Prologue Business School Ltd

Safeguarding Policy

Version	2.0
Organisation	Prologue Business School Ltd ("Prologue"), The Hub, Blackfriars Street, Stamford, Lincolnshire PE9 2BW
Designated Safeguarding Lead	Simon Selkirk, Founder/Director
Independent Safeguarding Adviser	Victoria Raynor, Raynor Safeguarding Ltd
Approved by	Simon Selkirk, Founder/Director, following independent review by Victoria Raynor
Date approved	09/10/2026
Next review	September 2027 – annually, or sooner after a serious incident or significant change

1. Policy statement

Prologue works with young people, many of them under 18, through mentoring, programmes, work placements, events and online activity. Their safety and wellbeing come first in everything we do.

Safeguarding is everyone's responsibility. Every adult working with or for Prologue must understand this policy, keep appropriate professional boundaries and report concerns promptly. Prologue will:

- take every concern seriously and act on it without delay;
- make sure only suitable, vetted and trained adults work with learners;
- keep independent oversight of safeguarding, so concerns can be raised without going through the Founder/Director;
- work with children's social care, the police and other agencies whenever needed; and
- keep accurate, secure records and review this policy at least annually.

2. Scope

This policy applies to all Prologue activity – in person, online, at partner or employer premises, during travel and on any digital platform. It applies to every adult associated with Prologue, including the Founder/Director, employees, tutors, mentors, speakers, volunteers, contractors and employer hosts.

Children. Anyone under 18 is a child for safeguarding purposes, including 16 and 17-year-olds in sixth form.

Adults at risk. Adult safeguarding principles apply to learners aged 18 or over who have care-and-support needs and, because of those needs, are unable to protect themselves from abuse or neglect.

Mixed-age groups. Prologue cohorts may include under-18s alongside adults. Adult learners are expected to follow the learner code of conduct, and the same boundaries apply to their contact with under-18s.

This policy is informed by Working Together to Safeguard Children 2026; the Department for Education's Out-of-school settings: safeguarding guidance for providers (updated February 2026); Keeping Children Safe in Education 2026, used as a best-practice reference where appropriate; the Children Acts 1989 and 2004; the Care Act 2014; the Safeguarding Vulnerable Groups Act 2006; relevant Prevent guidance, where applicable; UK GDPR and the Data Protection Act 2018; and local safeguarding partnership procedures.

3. Roles and responsibilities

3.1 Founder/Director – Designated Safeguarding Lead (DSL)

Simon Selkirk is the Designated Safeguarding Lead and has overall responsibility for safeguarding at Prologue. The DSL will:

- receive and respond to safeguarding concerns, and make referrals to children's social care, the police, the LADO or Prevent where needed;
- keep secure safeguarding records, including the reasons for each decision;
- make sure every adult is vetted, inducted and trained before working with learners;
- make sure activities are risk assessed and run safely;
- seek advice from the Independent Safeguarding Adviser on any concern where the right action is unclear; and
- never let commercial or reputational considerations override a learner's safety.

The DSL will hold current DSL-level safeguarding training, renewed at least every two years, and safer recruitment training.

3.2 Independent Safeguarding Adviser

Victoria Raynor of Raynor Safeguarding Ltd is Prologue's Independent Safeguarding Adviser. Because the DSL is also the Founder/Director, this role provides independent oversight and challenge. The Independent Safeguarding Adviser will:

- receive and manage any concern or allegation about the Founder/Director;
- be the contact when the DSL is unavailable or someone feels a concern has not been handled properly;
- give the DSL advice and supervision on safeguarding cases;
- review safeguarding records, vetting and training at least termly; and
- review this policy annually.

The Independent Safeguarding Adviser may contact or refer to any statutory agency without the Founder/Director's approval. The appointment, including access to records and availability, is set out in a written agreement. The Independent Safeguarding Adviser is not an emergency service.

3.3 All adults

Every adult working with Prologue must read this policy, sign the code of conduct, report concerns immediately, and never investigate a concern themselves. Staff, regular tutors, mentors and other adults in ongoing learner-facing roles must complete safeguarding induction before working with learners. Supervised, one-off visiting speakers must receive a safeguarding briefing before their session.

4. Raising a concern

Anyone – a learner, parent/carer, mentor, employer host or member of the public – can raise a concern about a learner's safety or about the conduct of any adult connected with Prologue.

Situation	Who to contact
Someone is in immediate danger	Call 999 first, then tell the DSL
Any safeguarding concern	DSL – Simon Selkirk: safeguarding@prlg.co.uk, +44 7825 447800
Concern about the Founder/Director, the DSL is unavailable, or you are unhappy with how a concern was handled	Independent Safeguarding Adviser – Victoria Raynor: victoria@raynorsafeguarding.com, +44 7545 233097
At any time, for any reason	Children's social care (where the child lives), the police on 101, or the NSPCC Helpline on 0808 800 5000

A concern about the Founder/Director must never be reported to, investigated by or managed by the Founder/Director. No one needs Prologue's permission to contact a statutory agency, and no one will be treated unfairly for raising a concern in good faith.

5. Responding to a disclosure

If a learner tells you something worrying:

1. Stay calm, listen and take them seriously.
2. Tell them they were right to tell you, and explain you cannot keep it secret.
3. Do not ask leading questions, investigate or contact the person concerned.
4. Call 999 if anyone is in immediate danger.
5. Write down what you saw or heard, using the learner's own words, with the date, time and your name.
6. Report it immediately to the DSL - or the Independent Safeguarding Adviser where the concern involves the Founder/Director or the DSL is unavailable.

Relevant online evidence, such as messages, usernames, dates and times, should be preserved where safe and appropriate. Do not copy, download, save, screenshot or forward suspected sexual images of anyone under 18, or ask a learner to send them. Report the concern immediately to the DSL - or the Independent Safeguarding Adviser where appropriate - and follow specialist or police advice.

6. What happens next

The DSL decides what action is needed, takes advice where appropriate and records the decision and the reasons for it. Parents/carers of under-18s will normally be informed, unless doing so could put the learner at greater risk or agency advice is not to.

Step	Timescale
Concern reported to the DSL	Immediately on becoming aware of the concern
Written record completed	Same day; within 24 hours at the latest
DSL reviews the concern	Within one working day
Referral to children's social care or police	Immediately where a learner is at risk of harm
LADO consulted on an allegation about an adult	Within one working day, before any internal enquiry

These are the latest acceptable times, never a reason to wait.

7. Concerns about adults

Allegations. An allegation is where an adult may have harmed a learner, committed an offence against a child, or behaved in a way that suggests they are unsuitable to work with children. The DSL will consult the Local Authority Designated Officer (LADO) within one working day and before any internal enquiry. Interim steps – such as pausing a mentoring arrangement – will be taken where needed to keep learners safe.

Allegations about the Founder/Director. These go straight to the Independent Safeguarding Adviser, who will consult the LADO within one working day and decide any interim measures with agency advice. The Founder/Director will take no part in handling the matter.

Low-level concerns. Behaviour that is not an allegation but is inconsistent with the code of conduct – for example over-familiar messages, favouritism or unnecessary one-to-one contact – must still be reported. These are recorded and reviewed for patterns.

Where an adult is removed from work with learners because they have harmed or posed a risk to a child, Prologue will consider its duty to refer to the Disclosure and Barring Service.

Concerns involving adult learners are referred to adult safeguarding services or the police where appropriate. LADO advice is also sought if the adult's alleged behaviour may indicate a risk to children.

8. Safer recruitment and vetting

Prologue assesses the checks required for each role according to its responsibilities, frequency of contact, supervision arrangements and access to learners. The assessment and checks completed are recorded on Prologue's Safer Recruitment and Vetting Register. Employees, regular tutors, mentors and other adults appointed to ongoing learner-facing roles must complete the following before starting:

- identity check and, where relevant, right to work;
- two references, and an explanation of any gaps in employment history;
- a DBS check at the right level for the role – an enhanced check with children's barred list for anyone in regulated activity, such as regular unsupervised mentoring of under-18s;
- a signed code of conduct and safeguarding declaration; and
- safeguarding induction.

A DBS certificate is only accepted from another organisation via the DBS Update Service where it is for the same workforce and level of check, and not a volunteer certificate for a paid role. The Founder/Director must hold a DBS check appropriate to the Prologue role, with the certificate and any relevant Update Service status independently verified by the Independent Safeguarding Adviser. One-off speakers who are always supervised may not need a DBS check; each role is assessed and the decision recorded.

9. Professional conduct

Every adult working with Prologue must keep contact with learners professional, purposeful and transparent. Adults must not:

- form a romantic, sexual or otherwise inappropriate relationship with a learner;
- contact under-18s using personal phone numbers, personal email addresses or personal social media or messaging accounts, or give learners these personal contact details. All communication with under-18 learners must use Prologue-approved channels;
- meet a learner alone in a private or unobservable place, or transport an under-18 alone except in an emergency;
- provide or use alcohol, drugs, vapes or gambling with learners;
- give personal investment advice, promote financial products, or ask for or enter into any money, loan, investment or commercial arrangement with a learner; or
- use career opportunities, introductions or references as leverage for personal contact or advantage.

Prologue's investment education is general and educational. Portfolio activity is simulated and no learner money is ever handled.

10. Online safety and mentoring

All communication with learners goes through Prologue-approved email accounts and platforms. WhatsApp, Snapchat, Instagram, Discord and similar apps are not used with under-18s.

One-to-one mentoring is central to Prologue's work and is managed so it is always visible:

- sessions are booked through Prologue and held on approved platforms or in open, observable locations;
- parents/carers of under-18s know when sessions take place;
- a brief note of each session is recorded; and
- there is no contact between sessions outside approved channels.

Online group sessions use waiting rooms or access controls, and private chat between adults and individual under-18s is disabled where the platform allows.

11. Placements, visits and events

Every employer placement, visit or event involving under-18s is risk assessed in advance. Each one has a named Prologue lead and named host, a written host agreement, clear supervision and travel arrangements, emergency contacts, a way for the learner to check in with Prologue, and parental consent where required. Host staff are briefed on Prologue's expectations, including no unsupervised one-to-one contact and no alcohol involving under-18s. Prologue does not run overnight activity for under-18s without separate, approved arrangements.

Attendance is recorded at every session. If an under-18 learner is missing or does not arrive as expected, the responsible adult informs the DSL immediately and contacts their parent/carer, unless there is reason to believe doing so could increase risk. Immediate danger is reported to the emergency services without delay.

12. Specific risks

Child-on-child abuse. Bullying, harassment, sexual harassment and sharing images without consent are never dismissed as banter. Concerns are reported to the DSL and both the learner affected and the learner responsible are supported.

Mental health and self-harm. Prologue is not a clinical service. Any adult worried about a learner's mental health or risk of self-harm tells the DSL immediately. A learner at immediate risk is never left alone; call 999.

Radicalisation. Concerns about extremist views or influences are reported to the DSL, who will seek advice and refer to Prevent where appropriate.

Additional vulnerability. Learners with SEND, mental health needs or other vulnerabilities may find it harder to tell someone. Adults should be alert to this and make reasonable adjustments.

13. Records and information sharing

Safeguarding records are factual, dated and signed, kept separately from programme records and stored securely with access limited to the DSL and the Independent Safeguarding Adviser. Records concerning the Founder/Director are controlled by the Independent Safeguarding Adviser and must not be accessible to the Founder/Director. The safeguarding mailbox is a reporting channel only; concerns are logged in the secure record.

Information is shared only with those who need to know. Consent is sought where appropriate, but information will be shared without consent where it is needed to protect someone from harm. Records relating to a child are kept until they reach 25; records of allegations against adults or of child sexual abuse are kept for longer in line with guidance.

14. Training

Staff, regular tutors, mentors and other adults in ongoing learner-facing roles complete Prologue's safeguarding induction before working with learners and a refresher every year. Supervised, one-off visiting speakers receive a safeguarding briefing before their session. Induction covers this policy, the code of conduct, how to recognise and report concerns, online safety, professional boundaries and the financial-conduct rules in section 9. Training is recorded on the Vetting Register.

15. Monitoring and review

The DSL and the Independent Safeguarding Adviser meet each term to review anonymised concerns, the Vetting Register, training records and any changes to Prologue's activities. This policy is reviewed annually, and sooner after a serious incident, a change in guidance or a significant change in how Prologue operates. Failure to follow this policy may lead to removal from work with learners and referral to the relevant agencies.

Appendix A: Safeguarding contacts

Contact	Details
Designated Safeguarding Lead	Simon Selkirk, Founder/Director – safeguarding@prlg.co.uk – +44 7825 447800
Independent Safeguarding Adviser	Victoria Raynor, Raynor Safeguarding Ltd – victoria@raynorsafeguarding.com – +44 7545 233097
Emergency	999
Police (non-emergency)	101
Lincolnshire Children's Services	01522 782111 - Monday to Friday, 8am–6pm 01522 782333 - Out-of-hours Emergency Duty Team
Lincolnshire LADO	01522 554674 LSCP_LADO@lincolnshire.gov.uk
Children's social care elsewhere	The local authority where the child lives
Lincolnshire Prevent	prevent@lincolnshire.gov.uk
Police Prevent team - advice	ctp-em-prevent@lincs.police.uk Call 101 and ask for the Prevent Team
NSPCC Helpline	0808 800 5000
NSPCC Whistleblowing Advice Line	0800 028 0285
Childline	0800 1111

Appendix B: Before any activity with under-18s

The DSL confirms that:

- every adult involved has completed the checks, code of conduct and safeguarding briefing or induction required for their role, with the assessment and checks recorded on the Vetting Register;
- a risk assessment is in place, including supervision, travel, first aid and emergency contacts;
- parent/carer consent and emergency contact details are held where required;
- communication is through approved channels only; and
- learners and parents/carers know how to raise a concern, including the independent route.

Appendix C: Review record

Version	Date	Summary of changes	Approved by
1.0	September 2026	First issue	Simon Selkirk, Founder/Director and Designated Safeguarding Lead.
1.1	September 2026	Added independent oversight, reporting standards, vetting register and retention framework	Simon Selkirk, Founder/Director and Designated Safeguarding Lead.
2.0	October 2026	Simplified and restructured following independent review. Founder/Director confirmed as DSL; Victoria Raynor (Raynor Safeguarding Ltd) appointed Independent Safeguarding Adviser	Simon Selkirk, Founder/Director and Designated Safeguarding Lead, following independent review by Victoria Raynor, Independent Safeguarding Adviser.