



SAFEGUARDING POLICY

COMMITMENT:

The Training Trust ensures that all staff, trustees, employers, visitors, subcontractors and volunteers share our commitment to safeguarding and promoting safe practices with learners.

As an adult working or associated with this organisation, you have a duty of care towards all learners. This means you should act at all times in a way that is consistent with their safety and welfare. If you have a concern about a child, particularly if you think they may be suffering or at risk of suffering harm, it is your responsibility to share the information promptly with the Designated Person(s) for Safeguarding (Mark Durham, June Gray and Alison Berkoff). In the absence of the Designated Persons, you should report to a member of Senior Management Team.

The following is not an exhaustive list but you might become concerned as a result of:

- Change in normal behaviour patterns of individual learner
- Seeing a physical injury which you believe to be non-accidental
- Observing something in the appearance of a learner which leads you to think his/her needs are being neglected
- Witnessing behaviour which gives rise to concern
- A learner telling you that they have been subjected to some form of abuse
- You suspect a learner or member of staff is at risk under the PREVENT Duty

In any of these circumstances you should write down what you observe or heard, complete the Safeguarding or PREVENT Incident Reporting Forms and give it to the Designated Person.

If a learner talks to you about (discloses) abuse you should;

- Listen carefully without interruption, particularly if they are freely recalling significant events
- Only ask sufficient questions to clarify what you have heard. You might not need to ask anything but, if you do, you must not 'lead' the learner in any way so you should only ask 'open' questions
- Make it clear you are obliged to pass the information on, but only to those who need to know
- Tell the Senior Designated Person without delay
- Write an account of the conversation as soon as you are able (definitely the same day), complete as in line with 'Raising a Concern Process' and give it to the Designated Person

If the learner talks to you about (discloses) abuse you must not;

- Promise to keep it confidential
- Ask the learner to repeat the disclosure to anyone on else in the organisation
- Press the learner for revelations or ask leading questions
- Attempt to remove clothing
- Suggest ways in which it might have happened
- Suggest who may have caused an injury
- Attempt a detailed physical examination
- Inform parents

You are not expected to make a judgement about whether the learner is telling the truth.

If the behaviour of another member of staff or visitor in the organisation gives rise to concern, you should report it to the Senior Designated Person (Mark Durham).

REMEMBER – SHARE ANY CONCERNS, DON'T KEEP THEM TO YOURSELF

I have received and read a full copy of the **Safeguarding & Child Protection Policy** and associated **Preventing Extremism & Radicalisation Policy** Information and agree to abide by all contained within them.

Signed:.....

Date:.....

Print Name:.....

Shared Drive/Quality Improvement/Guidance and support/Safeguarding folder/Safeguarding Policy/Updated: September 2021

TRAINING TRUST SAFEGUARDING AND CHILD PROTECTION POLICY

Purpose

The purpose of this Policy Document is:

1. To make it clear that safeguarding and child protection are of the highest significance and priority in every aspect of a learner's contact within The Training Trust.
2. To make clear the roles and responsibilities of the designated safeguarding leads within the organisation, officers within the local authorities and within the community.
3. To explain the wide range of events and relationships that can give rise to child protection issues.
4. To state with clarity what action is to be taken by any member of The Training Trust and associated contacts including subcontractors and employers in the event of an actual or suspected child protection case.
5. To keep staff safe.

Scope

Safeguarding the children in our care is the responsibility of all at The Training Trust. All children of any age have the right to be protected from abuse. Training Trust recognises fully its statutory duty to "safeguard and promote the welfare" of children.

Staff, Employers, Subcontractors and Volunteers

Keeping Children Safe in Education (DfE, 2019) states the need to check unsupervised volunteers who work in schools. "Under no circumstances should a volunteer in respect of whom no checks have been obtained be left unsupervised or allowed to work in regulated activity." (KCSIE, Paragraph 167)

The Training Trust will always undertake an individual risk assessment, and the response to this will always be to apply for an enhanced DBS check. A risk assessment will be carried out for each person.

All staff, employers, subcontractors and volunteers will be made aware that safeguarding incidents can happen at any time and anywhere and that they are required to be alert to all possible concerns. All staff and associated clients at Training Trust are empowered to make a referral to the Local Safeguarding Children Board (also known as Safeguarding Partners) or the Designated Officer of the Local Authority (LADO), or team of officers.

The Safeguarding referral form and flow chart in 'Reporting a Safeguarding Incident' should be used and handed to the Designated Safeguarding Officer or one of their deputies within 1 working day of such an incident taking place. Form and chart available on shared drive VPN.

This referral form is to be used in cases in which it is alleged that a person who works with children (either paid / unpaid/self-employed) has

- **behaved in a way that has harmed a child, or may have harmed a child**
- **possibly committed a criminal offence against or related to a child**
- **behaved towards a child or children in a way that indicates they may pose a risk of harm to children.**

- If the allegation meets any of the previous criteria, the Training Trust lead DSL or deputies will report it to the LADO within 1 working day. Referrals should not be delayed to obtain further information
- For services regulated/inspected by **OFSTED**, the provider should notify them of the allegation.
- The completed Training Trust referral form should be sent to the Redbridge LADO at the Safeguarding and Care Planning Team (020 8708 5350/5150/5173)

LADO@redbridge.gov.uk

- It is advisable to consult the LADO (or nominated IRO in the LADO's absence) on one of the above numbers before making a referral. Alternatively contact and referral to CPAT (CPAT.Referrals@redbridge.gov.uk) on 020 8708 3885 can be made.

If immediate action is required to protect a child, please discuss this with the LADO. Outside of office hours, contact the Emergency Duty Team (Tel. 020 8554 5000) or local Police (Met switchboard – 101 or in an emergency 999)

Mark Durham is the Designated Safeguarding Lead (DSL): markdurham@trainingtrust.org.uk
Switchboard: 0208 518 1344 Mobile: 07984 463 148

June Gray is Deputy Designated Safeguarding Lead:
Junegray@trainingtrust.org.uk Mobile: 07944 038 612

Alison Berkoff is Deputy Safeguarding Lead:
Alisonberkoff@trainingtrust.org.uk Mobile: 07946 534 010

The Training Trust has alternative lines of communication as below:

Dedicated Safeguarding mobile (monitored by DSL): 07931 707 394

Dedicated Safeguarding email address (monitored by DSL): safeguarding@trainingtrust.org.uk

SUBCONTRACTORS:

Choice Training DSL: Robert Tye - rob@choicetrainingltd.co.uk Mobile: 07830 303 134

Building Crafts College DSL: Frances Hill – frances.hill@thebcc.ac.uk
Telephone: 020 8522 1705

This policy applies to all staff and services associated with The Training Trust and is reviewed annually by the Designated Safeguarding Lead(s) (DSL) and Board of Trustees.
(See note on page 16).

Other useful contacts

Call 999 in an emergency or if you believe a child is in immediate danger

Call the Police on 101 to report cases of FGM

Child Line (advice for children): 0800 1111

NSPCC (advice for concerned adults): 0808 800 5000

NSPCC whistleblowing helpline: 0800 028 0285

e-mail: help@nspcc.org.uk

Metropolitan Police Child Sex Exploitation helpline: 0800 789321

Metropolitan Police Counter Terrorism Unit: 0800 789321

Prevent non-emergency advice for staff and Trustees (DfE Due Diligence and Counter-Extremism Group [DDCEG]): 020 7340 7264

e-mail: counter-extremism@education.gsi.gov.uk

DBS, PO Box 181, Darlington, DL1 9FA 01325 953795

Local Safeguarding Board Referral and Assessment /Children's Social Care Duty Teams are available 9.00am to 5.00pm weekdays (excluding bank holidays).

Shared Drive/Quality Improvement/Guidance and support/Safeguarding folder/Safeguarding Policy/Updated: September 2021

The Training Trust follows the London Child Protection Procedures as adopted by London Borough Safeguarding Children Boards associated with our learner base. Copies available from: <http://www.londonscb.gov.uk/london-safeguarding-contacts/london-scb-contacts> . 020 7934 9714 / Email: lison.renouf@londoncouncils.gov.uk.

Outside these hours – between 5.00 p.m. and 9.00 a.m. and on weekends and Bank Holidays – the Emergency Duty Teams can be contacted on 020 8379 1000

Contents

- 1.1 Policy aims
- 1.2 Principles of safeguarding and child protection
- 2 Key people and their responsibilities
- 3 Training
- 4 Local circumstances
- 5 Procedures
- 6 DSL job descriptions
- 7 The Care Act 2014

1.1 Policy Aims

This policy aims to:

- support a child's development in ways that will foster security, confidence and resilience.
- provide an environment in which children feel safe, secure, valued and respected, confident and know how to approach an adult if they are in difficulties.
- raise the awareness of all adults in the organisation of the need to safeguard children and of their responsibilities in identifying and reporting possible cases of abuse.
- provide an environment in which staff feel safe, secure, valued and respected in line with Training Trust's policies on Staff Code of Conduct, Safer Recruitment and Preventing Radicalisation and Extremism.
- make clear the procedure and policy for reporting concern and Whistle-blowing.

1.2 Principles of safeguarding and child protection

The prime concern at all stages must be the interests and safety of the child. A child is a person under the age of eighteen. Where there is a conflict of interest between the child and an adult, the interests of the child must be paramount.

Children must be protected from all forms of abuse: neglect; physical; emotional and sexual (including female genital mutilation [FGM] and sexual and criminal exploitation [CSE and CCE]).

Training Trust is also aware of the need to protect children from the threat of radicalisation as part of its wide safeguarding duties (Section 26 of the Counter-Terrorism and Security Act). The organisation is vigilant in seeking to assess any risk to learners, as individuals, or in the context of their families, of being drawn into terrorism, including indicating support for extremist ideas that are consistent with terrorist ideology. Training Trust recognises that its "Prevent Duty" draws on local partnership arrangements and is ready to draw on guidance from the London Borough of Redbridge and other Boroughs as required.

Refer to our separate **Preventing Radicalisation and Extremism Policy** for further guidance and explanation.

The responsibility to refer children thought to be at risk (this is not a duty unless it relates to Prevent or FGM) rests with the DSL not the individual who has the concern. The individual who has the concern has a responsibility to report this to the DSL, and onward to Children's Social Care if they feel their concern is not being properly dealt with (although the Whistleblowing policy should also be invoked at this stage).

Should a learner make an allegation of abuse against anyone to a member of staff or any adult in the setting, the adult must make it clear that they cannot keep the information secret. At no time should a member of staff promise complete confidentiality to a learner in matters of child protection. It is important, however, to stress that they believe the child's story and want to help.

The degree of confidentiality exercised is governed by the need to protect the child: the organisation has a responsibility to share relevant information about the protection of children with other professions, especially statutory agencies. All agencies receiving information in the context of a child protection investigation must treat it as confidential and must normally not disclose it for any other purpose without consulting the person who provided it, unless there is a public interest duty to do so. Children who have suffered or are likely to suffer significant harm are reported to Children's Social Care. Those in need of additional support from agencies, such as early help, are referred according to the relevant local authority's Local Safeguarding Children Board processes using the relevant referral framework where required.

In general, the organisation believes that parents / carers should be informed about any concerns regarding their children. However, in certain circumstances this may not be in the best interests of the child. In such cases, advice will be sought from the Designated Safeguarding Lead(s) (listed above and below) who may seek advice from the relevant Children's Social Care team.

Any Looked After Children will be supported by the organisation working with the Team around the Child (TAC) and ensuring that staff have the necessary skills, knowledge and understanding necessary to keep safe children who are looked after by the Local Authority. This will include ensuring that staff have up-to-date assessment information from the relevant Local Authority; the most recent Health, Education and Care Plan and contact arrangements with parents / carers, and delegated authority to carers, and information available to the DSLs. Staff will also be alerted to the particular potential vulnerabilities of Looked After Children.

2. Key People and their Responsibilities

- 2.1 The Board of Trustees (through the contact with the SMT) is responsible for:
- Reviewing annually the procedures and the efficiency with which child protection duties have been discharged including the reporting of allegations against staff to the local authority Designated Officer or team of officers;
 - Ensuring that any deficiencies or weaknesses are remedied without delay;
 - Approving amendments to child protection arrangements in light of changing regulations or recommended best practice.

The Trustee with responsibility for monitoring Child Protection arrangements is currently Alan Clements.

2.2 Designated Safeguarding Leads (DSLs)

The Senior Management Team designates appropriate senior member(s) of staff to take lead responsibility for child protection. This team has the status and authority within the organisation to carry out the duties of the post, including committing resources and, where appropriate, supporting and directing other staff.

The organisation ensures that the DSLs have sufficient time, funding, supervision and support to fulfil child welfare and safeguarding responsibilities effectively. The DSL job description is in section 6 of this document.

2.3 The designated staff within The Training Trust and associated subcontractors with responsibility for safeguarding and child protection (Designated Safeguarding Leads, DSLs and Deputies) are detailed on page 3 of this document.

3. Training

3.1 All DSLs receive appropriate training carried out every 3 years to level 4, and regularly attend any relevant or refresher training courses.

3.2 All staff are issued with guidelines on safeguarding (including part 1 and Annex A of Keeping Children Safe in Education, September 2019) and receive Level 1 training in line with local safeguarding requirements during induction and then renewed every 2 years.

General awareness training on safeguarding and Child Protection is given at least each year. General reminders and agenda item specifically targeted at Safeguarding discussed at Trustee's, SMT and Staff meetings at regular intervals throughout the year.

Regular, regional HE/FE correspondence is received (at least bi-monthly) and this is disseminated to all staff and trustees. This feeds into discussions at meetings and used to inform policy and procedural updates.

Staff can access resources on the Education & Foundation Excellence Gateway <https://www.excellencegateway.org.uk/> to assist with the recognition of children at risk of being drawn into terrorism and anything connected with Safeguarding and reporting.

3.3 New permanent and temporary staff along with volunteers are given safeguarding awareness training as part of their induction. This comprises:

- The organisation's safeguarding and Child Protection Policy, including details of the DSLs
- The Staff Code of Conduct
- The Guidance of Staff Behaviour Policy
- The organisation's Whistleblowing Policy
- Part One and Annex A of Keeping Children Safe in Education (September 2019)

In addition, the following are provided:

- Social Media Policy (including photographs)
- Communications Policy (including use of ICT and mobile phones)
- Anti-Bullying Policy
- Equality and Diversity Policy
- Preventing Radicalisation and Extremism Policy
- Health and Safety Policy
- Lone worker Policy
- Home Working Policy
- Safer Recruitment Policy
- Professional Development Policy

Staff receiving these documents sign a form confirming that they have received and familiarised themselves with them. These forms are retained by the Chief Executive Officer and held in staff personnel files. These Policies and the Staff Handbook are available within Training Trust's Shared Drive and accessed remotely via the VPN.

The Training Trust also provides information on safeguarding and child protection as well as Health and Safety for visitors. This is issued upon arrival at Reception and is also available on the organisation's website.

3.4 Teaching learners how to keep safe

Keeping safe online is embedded into all our programmes.

It is essential that learners understand and commit to not sharing personal information with people they view as "friends" online. This includes their real name, address, phone number, financial information, school name, passwords, or other private personal information.

Shared Drive/Quality Improvement/Guidance and support/Safeguarding folder/Safeguarding Policy/Updated: September 2021

Learners must commit to being ethical online users including:

- Posting only what they would feel comfortable with the whole world seeing, including parents or training centre admissions personnel.
- Never using the Internet to spread gossip, bully or hurt someone's reputation.

Learners are made aware and should understand what security tools are available to use on most computers to further protect themselves, their personal information, and their computer from viruses, spyware, and spam.

Learners are taught that they are in charge of their online experience and should manage it the way they would in the real world. If something or someone online makes them feel uncomfortable, they have the right to not respond, delete a post, and most importantly tell a trusted adult.

Learners must commit to never meet in person with someone they met online unless they have first checked with an adult such as a parent/carer or member of Training Trust staff.

All learners are made aware of and have access to <https://www.thinkuknow.co.uk/>

4. Local circumstances

Keeping children safe in education (September 2019) makes clear that schools' policies should reflect local circumstances. For The Training Trust, these are:

1. Gun and knife crime

1.1 Gun and knife crime is linked to Child Criminal Exploitation, County Lines and gang and postcode issues. Training Trust has specific procedures relating to the carrying of weapons on its premises. Where necessary, local Police teams should be involved in supporting the education of learners in relation to weapons.

2. Child Criminal Exploitation / County Lines

2.1 Criminal exploitation of children is a geographically widespread form of harm that is a typical feature of County Lines criminal activity: drug networks or gangs groom and exploit children and young people to carry drugs and money from urban areas to suburban and rural areas, market and seaside towns. Key to identifying potential involvement in county lines are missing episodes, when the victim may have been trafficked for the purpose of transporting drugs and a referral to the National Referral Mechanism should be considered.

2.2 Like other forms of abuse and exploitation, County Lines exploitation:

- can affect any child or young person (male or female) under the age of 18 years;
- can affect any vulnerable adult over the age of 18 years;
- can still be exploitation even if the activity appears consensual;
- can involve force and/or enticement-based methods of compliance and is often accompanied by violence or threats of violence;
- can be perpetrated by individuals or groups, males or females, and young people or adults; and
- is typified by some form of power imbalance in favour of those perpetrating the exploitation. Whilst age may be the most obvious, this power imbalance can also be due to a range of other factors including gender, cognitive ability, physical strength, status, and access to economic or other resources.

3. Gang and postcode issues

3.1 Indicators of vulnerability to being recruited into a gang

3.1.1 Home Environment

- unstable family environment or conflict between parents/siblings
- neglect, maltreatment, physical or sexual abuse
- absence of parental attachment, lack of emotional care
- parents who are not positive role models; are unable to communicate effectively with the child; provide poor discipline; do not give guidance or set proper boundaries

- parents who discipline with uncaring harsh or violent punishment
- parents with alcohol, substance, drug or mental health issues
- witnessing domestic abuse or violent conflict
- broken home, is separated from a parent or has a parent in prison
- living with a gang member or family members involved in gang activity and criminality
- exposure to violent media

3.1.2 Personal

- child has suffered traumatic life experiences
- low academic achievement, significant levels of truancy and unauthorised absences; has a poor attendance record or is regularly excluded from school
- within the care system; and/or is historically involved with social services
- history of missing, especially around 15 years old socially isolated; is bullied or bullies others
- learning disabilities or difficulties
- mental health issues, depression or behavioural problems, poor self-esteem
- vulnerable to peer pressure and intimidation
- lack of ethnic identity or feels socially isolated with no support
- unable to regulate own emotions and behaviour, displays anger and resentment towards society or demonstrates physical violence and aggression
- alcohol or drug issues

3.1.3 Community

- lives in an area with high gang activity
- has become involved in antisocial and criminal behaviour early, which has led to persistent offending and juvenile convictions
- associates with friends, peers who are involved in antisocial and aggressive behaviour
- lives in an area where drugs are readily available; or is exposed to drug use
- lives in areas with high levels of poverty, unemployment, social housing and crime
- comes from communities who have experienced war situations prior to arrival in the UK or groups more likely to tolerate crime
- has no positive role models in the community
- comes from an area which lacks diversionary activities (e.g. youth services)
- lacks aspirations, has little or no job prospects, is likely to become unemployed
- attends a school where gang recruitment is known to occur
- has no or little of access to productive social activities and opportunities
- has disengaged from support services

3.2 'Preventing youth violence and gang involvement' (Home Office, 2015) will be referred to in planning specific safeguarding and protective activity for those learners either engaged in, or at risk of engagement with, gangs.

4. Child sexual exploitation and grooming

4.1 Child sexual exploitation is a form of sexual abuse. It occurs where an individual or group takes advantage of an imbalance of power to coerce, manipulate or deceive a child or young person under the age of 18 into sexual activity (a) in exchange for something the victim needs or wants, and/or (b) for the financial advantage or increased status of the perpetrator or facilitator. The victim may have been sexually exploited even if the sexual activity appears consensual. Child sexual exploitation does not always involve physical contact; it can also occur through the use of technology.

4.2 What to look out for:

- Acquisition of money, clothes, mobile phones, etc without plausible explanation
- Gang-association and/or isolation from peers/social networks
- Exclusion or unexplained absences from school, college or work
- Leaving home/care without explanation and persistently going missing or returning late
- Excessive receipt of texts/phone calls
- Returning home under the influence of drugs/alcohol
- Inappropriate sexualised behaviour for age/sexually transmitted infections
- Evidence of/suspicions of physical or sexual assault

- Relationships with controlling or significantly older individuals or groups
- Multiple callers (unknown adults or peers)
- Frequenting areas known for sex work
- Concerning use of internet or other social media
- Increasing secretiveness around behaviours
- Self-harm or significant changes in emotional well-being

5. Procedures

Documents relating to individual child protection concerns are held securely by the Chief Executive, with an indicator that such records are held placed in a learner's main file. These documents are passed securely to the DSL at the receiving organisation when a child leaves the Training Trust. **Child protection records must be retained by all educational establishments until the child's 25th birthday**, unless the records are transferred to a new establishment when the child leaves.

5.1. Vetting

All staff, teaching and non-teaching, are vetted according to current legal requirements and all references for staff are followed up. Staff appointments are made according to the organisation's Safer Recruitment Policy.

- All employees are subject to Enhanced DBS checks and barred list check.
- Staff are required to complete a Disqualification by Association Declaration if they are considered by the Organisation to be within the scope of the guidance.
- Volunteers who visit once a week, or four or more times in a 30-day period, are subject to an enhanced DBS check, even if they do not have unsupervised access to children.
- Volunteers helping with one-off events who do not have unsupervised access to children are not checked.
- The classroom-based staff and supervising staff receive training in safeguarding every two years. A list of staff and dates of last training are held on a central register.
- Visiting speakers are appropriately supervised by at least one member of staff whilst on the organisation premises. All visitors must adhere to Training Trust's Safeguarding Policy commitment on page 1 of this document to give assurances that they have an understanding of Safeguarding and the Prevent Duty in advance of their activity.
- The organisation seeks assurances that any residential facilities used have safeguarding procedures in place.

5.2 Radicalisation

Children and young people can be exposed to extremist influences or prejudiced views, in particular via the internet and other social media. It is the Training Trust's legal duty to protect all learners and staff from extremist and violent views in the same way that we seek to safeguard the children from drugs, gangs, violence or alcohol. Please refer to the Training Trust's 'Preventing Radicalisation and Extremism Policy', which is found on the shared drive VPN.

Indicators of possible radicalisation can include:

1. Spending increasing time in the company of suspected extremists;
2. Changing style of casual dress or personal appearance to accord with an extremist group;
3. Day-to-day behaviour becoming centred around an extremist ideology, group or cause;
4. Loss of interest in friends and/or activities not associated with an extremist cause;
5. Attempts to recruit others to a specific group/cause/ideology;
6. Communications with others that suggests identification with a group/cause/ideology;
7. Identifying clearly with another group, or groups, as perpetrators of social or political ills;
8. Expressing attitudes that justify offending on behalf of a group, cause or ideology.

Concerns about the activities or behaviour of a child where radicalisation is suspected will be made to the Metropolitan Police Anti-Terrorist Hotline or regional authorities by a DSL.

5.2.1 Children who may be particularly vulnerable are defined either as “in need” or “at risk”

5.2.2. A child in need is defined as:

- He/she is unlikely to achieve or maintain, or have the opportunity of achieving or maintaining, a reasonable standard of health or development without the provision for him/her of services by a local authority;
- His/her health or development is likely to be significantly impaired, or further impaired, without the provision for him/her of such services; or
- He/she is a Disabled child.

5.2.3 Categories of Children in Need

- Significant Harm: children who have suffered significant harm. This may be escalated: see below
- Disabled Children: children with physical disabilities, sensory disabilities, learning disabilities or emotional and behavioural disabilities
- Parental Illness/Disability: alcohol or drug misusing parents / carers, acutely ill parents / carers (short term), Chronically disabled parents / carers, chronically mentally ill parents / carers, children assuming responsibility for chronically ill, addicted, or disabled parents / carers
- Family in Acute Stress: homeless family, unsupported single parent, death of carer
- Family Dysfunction: domestic violence, inconsistent parenting, family breakdown
- Socially Unacceptable Behaviour: disorderly behaviour, offending, truancy, unsafe sexual behaviour
- Low Income: asylum seeking families, non-habitually resident status, independent young people
- Absent Parenting: parents / carers died, unaccompanied child asylum seekers, children privately fostered
- Other: step-parent adoptions, inter-country adoptions, Court Reports, subject access to files, historical allegations/complaints

Anyone with concerns regarding a child in need should contact a DSL who will refer the relevant Children’s Services department.

Reminder: Anyone with concerns may refer these to the relevant Children’s Services department or the Police at any time.

5.2.4 Anyone with concerns regarding a child at risk should contact a DSL who will refer the relevant Children’s Services department within one working day or immediately to the Police if a crime has been committed.

Reminder: Anyone with concerns may refer these to the relevant Children’s Services department or the Police at any time.

5.2.5 Children who go missing

Attendance Registers are completed at the beginning of the learning day and in the afternoons by 2pm. Children with unexplained absences are contacted by telephone by their Liaison Officer and/or the learner Personal Development, Behaviour and Welfare Officer for an explanation. If there is unexplained absence of a child present in the morning from afternoon registration, the organisation’s Missing Child Procedure will be followed.

If contact is not possible, the additional contacts listed for a child will be used. If this is unsuccessful or there is no satisfactory explanation for a child’s absence, the local authority will be contacted within 10 days.

Reminder: Anyone with concerns may refer these to the relevant Children's Services department or the Police at any time

5.2.9 Disclosures from children to a member of staff

If a child volunteers information about abuse to a member of staff, it may be done obliquely rather than directly. An abused child is likely to be under severe emotional stress and the staff member may be the only adult the child is prepared to trust.

Tact, sensitivity and reassurance will be required by staff responding to a disclosure but at the same time the child must understand that other adults will need to be informed. In order to prevent the child having to repeat the information.

In the event of criminal proceedings being instituted, records of any interview with the child will need to be available for disclosure to the Crown Prosecution Service.

5.2.10 Action to be taken if abuse, or related risks, is suspected

Inform a DSL who will then seek advice from the Social Services locality team as to the appropriate action. Social Services will determine a response, including advising parents / carers. The DSL will keep the Chief Executive informed. The Trustee responsible for Child Protection will also be informed of the response from Social Services. The Trustee doesn't have a right to know details, so any information will be anonymised.

It is mandatory for cases of FGM to be reported to the Police.

The organisation will endeavour to support a learner suspected of being abused.

5.3 Allegations relating to staff, subcontractors, employers or volunteers

5.3.1 Child abuse may be physical, sexual or psychological. Whilst child abusers may be relatives or friends of the family, some meet children in other contexts. A small minority of these may be tutors or other staff.

5.3.2 Action to be taken

- Where a child raises a concern, follow the Safeguarding referral flow chart, complete the referral form and inform a DSL or Deputy.
- Should staff have concerns about another member of staff, they must take these to the Lead DSL directly. In the absence of the Lead DSL or Deputy, they should contact the authorities as detailed on page 3 of this document.
- If the Chief Executive is the subject of an allegation, the matter must be referred to the Deputy DSL's in consultation with the Trustee who is responsible for Safeguarding who will inform the Local Designated Officer or team of Officers.
- Every effort to maintain confidentiality and guard against unwanted publicity will be made.

The DSL will seek advice within one working day from the local authority Designated Officer, or team of officers giving the content and context of the allegation and agree a course of action, including any involvement of the police. Discussions will be recorded in writing and communication with both the individual and the parents / carers of the child/children agreed. Careful consideration will be given to whether the circumstances of the case warrant suspension or whether alternative arrangements should be put in place. The Training Trust will make every effort to ensure confidentiality.

- The organisation will not undertake its own investigations without prior consultation with the local authority Designated Officer, or team of officers, or in the most serious cases, the Police.
- The child should be listened to but not interviewed or asked to repeat the account. Avoid questions, particularly leading questions. Avoid offering alternative explanations for the child's worries.
- Avoid interrupting the child.
- Note all information carefully, including timings, settings, who was present, what was said using the child's own words.
- Do not make assumptions about what the child is saying.
- The person making the written record must sign and date it.

- The organisation will report without delay to the DBS any person whose services are no longer used and the DBS referral criteria are met. This includes: dismissal; non-renewal of a fixed-term contract; no longer engaging/refusing to engage a supply tutor provided by an agency; terminating the placement of a student tutor or other trainee; no longer using staff employed by contractors; no longer using volunteers; resignation; voluntary withdrawal from supply teaching or contract working.
- Historical allegations will be reported to the Police.

5.4 Allegations of peer-on-peer abuse (against a learner by another learner)

- All children involved in learner against learner abuse should be treated as “at risk”.
- The statutory guidance given in Keeping children safe in education (September 2019) will be followed.
- The Training Trust will inform the parents/carers of a learner against whom an allegation of abuse has been made, the fact that an allegation has been made (but not its detail), and give the parents/carers the option of removing their child from the organisation whilst an investigation is undertaken.
- The Training Trust will seek advice from the DSL, or team of officers on the investigation of the allegation, taking all appropriate action to ensure the safety and welfare of all learners involved, including the learner accused of abuse.
- A learner may be suspended from the Training Trust during the investigation.
- Should the police wish to interview a learner in relation to allegations of abuse, advice from the DSL, or team of officers, will be followed. Subject to this advice, the organisation will inform the learner’s parents/carers as soon as possible and support the learner during the interview with an appropriate adult.
- Cases of serious harm (physical abuse, sexual abuse and emotional abuse) are a safeguarding issue and the police will be informed immediately by the organisation.

SAFEGUARDING – SEXUAL HARASSMENT AND VIOLENCE

The Training Trust has an obligation to keep our learners safe and free from harm, which also covers sexual harassment and sexual violence allegations. We will promote the welfare of all learners, especially those who are classed as children or vulnerable adults.

The following links contain resources to support the recognition and understanding of subjects categorised as sexual harassment and sexual violence:

[Keeping Children Safe in Education](#)

[Working together to safeguard children inter agency guidance](#)

[Sexual violence and harassment guidance-2021](#)

The relationships, sex and health education curriculum is now part of all Further Education responsibilities and the Training Trust embraces this. It includes the teaching and protection against sexual abuse, cyber-bullying and pornography as well as healthy relationships and consent.

These subjects are reportable under the Training Trust’s safeguarding lines of communication (see page 3 in this document).

5.5 Broad government advice on these issues can be found in Keeping children safe in education (September 2019) and/or may be accessed via the gov.uk website:

- Child criminal exploitation/county lines
- Children missing from education
- Child sexual exploitation (CSE)
- Peer-on-peer abuse and peer-on-peer sexual abuse, Bullying, including cyber-bullying
- Domestic abuse

- Drugs
- Fabricated or induced illness
- Faith abuse
- So-called 'honour-based' violence
- Female genital mutilation (FGM)
- Forced marriage
- Homelessness
- Mental health
- Private fostering
- Radicalisation
- Sexting
- Upskirting
- Teenage relationship abuse

5.6 Matters not requiring referral under child protection procedures are as follows:

- An allegation relating to the use of reasonable force to restrain a learner (in accordance with s.550A of the Education Act, 1996) unless an allegation of assault beyond the use of reasonable force is made.
- Where, following initial consideration, it is absolutely clear to the Chief Executive, DSL and officers, and Trustee responsible for Safeguarding that the allegation is demonstrably false.
- The allegation may represent inappropriate behaviour or poor practice by a member of staff.

6. DSL Job Description

The Training Trust's board of Trustees along with the trustee responsible for Safeguarding designates appropriate senior member(s) of staff to take lead responsibility for safeguarding and child protection. Th(is) (ese) person(s) will have the status and authority within the organisation to carry out the duties of the post, including committing resources and, where appropriate, supporting and directing other staff. The organisation will ensure that the DSLs have sufficient time, funding, supervision and support to fulfil child welfare and safeguarding responsibilities effectively.

Areas of responsibility for the DSLs are:

Managing Referrals

- Act as a source of support, advice and expertise to staff on matters of safety and safeguarding and when deciding whether to make a referral by liaising with relevant agencies.
- Refer all cases of abuse to the Local Authority Children's Social Care and regional teams.
- Refer promptly (within one working day) cases which concern a member of staff to the local authority Designated Officer or team of officers for child protection concerns.
- Arrange for the Disclosure and Barring Service to be informed where a person is dismissed or has left due to risk/harm to a child.
- Refer cases where a crime may have been committed to the Police.
- Report cases of FGM to the Police.
- Make prompt (within one working day) contact with Children's Services if a child is in need of help or is at risk.
- Liaise with the Chief Executive to inform them of issues, especially ongoing enquiries under section 47 of the Children Act 1989 and police investigations.

Training

- The DSL and Deputies should receive appropriate training carried out every two years in order to:
- Understand the assessment process for providing early help and intervention, for example through locally agreed common and shared assessment processes such as early help assessments.

- Have a working knowledge of how local authorities conduct a child protection case conference and a child protection review conference and be able to attend and contribute to these effectively when required to do so.
- Ensure each member of staff has access to, and understands, the organisation's safeguarding and child protection policy and procedures, especially new and part-time staff.
- Be alert to the specific needs of children in need, those with special educational needs and young carers.
- Be able to keep detailed, accurate, secure written records of concerns and referrals.
- Obtain access to resources and attend any relevant or refresher training courses.
- Encourage a culture of listening to children and taking account of their wishes and feelings, among all staff, in any measures the organisation may put in place to protect them.

Raising Awareness

- The DSL and Deputies should ensure the organisation policies are known and used appropriately:
- Ensure the organisation's safeguarding and child protection policy is reviewed annually and the procedures and implementation are updated and reviewed regularly, and work with the board of trustees regarding this.
- Ensure the safeguarding and child protection policy is available publicly and parents/carers are aware of the fact that referrals about suspected abuse or neglect may be made and the role of the organisation in this.
- Link with the Local Safeguarding Children Board (LSCB) and local authorities to make sure staff are aware of training opportunities and the latest local policies on safeguarding.
- When children leave the organisation ensures their child protection file is copied for any new organisation as soon as possible but transferred separately from the main learner file.

7. Other responsibilities

Safeguarding adults: The Care Act 2014 sets out a clear legal framework for how local authorities and other parts of the system should protect adults at risk of abuse or neglect. Local authorities have new safeguarding duties and The Training Trust will monitor adult learners under this framework to protect and support them as necessary. Further information can be accessed via the link below:

<https://www.gov.uk/government/publications/care-act-2014-part-1-factsheets/care-act-factsheets>

This Safeguarding Policy is reviewed annually or whenever there are significant changes in current situations, or as advised by local authority or regional Safeguarding teams.

Details within this policy will be shared with all staff and learners at their Inductions and they will be expected to commit to the information contained. Information will be further promoted with every learner while on programme through the 'Fast Facts' sheets and discussed at every Learner Review.

Person Responsible:



Mark Durham
Chief Executive

Review Date: September 2021

Previous Review Dates: April 2020
March 2019