



Safeguarding Policy

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Quality Leisure Management Ltd is a wholly owned subsidiary of PHSC Plc

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Purpose and scope

Quality Leisure Management Ltd (QLM) is committed to providing training environments in which learners and other participants are treated with dignity and are protected from abuse, neglect, exploitation, harassment and avoidable harm. This policy explains how safeguarding concerns arising during or in connection with QLM training will be prevented, recognised, reported, recorded and escalated.

The policy applies to learners, prospective learners, tutors, assessors, invigilators, employees, associate consultants, subcontractors and other persons involved in QLM classroom, practical, workplace, blended or online training. It applies primarily to safeguarding adults, including adults with care and support needs. Where a concern involves a person under 18, QLM will take immediate protective action and refer the matter through the appropriate child-safeguarding route.

Legal and policy framework

QLM will act in accordance with applicable safeguarding, equality, data protection and counter-terrorism law and guidance. Relevant frameworks include the Care Act 2014 and its statutory guidance, the Counter-Terrorism and Security Act 2015 and current Prevent duty guidance where applicable, together with local safeguarding procedures and the requirements of relevant awarding, licensing or endorsing organisations.

The six principles of adult safeguarding are empowerment, prevention, proportionality, protection, partnership and accountability. QLM will seek to make safeguarding personal by listening to the adult, considering the adult's wishes and desired outcomes, and taking proportionate action, subject to immediate safety, legal duties and the rights of others.

Definitions

Safeguarding means protecting a person's right to live in safety, free from abuse and neglect, while promoting wellbeing and preventing harm.

An adult at risk is an adult who has needs for care and support, is experiencing or is at risk of abuse or neglect, and, because of those needs, is unable to protect themselves from the abuse or neglect or the risk of it.

Abuse or neglect may include physical abuse, domestic abuse, sexual abuse, psychological abuse, financial or material abuse, modern slavery, discriminatory abuse, organisational abuse, neglect and acts of omission, and self-neglect. Harm may occur in person, online, in a workplace, at a training venue or elsewhere.

Prevent forms part of the United Kingdom's counter-terrorism arrangements and seeks to stop people becoming terrorists or supporting terrorism. A Prevent concern is managed as a safeguarding concern and should be based on relevant behaviour and circumstances, not assumptions about protected characteristics, beliefs or lawful expression.

Safeguarding principles

QLM will:

- place immediate safety and welfare at the centre of its response;
- listen without judgement and take concerns seriously;

- avoid promising absolute confidentiality;
- record facts accurately and distinguish fact from opinion;
- share information lawfully, proportionately and only where necessary;
- respect the adult's views and choices where this is safe and lawful;
- manage conflicts of interest and allegations against persons working for QLM;
- cooperate with statutory agencies and relevant external organisations; and
- use safeguarding learning to improve training controls and practice.

Roles and responsibilities

The Managing Director has overall responsibility for this policy and will act as, or appoint, the Safeguarding Lead. The Safeguarding Lead is responsible for receiving concerns, assessing immediate risk, deciding referrals, maintaining secure records, coordinating with statutory agencies and ensuring that actions are completed.

Directors and managers must ensure that appropriate resources, reporting routes and oversight are available. Tutors, assessors and invigilators must maintain professional boundaries, promote a safe learning environment, respond appropriately to disclosures and report concerns without delay. Employees, associates and subcontractors must remain alert to safeguarding indicators and cooperate with authorised action. Learners are encouraged to report concerns and to treat others with dignity and respect.

Prevention and safer training arrangements

QLM will apply proportionate preventive arrangements, which may include:

- clear codes of conduct and professional-boundary expectations;
- appropriate tutor, assessor, invigilator and subcontractor selection and briefing;
- risk assessment of venues, practical activities, lone working and online delivery;
- secure and suitably moderated digital platforms and communication channels;
- accessible information about how learners can obtain help or report a concern;
- appropriate supervision and management of practical or assessment activity;
- consideration of reasonable adjustments and individual support needs; and
- prompt action where behaviour creates an unsafe, intimidating or exploitative environment.

Training and awareness

QLM will provide safeguarding and Prevent information, guidance or training proportionate to each person's role and the risks of the work. Refresher arrangements will be determined by role, risk, changes in guidance and learning from incidents rather than relying solely on a fixed interval.

Persons responsible for receiving or referring concerns will be supported to understand local safeguarding pathways, information sharing, immediate-risk decisions and the distinction between observation, professional concern and evidence.

Recognising a concern

Possible indicators may include unexplained injury, fear of a particular person, controlling behaviour, coercion, neglect of basic needs, financial exploitation, sexual or discriminatory conduct, unsafe care, modern slavery indicators, serious self-neglect, online exploitation, threats, or significant changes in

behaviour or participation. An indicator does not by itself prove abuse or radicalisation, but it may justify a safeguarding conversation or report.

QLM personnel must not investigate informally, confront an alleged perpetrator or seek evidence in a way that could increase risk, contaminate evidence or compromise a statutory investigation.

Responding to a disclosure or concern

When a person discloses a concern, the person receiving the information should:

- listen carefully and remain factual and non-judgemental;
- take immediate action if anyone is in danger or needs urgent medical assistance;
- reassure the person that reporting was appropriate;
- explain that information may need to be shared to protect the person or others;
- ask only necessary open questions to clarify immediate safety and basic facts;
- avoid investigating, leading questions or requesting repeated accounts;
- make a timely written record using the person's own words where possible; and
- report the concern to the Safeguarding Lead without delay.

Reporting procedure

Stage 1 – Immediate danger. If a person is in immediate danger, a serious crime is in progress or urgent medical help is required, call 999. Take reasonable steps to preserve safety and then notify the Safeguarding Lead as soon as possible.

Stage 2 – Internal report. Report any other safeguarding or Prevent concern to the Safeguarding Lead without delay at admin@qlmconsulting.co.uk. The report should include the persons involved, date, location, factual account, immediate action and available contact information.

Stage 3 – Risk assessment and referral. The Safeguarding Lead will assess immediate and ongoing risk, the adult's wishes where relevant, possible risk to others, evidence preservation, consent, confidentiality and the need to consult or refer to Adult Social Care, the police, a local Prevent team, an employer, an awarding or endorsing organisation, or another competent body.

Stage 4 – Follow-up. QLM will record the decision, reasons, referrals, advice received, actions, responsible persons and review arrangements. QLM will check that immediate actions are completed and consider any continuing support or training controls.

Consent and information sharing

Where appropriate, QLM will seek the adult's consent before sharing safeguarding information. Information may be shared without consent where there is a risk of serious harm, risk to another person, suspected serious crime, concern about coercion or capacity, a legal duty, or another sufficiently strong public-interest basis. The Safeguarding Lead will record the decision and share only information that is relevant and proportionate.

QLM cannot guarantee confidentiality. Information will be restricted to persons who need it to protect someone, assess or manage risk, investigate, meet a legal obligation or comply with an applicable external requirement.

Allegations concerning QLM personnel

An allegation concerning a tutor, assessor, employee, associate or subcontractor will be reported immediately to the Safeguarding Lead or, where the allegation concerns that person, to another Director. The person managing the concern will have no material conflict of interest.

QLM may take precautionary action, including changing duties, supervision or access to learners, while the concern is assessed. Precautionary action is not a disciplinary finding. QLM will coordinate safeguarding, contractual, disciplinary and external referral processes so that protective action is not delayed and evidence is not compromised.

Prevent concerns

A concern about susceptibility to radicalisation should be reported through the safeguarding route. QLM will use a proportionate notice, check and share approach, seek specialist advice where appropriate and avoid treating lawful debate, protected beliefs or a person's identity as evidence of risk.

QLM is not assumed to be a specified authority solely because it provides training. Where QLM works for or alongside a specified authority, QLM will cooperate with the client's lawful safeguarding and Prevent arrangements and follow applicable contractual requirements.

Online and remote learning

QLM will use proportionate controls for online learning, including approved platforms, appropriate access settings, professional communication, moderation where relevant and clear reporting routes. Tutors will not use personal or informal channels with learners where this would undermine professional boundaries or record keeping.

Online abuse, exploitation, threatening communication, inappropriate sharing of material or concerns arising during remote delivery will be reported and managed under this policy.

Support for learners

QLM will provide available information about the safeguarding process and, where appropriate, signpost a learner to statutory services, specialist support, an employer support route or another relevant service. QLM does not replace emergency, social care, police, health or specialist safeguarding services.

Whistleblowing and complaints

A person who cannot use the normal safeguarding route, or reasonably believes that a serious concern is not being addressed, may raise the matter with another Director, use the applicable whistleblowing route or contact an appropriate statutory agency. Service complaints will be handled under QLM's Safeguarding Policy, but a safeguarding concern will not be delayed while a complaint is considered.

QLM will support persons who raise genuine concerns in good faith. No person should suffer detrimental treatment for making a safeguarding report or assisting an appropriate enquiry. Knowingly false or malicious reports may be addressed separately, but a concern is not malicious merely because it is not substantiated.

Recording, confidentiality and data protection

Safeguarding records will be factual, dated, attributable and stored securely, separately from routine course records where appropriate. Access will be restricted to authorised persons. QLM will retain and dispose of records in accordance with applicable legal, safeguarding, contractual and data protection requirements.

Corrective and preventive action

Where a safeguarding concern identifies a failure or risk in QLM's arrangements, QLM will record proportionate corrective or preventive action. The record will identify the issue, immediate containment, affected persons or activities, root cause where known, required action, responsible person, target date and verification of effectiveness.

Monitoring and organisational learning

QLM will review safeguarding concerns, referrals, incidents, complaints, training completion and corrective actions to identify recurring risks and opportunities to improve training delivery. Information used for monitoring will be limited to what is necessary and, where practical, anonymised or aggregated.

Policy review

This policy will be reviewed biannually and sooner where required by changes in law or statutory guidance, local safeguarding arrangements, QLM's activities, external organisation requirements, identified risks, incidents or management review findings.

Signed:

A handwritten signature in black ink, appearing to read 'Leigh Simmonds', written over a horizontal line.

Date: September 2026

Leigh Simmonds
Quality Leisure Management Ltd