radicalisation

While the presence of one or more of these indicators does not confirm radicalisation, staff should remain alert to the following behaviours, which may signal that a student or staff member is at risk:

- Use of discriminatory language or engaging in discriminatory actions towards particular groups, communities, or individuals with protected characteristics.
- Possession of, or interest in, extremist or violent literature, online materials, or propaganda.
- Sharing extremist content with others, either digitally or in person.



- Noticeable changes in behaviour, such as becoming withdrawn, isolated, or unwilling to engage with peers.
- Expressing extremist views that support or justify violence, intolerance, or hatred.
- Advocating violent actions or justifying the use of violence to achieve ideological goals.
- Associating with individuals or groups known to hold extremist views.
- Actively seeking to recruit others to an extremist cause or ideology.

12.2. Dealing with Concerns about Radicalisation

At QA Higher Education, our safeguarding responsibilities include protecting children, young people, and adults not only from physical harm but also from exposure to people or groups that attempt to radicalise individuals. Radicalisation is understood as the process through which someone begins to support terrorism or extremist ideologies that could lead to terrorism.

Under the Counter-Terrorism and Security Act 2015, universities and other organisations are legally required to give due consideration to preventing people from being drawn into terrorism. This responsibility is known as the Prevent Duty. Prevent forms one of the four key elements of the UK Government's counter-terrorism strategy and focuses on reducing the risk of people becoming terrorists or endorsing terrorist activities.

QA Higher Education carries out an annual risk assessment relating to Prevent, supported by an action plan that is reviewed and updated regularly.

If a staff member has concerns that an individual (staff or student) may be vulnerable to radicalisation, they should raise the matter with the QA Higher Education Safeguarding team, see Appendix B. Similarly, if a student has such concerns, they should speak with the QA Higher Education Welfare team.

QA Higher Education adopts a safeguarding-based approach to issues of radicalisation. This ensures that appropriate internal and external services can work together to assess an individual's needs and provide the right support to reduce risk and promote safety.

12.3. Dealing with Concerns about Radicalisation for Off-Campus Activities

Safeguarding responsibilities apply both on and off campus. When staff or students take part in activities or events hosted by an external organisation, it is the responsibility of that organisation to ensure compliance with its own safeguarding policies and procedures. At the same time, it is reasonable for external partners to expect that QA Higher Education staff and students will have adhered to QA Higher Education's safeguarding standards prior to engagement.

Departments must therefore complete a risk assessment for any such activity, taking into account both the nature of the event and the individuals involved. The designated QA Higher Education lead for the activity is responsible for identifying any safeguarding risks linked to staff or student participation. Where significant concerns arise, these should be reported to the QA Higher Education Safeguarding team, Appendix B.



13. Victimisation and Deliberately False or Malicious Accusations

Any action that could be perceived as retaliation against an individual who raises a concern under this policy may constitute victimisation. Such behaviour may be unlawful and will be treated as a disciplinary matter. At the same time, QA Higher Education recognises the importance of safeguarding the wellbeing of individuals who may be wrongly accused of serious misconduct. Accordingly, anyone found to have made a deliberately false or malicious allegation may also be subject to disciplinary proceedings.

14. Appendices

14.1. Appendix A – Safeguarding Code of Conduct for all QAHE staff

All staff are accountable for the way in which they exercise authority, manage risk, use resources and protect others from discrimination and avoidable harm. Staff should discuss and/or take advice promptly from their line manager, QA Higher Education Safeguarding team, People Team or another senior member of staff over any incident which may give rise to concern. This code of conduct also applies to volunteers who work in an unpaid capacity in QA Higher Education premises and any other capacity at QA Higher Education including agency workers or contractors.

Employees must:

- Comply with the Safeguarding and Prevent policies and procedures and make themselves aware of the content of Keeping Children Safe in Education Part 1, in particular
- Staff should demonstrate exemplary behaviour and be open and transparent when working with students to protect students from abuse and to protect themselves from false allegations.
- Any incidents or behaviour which give rise to concern should be discussed immediately with the Designated Safeguarding Officer (DSO).
- Any allegations or suspicions that a student is being abused should be reported immediately to the DSO. Any allegations or concerns regarding another colleague must be reported immediately to the People team, unless the person against whom the allegation is made is from the People team, in which case the report should be made the CEO.
- Treat students, other employees with courtesy and respect.
- Complete and remain up to date with all mandatory Safeguarding and Prevent training.



- Inform their line manager and People team of any prior association or relationship with a student
- All staff should know the name of the Designated Safeguarding Officers A list of all DSOs, including contact details, is available on the QA Higher Education Hub on the Staff Intranet

14.1.1. Relationships between Staff and Students

Staff must ensure that their relationships with students remain appropriate for the respective student group. Staff are prohibited from socialising or engaging in intimate personal relationships with students. Any violation of this policy will be addressed under QA Higher Education's Disciplinary Policy, and relevant external agencies will be notified as necessary. Such conduct may be classified as gross misconduct and could result in dismissal. It is crucial to ensure that attitudes, demeanour, language, and conduct are not perceived as inappropriate. While it is acknowledged that some students may require additional help or support, staff should avoid showing favouritism, as this could be interpreted as part of a 'grooming process,' which is a serious offense.

Staff are not allowed to give gifts or rewards to students unless the gift or reward is part of an open competition in which all students have participated and are aware of the procedures. If any staff member feels that their relationship with a particular student is becoming inappropriate, they should discuss the situation with their line manager immediately.

Employees should only contact students using the Company's mail, SMS, telephone and e-mail/intranet systems, and do so within reasonable business hours or those which are deemed appropriate in exceptional circumstances based on business needs.

14.1.2. Social Contact

Social contact with students, outside of events organised by QA Higher Education, should be actively avoided. While there may be occasions where social interaction is unavoidable, staff must remain mindful to always maintain an appropriate and professional relationship with students.

Staff are prohibited from sharing their personal contact information with students, including home or mobile phone numbers, personal email addresses, and private social media accounts.

Staff must not use WhatsApp, or any other messaging service, to communicate with students from any device, unless explicit authorisation has been given by senior management. Authorised use must be solely for work-related communication, not social interaction, even when using a company device.

Social media is commonly used by many individuals, especially students, to communicate with peers and the public. While students may seek to form personal relationships with staff, it is essential to uphold professional boundaries. Therefore, staff must not accept or send friend requests to students on personal social media accounts or other online platforms. Privacy settings should be set to ensure that access is restricted to friends only. It is up to staff to ensure that you do not have anyone on their social media network, and to check before accepting or sending any friend requests, to ensure that you are not breaching this policy.



Staff should avoid posting comments that:

- Are critical of any other employees or students on any forum, website, social networking site, blog etc.
- Run counter to the QA's Equality and Diversity Policy
- Recommend, or appear to endorse, lawbreaking of any kind
- Exhibit grossly irresponsible behaviour, or appear to endorse irresponsible behaviour, that could be argued to encourage "copycat" behaviour by students. This would include, for example, dangerous driving or alcohol abuse.
- Incite violence and hatred based on ethnic, racial or religious grounds.

14.1.3. Physical Contact / Intervention

As a general principle, staff should avoid unnecessary physical contact with students. However, there may be rare occasions when a student requires comfort or reassurance that might include physical gestures. In such cases, it is important for staff to ensure that any comforting actions are acceptable to the student. Staff should also be mindful that even well-intentioned physical contact can be misinterpreted by the student.

If a student poses an immediate risk to themselves or others, trained staff members may need to intervene and restrain the student as a last resort. In any situation that presents a risk on campus, the Estates and Facilities team should be contacted.

For restraint to be legally acceptable, it must be a reasonable and appropriate response to the situation. The amount and type of force used must correspond to the circumstances. Staff should cease any restraint as soon as it is safe to do so. If the student is struggling to breathe, the restraint must be stopped immediately.

It is essential that a member of the Safeguarding, Student Life, and Wellbeing team is notified if a student has been restrained.

14.1.4. One to One Situations

It is acknowledged that there will be times when staff need to work one-on-one with students. In these situations, staff may be more vulnerable to allegations. To safeguard against any potential allegations, staff should follow these guidelines:

- Consider the needs and circumstances of the student involved.
- Avoid meeting students in remote or secluded areas of the campus.
- Ensure there is visual access to the meeting and/or keep the door open during one-on-one interactions.
- Sit closest to the exit during the meeting.



- Before the meeting, inform colleagues and evaluate whether it is appropriate to have a colleague present or nearby.
- If a student becomes distressed or angry, report the situation to a senior colleague and, if necessary, to the Estates and Facilities team and/or the Safeguarding, Student Life, and Wellbeing team.
- Staff are not allowed to meet with students off-campus unless prior approval has been obtained from senior management.

14.1.5. Confidentiality

Staff members often have access to highly sensitive confidential information about colleagues, third parties, students, and their families. Such information should only be discussed or shared on a need-to-know basis, and when possible, the individuals' identities should remain anonymous.

If a staff member suspects that a student is being abused or if a student discloses that they are being abused, or if there are any safeguarding concerns—including situations where a student may pose a risk to others—they must report this information to the Designated Safeguarding Officer (DSO) immediately,

If there is any uncertainty about whether to share information or maintain confidentiality, staff should seek guidance from the DSO or another member of the Safeguarding team.

Any requests for information from the police, local authorities, or any other government agency should be referred to the Assistant Director of Safeguarding, Student Life, and Wellbeing for appropriate action.

14.1.6. Warning signs of breaches of professional boundaries

This guidance aims to support individuals in reflecting on their professional boundaries, as well as assisting those who may be concerned about the boundaries of others. While not an exhaustive list, the following indicators can serve as helpful prompts for evaluating whether boundaries might be at risk of being crossed:

- Regularly considering a student outside of work hours, which may indicate an emotional investment that needs to be assessed.
- Favouring one student's needs at the expense of others or giving special treatment to a particular student
- Selective reporting/recording of time spent with the student and the student's behaviour
- Communicating in a guarded and defensive manner when questioned regarding interactions and relationship with the student
- Denying that the behaviour has or is likely to cross a professional boundary

14.1.7. Implications for employees

Employees who breach any of the above may be subject to disciplinary action.

If there is an allegation against an employee, then the People Team will be notified so that they can trigger the implementation of the relevant process and investigate.



QA Higher Education reserves the right to suspend any employee under the Safeguarding Policy to protect children and adults at risk whilst an internal and/or external investigation takes place.

The organisation can implement its own internal investigation during any stage of this process, which will be under the advice and support of the People Team. This may result in disciplinary action being taken against an employee, which could result in sanctions up to and including dismissal.

Please see the Disciplinary Policy, available on the People Hub, for further information.

14.1.8. Suspension of employees under the Safeguarding Procedure

Should QA Higher Education decide to suspend the employee because of a safeguarding concern the company disciplinary policy will be utilised. The People Team should be informed immediately prior to any suspension taking place to ensure the relevant processes are being followed and to advise accordingly.



14.2. QA Higher Education Safeguarding Team Contact Details

Designated Safeguarding Officer

Lorraine Walsh, Assistant Director Safeguarding Student Life and Wellbeing
email:Lorraine.walsh@qa.com

Phone: 0203 921 0163

Out of hours contact (Safeguarding only) 07388381567

Deputy Safeguarding Leads

Karen Flowers Matini, Head of Safeguarding and Student Wellbeing

Email: Karen.flowersmatini@qa.com

Tel: 0203 921 0163

Alex Booth, Safeguarding and Student Welfare Manager - London

Email: alex.booth@qa.com

Tel: 0203 921 0163

Nick Wilkinson, Safeguarding and Student Mental Health Manager - Birmingham

Email: Nick.Wilkinson@qa.com

Tel: 0203 921 0163

Priscilla Afolabi, Welfare Advisor/SVLO - Manchester

Email: priscilla.afolabi@qa.com

Tel: 0203 921 0163

Roles and responsibilities

Role/area		Named person	Contact Details
DSO	Designated Safeguarding Officer	Lorraine Walsh	See above
DSL	Deputy Safeguarding Lead	Karen Flowers Matini, Alex Booth, Nick Wilkinson, Priscilla Afolabi	See above
SSWT	Safeguarding and Student Wellbeing team	Karen Flowers Matini, Alex Booth, Will Houghton, Josselyn Teran, Hannah Stiles, Nikki George, David Jones, Vani Prasad	Qahe.welfare@qa.com Qahe.mentalhealthsupport@qa.com
SWRP	Student Welfare Risk Panel	Karen Flowers Matini, Alex Booth, Nick	Qahe.safeguardingalerts@qa.com



		Wilkinson, Priscilla Afolabi, Tim Harris, Heather Winters, Casey Mack, Samantha Waters	
DO	Director of Operations	Heather Winters	Heather.winters@qa.com
HP	Head of People - QAHE	Carrie Hooper	Carrie.hooper@qa.com
SET	Senior Executive team	Simon Nelson, Tim Harris, John Howell, Steve Rimmel, Tim Slater, Steve Greatrex, Nick Miller, Nikki Drake	Liz.hill@qa.com
UP	University Partner		
LA	Local Authority		
999	Emergency Services		

Risk Level	Responsible	Accountable	Consult (as required)	Immediately inform (always)	Inform post case analysis
No Concern	SSWT	SSWT	DSO/DSL		
Limited Concern	SSWT	DSO/DSL	SWRP/DO/LA	DSO/DSL	SWRP
Significant Concern	SSWT	DSO/DSL	SWRP/DO/HP/LA/999	DSO/DSL	SWRP
Critical Concern	SSWT	DSO/DSL	SWRP/DO/HP/LA/999/UP	DSO/DSL/SWRP	SET



14.4. Prevent Referral

As per guidance received from Regional Prevent coordinators, this form should be utilised for all future

Prevent Referrals: [Prevent Referral Form](#)

QA Higher Education will continue to follow local referral pathways in respect of the submission of the form to the relevant body. Please find named regional Prevent leads below.

Lorraine Walsh is the Prevent lead for QA Higher Education

Area/Region	Regional Prevent Co-ordinator	Email Address
London	Jennie Fisher	jennie.FISHER@education.gov.uk
West Midlands	Alamgir Sheriyar	alamgir.sheriyar@education.gov.uk
North West	Claire Little	claire.little@education.gov.uk

14.5. Online Safety Arrangements

IT Systems Management

The IT team works with the Designated Safeguarding Officer and are responsible for:

- Putting in place appropriate filtering and monitoring systems, which are reviewed and updated accordingly keep students safe from potentially harmful and inappropriate content and contact online while at QA Higher Education, including terrorist and extremist material
- Ensuring that QA's IT systems are secure and protected against viruses and malware, and that such safety mechanisms are updated regularly
- Conducting a full security check and monitoring QA's IT systems on an agreed basis
- Blocking access to potentially dangerous sites and, where possible, preventing the downloading of potentially dangerous files
- Ensuring any online safety incidents are logged in line with procedures.
- Ensuring that any incidents of cyber-bullying are dealt with appropriately in line with QA Higher Education's Respect for All policy

This list is not intended to be exhaustive.

All staff and volunteers

All staff, including contractors and agency staff, and volunteers are responsible for:

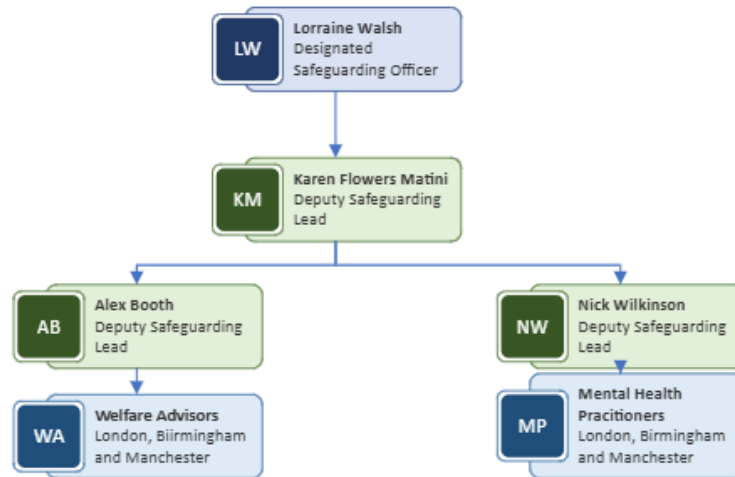
- Maintaining an understanding of this policy
- Implementing this policy consistently
- Agreeing and adhering to the terms on acceptable use of the QA's IT systems and the internet (Computer User Agreement), and ensuring that students follow the QA's terms on acceptable use additionally found in Respect for All Policy
- Working with the DSO to ensure that any online safety incidents are flagged and dealt with appropriately in line with this policy
- Ensuring that any incidents of cyber-bullying are dealt with appropriately in line with QA Higher Education's Safeguarding Policy and Procedure

This list is not intended to be exhaustive.



14.6. Safeguarding Team Governance

The Safeguarding Team



Student Welfare Risk Panel

The DSO/DSLs will provide fortnightly updates to the Student Welfare Risk Panel to ensure they are made aware of all relevant information/updates related to safeguarding. Additionally, the Panel will be informed when a significant or critical concern alert is received and updated accordingly in a frequency that will be determined by the severity of each case.

Student Welfare Risk Panel Members

Lorraine Walsh, Assistant Director of Safeguarding, Student Life and Wellbeing

Karen Flowers Matini, Head of Safeguarding and Student Wellbeing

Alex Booth, Safeguarding and Welfare Manager

Nick Wilkinson, Senior Mental Health Practitioner

Priscilla Afolabi, Welfare Advisor, SVLO

Tim Harris, Executive Dean and Provost

Heather Winters, Director of Operations

Casey Mack, Head of Estates and Facilities

Samantha Waters, University Secretary

Ali Wright, Legal Counsel - QAHE

