

Safeguarding and Prevent Policy

Issue	Date	Sections Affected	Description of Change / Change Request Reference / Remarks	Amended by
14	12/09/2024	All	Full Policy review addition of front page and version control	RRD – SB
14	13/09/2024	Legislation and Guidance	Amendment to KCSIE	RRD - SB
15	01/10/2025	Legislation and Guidance	Amendment to KCSIE	RRD - SB

Contents	Page
Introduction	4
Policy	4
Safeguarding and Prevent Policy Statement	4
Role of the Designated Safeguarding and Prevent Officer (DSL)	5
Safeguarding Code of Conduct	7
Responding to Concerns	10
Talking to Parents / Carers	12
Abuse Requiring Immediate Response	12
Allegation against Employees or other stakeholders	13
Support for referrer	15
Record Keeping and Informative Security	15
Guidance	17
Adult at Risk	19
Legislation and Guidance	20
How does Channel work?	21
What does Channel support look like?	21
Who can make a referral?	21
What happens with the referral?	21
Raising Concern	22

Safeguarding and Prevent Policy

Learner Recruitment	22
Wellbeing for Learners	22
Channel Risk Assessment	22
Welfare & pastoral care	22
Abuse of position of Trust	23
Anti-Bullying and Harassment	23
Communications	23
Openness and scrutiny	24
Recording	24
Use of equipment	24
Safer Recruitment and Training for employees	24
Training Interventions	25
Definitions	26
Sexual Exploitation and Grooming	33
Child on Child Sexual Violence & Sexual Harassment (Peer to Peer)	33
Mate Crime	33
Online Safety and Social Media	33
Sexting	34
Modern Slavery	35
Suicide & Mental Health Matters	36
Eating Disorders	36
Self-Harm	36
Violence	37
Gangs & County Lines	38
Domestic Violence and Abuse	39
Identifying case of Female Genital Mutilation (FGM) and Forced Marriage	39
Prevent Duty & British Values	40
Annex 1: The Channel Process	43
Annex 2: Helplines & Reporting	44
Annex 3: Information Security Management	47
Annex 4: Designated & Deputy Designated Safeguarding & Prevent Officer Job Description	49
Annex 5: Safeguarding & Prevent Officer Job Description	50
Annex 6: Safeguarding, Prevent & Welfare Reporting Procedure	52

Safeguarding and Prevent Policy

Annex 7: Referral Form (SPW)	53
------------------------------	----

This Policy Applies to:

All Employees, Learners (Apprentices), Employers and the Training Works Advisory Board.

Where this policy identifies responsibilities for the Designated Safeguarding & Prevent Lead (DSL), it equally applies to the Deputy Designated Safeguarding & Prevent Lead (DDSL) in DSL absence.

2. Policy

This policy has been agreed and approved by Senior Management Team (SMT), including the DSL.

If you have any concerns, contact the above officers, or use the email below. Learners, Employees & Employers should be made aware of this email address.

The Safeguarding E-mail address: safe@training-works.co.uk

The links below have been taken from the Working Together to Safeguarding Children guidance document.

For Children and Young People

Childline	0800 11 11
Child Exploitation and Online Protection Centre (CEOP)	http://www.thinkuknow.co.uk/ 0870 000 3344

Safeguarding and Prevent Policy

NSPCC Helpline	https://www.nspcc.org.uk 0800 800 5000
NSPCC Whistleblowing Helpline	help@nspcc.org.uk 0800 028 0285
Internet Watch Foundation	https://www.iwf.org.uk/
Social Care Link for Safeguarding Concerns	https://www.gov.uk/report-child-abuse-to-local-council
NHS commissioned website for young people – 'Kooth'	www.kooth.com

For further useful links turn to

The need to refer allegations or concerns about possible risks to our Learners to the Designated Local Authority Person (formerly LADO) is a requirement, as detailed in the government guidance Working Together to Safeguard Children.

Note: If you suspect child trafficking is taking place, the DSL must be informed immediately, and they will contact CEOP (Child Exploitation and Online protection Centre) to implement urgent steps to protect the child/children in question.

We must inform ESFA if we are subject of an investigation by the local authority or the police relating to funded learners, in such circumstances the Director with Safeguarding responsibilities (or DSL) will contact the ESFA directly.

ESFA will need to know the name of the institution, the nature of the incident and confirmation that it is, or is scheduled to be, investigated by the local authority and/or the police. If a referral has been made to the Disclosure and Barring Service, we are required to inform the ESFA.

Duties

Role of the Designated Safeguarding and Prevent Officer (DSL & DDSL) & the wider Safeguarding & Prevent Team (SPT)

We have appointed a Lead and Deputy DSL who have overall responsibility for issues related to safeguarding children and vulnerable adults and are supported by a team of SPOs. The DSL is responsible for acting as a source of advice on child and adult at risk safeguarding matters, for coordinating action within the Company and for liaising with health, children's service, adult services, and other agencies about suspected or actual causes of abuse. The DSL will be assisted by other designated members of staff from senior management and suitably experienced employees (SPOs). SPOs have a key responsibility for raising awareness, within the staff, of issues relating to the welfare of children and adults at risk and the promotion of a safe environment for children and adults at risk.

The Safeguarding & Prevent Team (SPT), consisting of the Director, DSL, DDSL, SPOs, receive training in safeguarding children and adults at risk. All employees receive initial &

Safeguarding and Prevent Policy

annual refresher training on Safeguarding & Prevent as required by Training Works. The SPT are required to keep up to date with developments in safeguarding children and adults at risk.

The DSL has governance over Safeguarding and Prevent matters across the Company, and the Director has overall responsibility for safeguarding and Prevent at Board level. The Director will ensure that resources, support, and all relevant training are available and in place for employees. The Director will support the Safeguarding and Prevent Team (SPT) in meeting their responsibilities and commitments.

There is a clear and robust job description for the DSL role within the business which can be accessed on our website www.training-works.co.uk via the Safeguarding section, the DSL is responsible for reviewing the child and adult at risk Safeguarding and Prevent Policy annually, or more frequently if there is a change to current legislation, along with any policies linked to the Safeguarding and Prevent Policy and processes and procedures that support the embedding and working practices of this policy.

- The DSL is responsible for ensuring the child and adult at risk policy is available publicly and to parents and carers, that parents and carers are aware that suspected abuse referrals may be made, and our role in this.
- The DSL will alert the DBS when a person has been dismissed or left due to risk to or harm that they presented, or may have presented, to a child or vulnerable adult.
- The DSL will alert the police when a crime may have been committed.
- The DSL will foster strong links with the Designated Local Authority Person.
- The DSL will refer all cases of suspected abuse to the local authority, children's social care agency or, in the case of a vulnerable adult, to the local authority adult's social care.
- The Director will refer to the ESFA should we be subject to an investigation regarding our safeguarding practices.
- The Director will refer all reportable safeguarding matters to the relevant funding partner.
- The DSL will liaise with senior management to inform them of issues, especially on-going enquiries, and police investigations.
- The DSL will maintain a proper record of any safeguarding referral, complaint, or concern, even when that concern does not lead to a referral.
- The DSL will act as a source of advice, support, and expertise to employee on matters of safety and safeguarding.
- The DSL will liaise with relevant agencies following a referral to ensure it has been dealt with effectively and identify whether a resolution has been achieved.
- The DSL will ensure that we work with employers to ensure that appropriate safeguarding's are in place.
- The Director (Operations) ensures that all employees receive training in safeguarding children and vulnerable adults, are aware of procedures for protecting children and adults at risk and that refresher training takes place annually.
- The DSL provides information at Board meetings about how we have discharged our duties. The DSL is also responsible for reporting deficiencies in procedure or policy to the Board at the earliest opportunity.

Safeguarding and Prevent Policy

- The DSL will receive subject area advice, guidance, and support from SPOs.
- If the DSL is absent from the business, the DDSL will be responsible for undertaking DSL duties.

Under no circumstances should a member of staff undertake any investigative activities of alleged or actual abuse, nor should they contact any of the external agencies that will deal with a referral. It is the responsibility of the DSL, with support from the senior management team & SPOs, to decide whether a referral should be made and to which agency or agencies. It is the role of the relevant Safeguarding and Police Services agencies to decide if abuse has taken place.

Safeguarding Code of Conduct

This Code of Conduct will be issued to every learner and discussed during induction. Employers will receive a copy in their Welcome Pack. Employees will be issued with a copy at induction, with the contents forming a discussion with the line manager.

Training Works follow the Equality and Human Rights Commission Statutory Code of Practice 2010. This safeguarding code of conduct also details how individuals can protect themselves against allegations of abuse.

Avoid personal and social contact with children or adults at risk and seek to minimise the risk of any situation arising in which misunderstandings can occur.

You will **NOT**:

- Engage in flirting or innuendo, make suggestive terms or gestures, or indicate favouritism for a child or vulnerable adult.
- Issue or threaten any form of physical punishment.
- Initiate or engage in sexually provocative games, conversations or activity involving or observed by young people, whether based on talking or touching.
- Make sexually suggestive remarks or discriminatory comments to or in front of a young person or discuss employee's own sexual relationships in front of them.
- Engage in any sort of sexual relationship with a young person, even when the young person is aged 16 or over and therefore legally able to consent.
- Use any type of physical punishment in order to discipline. Shouting at young people should be avoided whenever possible and only used if alternative forms of discipline have failed.
- Photograph or film young people for which no prior consent has been sought.
- Broadcast or view any audio and / or visual material (CDS, DVDs, videos, computer, or games etc.) that has inappropriate content for young children.

Safeguarding and Prevent Policy

- Invite or allow a young person or adult at risk who you have met through your work to your home or another location where the purpose is one of friendship or an intimate relationship.
- Engage in or tolerate any inappropriate physical activity involving young people.
- Allow the use of inappropriate language to go unchallenged.
- Do things of a personal nature for children or adults at risk that they can do for themselves.
- Dismiss an allegation of any sort relating to a learner's, learner or adults at risk's welfare or delay the reporting of an allegation.
- Discourage anyone from reporting concerns or ask individuals to keep secrets.
- Make promises to keep secrets, keep any disclosure confidential, overreact or be judgmental, should you suspect abuse.
- Spend excessive amounts of time alone with children or vulnerable adults, away from others
- Make unnecessary physical contact with children or vulnerable adults. However, there may be occasions where physical contact is unavoidable, such as providing comfort at times of distress or physical support in contact sports, etc. in all cases, contact should only take place with consent of the child or the vulnerable adult.
- Arrange to meet a child, adult at risk or their families, with whom you work outside of working hours, unless it is with consent of the parents/carers and person in charge of the activity.
- Give or receive gifts and / or substances such as drugs, alcohol, cigarettes or e-cigarettes to / from a young person or their families.
- Consume alcohol, take illegal drugs or legal highs during the working day / evening or at events, including during any breaks or when in the presence of young people.
- Smoke / vape with, or in front of, young people.
- Steal, or condone someone else's stealing, regardless of the value of the stolen item.

You WILL:

- Work in a room where you can be visibly seen, leave the door open and make sure other adults visit the room regularly whilst respecting children and vulnerable adult's rights to privacy, encouraging children and adults to feel comfortable enough to report attitudes or behaviours they do not like.
- Plan activities that involve more than one other person being present, or at least within sight and hearing of others. If this is unavoidable, always ensure your line manager knows where you are, with whom and why.
- Act with discretion regarding personal relationships at organised activities, ensuring your personal relationships do not affect your leadership role within the Company. All pre-existing relationships between employee, employers, contractors and / or participants of the organised activities must be declared.
- Avoid working in isolation with children and adults at risk, follow the recommended adult to young people ratios for meetings and activities and ensure there is separate sleeping accommodation for young people, adults, and group leaders.
- Never give out a personal mobile number or private e-mail address and ensure working hours of contact ability are stated.
- Never engage with Apprentices via personal social media on personal matters.

Safeguarding and Prevent Policy

- Be aware of the procedures for reporting concerns or incidents and be familiar with the contact details of the Designated Safeguarding & Prevent Officer (DSL), Deputy Designated Safeguarding & Prevent Officer (DDSL), Safeguarding & Prevent Officers (SPO).
- Treat all young people and adults equally and listen to them, avoiding favouritism and gossiping ensure allegations or disclosures by a young person or another adult are taken seriously and reported, including any made against you. Follow the procedures for reporting concerns.
- Never befriend or chat to children or adults at risk on social media / network sites. Always use professional language when writing, phoning, emailing, or using social media / network to communicate with young people or vulnerable adults.
- Be aware that young people can develop heterosexual and homosexual infatuations (crushes) towards adults working with them. If this happens, tell your line manager, and then respond to the situation in a way that maintains the dignity of all concerned.
- Immediately report concerns relating to the welfare of a child or adult at risk in your care, whether these concerns are about actions / behaviours of another colleague or based on any conversation with the child or vulnerable adult, particularly when they make an allegation.
- Act as a role model.
- Set and monitor appropriate boundaries and relationships when working with children and adults at risk, based on openness, honesty and respect for the child or vulnerable adults.
- Ensure that the focus of your relationship with a young person that you have met through any programmes always remains professional. The aim should never be to develop the relationship into a friendship or intimate relationship.
- Respect a young person or vulnerable adult's right to personal privacy but never agree to keep any information relating to the harm or a young person or adult at risk confidential. Provide support to a child, young person or adult at risk making a complaint.
- Remain calm and ensure that no one is in immediate danger if they suspect abuse. Report any concerns to the DSL without delay and record all the facts.
- Ensure that if a distressed young person needs comfort, that this is done in a way that is both age appropriate and respectful of their personal space. Never act in a way which may be perceived as threatening or intrusive. Always ask a young person before you act. Hugging should be limited and never initiated by employee / volunteers. Any hugging should be done by the side of the young person with an arm placed around the shoulders, side by side.
- Ensure that if any kind of physical support is required during any activities, it is provided only, when necessary, in relation to the activity and that this is done in a way that other colleagues can observe you.

Upon induction to a programme of learning, each Learner will be given a copy of our Safeguarding Code of Conduct and our employee will go through this document with them to ensure they understand their responsibilities. Employers will receive a copy in their Welcome Pack.

Safeguarding and Prevent Policy

If a Learner or Employer feels that there has been a breach of the Safeguarding Code of Conduct, they should report this breach immediately by contacting the DSL safe@training-works.co.uk / 07593703281. The complaint will be fully investigated as per the policy / process and actions will be taken to ensure the individual making the complaint is fully supported. If the complaint is regarding another child, young person or vulnerable adult, there may be a need for immediate actions to be implemented to ensure the safety of both the individual making the complaint and the person the complaint has been made against.

All complaints will be recorded and followed up to a satisfactory conclusion.

Employees who breach the Code of Conduct will be subject to our disciplinary procedures. Serious breaches may result in a referral being made to a statutory authority.

All children, young people and adults at risk should be treated with respect and the Code of Conduct has been written with respect, dignity, and safety for every individual in mind. However, employees understand that children and young people can abuse their peers. Peer abuse can take many forms, such as sexting, bullying, physical and emotional abuse, and inappropriate banter.

Procedure: Responding to concerns

We ensure and emphasise that everyone in the Company understands and knows how to share any concerns immediately with the DSL or DDSL. The process for responding to concerns is set out at Annex 7.

When an allegation of abuse is made to a member of staff, the employee who receives it will:

- Reassure the individual making the allegation (child or vulnerable adult) that they have done the right thing. They should never be given the impression that they are creating a problem by reporting sexual violence or sexual harassment. Nor should they ever be made to feel ashamed for making a report
- Listen & not interrupt
- Not promise that the matter will be kept confidential. Explain to them that the matter must be reported to a member of the Safeguarding & Prevent Team (SPT) as part of the legal duty. If there is any doubt as to whether the matter is a safeguarding issue, check with one of the SPT members
- Let the individual finish speaking and then only ask questions if you are still unsure whether this is a safeguarding issue
- Note that this is not an investigation and simply establish the key facts: remember **TED -Tell, Explain, Describe**
- Only ask simple, open, non-leading questions, e.g., if a child or adult at risk tells you they have been hurt, ask “Can you describe how that happened?” rather than, “Did someone hit you?”

Safeguarding and Prevent Policy

- Accept what the individual is saying and do not offer an alternative interpretation of the alleged event.
- Raise the concern with a DSL and not ask any more questions.
- Write down what has been said immediately afterwards, to the best of your memory, in the words used by the individual, ensuring that you make clear which is fact and what is opinion or hearsay in any given piece of information.
- Not ask the individual to sign anything at this stage.
- Note anything about the individual which may be connected, e.g., any visible injuries, including the position and description.
- **Report the matter to the DSL immediately within the same working day.**
- Complete the relevant documentation (the Referral Form located on the Shared Drive) and submit to the DSL via the safeguarding e-mail address safe@training-works.co.uk ensuring that you tell the individual what will happen next. Inform the DSL that the Referral Form has been completed & available on the Shared Drive.

Remember, if a child or adult at risk tells you about abuse that happened a long time ago or some time has lapsed since it last occurred, it does not make it any less real and distressing for the child or vulnerable adult. Abuse can be historic and relate to incidents that happened a long time ago. They must still be referred on to the DSL as per this procedure. Allegations against a teacher who is no longer teaching should be referred to the police. Historical allegations of abuse should also be referred to the police.

The following definitions should be used when determining the outcome of allegation investigations:

- Substantiated: there is sufficient evidence to prove the allegation.
- Malicious: there is sufficient evidence to disprove the allegation and there has been a deliberate act to deceive.
- False: there is sufficient evidence to disprove the allegation.
- Unsubstantiated: there is insufficient evidence to either prove or disprove the allegation. The term, therefore, does not imply guilt or innocence.
- Unfounded: to reflect cases where there is no evidence or proper basis which supports the allegation being made.

Employees should be mindful that an allegation may involve another child/children/young person(s) and if a child has been involved, the DSL should be contacted immediately as the welfare of the child being accused is equally paramount at this time.

The DSL will ensure that the member of staff reporting the incident/concern is reassured that their concerns are being appropriately addressed and that they have access to employee support, if needed.

If a child or adult at risk chooses to disclose, you should never:

- Take photographs of injuries.
- Examine marks or injuries solely to assess whether they may have been caused by abuse (there may be a need to give appropriate First Aid)
- Investigate or probe, aiming to prove or disprove possible abuse.

Safeguarding and Prevent Policy

- Make promises to the individual about confidentiality or keeping secrets.
- Assume that someone else will take necessary action.
- Jump to conclusions or react in any way to what the individual is disclosing.
- Speculate or accuse anybody.
- Confront another person (adult or child) allegedly involved.
- Offer opinions about what is being said or about the persons allegedly involved.
- Forget to record what you have been told – what may seem insignificant to you could be extremely important in supporting external agencies to decide whether abuse has occurred or is indeed likely to occur. **Remember: IF ANY STEP IN THE PROCESS IS NOT RECORDED, THEN IT IS ASSUMED THAT IT DID NOT HAPPEN**
- Fail to pass the information on to the DSL.
- Ask the individual to sign a written copy of the disclosure or a statement.

Where a child or adult at risk has communication difficulties or uses alternative/augmented communication systems, you may need to take extra care to ensure that signs of abuse and neglect are identified and interpreted correctly, but concerns should be reported in the same manner as for other children or vulnerable adults.

If young person or adult has personal needs, their requirements should be discussed prior to commencement of their programme of learning and additional support plan implemented. We will respect personal privacy and dignity, ensuring that young people and adults are supported in meeting their own physical care needs, wherever this is possible.

If it is determined by the DSL that the concern is not a safeguarding one but rather the child needs support services, then this should be discussed with the child and with the parents. A referral for child in need of local authority services requires parental consent.

The DSL is responsible for following up any referrals made to social care to ensure that action has been taken. This should be done within 3 working days of having made the referral if social care has not been back to the DSL to confirm their actions. A record of actions being taken must be made by the DSL.

If there is concern that the action is not sufficient to safeguard the child or adult, then the DSL must escalate, if necessary, with social care or the police. The CSAP (Childrens Safeguarding Assurance Partnership) will have procedures to follow in this instance.

Talking to Parents / Carers

In most cases, it is good practice to be open and honest from the outset with parents/carers about concerns and any action that we intend to take. Parents / Carers should be issued with a copy of our Safeguarding & Prevent Policy, including a link to our policy on the website. When a referral is to be made, the DSL will make all reasonable efforts to ensure parents/carers are informed. However, an inability to inform parents/carers should not prevent a referral being made. Consideration will be given with regards to not informing parents/carers when a child or adult at risk expresses a wish that they are not informed at this stage.

Safeguarding and Prevent Policy

There are cases where it would not be good practice for the DSL to discuss concerns with parents/carers before referral.

In these cases, arrangements for discussing concerns with parents/carers should be agreed in advance with social care and / or the police.

- Discussion would put a child or adult at risk of significant harm.
- Discussion would impede a police investigation or social work enquiry. E.g., FGM or Forced Marriage
- Sexual Abuse is expected
- Organised multiple abuse is suspected.
- The fabrication of an illness is suspected.
- Contacting parents / carers would place you or others at risk.
- It is not possible to contact parents / carers without causing undue delay in making the referral.

In each case the DSL must make a reasoned judgement and record the decision they reach. Where further guidance is needed, contact should be made with the relevant social care department or police.

Abuse Requiring Immediate Response

If medical attention or police emergency action is required, then:

- The emergency services should be contacted on 999 immediately.
- The DSL should be informed without delay.
- The DSL should contact the relevant social care and / or police service
- The DSL must consider if it is safe for the child or adult at risk to return home or to a potential abusive situation, seeking advice from social care or police, as required.
- Managers in the police or social care agencies will then advise about how to proceed to ensure immediate wellbeing of the child or vulnerable adult.

If no action has been taken after 48 hours, the DSL should utilise the escalation process with the CSAP.

Employees must also be aware that if they feel the referral has not been dealt with, no action has been taken, or that senior management is trying to disregard the referral, they should follow the procedures as set out in the Whistleblowing Policy.

Allegations against Employees, Employers, or other Stakeholders

All allegations of abuse made against a member or members of staff, employers or other stakeholder will be managed in line with Safeguarding and employment policies and procedures.

Safeguarding and Prevent Policy

These procedures apply to a wide range of allegations, including those that indicate a person may be unsuitable to work with children or adults at risk in their present position or in any capacity. It is essential that any concerns for the welfare of a child or adult at risk arising from abuse or harassment by a member of employee, employer or other stakeholder should be reported immediately to the DSL, who will contact the Designated Local Authority Person (formerly known as LADO).

The procedures apply to a wide range of allegations, including those that indicate a person may be unsuitable to work with children or adults at risk in their present position or in any capacity. It is essential that any concerns for the welfare of a child or adult at risk arising from abuse or harassment by a member of employee or contractor should be reported immediately to the DSL, who will contact the Designated Local Authority Person (formerly known as LADO).

The procedures are, therefore, to be followed in respect of allegations that a member of staff, employer or other stakeholder has:

- Behaved in a way that has harmed, or may harm, a child or vulnerable adult.
- Possibly committed a criminal offense against, or related to, a child or vulnerable adult.
- Behaved towards a child or adult at risk in a way that indicates they are unsuitable to work with children or adults at risk.

Where you have concerns about a colleague, employer, or other stakeholder, you should report these concerns to the DSL **immediately**, detailing your concerns on the Safeguarding & Prevent Referral form (on the Shared Drive), and the DSL will manage the allegations in line with agreed policy.

Where allegations are made against an employer, the DSL will immediately inform the ESFA and follow detailed investigation & reporting procedures below.

The DSL will discuss allegations against employee, employers, or other stakeholders with the Designated Local Authority Person. The purpose of this discussion is to consider the nature, content, and context of the allegation and to agree what further action, if any, is necessary. They will notify parents/carers that the person the allegation has been made against will be suspended, partly to protect them during any investigation (employees). They will also consider risks to other children and communication with relevant Company's / bodies and will support the person the allegation has been made against, ensuring they are treated fairly and impartially as detailed in our disciplinary policy and procedures. They will include any support from the other agencies involved and manage possible media interest. Disciplinary procedures will not be initiated until the investigation by police or social care has been concluded. We will take the lead from these bodies at all stages of the process and involve the DSL & Senior Managers. These may include:

- Child Protection or Adult at risk Safeguarding Investigation – this will assess whether the child/adult needs protection or in need of services – led by social care.
- Criminal investigation – led by the relevant police force.
- A Disciplinary Investigation – in line with our disciplinary procedures

Safeguarding and Prevent Policy

In the first two instances, social care and / or the police will lead on investigations.

The DSL will notify the Disclosure and Barring Service (DBS) where:

- We have permanently removed a member of staff or other stakeholder from regulated activity.

For most cases, the DBS only has the power to bar a person who is, has been, or might in the future engage in regulated activity.

The Director will act as the Named Senior Manager to provide high level support to DSL in handling allegations of abuse made against a member of employee, employer, or other stakeholder, in line with our current policy.

If the concern raised is related to a SPO, then the DSL in conjunction with the Director will follow the safeguarding process. If concerning the DSL, then the DDSL would be involved with the Director. If concerning the named Director, then the DSL would be informed in conjunction with the Advisory Board of Governors.

Where the allegation is found to be of a malicious nature, unfounded and with no further action to be taken, the individual the allegation was made against will be supported back into work and their team environment by the Director (Operations), with an agreed support plan put in place.

Support for the Referrer

Training Works will fully support and protect employee, employers, and other stakeholders who, in good faith (without malicious intent), make a referral about a colleague who may be abusing a child or adult at risk and reports his or her concern about a colleague's practice.

This support may take the form of counselling or addressing learner caseloads whilst the incident is investigated. Our Whistleblowing procedures can be followed if they feel their concerns are not being acted upon appropriately. However, all employees, employers and other stakeholders have a duty to safeguard and promote the welfare of children and vulnerable adults. To investigate concern as robustly, it may not be possible to maintain complete anonymity, but interests of the referrer will be protected when concerns are raised.

Following a referral, employees, employers, and other stakeholders may be involved in the assessment and management process led by the relevant social care team and may be invited to take part in any strategy meeting or may be asked to attend an initial Case Conference. Where there is a criminal investigation, they may be required to co-operate with the police. In all these circumstances, they will be offered sufficient time to prepare and attend meetings with the support of their line manager and the SPT team.

They will also receive appropriate senior management support and the DSL will continue to provide support and guidance as required/appropriate.

Safeguarding and Prevent Policy

Records will be kept of every concern raised and they will be detailed in terms of what actions have been taken, whether an external agency has been involved and is leading on any investigation, and what the outcome has been, so that the file can be closed and then stored for legal purposes on the secure system.

Record Keeping and Information Security

Well-kept records are essential in situations where it is suspected or believed that a child or adult at risk may be at risk from harm.

Records should state who was present, the time, date, and place. Records should be factual, state exactly what was said, observed or alleged.

Records must also be stored, retrieved, and destroyed within current Data Protection laws and our robust Data and Information Security requirements.

The use of a standard Safeguarding and Prevent Referral Form for all employee, irrespective of their role or which delivery contract the currently work with, is available on the Shared Drive.

Employees, employers, and other stakeholders are guided in recording, so that they are mindful of the possibility that this may be shared with others at some stage and in exceptional circumstances, the possibility that records may become evidence in court proceedings. Equally, employees, employers and other stakeholders must be aware that documents regarding an individual that we hold may be subject to a Freedom of Information request under the Freedom of Information Act. Under the Act, individuals have the right to access their own records, unless the situation is covered by the following exemptions:

- Information that would be likely to prejudice the prevention and detection of a crime, or the capture or prosecution of an offender.
- Information held for the purpose of social work where disclosure would be likely to prejudice the work, by causing serious harm to the physical or mental health or condition of the data subject or another person.

Records are kept for the time required legally and contractually. There is a robust storage, retrieval and disposal process and system in place.

Details of allegations that are found to be malicious will be removed from personnel files. However, for all other allegations, it is important that a clear and comprehensive summary of the allegation, detail of how the allegation was followed up, resolution to the allegation, and notes of action/s taken, and any decisions reached, is kept on the confidential personnel file of the accused and a copy provided to the person concerned.

In cases where future DBS checks reveal information from the police about an allegation that did not result in a criminal conviction, and it will help to prevent unnecessary re-investigation if an allegation re-surfaces later. In respect of safeguarding allegations against an adult, the

Safeguarding and Prevent Policy

record should be retained at least until the accused has reached normal pension age or for a period of 10 years from the date of the allegation, if that is longer.

Records in relation to a safeguarding concern about a child should be kept for 7 years (or until the age of 25, whichever is longer), unless a minimum time is specified contracts held by us.

Where a request for information sharing is made, the DSL and Director would decide as to whether they are able to share the information and, if necessary, would seek relevant legal advice and advice from other bodies such as the NSPCC and ChildLine. All decisions taken about information sharing are expected to keep the safety of the young person or adult at risk of central and paramount importance. Once the decision has been made, regardless of whether it must be shared or not, this is still not recorded, identifying the reasons for the decision. If the request has come from the LSCB, they will provide us with clear rationale as to why the information is needed and the request should be proportionate to the reason. We follow the 7 Golden Rules to Information Sharing as per the guidance document *“Information Sharing: Advice for Practitioners Providing Safeguarding Services to Children, Young People, Parents and Carers”*. July 18.

All learners undergo induction relevant to their programme. Part of this process includes consent forms, as required, and collection of other personal details. This is recorded on our systems, and other documents directly relating to delivery all are stored securely.

Learners and their parents/carers are made aware of the need for us to hold information relating to them, what will be held, how it will be held, how long it may be held, who might have access to it and how it will be used.

The Safeguarding & Prevent Referral Form is sent to the safeguarding e-mail address, and this is then uploaded by the DSL to the secure safeguarding folder within 24 hours. It can only be accessed by the Safeguarding team (SPT). Once a copy has been uploaded to the system, any local records will be destroyed. All concerns and incidents are reported to the senior management team by the DSL and lessons learnt in how these were dealt with are discussed. Where appropriate, procedures are revised.

We also provide an online data security E-Learning course (GDPR) with a related test at the end, which all employees are required to complete in their first two weeks of induction.

Guidance

Abuse is the violation of an individual’s human rights. It can be a single act or repeated acts. It can be physical, sexual, or emotional. It also includes acts of neglect or an omission to act. Abuse can take many forms and is not acceptable in any way.

We endeavour to safeguard children and adults at risk by:

- Valuing, listening to and respecting them.
- Adopting policies, guidelines, a Code of Conduct and behaviour for employees, employers, and contractors

Safeguarding and Prevent Policy

- Sharing information about concerns with agencies which need to know and involving parents and children appropriately.
- Ensuring that the DBS, in accordance with their guidelines, checks all employees (Trainers & those in non-delivery roles) on entry to employment and periodically thereafter.
- Providing employees with direct access to our Safeguarding and Prevent Policy and procedures
- Providing all employee with safeguarding & Prevent training, including annual refresher
- Ensuring that all children, adults at risk, their parents and carers are aware of our Safeguarding and Prevent Policy and procedures
- Ensuring that all employee, employers, and other stakeholders are aware of their role and responsibilities in relation to safeguarding.

We are committed to be alert to a young person who:

- Is disabled and has specific additional needs.
- Has special educational needs (whether they have a statutory Education, Health and Care Plan)
- Is a young carer.
- Is showing signs of being drawn into anti-social or criminal behaviour, including gang involvement and association with organised crime groups.
- Is frequently missing / goes missing from care or from home.
- Is at risk of modern slavery, trafficking, or exploitation.
- Is at risk of being radicalised or exploited.
- Is in family circumstance presenting challenges for the child, such as drug and alcohol misuse, adult mental health issues and domestic abuse.
- Is misusing drugs or alcohol themselves.
- Has returned home to their family from care.
- Is a privately fostered child.

We are committed to reviewing our policies and good practice annually, unless there is a change to legislation, with immediate effect or if there has been a significant change within the Company. The DSL is responsible for updating the policy with support from the Director, Senior Management Team & Advisory Board.

We operate a culture of openness and transparency and embeds the principles of the '4 R's' across all our services, ensuring that all employee, employers, and contractors understand their responsibilities regarding safeguarding.

The 4 Rs:

Recognise – the signs and indications of abuse.

Respond – as soon as possible.

Record – everything you have heard, what was said, or any actions seen.

Safeguarding and Prevent Policy

Refer – to the designated person.

Adult at Risk

An adult at risk is a person who is over the age of 18 years who is, or may be, in need of advisory services by reason of mental or other disability, age or illness, and may be unable to take care of themselves or unable to protect themselves from significant harm or serious exploitation. An adult at risk may be a person who:

- Has a physical or sensory disability.
- Is physically frail or has a chronic illness.
- Has a mental illness or dementia.
- Has a learning difficulty.
- Misuses drugs and / or alcohol
- Has social and / or emotional issues.
- Exhibits challenging behaviours.

Statutory guidance and legislation differ in relation to working with these two groups (children and adults at risk).

Under the Care Act 2014, local authorities have new functions. This is to make sure that people who live in their areas:

- Receive services that prevent their care needs from becoming more serious or delay the impact of their needs.
- Can get the information and advice they need to make good decisions about care and support.
- Have a range of provision of high quality, appropriate services to choose from

The Care Act helps to improve people's independence and wellbeing. It makes clear that local authorities must provide or arrange services that help prevent people developing needs for care and support or delay people deteriorating such that they would need ongoing care and support.

Safeguarding and Prevent Policy

Local authorities must consider various factors:

- What services, facilities and resources are already available in the area (for example local voluntary and community groups), and how these might help local people
- Identifying people in the local area who might have care and support needs that are not being met.
- Identifying carers in the area who might have support needs that are not being met.

Local authorities should also provide or arrange a range of services which are aimed at reducing needs and helping people regain skills, for instance after a spell in hospital. They should work with other partners, like the NHS, to think about what types of service local people may need now and in the future.

The Act says clearly that a person will be entitled to have their needs met when:

- the adult has 'eligible' needs.
- the adult is 'ordinarily resident' in the local area (which means their established home is there)
- any of 5 situations apply to them.

These are the 5 situations:

- the type of care and support they need is provided free of charge.
- the person cannot afford to pay the full cost of their care and support.
- the person asks the local authority to meet their needs.
- the person does not have mental capacity and has no one else to arrange care for them.
- when the cap on care costs comes into force, their total care and support costs have exceeded the cap.

Legislation and Guidance

- The Children Act 2016.
- United Nations Convention on the Rights of the Child 1991
- Data Protection Act 2018 and General Data Protection Regulations (GDPR)
- Sexual Offences Act 2003
- Protection of Freedoms Act 2012
- Education Act 2011
- Human Right Act 1998
- Health and Social Care Act 2008
- Domestic Violence, Crime and Victims (amendment) Act 2012
- Statutory guidance Working Together to Safeguard Children 2023 (previous versions: 1999, 2006, 2010, 2013, 2014 and 2015, 2018)
- Keep Children Safe in Education 2025 (this replaces previous versions: 2014, 2015, 2018, 2022, 2023 2024 and the Safeguarding Children and Safer Recruitment in

Safeguarding and Prevent Policy

Education 2006). **All employees must read part 1 as part of mandatory training and on induction.**

- Information Sharing Advice for Practitioners Providing Safeguarding Services to Children, Young People, Parents and Carers 2018.
- The Care Act 2014
- The Mental Capacity Act 2005
- The “No Secrets” guidance, which sets out a code of practice for the protection of vulnerable adults.
- Counter Terrorism and Boarder security Act 2019
- Contest 2018
- Work-based learners and Prevent Statutory Duty guidance for providers 2021.
- Equality Act 2010
- What to do if you are worried a child is being abused 2015?
- Mandatory reporting of FGM (Jan 2020)
- Prevent Duty 2023 update March 2024
- Coronavirus (COVID-19) – Actions for FE Colleges & Providers during coronavirus outbreak.

How does Channel work?

Channel works in a similar way to existing safeguarding partnerships aimed at protecting vulnerable people.

Channel is designed to work with individuals of any age, is shaped around the circumstance of everyone and can provide support for any form of radicalisation or personal vulnerabilities.

Each Channel panel is chaired by a local authority and brings together a range of multi-agency partners to collectively assess the risk and decide whether a support package is needed. The group may include statutory and non-statutory partners, as well as lead safeguarding professionals. If the group feels the person would be suitable for Channel, it will look to develop a package of support that is bespoke to the person. The partnership approach ensures that those with specific knowledge and expertise around the vulnerabilities of those at risk can work together to provide the best support. The link below will provide more information:

www.counterterrorism.police.uk

What does Channel support look like?

Channel Interventions are delivered through local partners and specialist agencies. The support may focus on a person's vulnerabilities around health, education, employment, or housing, as well as specialist mentoring or faith guidance and broader diversionary activities such as sport. Each support package is tailored to the person and their circumstances.

A person will always be informed first if it is felt that they would benefit from Channel support. The process is voluntary, and their consent would be needed before taking part in the process. This process is managed carefully by the Channel Panel.

Safeguarding and Prevent Policy

Who can make a referral?

Anyone can make a referral. Referrals come from a wide range of partners, including education, health, youth offending teams, police, and social services.

What happens with the referral?

Referrals are first screened for suitability through a preliminary assessment by the Channel Coordinator and the local authority. If suitable, the case is then discussed at a Channel panel of relevant partners to decide if support is necessary.

Raising concern

If you believe that someone is vulnerable to being exploited or radicalised, please use the established safeguarding procedures to escalate your concerns to the DSL, who can raise concerns to Channel if appropriate: Completion of the Safeguarding & Prevent Referral Form on the Shared Drive. Contact the DSL to confirm that the referral form has been completed. All concerns should be immediately reported.

Learner Recruitment

When joining a programme, a detailed record of learner needs will be kept, and an Individual Learning Plan (ILP) prepared to ensure all the needs are planned for. All learners receive a Learner Handbook, detailing our support policies and key contacts. There is also follow up review points to capture their journey and ensure their needs are being met. Trainers will work closely with the Designated Employer contact ensuring a tri-party support system is in place.

Channel Risk Assessment

Risk is a theme that runs through the entire Channel process, i.e., risk to the individual, risk to the public and risk to partners or Company's providing support to the individual, including any intervention providers. The Channel Panel is responsible for managing the risk in relation to the vulnerable individual.

Wellbeing for Learners

We will abide by Government guidance relating to learner's safety and measures that need to be taken to minimise the risk of infection during pandemics. We will be vigilant to the mental health and wellbeing of learners during the time of any isolation and provide a support plan for regular contact where attendance is not a normal indicator of engagement. Learners will also be provided with guidance on safe home working.

Safeguarding and Prevent Policy

Welfare & Pastoral Support

We will provide all our Learners with contact details of their named Trainer to raise any issue of welfare or pastoral support that is required.

Any support required by a Learner, or identified by a Trainer during normal training activity, will be recorded on the Safeguarding & Prevent Referral Form (identified as Welfare / Pastoral) and emailed to safe@training-works.co.uk this will ensure that no issue is ever lost due to Trainer handover / resignation. The DSL will be responsible for tracking each case raised.

All support offered to / requested by a Learner will be individual to the identified circumstance(s).

Abuse of position of Trust

We recognise that our employees, employers, and other stakeholders are in a position of trust with the learners in our care, whether they are children, young people, or adults at risk, and acknowledge that it could be considered a criminal offence to abuse that trust. Broadly speaking, a relationship of trust can be described as one in which one party is in a position of power or influence over the other by virtue of their work or the nature of their activity. It is vital for all of those in positions of trust to understand the power this can give them over those they care for and to understand their responsibility.

We recognise that the legislation is intended to protect young people who are over the age of consent but under the age of 18 years.

We recognise the importance that our employees, employers and other stakeholders must protect the rights and needs of all children, young people, and adults at risk on our programmes and in our care.

Anti-Bullying and Harassment

Our policy on Bullying and Harassment is set out in a separate policy and acknowledges that allowing or condoning bullying or harassment may lead to consideration under safeguarding children or vulnerable adult's procedures. All incidents of bullying and harassment, including cyber-bullying, racist, homophobic, and gender-related bullying, will be dealt with in accordance with our antibullying policy. We recognise that children and young adults at risk with special needs and/or disabilities are more susceptible to being bullied.

We will maintain a log of bullying incidents on our programmes. Our policy on Bullying and Harassment is explained at the induction process for new learners.

Communications - rules

- When communicating with young people / vulnerable adults online, observe the same rules of behaviour as if speaking with them in person by being professional: polite,

Safeguarding and Prevent Policy

respectful, not swearing or saying anything (using the written word, images, or icons) that could be regarded as sexual innuendo, bullying or discrimination.

- Do not use any text speak abbreviations or symbols / emoticons, even if you ordinarily use these in your personal life.
- Never disclose non-public and confidential information about us, our employee, associates, volunteers, or the young people with whom we are working.
- Do not say anything or share any posts that could be deemed offensive, controversial, or socially inappropriate in any way.
- Contact with young people or adults at risk online should only be a recognised element of your work and done strictly for business purposes.
- Do not send any illegal or inappropriate content (written, images or icons), including sexting via mobile phones.

Openness and scrutiny - rules

- Always communicate with young people in a way that is open for others to see, if necessary.
- Do not use private messaging facilities on social networks or apps; if it needs to be private, then do this by email exchange or phone and note the conversation afterwards.
- Ensure there is always a record of such communication that would be open for others to check, if necessary.
- It should always be clear who the communication is from when we are communicating with a young person or a vulnerable adult.
- There should be no use of anonymous apps, where the sender can remain anonymous.

Recording - rules

Only use social media and apps where there is a permanent record of what has been said and sent, thereby being open to scrutiny, e.g., the use of Snapchat is not appropriate.

Use of Equipment

Our IT equipment (including computers, laptops, mobile phones, etc.) must not be used to view, download, create or share (with colleagues or children) illegal content, including abusive images of children or young people. The misuse of IT equipment is a disciplinary offence. Our IT Acceptable Use Policy covers this subject.

Safer Recruitment and Training for Employees

When recruiting new members of staff, we follow the government guidance “Safeguarding Children: Safer Recruitment in Education” and Safer Recruitment principles and pay due regard to the Safeguarding Vulnerable Groups Act 2006 and the Protection of Freedom Act 2012. We adapt the guidelines within the Baseline Security Standard (BPSS) for all appointments and ensure that the relevant employee member uses the DBS checking service to assess applicants’ sustainability for positions of trust. The company also complies fully with

Safeguarding and Prevent Policy

the Code of Practice and aims to treat all applicants for positions fairly. DBS checks are undertaken in line with government guidance and current legislation, alongside appropriate references being obtained and ensuring qualifications are verified. Safer Recruitment training has been undertaken by senior members of staff who conduct recruitment activities in accordance with statutory guidance.

Newly appointed employee will have a job role induction in line with our probation policy over a 6-month period. A robust induction into the safeguarding of children, young people and adults at risk procedures is provided when they join the Company, this includes mandatory reading of the internal and external policies and E-Learning modules. Probation is a period of both professional development and review. It provides a fair opportunity for an employee to understand the Company, the standard of performance required and to be given the guidance and support needed to be effective in their new role.

Probation allows the manager of the newly appointed employee to assess objectively whether the recruit is suitable for the role, considering the individual's overall capability, skills, performance, and general conduct in relation to the job in question.

We ensure that all employees are made aware of the standards expected of them and implements the appropriate support, training feedback to achieve these standards.

For the Company, probation allows the assessment of the employee's contribution, potential and suitability for the role to which they have been appointed.

Furthermore, probation aims to identify the essential development required to undertake the job role, identify any areas for development following initial interventions, and provide support in these areas through a structured plan.

Employees will be made aware of the relevant Safeguarding and Prevent procedures as part of that induction programme and will be given a copy of our Safeguarding & Prevent Policy.

Training Interventions:

Individual / Group	Training	Frequency
All new employees and annual updating	<ul style="list-style-type: none"> • Safeguarding Prevent Duty • Extremism and Exploitation • Policy review • Safer Recruitment Psitticus 6 mandatory training courses 	At induction and annual updating or at time of changes

Safeguarding and Prevent Policy

Managers – Additional Training	<ul style="list-style-type: none"> • Prevent for Managers • Safer Recruitment 	Complete and appropriate updating
Safeguarding Leads (DSL, DDSL, SPOs)	<ul style="list-style-type: none"> • Identified essential reading • Prevent for Managers • Self-harm and suicidal thoughts • Preventing Violent Extremism • Level 4 DSL 	Complete and appropriate updating
		Specialism divided by the team to ensure full coverage
	<ul style="list-style-type: none"> • Forced Marriage Awareness • Female Genital Mutilation • Bullying and Harassment • Honour-based violence • Sexting • Peer on Peer • County Lines • Domestic Violence (Domestic general and sexual) • Sexual exploitation • Online Safety / E-Safety Channel • Designated Safeguarding Officer Training 	
Board and Senior Managers	<ul style="list-style-type: none"> • Prevent for Board Members • Safeguarding • Prevent for employers 	Complete and appropriate updating

III. Definitions

Definitions and Indicators of Abuse:

Safeguarding and Prevent Policy

Abuse, including neglect, is a form of maltreatment of a child or vulnerable adult. In relation to adults, the terminology 'serious harm' is frequently used within the guidance rather than 'significant harm', which is a term from the Children Act 1989. Someone may abuse a child or an adult at risk by inflicting harm, or by failing to act to prevent harm. Children and adults at risk may be abused in a family or in an institutional or community setting by those known to them, or, more rarely, a stranger, for example via the Internet. They may also be abused by an adult or adults, or by another child or children.

Working Together to Safeguard Children 2018 defines four types of abuse: physical, emotional, sexual and neglect. Adults at risk may also be subjected to these forms of abuse (see No Secrets guidance link). Therefore, the wording from Working Together to Safeguard Children 2018 has been slightly altered to reflect this. Children and adults at risk may be subjected to financial, discriminatory, and institutional abuse, and employee should be familiar with indicators of all forms of abuse.

It is also recognised that domestic abuse can impact on children when they witness it at home and/or suffer it in an intimate personal relationship.

Physical Abuse	
Physical Abuse may involve	Signs may include

Safeguarding and Prevent Policy

<ul style="list-style-type: none"> • Hitting • Shaking • Throwing • Poisoning • Burning or scalding • Drowning • Suffocating or otherwise causing physical harm 	<ul style="list-style-type: none"> • Unexplained bruises, marks, or injuries to any part of the body • Frequent visits to the GP or A & E • A n injury inconsistent with the explanation offered • Fear of parents or carers being approached for an explanation • Aggressive behaviour or severe temper outbursts • Flinching when approached • Reluctance to get changed, or wearing long sleeves in hot weather • Depression • Withdrawal behaviour, or other behaviour change • Distrust of adults, particularly those with whom a close relationship would normally be expected.
<p>Physical harm may also be caused when a parent or carer fabricates the symptoms of, or deliberately indicates, illness in a child, young person, or vulnerable adult.</p>	

Emotional Abuse: is the persistent maltreatment of a child or adult at risk which causes severe and persistent adverse effects on the child or vulnerable adult’s emotional development.

Emotional Abuse may involve:

Signs may include:

Safeguarding and Prevent Policy

<ul style="list-style-type: none"> • Conveying to the child or adult at risk that they are worthless and unloved. • Conveying that they are inadequate or valued only insofar as they meet the needs of another person. • Not giving the child or vulnerable adult opportunities to express their views. • Deliberately silencing them • Making fun of what they say or how they communicate. • Age or developmentally inappropriate expectations being imposed on the child or vulnerable adult. • Demanding interactions that are beyond their developmental capability. • Overprotection and limitation of exploration and learning • Preventing the child or vulnerable adult participating in normal social interactions • Seeing or hearing the ill-treatment of another child or vulnerable adult 	<ul style="list-style-type: none"> • A failure to thrive or grow • Sudden speech disorders • Developmental delay, either in terms of physical or emotional progresses • Behavioural changes • Being unable to play or socialise with others. • Fear of making mistakes. • Self-harm • Fear of parents or carers being approached regarding their behaviour. • Confusion • Use of inappropriate language, possession of violent, extremist literature, behavioural changes, the expression of extremist views, advocating violent actions and means, association with known extremist or seeking to recruit others.
<ul style="list-style-type: none"> • Serious bullying (including cyber bullying) • Causing children or adults at risk to frequently feel frightened or in danger. • Exploitation or corruption of children or vulnerable adults 	
<p>Some level of emotional abuse is involved in all types, of maltreatment of a child or vulnerable adult, though it may occur alone</p>	

Sexual Abuse	
Sexual Abuse may involve:	Signs may include:

Safeguarding and Prevent Policy

<ul style="list-style-type: none"> • Forcing or enticing the child or adult at risk to take risk part in sexual activities, not necessarily involving at a high level of violence, whether or not the child or adult at risk is aware of what is happening. • Physical contact, including assault by penetration (for example, rape or oral sex) • Non penetrative acts, such as masturbation • Kissing • Rubbing and touching outside of clothing • Non-contact activities, such as involving children or adults at risk in looking at, or in the production of, pornographic material or watching sexual activities. • Encouraging children to behave in sexually inappropriate ways. • Grooming a child in preparation for abuse (including via the internet) 	<ul style="list-style-type: none"> • Pain or itching in the genital/anal areas. Bruising or bleeding near the genital/anal areas • Sexually transmitted diseases • Vaginal discharge or infection • Stomach pains • Discomfort when walking or sitting down. • Pregnancy • Sudden or unexplained changes in behaviour, e.g., becoming aggressive or withdrawn. • Fear of being left with a specific person or group of people. • Nightmares • Leaving home • Sexual knowledge which is beyond their age or developmental stage • Sexual drawings or language • Bedwetting • Saying they have secrets they cannot tell anyone about • Self-harm or mutilation, sometimes leading to suicide attempts. • Eating problems, such as overeating or anorexia.
<p>Sexual abuse is not solely perpetrated by adult males. Women can also commit acts of sexual abuse, as can other children.</p>	

Safeguarding and Prevent Policy

<p>Neglect: this is the persistent failure to meet the basic physical and/or psychological needs of a child or adult at risk, likely to result in the serious impairment of the child or vulnerable adult's health or development.</p>	
Abuse by neglect may involve:	Signs may include:
<ul style="list-style-type: none"> Neglect may occur during pregnancy as a result of material substance abuse. 	<ul style="list-style-type: none"> A constant hunger, sometimes stealing food from others.
<ul style="list-style-type: none"> A parent or carer failing to provide adequate food, clothing, and shelter. Exclusion from home or abonnement Failure to ensure adequate supervision. Failure to protect a child or adult at risk from physical harm or danger. Failure to ensure adequate care takers. Failure to ensure access to appropriate medical care or treatment. <p>Neglect of, our unresponsiveness to, a child or vulnerable adult's basic emotional needs.</p>	<ul style="list-style-type: none"> Dirty or smelly Loss of weight or being constantly underweight. Inappropriate dress for the weather Complaining of being tired all the time. Not requesting medical assistance and/or failing to attend appointments. Having few friends Worsening health conditions Pressure sores Mentioning that they are being left alone or unsupervised. Sore or extreme nappy rash Lack of response to stimuli or contact Poor skin contact, or skin infections Frozen watchfulness Anxiety Distress Child moves away from parent under stress. Little or no distress when separated from primary carer. Inappropriate emotional responses Language delay

Safeguarding and Prevent Policy

Financial Abuse	
Financial Abuse may involve:	Signs may include:
<ul style="list-style-type: none"> • Being overcharged for services. • Being tricked into receiving goods or services that they do not want or need. • Inappropriate use, exploitation or misappropriation or property and/or utilities • Theft • Deception • Fraud • Explanation or pressure in connection with wills 	<ul style="list-style-type: none"> • Lack of basic requirements, e.g., food, clothes, or shelter • Inability to pay bills. • Unexplained withdrawals from accounts • Inconsistency between standard of living and income • Reluctance to take up assistance which is needed. • Unusual interest by family or other people in the person's assets • Recent changes in deeds • Power of Attorney obtained when the person lacks capability to make the decision.

Safeguarding and Prevent Policy

Institutional Abuse	
Institutional Abuse may involve:	Signs may include:
<ul style="list-style-type: none"> • Service users required to fit in excessively to the routine of the service. 	<ul style="list-style-type: none"> • Inflexible daily routines, e.g., set bedtimes and / or deliberate waking • Dirty clothing and bed linen
<ul style="list-style-type: none"> • More than one individual is being neglected. • Everyone is treated in the same way. • Other forms of an abuse on an institutional scale 	<ul style="list-style-type: none"> • Lack of personal clothing and possessions • Inappropriate use of nursing and medical procedures • Lack of individualised care plans and failure to comply with care plans. • Inappropriate use of power, control, restriction, and confinement • Failure to access health care, dentistry services etc. • Inappropriate use of medication • Misuse of resident's finances or communal finances • Dangerous moving or handling practices • Failure to record incidents or concerns

Safeguarding and Prevent Policy

Sexual Exploitation and Grooming

Grooming is when someone builds an emotional connection with a child to gain their trust for the purpose of sexual abuse or exploitation. Children and young people can be groomed online or in the real world, by a stranger or by someone they know – for example, a family member, friend or professional. Groomers may be male or female. They could be any age.

Child sex exploitation (CSE) is a type of sexual abuse in which children are sexually exploited for money, power, or status. Children or young people may be tricked into believing they are in a loving, consensual relationship. They may be also groomed online. Some children and young people are trafficked into or within the UK for the purpose of sexual exploitation. Sexual exploitation can also happen to young people in gangs.

Child on Child Abuse

This exists in many forms, from calling someone sexualised names, flicking bra straps, lifting skirts, grabbing bottoms, genitalia etc.

Mate Crime

Mate crime happens when people with learning difficulties are befriended by someone who uses the relationship to exploit or abuse them. For more information – www.arcuk.org.uk/safetynet/examples-of-mate-crime/

Online Safety and social media

All employees, employers, and other stakeholders, if relevant, are trained in and receive regular updates in e-safety and recognising and reporting concerns. Our policies recognise that Internet Safety is a whole team/Company responsibility which includes learners and their parents and carers.

Children, young people, and adults at risk may expose themselves to danger, whether knowingly or unknowingly, when using the Internet and other technologies. Additionally, some children, young children and adults at risk may find themselves involved in activities which are inappropriate or possibly illegal.

We therefore recognise our responsibility to educate our learners, teaching them the appropriate behaviours and critical thinking skills to enable them to remain both safe and legal when using the Internet and related technologies. These issues are addressed within the learner journey, within relevant policies and procedures and with parents and carers.

We will ensure filters are in place to prevent access to unsuitable sites and we will monitor and report monthly on the use of the network and internet to ensure that any learner, employee,

Safeguarding and Prevent Policy

employer, or contractor attempting to access inappropriate, harmful, or indecent images are found, then the police will be informed immediately, and we will fully support their investigation. If involving an employee member/volunteer, immediate suspension, in line with the disciplinary process, will immediately take effect and the managing safeguarding and prevent allegations procedure may need to be instigated by the DSL. We will take the police advice when learners are involved as to whether the relevant commissioner should be informed.

The welfare and protection of our children and adults at risk is paramount and consideration should always be given as to whether the use of photography will place them at risk. Images may be used to harm children or adults at risk, for example as a preliminary to grooming or by displaying them inappropriately on the internet, particularly social networking sites. For this reason, consent must be sought from those with parental responsibilities (this may include the Local Authority in the case of looked after children)

We are aware of the Safeguarding Partners escalation procedures for raising concerns in respect of poor practice and recognise our responsibility to utilise these as and when necessary, in the interest of safeguarding and promoting the welfare of children and vulnerable adults.

Online safety also involves being aware of the risks to young people, our employee and adults at risk when communicating via the Internet, digital and mobile devices and using social media. Social media includes blogs, Wikis, online communities, and social networking sites such as Facebook and Twitter.

As a Company working with young people, we acknowledge the impact and involvement that social networking sites such as Facebook and Twitter have on the lives of young people, and their role in the ways which they interact with each other. These tools are used by us to encourage young people in their projects and involvement with gratitude activities. At the same time, we recognise the dangers and potential risks that these sites can pose to both young people and employee/volunteers, and that they have the potential to be abused as a means of interacting with young people.

There is a wide range of ways to communicate with young people and this is a rapidly changing environment as new technologies, applications, and social media sites merge. No Code of Conduct for e-safety can cover all these separately. However, there are broad principles that we expect all employee/volunteers to adhere to safeguard young people and themselves in respect of using all these forms of media, devices, apps and social networking sites.

Sexting

Sexting means sending sexually explicit messages and/or suggestive images, such as nudes. While the name suggests that this is only done via text message, these types of messages can be via any messaging service, including emails and social media.

This also means that sexts can be sent or received via several electronic devices, such as smart phones, computers, and tablets.

Safeguarding and Prevent Policy

If a child is under the age of 18, it is illegal for them to take a nude photo of themselves or a friend, as well as distributing them. Even though the age of sexual content is 16, the Protection of Children Act means it is against the law for a child to share a sexual image, even if it is with someone who is also under the age of 18.

Images covered under the law include, but are not limited to, naked pictures, topless photos of girls, any sex acts and sexual images in underwear. If it is found that a child under the age of 18 is in possession of any of these, has been sending them or taking these types of photos, the police can record it as a crime.

Up skirting

The Voyeurism (Offences) Act, which is commonly known as the Up-skirting Act, came into force on 12 April 2019. 'Up skirting' is where someone takes a picture under a person's clothing (not necessarily a skirt) without their permission and or knowledge, with the intention of viewing their genitals or buttocks (with or without underwear) to obtain sexual gratification, or cause the victim humiliation, distress, or alarm. It is a criminal offence. Anyone of any gender, can be a victim.

Modern Slavery and Human Trafficking

Modern Slavery examples include forced labour, debt bondage, sexual or criminal exploitation, domestic servitude, and trafficking.

Under the Modern Slavery Act 2015, we are required to ensure we do not have any aspect of modern slavery within our own Company.

Modern Slavery (s.1 of the Act) comprises of the following:

1. Slavery, servitude and forced or compulsory labour.
2. Human Trafficking (s.2) – this is the movement of a person for the purposes of being exploited. There is no minimum distance (i.e., it can be from one room to another).

Exploitation can include (in addition to above):

- Sexual exploitation (regardless of age of the individual being exploited)
- Removal of organs
- Securing services by force, threats, or deception (in particular, if the individual being exploited is a child or an adult at risk).

Child Trafficking is child abuse; children are recruited, moved, or transported and then exploited, forced to work, or sold. They are often subject to multiple forms of exploitation.

For full details please see the Modern Slavery and Human Trafficking Policy

Safeguarding and Prevent Policy

Suicide and Mental Health Matters

Mental health and mental ill health can be defined in very different ways. Mental health influences how we think and feel about ourselves and other and how we interpret life events. Whereas mental ill health is a term that is used for a person whose thinking, emotions and behaviours negatively affect their ability to go about day-to-day activities such as work, and home life and it disrupts their abilities. This can be particularly prevalent during times of isolation from others. There are several different types of mental illnesses including:

1. Depression
2. Anxiety disorders
3. Self-harm
4. Suicide
5. Substance misuse

Suicide is a major public health issue in England. Suicide and suicidal thoughts need to be given the highest priority when dealing with an individual presenting these feelings. That said, not all people expressing suicidal thoughts want to die, they often do not want to feel the way they currently are which results in the thoughts turning to suicidal. The most important action to take when speaking to a person showing signs of suicide is to ask them directly 'are you having thoughts of suicide?' This will be able to guide the best possible action depending upon the answer you receive.

Eating Disorders

Characterised by an abnormal attitude towards food that causes someone to change their eating habits and behaviour (www.nhs.co.uk/eating-disorders). Anorexia nervosa, when a person tries to keep their weight as low as possible e.g., by starving themselves or exercising excessively. Bulimia: when a person goes through periods of binge eating and is then deliberately sick or uses laxatives to try to control their weight. Binge eating disorder: When a person feels compelled to overeat large amounts of food in a short period of time.

Self-Harm

The idea of self-harm is tied up in stereotypical actions. It is a behaviour not an illness, people self-harm to cope with emotional distress or to communicate that they are distressed. It can present itself in many ways, for example:

1. Cutting, scratching the skin with sharp objects such as knives or razor blades
2. Burning oneself with heated wax or cigarettes
3. Hitting or banging arms, legs or head on walls or other objects

Safeguarding and Prevent Policy

4. Compulsory action of pulling hair out of the head.
5. Abusing drugs and alcohol for risk rather than enjoyment
6. Eating Disorders

It is generally seen as a physical reaction to emotional pain and can be extremely addictive. This means that it is often more productive to focus on why an individual feels compelled to harm themselves, rather than how they are doing so. Self-harm should not be misunderstood for being suicidal.

Violence

Gun and Knife Crime

Gun and knife crime is not as common as some people think, but it does happen. Guns and knives can affect everyone, not just people in gangs. Gun and knife crime include stabbing or shooting someone.

But it is also illegal to:

- carry a knife.
- threaten someone with a knife or gun.
- commit a crime with the use of a weapon - like a robbery.
- commit a crime by pretending you have a real knife or gun.

Some people carry weapons like knives and guns to feel protected, because of peer pressure or to feel powerful. If a person has a weapon, they might not always plan to use it – whether it is used as a weapon or not, it is still illegal.

Police have the power to stop and search if they think someone has a weapon. This could result with an arrest or the person going to prison for carrying, buying, or selling a weapon.

Situations involving weapons can get out of control very easily and there might not have time to think about actions.

If carrying a weapon, a person is more likely to:

- be attacked or threatened by other gangs who use weapons.
- be arrested by the police.
- kill or injure yourself badly with your weapon.
- hurt or kill others with your weapon.
- hurt innocent people if a fight happens.
- be charged with murder through joint enterprise if you are at a place where someone is killed, even if you weren't carrying the weapon.

Gangs

Being in a gang can make a person feel part of something or that they belong but being part of a gang like this can be dangerous. Sometimes a person can be forced to commit a crime or

Safeguarding and Prevent Policy

do things that are unsafe. If a gang carries knives or other weapons, they might get them out to show off or intimidate people. This can be very scary for other people, especially if they think the gang will use them.

Why do people join Gangs?

Young people join gangs for lots of different reasons. Some of these include:

- fitting in with friends and other gang members
- having the same interests as other people, like sports or music
- feeling respected and important
- to be protected from bullying or from other gangs
- making money from crime or drugs
- gaining status and feeling powerful.

Being in a gang is not against the law but being involved with illegal activities (that some gangs do) could be an offence. A person could go to prison or end up with a criminal record if involved with:

- gun and knife crime
- violence or harassment
- turf wars or postcode wars
- carrying, using, or selling drugs
- theft or other illegal activities
- rape and sexual assault.

County Lines

County lines is a term used to describe gangs and organised criminal networks involved in exporting illegal drugs (primarily crack cocaine and heroin) into one or more importing areas [within the UK], using dedicated mobile phone lines or other form of “deal line”. Exploitation is an integral part of the county lines offending model with children and vulnerable adults exploited to move [and store] drugs and money. Offenders will often use coercion, intimidation, violence (including sexual violence) and weapons to ensure compliance of victims. Children can be targeted and recruited into county lines in several locations including schools, further and higher educational institutions, pupil referral units, special educational needs schools, children’s homes, and care homes.

Children are often recruited to move drugs and money between locations and are known to be exposed to techniques such as ‘plugging’, where drugs are concealed internally to avoid detection. Children can easily become trapped by this type of exploitation as county lines gangs create drug debts and can threaten serious violence and kidnap towards victims (and their families) if they attempt to leave the county lines network. One of the ways of identifying potential involvement in county lines are missing episodes (both from home and school), when the victim may have been trafficked for the purpose of transporting drugs and a referral to the National Referral Mechanism should be considered.

Safeguarding and Prevent Policy

If a child is suspected to be at risk of or involved in county lines, a safeguarding referral should be completed alongside consideration of availability of local services/third sector providers who offer support to victims of county lines exploitation.

Domestic Violence Abuse

Domestic violence and abuse are any incident, or pattern of incidents, of controlling, coercive or threatening behaviour, and violence or abuse between those aged 16 years or over who are or have been intimate partners or family members regardless of gender or sexuality. This can encompass, but is not limited to. The following types of abuse: psychological, physical, sexual, financial and or emotional.

Identifying cases of Female Genital Mutilation (FGM) and Forced Marriage

There are many different types of abuse but there are some that employees may be less aware of. Female Genital Mutilation (FGM) and Forced Marriage fall into this category. Any indications that children or adults at risk may be subject to FGM or Forced Marriage, or that this may have already taken place, will be dealt with under the procedures outlined in this policy. In support of this provision, we will do everything that it can to ensure that:

- The DSOs are aware of the issues surrounding FGM, Forced Marriage and current legislation.
- Advice and signposts are available for accessing additional support, e.g., the NSPCC's helpline, ChildLine services, Forced Marriage Unit
- Awareness raising about FGM, and Forced Marriage is incorporated in the safeguarding training.

Where there are concerns about FGM or Forced Marriage, a referral must be made as a matter of urgency by the employee to the DSL. It is also extremely important that if a child or adult at risk has disclosed that they are at risk of FGM or Forced Marriage, the case is referred to Social Care by the DSL, even if it is against that person's wishes. Employees must NOT consult or discuss these concerns with the child or vulnerable adult's parents or family, or others within the community, if there is an imminent risk, e.g., the child or adult at risk being taken out of the country, police must be informed (999) and the safety of the child or adult at risk must be the prime consideration whilst awaiting the police response. It was made a legal requirement in October 2015 to report known cases to FGM in under 18's.

Safeguarding and Prevent Policy

Prevent Duty

Please see TWNW LTD Preventing Radicalisation Policy V1 for full details of how we work together to prevent Radicalisation.

All staff complete the Government Prevent Duty training within a week of their induction using the following link [Prevent duty training - GOV.UK \(www.gov.uk\)](http://www.gov.uk) and certificates are sent and stored by the Designated Safeguarding Lead who then issues annual reminders to all staff when training needs to be redone.

Prevent is about safeguarding and supporting those vulnerable to radicalisation. Prevent is one of the 4 elements of CONTEST, the Government's counter-terrorism strategy. It aims to stop people becoming terrorists or supporting terrorism.

What does PREVENT do?

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

The main aim of Prevent is to stop people from becoming terrorists or supporting terrorism.

At the heart of Prevent is safeguarding children and adults and providing early intervention to protect and divert people away from being drawn into terrorist activity.

Prevent addresses all forms of terrorism but continues to ensure resources and effort are allocated based on threats to our national security.

The Counter Terrorism and Security Act 2015 places a duty on certain bodies to have 'due regard to the need to prevent people from being drawn into terrorism'.

The government have defined extremism in the Prevent Strategy as vocal opposition to fundamental British Values:

- Democracy,
- The rule of law,
- Individual liberty
- Mutual respect for and tolerance of different faiths and beliefs.

Safeguarding and Prevent Policy

All suspected cases relating to Prevent **MUST** be reported immediately to the DSL by completing the Safeguarding & Prevent Referral Form on the Shared Drive and informing the DSL that the form has been completed. The DSL will refer all cases to the relevant local police Prevent teams for initial assessment. The initial assessment outcome will be used to inform the decision as to whether an individual should be referred to Channel.

Terms and Definition	
Radicalisation and/or Extremism may involve	Signs may include
<ul style="list-style-type: none"> An ideology is a set of beliefs. Radicalisation is the process by which a person comes to support terrorism and forms of extremism leading to terrorism. Safeguarding is the process of protecting vulnerable people, whether from crime, other forms of abuse or 	<ul style="list-style-type: none"> Isolation and identity crisis Personal crisis and / or circumstances A misconception and / or rejection of UK foreign policy A disrupt of Western media reporting. Perceptions that UK government policy is discriminatory.
<ul style="list-style-type: none"> from being drawn into terrorism related activity. Terrorism is an action that endangers or causes serious violence, damage, or disruption, is intended to influence the government, or intimidate the public and is made with the intention of advancing a political, religious, or ideological cause. Vulnerability describes factors and characteristics associated with being susceptible to radicalisation. Extremism is defined as “the promotion or advancement of an ideology based on violence, hatred or intolerance” that aims to “negate or destroy the fundamental rights and freedoms of others” or “undermine, overturn or replace the UK’s system of liberal parliamentary democracy and democratic rights 	<ul style="list-style-type: none"> Perception that their aspirations for career and lifestyle are undermined by limited employment prospects. Thinks that the ‘world owes them a favour’ <p>Other factors:</p> <ul style="list-style-type: none"> Ideology, politics and / or youth rebellion Provocation and anger (grievance) Need for protection. Seeking excitement and action Fascination with, or a morbid interest in, violence, weapons, and uniforms Seeking family and father substitutions Seeking friends and community, status, and identity.

Safeguarding and Prevent Policy

Annexes

Annex 1: The Channel Process

Annex 2: List of Relevant Agencies and Contact Details

Annex 3: Information Security Management

Annex 4: Designated & Deputy Designated Safeguarding & Prevent Officer Job Description

Annex 5: Safeguarding & Prevent Officer Job Description

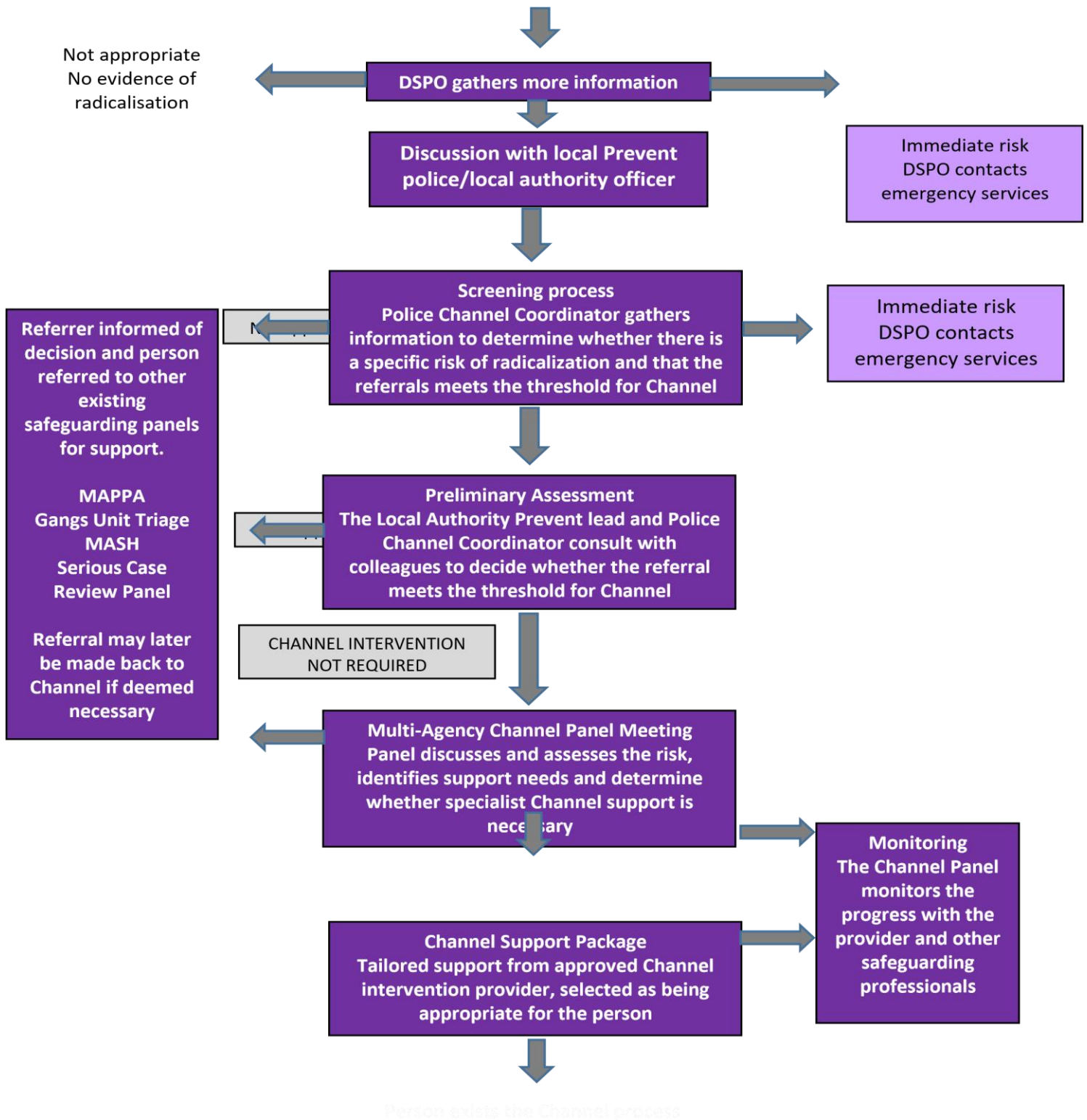
Annex 6: Safeguarding, Prevent & Welfare Reporting Procedure

Annex 7: Safeguarding, Prevent & Welfare Concern Form (SPW)

Safeguarding and Prevent Policy

ANNEX 1: The Channel Process

Safeguarding and Prevent Policy



Safeguarding and Prevent Policy

ANNEX 2: Helplines and reporting

Children can talk to a ChildLine counsellor 24 hour a day about anything that is worrying them by calling 0800 11 11 or in an online chat at <http://www.childline.org.uk/Talk/Chat/Pages/OnlineChat.aspx>.

If parents or carers are concerned that their child is being contacted by adults as a result of sharing sexual imagery they should report to NCA-CEOP at www.ceop.police.uk/safety-centre

ChildLine and the Internet Watch Foundation have partnered to help children get sexual or naked images removed from the internet. Young person can get their photo removed by talking to a ChildLine counsellor. More information is available at:

<http://www.childline.org.uk/explore/onlinesafety/pages sexting.aspx>

If parents and carers are concerned about their child, they can contact the NSPCC Helpline by ringing 0808 800 5000, by emailing help@nspcc.org.uk, or by texting 88858. They can also ring the Online Safety Helpline by calling 0808 800 5002.

[NSPCC | The UK children's charity | NSPCC](#)

Helplines

Help for adults concerned about a child.

Call us on 0808 800 5000

Help for children and young people.

Call Childline on 0800 1111

For supporter, donation, and fundraising queries

Call us on 020 7825 2505

The NSPCC has information and advice about sexting available on its website: [NSPCC Sexting](#)

Safeguarding and Prevent Policy

The National Crime Agency/CEOP has produced a film resource for parents and carers to help them prevent their children coming to harm through sharing sexual imagery: [THINKUKNOW Nude-selfies-a-parents-guide](#)

Childnet have information and advice about sexting available on its website: <http://www.childnet.com/young-people/secondary/hot-topics/sexting>

Children can talk to a ChildLine counsellor 24 hour a day about anything that is worrying them by ringing 0800 11 11 or in an online chat at: <http://www.childline.org.uk/Talk/Chat/Pages/OnlineChat.aspx>

If parents or carers are concerned that their child is being contacted by adults as a result of having sharing sexual imagery they should report to NCA-CEOP at www.ceop.police.uk/safety-centre

ChildLine have created Zip-It, an app that provides witty comebacks in order to help young person say no to requests for naked images [Childline Zipit Ap](#)

There is information on the ChildLine website for young people about sexting: [Childline information for young people](#)

The Safer Internet Centre has produced resources called '[Childnet So you got naked online](#)' which help young people to handle incidents of sexting

The NSPCC adult's helpline: 0808 800 5002 The NSPCC has partnered with O2 to offer direct support to parents and other adults on issues relating to online safety.

ChildLine: www.childline.org.uk ChildLine offers direct support to children and young people including issues relating to the sharing of sexual imagery.

The Professionals Online Safety Helpline (POSH): <http://www.saferinternet.org.uk/about/helpline> Tel: 0844 381 4772. This helpline supports professionals with an online safety concern or an online safety concern for children in their care. Professionals are able to contact the helpline to resolve issues.

REFERENCES

OFSTED- safeguarding policy
<https://www.gov.uk/government/publications/ofsted-safeguarding-policy>

Inspecting Safeguarding in early years education and training:
<https://www.gov.uk/government/publications/inspecting-Safeguarding-in-early-years-educationand-skills>

Safeguarding and Prevent Policy

Keeping Children Safe in Education September 2025

[Keeping children safe in education 2025](#)

Up-Skirting:

<https://www.gov.uk/government/news/upsirting-know-your-rights>

Online abuse

<https://www.nspcc.org.uk/what-is-child-abuse/types-of-abuse/online-abuse/>

Sexting:

<https://www.gov.uk/government/publications/sexting-in-schools-and-LHAAs>

Working together to Safeguard Children:

<https://www.gov.uk/government/publications/working-together-to-safeguard-children--2>

Knife crime:

<https://www.gov.uk/government/publications/knife-crime-safeguarding-children-and-youngpeople-in-education>

Sexual violence and sexual harassment between children in schools and LHAAs:

<https://www.gov.uk/government/publications/sexual-violence-and-sexual-harassment-betweenchildren-in-schools-and-LHAAs>

Information sharing: <https://www.gov.uk/government/publications/safeguarding-practitioners-information-sharingadvice>

Work base learners and the Prevent Strategy:

<https://www.gov.uk/government/publications/work-based-learners-and-the-prevent-statutory-duty>

Safeguarding Vulnerable Adults:

<https://www.gov.uk/government/publications/safeguarding-policy-protecting-vulnerable-adults>

NSPCC:

<https://www.nspcc.org.uk/preventing-abuse/safeguarding/>

Safeguarding and protecting people for charities and trustees:

<https://www.gov.uk/government/publications/safeguarding-children-and-youngpeople/safeguarding-children-and-young-people>

FGM Safeguarding pathway:

https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/542650/FGM_Flowchart.pdf

Safeguarding and Prevent Policy

Safeguarding women and girls at risk of FGM:

<https://www.gov.uk/government/publications/safeguarding-women-and-girls-at-risk-of-fgm>

MASH

<https://www.gov.uk/government/news/working-together-to-safeguard-children-multi-agencysafeguarding-hubs>

CASPER Safeguarding child Protection:

<https://learning.nspcc.org.uk/newsletter/caspar/>

Child exploitation:

<https://www.nspcc.org.uk/preventing-abuse/child-abuse-and-neglect/child-sexual-exploitation/> <https://www.gov.uk/government/publications/child-sexual-exploitation-definition-and-guide-forpractitioners>

Teaching online safety in schools:

<https://www.gov.uk/government/publications/teaching-online-safety-in-schools>

Channel guidance:

<https://www.gov.uk/government/publications/channel-guidance>

Prevent Duty guidance:

<https://www.gov.uk/government/publications/Prevent-duty-guidance>

ANNEX 3: Information Security Management

In accordance with our data and information security policies, all security elements and documents are reviewed on an annual basis, and data and information security risks are managed continually through our monthly Safeguarding Task Group and our Risk Register Record. The Risk Register records all risks which are either reported into the Safeguarding Group or escalated immediately to the SMT and Director (Operations).

All information security incidents will be immediately reported to our Director (Operations) responsible for ensuring incidents are correctly raised, reported, and evaluated for risk. The Director will work with the identified risk owner responsible to resolve such incident and take any further actions required for future mitigation. Where appropriate, part of the process deemed would be to inform the Advisory Board.

All assets relating to our information systems are controlled and maintained through AGT (outsourced).

All physical storage media is recorded and logged in the IT asset management system. All data stored on our hardware will be dealt with as set out in the IT Data Protection Policy.

All Learner-related data is treated as sensitive unless the data is public e.g., Class lists. Our employees sign agreements stating that they will work in complete compliance with our

Safeguarding and Prevent Policy

processes. Disclaimer detail is also included in all communication via email. Any non-conformities are recorded in Risk Record to be dealt with., in line with our IT policies. Where a security incident is identified, this is followed up in accordance with our processes by the Director (Operations).

All employees are issued with a job description for the job role they are employed for. Their roles and responsibilities are defined within the job description. Job descriptions clearly state individual responsibilities for IT security, safeguarding and other operational areas.

All our employees sign a confidentiality agreement under our standard terms of employment. Data security/protection awareness is maintained by communications, inductions, and reviews. We carry out internal and external audits in accordance with our IT policies and HR processes. We ensure training is maintained within the Company on an on-going basis through annual mandatory training. Quality is maintained through the focuses groups and training content is annually updated to be reflective of current practices and legalisation.

Systems records are maintained so that the company network and systems can be adequately monitored for signs of actual, or possible, security breaches and attacks. 24/7 monitoring is in place through AGT.

Where we collect items such as CVs and/or training certificates, these are all handed in the same way as any paper record in that they are stored electronically on secure storage. Where a paper copy is maintained, it would be stored with the particular learner file and stored in secure locked cabinets as all learner data is classified within our systems as sensitive.

We have a fully compliant backup and restore service for all data in line with its contractual agreements.

Access to the Internet is via a fully managed firewall, with access to websites being restricted.

Access to the most sensitive data will be provided only through the use of the company PC or laptop. All portable devices will be encrypted. It is an accepted risk that some data can be accessed through non-Training Works hardware. It is the responsibility of the Curriculum Leads to monitor the adherence to the IT Acceptable Use Policy. Authentications will be configured to ensure the employee connect using a username and password.

- All remote connections are via SSL encrypted tunnels.
- Annual external penetration testing is carried by a AGT registered supplier.
- Quarterly Vulnerability Scanning is carried by a AGT registered supplier.

We will also follow HM Government information sharing GUIDANCE July 2018 and the seven rules of data sharing.

Safeguarding and Prevent Policy

ANNEX 4

Designated & Deputy Designated Safeguarding & Prevent Officer (DSL & DDSL) **Job Description**

Reports to: Director (Development)

In the absence of the Designated Safeguarding & Prevent Officer (DSL), the DDSL will assume the following Principle Tasks & Key Responsibilities:

Principle Tasks

The DSL is responsible for acting as a source of advice on child and adult at risk safeguarding matters, for coordinating action within the Company and for liaising with health, children's service, adult services, and other agencies about suspected or actual causes of abuse. The DSL will be assisted by other designated members of staff from senior management and suitably experienced employees (SPOs).

The DSL is responsible for reviewing the child and adult at risk Safeguarding and Prevent Policy annually, or more frequently if there is a change to current legislation, along with any policies linked to the Safeguarding and Prevent Policy and processes and procedures that support the embedding and working practices of this policy.

Key Responsibilities

The DSL will:

- Have a key responsibility for raising awareness, within the staff, of issues relating to the welfare of children and adults at risk and the promotion of a safe environment for children and adults at risk.
- Lead on governance over Safeguarding and Prevent matters across the Company.
- Be responsible for ensuring the Safeguarding & Prevent child and adult at risk policy is available publicly and to parents and carers, that parents and carers are aware that suspected abuse referrals may be made, and our role in this.
- Alert the police when a crime may have been committed.
- Foster strong links with the LSCB and Designated Local Authority Person.
- Refer all cases of suspected abuse to the local authority, children's social care agency or, in the case of a vulnerable adult, to the local authority adult's social care.
- Refer to the ESFA should we be subject to an investigation regarding our safeguarding practices.
- Refer all reportable safeguarding matters to the relevant funding partner.

Safeguarding and Prevent Policy

- Liaise with senior management to inform them of issues, especially on-going enquiries, and police investigations.
- Maintain a proper record of any safeguarding referral, complaint, or concern, even when that concern does not lead to a referral.
- Act as a source of advice, support, and expertise to employee on matters of safety and safeguarding.
- Liaise with relevant agencies following a referral to ensure it has been dealt with effectively and identify whether a resolution has been achieved.
- Will ensure that we work with employers to ensure that appropriate safeguarding's are in place.
- Provides information at each Board meeting about how we have discharged our duties.
- Report deficiencies in procedure or policy identified by the LSCB at the earliest opportunity.
- Receive subject area advice, guidance, and support from SPOs.
- *On return to the business, the DDSL will provide the DSL with a full and comprehensive briefing of action & issues raise / undertaken in their absence.*

ANNEX 5

Safeguarding & Prevent Officer (SPO)

Job Description

Principle Tasks

To support the Lead & Deputy DSL in issues related to safeguarding children and vulnerable adults.

Take responsibility for raising awareness, within the staff, of issues relating to the welfare of children and adults at risk and the promotion of a safe environment for children and adults at risk.

As a member of the Safeguarding & Prevent Team (SPT) keep up to date with developments in safeguarding children and adults at risk.

Advise the DSL / DDSL on all safeguarding & prevent issues relating to their sector specialism.

Key Responsibilities

The SPO will:

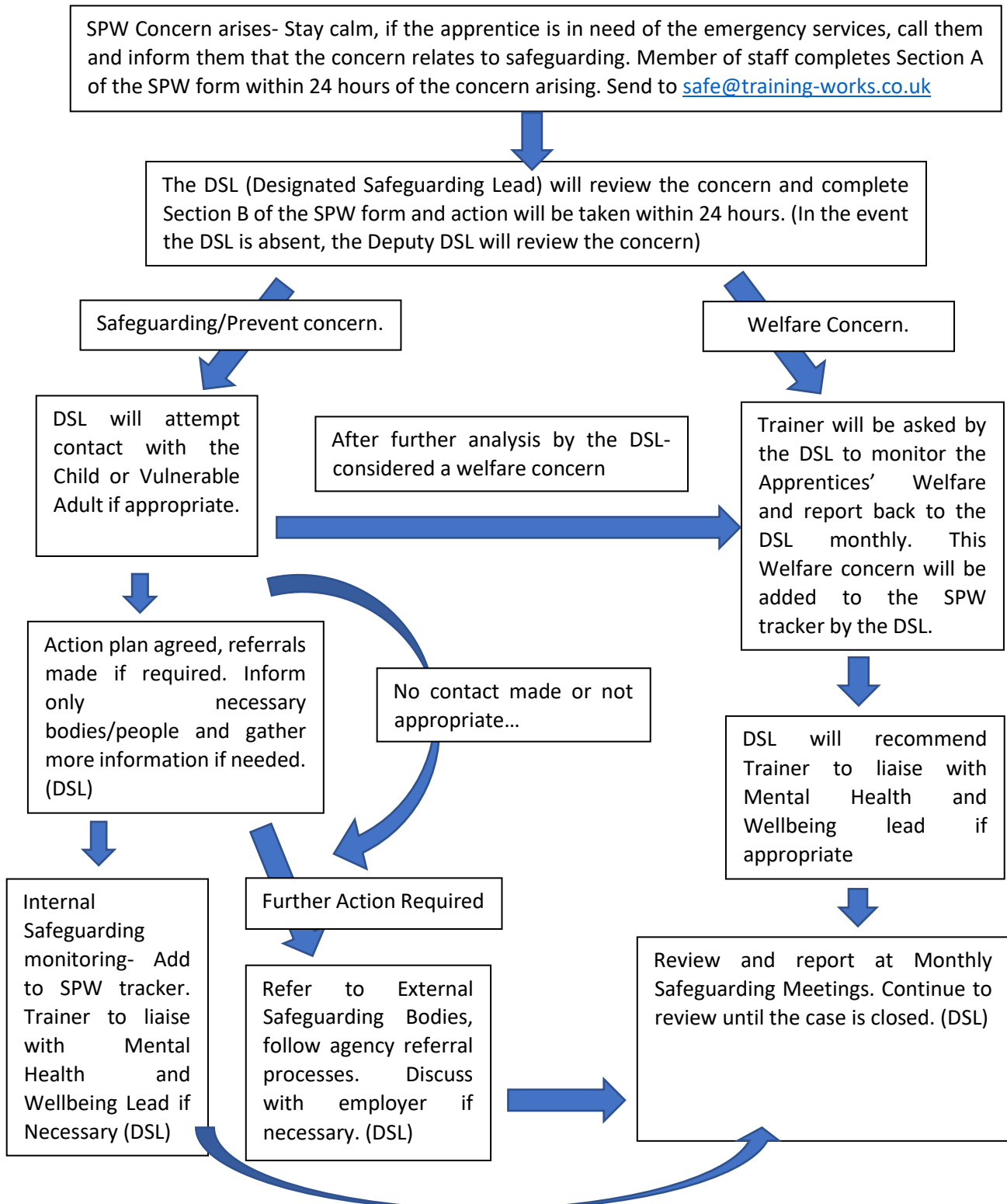
- Have a responsibility for raising awareness, across sector staff, of issues relating to the welfare of children and adults at risk and the promotion of a safe environment for children and adults at risk.

Safeguarding and Prevent Policy

- Ensuring the Safeguarding & Prevent child and adult at risk policy is available publicly and to parents and carers, that parents and carers are aware that suspected abuse referrals may be made, and our role in this.
- Alert the DSL when a person has been dismissed or left due to risk to or harm that they presented, or may have presented, to a child or vulnerable adult.
- Refer all safeguarding matters promptly to the DSL.
- Maintain a proper record of any safeguarding referral, complaint, or concern.
- Act as a source of advice, support, and expertise to the DSL / DDSL on matters of safety and safeguarding.
- Work with employers to ensure that appropriate safeguarding's are in place.
- Provides information at each Safeguarding & Prevent Team meeting about how we have discharged our duties.
- Provide subject area advice, guidance, and support to the DSL / DDSL.
- Ensure that all new & current staff (employees) within your sector are provided with current & appropriate Safeguarding & Prevent training, on-entry & ongoing.
- Ensure that all learners & employers within your sector are provided with appropriate Safeguarding & Prevent information and training, on entry & ongoing throughout the training period.
- Ensure that all learner welfare & support issues are referred to the DSL / DDSL for tracking.
- Attend & participate in periodic Safeguarding & Prevent Team meetings.

Safeguarding and Prevent Policy

ANNEX 6: Safeguarding, Prevent and Welfare Reporting Procedure.



Safeguarding and Prevent Policy

ANNEX 7: Referral Form (SPW)

Safeguarding, Prevent and Welfare Concern Form (SPW)

If you have a concern about a child or a vulnerable adult, please complete this form and send it to safe@training-works.co.uk at the earliest opportunity. Call the safeguarding helpline on 07593703281 if any advice is needed. Remember, it isn't your responsibility to decide whether abuse is taking place, however it is your responsibility to report your concerns.

Section A- To be completed by the staff member.

Your Details.

Date:

Name:

Job Role:

Contact Details:

Child or Vulnerable Adult Details.

Name:

Date of Birth:

Contact Details:

Preferred time and method of contact:

Concern details.

Based on your existing knowledge, please identify the type of concern you think this is.

Welfare Safeguarding Prevent

Date of the initial raising of concern or incident:

Who initially raised the concern? Please provide their contact details (if this is different to you):

When did the concern/incident occur?

Where did the concern/incident occur?

Please provide details regarding the concern/incident. (This must be factual and include others who were present as well as stating anything that was seen or heard in regards to the concern/incident. This includes direct disclosures and/or comments from the child/vulnerable adult and these must be recorded factually and in quotation marks.)

Safeguarding and Prevent Policy

Please provide witnesses' name/s and contacts details (if applicable):

Has any action already been taken? Please provide names or roles of people aware of this incident/concern.

Please confirm the date and time you have completed this form and the email address you will be sending it to.

Date:

Time:

Sent to (Email Address):

Section B- To be completed by the safeguarding team.

Date and time the form was received:

Name of the person receiving the form:

Position of the person receiving the form:

Was any advice sought in relation to this concern/incident? Please include date, time, name, role, organisation and the advice given.

Analysis of the concern/incident and advice received:

Action taken, please include any referrals, monitoring details, advice or instruction given to those involved or aware of this concern/incident.

Next steps:

Has this been recorded on the Safeguarding tracker?

Outcome:

Completed by:

Date: