



Education & Skills
Funding Agency

PREVENT POLICY

Prevent Officer and Designated Safeguarding Lead: Amanda Robert Shaw

POLICY STATEMENT

Prevent is a strand of the [Government's Counter Terrorism Strategy CONTEST](#) and is about working together to 'prevent' children, young people and adults from being drawn into extremist activity including acts of terrorism. It is about everyone taking responsibility and knowing what to do if they have concerns. Further information is also available at <https://www.gov.uk/government/publications/prevent-duty-guidance>

Talented Training Ltd takes its responsibilities for safeguarding extremely seriously and believes that it is never acceptable for a child, young person, vulnerable adult, or any member of society to experience abuse of any kind. This policy aims to:

- protect and promote the welfare of the young people, young people and vulnerable adults who engage with us
- communicate our approach to safeguarding in a clear and transparent way
- demonstrate compliance with relevant statutory guidelines
- ensure that safeguarding responsibilities are clear, and that people understand how to report concerns they may have about a child, young person or vulnerable adult

This policy is also our response to Prevent, part of the Government's counter-terrorism strategy. We understand the need to safeguard our learners from harm and the risk from radicalisation of any type is no different. We recognise our responsibility to participate in such work and to safeguard the welfare of people by committing to practice in a way which prevents and protects people from being drawn into terrorism. Talented Training Ltd reserves the right to modify this policy from time to time at its discretion and in line with legislation.

SCOPE

This policy applies to all employees, volunteers, workers, visitors and all other third parties who, through their involvement with Talented Training Ltd work with young people or vulnerable adults.

RELATED LEGISLATION & GUIDANCE

- The Young people Act 1989
- The Young people Act 2004
- Working Together to Safeguard Young people 2018
- What to do if you are worried a child is being abused 2015
- Keeping Children Safe in Education (KCSIE) September 2021
- Protection of Freedoms Act 2012
- Care Act 2014
- Keeping Learners Safe 2015
- Safeguarding Young people: Working Together Under the Young people Act 2004 a Disqualification under the Childcare Act 2006 (2018)

- Counter Terrorism and Security Act 2015
- Prevent Duty Guidance for England and Wales (2015)
- Channel Duty Guidance: Protecting vulnerable people from being drawn into terrorism 2015
- Multi-agency guidance on FGM (2016)
- Modern Slavery Act (2015)
- Information sharing advice for practitioners providing safeguarding services (2018)
- Young people missing in Education (2016)
- Child sexual exploitation: definition and a guide for practitioners, local leaders and decision makers working to protect young people from child sexual exploitation (2017)
- Sexting in schools and colleges: responding to incidents and safeguarding young people (UK Council for Child Internet Safety (UKCCIS), 2016);
- Sexual violence and sexual harassment between young people in schools and colleges (2018)
- General Data Protection Act (2018)
- Specific roles and responsibilities concerning Safeguarding.

RELATED POLICIES, PROCEDURES, AND TEMPLATES

- Safer Recruitment Policy
- DBS Policy
- Safeguarding Policy

ACT EARLY

Launched by Counter Terrorism Policing (CTP) in November 2020, the <https://actearly.uk/> website is designed to encourage friends and family to act early, share concerns and seek help if they are worried that someone, they care about is being radicalised.

The website includes case studies, signs to spot, FAQs and details of where to get help, including a new, confidential advice line staffed by specialists at CTP. The [ACT Early website](#) has two short films aimed at the general public, and concerned friends and family:

<https://actearly.uk/support/reach-out-for-help/>

<https://actearly.uk/working-together/how-we-help/>

The website provides an introduction to Prevent and to the work of Prevent officers, improving understanding and encouraging individuals to seek advice or help at an earlier stage where appropriate.

Steps to support ACT Early:

1. Signpost and promote the ACT Early website on social media channels and internally with our staff
2. Display ACT Early posters and banners in the centre, display screens and public areas
3. Print the ACT Early leaflets and business cards to share with the public when that is possible

More information on how to use ACT Early is available by contacting nctphq.comms@met.police.uk

CHANNEL

Channel is a partnership approach to identify and safeguard individuals who may be vulnerable to

being radicalised and drawn into terrorist activity. The process is a key strand of the Government's [Prevent Strategy](#).

Building on existing partnership structures, Channel works in a similar way to other safeguarding processes that support individuals at risk from involvement in gangs, drugs and knife crime. By safeguarding those most at risk of being drawn into terrorism they can be diverted away from any potential threat at an early stage.

Partnership and community involvement are vital to Channel ensuring that people most at risk are given support at an early stage. Partners include:

- Local authorities
- Education
- Health
- Probation
- Youth offending teams and prisons
- Police and other emergency services
- UK Border Agency
- Community and Voluntary Services
- Local communities

Through the Channel process partners are able to work together to assess the nature and extent of the risk and, where necessary, provide an appropriate support package tailored to the individual's needs. A multi-agency panel, chaired by the local authority, decides on the most appropriate action to safeguard an individual and this is monitored closely and reviewed regularly. This aims to protect vulnerable people by:

- **Identifying** individuals at risk.
- **Assessing** the nature and extent of that risk.
- **Developing** the most appropriate support plan for the individuals concerned.

The support provided will vary according to the nature and extent of the risk that has been identified by the multi-agency panel and may include targeted support (including faith guidance, counselling and mentoring, assistance with employment or diversionary activities).

FURTHER INFORMATION

More information on safeguarding young people from radicalisation including links to online resources and training can be found on the [Leeds Safeguarding Children's Partnership](#) website. Contact details for Prevent concerns are [Leeds Prevent Team](#) or:

Phone: 0113 535 0810 (Monday to Friday, 9am to 4pm)

Email: prevent@leeds.gov.uk

You can call the police Prevent team on 0113 241 3386.

Information has also been produced by the [NSPCC](#) or can be found on the [Educate Against Hate](#) website.

PRINCIPLES

Safeguarding

We all have a shared responsibility to identify young people and young people who may be in need of extra help or who are suffering, or are likely to suffer, significant harm. This is an inherent part of

Talented Training Ltd's culture, as we adopt a culture of vigilance in relation to all of our stakeholders and the communities that we engage with.

We aim to embed a culture of safeguarding across Talented Training Ltd by communicating practical guidelines to support the principles and aims of this policy, reinforced by training for all employees and volunteers to ensure that our approach is robust and reflects best practice standards. Everyone should aim to ensure the welfare of young people, young people and vulnerable adults first and foremost, checking your approach with one of our internal Safeguarding contacts if you are unsure how to handle a safeguarding issue.

Prevent

Preventing people from being drawn into terrorism, extremism and radicalised ideology has never been more important. As a provider of education and training programmes for people, particularly young people, from ethnically diverse, and socially and economically disadvantaged areas it is essential that Talented Training Ltd is involved in the Prevent Strategy.

Talented Training Ltd will promote and reinforce values of openness and respect, tolerance, cohesion and equality of opportunity and treatment by:

- creating space for free and open debate; and by listening, valuing and respecting the learner voice
- breaking down barriers and supporting inter-faith and inter-cultural dialogue and understanding and by engaging all learners in playing a full and active role in wider engagement in society
- making sure that Talented Training Ltd is free from bullying, harassment and discrimination
- providing support for learners who may be at risk by providing appropriate sources of advice and guidance
- making sure that staff and learners are aware of their roles and responsibilities in preventing violent extremism
- promoting British values

Talented Training Ltd recognises:

- The welfare of any child, young person or vulnerable adult is paramount and ensure all feel safe
- We aim to create a culture of vigilance in relation to our safeguarding approach, while continually developing our knowledge and practice accordingly
- Everyone, regardless of their age, background, ability, culture, disability, gender, language, religious beliefs and sexual identity has the right to protection from abuse
- We will take all suspicions and allegations of abuse and/or poor practice seriously and will respond to them swiftly and appropriately
- Where there is a possibility of abuse or neglect by a person or persons, everyone has a responsibility to report their concerns to the appropriate person
- It is not the responsibility of anyone working/volunteering at Talented Training Ltd to decide whether or not abuse has taken place; it is their duty to act on any concerns by reporting them to the appropriate person
- We will support people who report their concerns about abuse in good faith and will investigate their concerns, referring to the appropriate people where necessary
- We will take all actions within our power to enable any child, young person or

vulnerable adult to have the best outcomes

- We recognise that safeguarding is not just about protecting any child, young person or vulnerable adult from deliberate harm and neglect, but also about broader aspects of care and education such as well-being (including mental health), first aid, special educational needs and/or disabilities, educational visits and online safety.

KEY DEFINITIONS

SAFEGUARDING

Safeguarding describes the actions we take to ensure the safety and well-being of young people, young people and vulnerable adults in our care.

The terms abuse and neglect are forms of maltreatment. Both can involve inflicting or failing to act to prevent harm to young people, young people or vulnerable adults. Abuse can be from neglect, physical injury, sexual abuse or emotional abuse or any combination of the following definitions.

- **Physical Abuse**

Deliberate physical harm to young people and vulnerable adults or any other form of harm which causes illness in a child or vulnerable person.

- **Sexual Abuse**

Forcing or manipulating a child or vulnerable adult to take part in sexual activities.

- **Neglect**

This involves the persistent failure to meet a child's or vulnerable adult's basic physical and/or psychological need, likely to result in the serious impairment of the child's or vulnerable adult's health or development.

- **Emotional Abuse**

This involves the persistent emotional maltreatment of a child or vulnerable adult such as to cause severe and persistent adverse effects on the child's or vulnerable adult's emotional wellbeing and/or development.

- **Psychological Abuse**

This is a form of abuse, characterised by a person subjecting or exposing another person to behaviour that may result in psychological trauma, including anxiety, chronic depression, or post-traumatic stress disorder.

- **Domestic Abuse**

Domestic violence (also named domestic abuse or family violence) is violence or other abuse by one person against another in a domestic setting, such as in marriage or cohabitation.

- **Discriminatory Abuse**

This includes abuse that is racist, sexist, homophobic or is based on age or disability, or any forms of harassment.

- **Financial Abuse**

This is when an unauthorized use of a person's property, money, pension book or other valuables (including changing the person's will to name the abuser as heir), often fraudulently obtaining power of attorney, followed by deprivation of money or other property, or by eviction from own home.

PREVENT

Extremism is defined in the 2011 Prevent strategy as vocal or active opposition to fundamental

British values, including democracy, the rule of law, individual liberty and mutual respect and tolerance of difference faiths and beliefs. The definition in HM Government Prevent Duty Guidance includes calls for the death of members of our armed forces, whether in this country or overseas.

Radicalisation refers to the process by which a person comes to support terrorism and extremist ideologies associated with terrorist groups.

Some possible signs of radicalisation include:

- increasingly extreme views about another section of society or government policy
- downloading, viewing or sharing extremist propaganda from the internet
- becoming withdrawn and/or increasingly intolerant of more moderate views
- changes in appearance or health (including mental health) and becoming isolated from family, friends, peers or social groups
- expressions of a desire/intent to take part in or support extremist activity

Terrorism is defined in the Terrorism Act 2000 (TACT 2000) as an action that endangers or causes serious violence to a person / people; causes serious damage to property; or seriously interferes or disrupts an electronic system. The use or threat must be designed to influence the government or to intimidate the public and is made for the purpose of advancing a political, religious or ideological cause.

British values are defined as democracy, the rule of law, individual liberty and mutual respect.

Raising awareness of the policy

All new members of staff are made aware of this policy and are given time to read it during their induction period. Where appropriate to their role, staff will receive the appropriate level of training which includes Safeguarding training and Prevent training in respect of the Counter Terrorism and Security Act 2015.

All staff will be trained in the appropriate response to a disclosure and the correct procedure for dealing with concerns. Staff will work proactively to protect people from abuse and neglect and prevent people being placed in an abusive situation.

Ongoing support will also be provided to make sure that staff are informed and confident to take appropriate preventative and responsive steps. Information, advice and guidance for staff will be available and regularly updated through briefings at staff meetings and training interventions.

eLearning Modules

- All staff are required to successfully complete Safeguarding and Prevent eLearning modules every year, while new members of staff will receive this training as part of their induction.

Face to Face Training

- In addition to the eLearning modules, those who work in a regulated activity, will be required to undergo face to face training at a local level.
- This face-to-face training will be carried out by safeguarding leads and will be appropriate to each specific business area.
- Regular safeguarding updates will also be provided to support the face-to-face training, with a special focus on a bi-monthly basis.

GUEST SPEAKERS

Talented Training Ltd believes that guest speakers can enrich our education programmes and other areas of our business by adding depth and breadth on a range of subjects. This can especially help to prepare our learners and all young people we engage with for life in modern

Britain and to further extend their employability and vocational skills.

In relation to this, it is Talented Training Ltd's policy that guest speakers should:

- o follow the same signing in procedures as other visitors
- o not be left alone with learners, young people, young people or vulnerable adults unless they have a current DBS which we have had sight of and logged
- o have their views countered and balanced by our employees, self-employed contractors or volunteers should they have any extreme views, whether political or religious.

INITIATING THE RISK ASSESSMENT PROCESS

Organisations are required under health and safety legislation to protect people as far as is 'reasonably practicable'. In particular, the Management of Health and Safety at Work Regulations 1999 require organisations to assess the risks in their workplaces and to put plans in place to control the risks.

The Young people & Vulnerable Adults Safeguarding & Prevent risk assessment process will be initiated by the following circumstances (although other situations may trigger this procedure if deemed appropriate by the department):

- Recruitment to a new or existing post which involves working with young people and/or vulnerable adults
- The commencement of new activities or events involving or potentially involving young people and/or vulnerable adults
- Changes being made to activities or events involving or potentially involving young people and/or vulnerable adults.

Once it has been identified that the risk assessment process should be initiated, it is vital that the person responsible for the relevant recruitment campaign, activity or event includes completion of this within the planning process and ensures that it is completed.

Identifying required checks

Once the key duties and responsibilities of the activity are determined, one of the required actions must be to identify which checks, if any, are required prior to the individual working with young people and/or vulnerable adults.

In addition, the department must consider if any required checks should be treated as essential before employment (that is, that the new employee recruited to the role should not be able to start work until the check is completed).

PRE-EMPLOYMENT CHECKS

All staff have Right to Work in the UK ID checks; DBS checks are carried where relevant to their role.

We are registered with criminal record check provider. Their comprehensive service is registered with both the Disclosure and Barring Service (DBS) and Disclosure Scotland.

There are two types of check available from the DBS. The default check will be the standard, except for people that are identified as requiring an enhanced check.

- Standard – contains details of all spent and unspent convictions, cautions, reprimands and warnings held on the Police National Computer (PNC) that are not 'protected'. Protected convictions and cautions are normally old and minor; they are filtered by the DBS so they are not disclosed, and they must not be taken into account by employers. The filtering rules and the list of offences that will never be filtered are now available for you to view on the DBS's web pages.

- Enhanced – contains the same information as the standard check but also any relevant and proportionate information held by the local police forces. In addition, where the role is eligible, registered bodies can request a check on whether a person is barred from working with young people or adults in regulated activity (particular types of work with young people and adults).

Following the DBS application, it is the requirement of Talented Training Ltd that required staff will subscribe to the DBS Update Service. Talented Training Ltd will reimburse the annual fee for this service via the staff expenses claim process for the duration of their employment with Talented Training Ltd. With the individual's permission, routine status checks will be carried out on an annual basis.

PORTABILITY

DBS checks are not portable. Any DBS check that has not been carried out by Talented Training Ltd will not be accepted as meeting our requirements for a post-holder.

Exceptions to this are as follows:

- Where an individual has subscribed to the DBS Update Service – this means that their DBS check will be kept up-to-date and they can take this with them from role to role, where the same level and type of check is needed. With the individual's permission, representatives from Talented Training Ltd will be able to go online to do a free, instant check (known as a status check) to confirm that their DBS Certificate is still up to date.
- Where a DBS check or basic disclosure has been carried out within the last 12 months by Talented Training Ltd for a post with comparable duties – individual cases will need to be discussed with the group's Designated Safeguarding Officer's agreement provided that another check is not required.

DISCLOSURE OF A CRIMINAL RECORD

Where a criminal conviction is disclosed by an applicant or through a DBS check/basic disclosure, Talented Training Ltd's Designated Safeguarding Lead and HR will assess and discuss using current guidelines and policy.

Possible outcomes include amended duties, redeployment, withdrawal of an offer of employment or, where the individual started work before the relevant screening check was completed, dismissal.

ROLES & RESPONSIBILITIES

Employees, self-employed and volunteers

- All employees are required to familiarise themselves with this policy and procedure and follow this at all times
- If you have concerns about the welfare of a child, young person or vulnerable adult and believe that they may be at risk of, you must share that concern confidentially with a local safeguarding lead immediately
- Any information shared should always be accurate, up to date and shared appropriately and securely with only the person or people who need to know and limited to information relevant for the purpose. If you have any doubts about when to share safeguarding information, discuss the situation with a safeguarding lead
- Everyone must complete their required Safeguarding Awareness and Prevent Training to help increase their knowledge of safeguarding and prevent issues
- Everyone working in a regulated activity must read and familiarise themselves with Part 1 of the statutory guidance Keeping Children Safe in Education (September 2021)

- If you feel that you could benefit from further training on safeguarding or child protection, then please contact your Safeguarding Lead Amanda Robert-Shaw.

Line Managers

- Support and encourage the completion of required Safeguarding Awareness and Prevent Training
- Ensure all direct reports working in a regulated activity have read and familiarised themselves with the statutory guidance Keeping Children Safe in Education (September 2021)
- Adopt Talented Training Ltd's culture of vigilance and lead by example

Senior Management Team

Directors and the Senior Management Team are responsible for understanding the nature of the threat and the risks of extremism and radicalisation within Talented Training Ltd. They will ensure that Talented Training Ltd effectively manage risks and is able to deal appropriately with issues of radicalisation and extremism by:

- o creating an ethos which upholds core values of shared responsibility and wellbeing for all, while promoting respect, equality and diversity and understanding
- o adopting stringent and transparent safeguarding/prevent duty practices which recognise, support and protect individuals who might be susceptible to radicalisation
- o sharing information about safeguarding/prevent duty and good practice with other key stakeholders and external agencies
- o providing training opportunities for staff and volunteers to enable them to continually update their safeguarding and prevent knowledge
- o sharing information and concerns with agencies who need to know and ensuring we involve learners, parents, staff and others in an appropriate way
- o providing effective management for staff and volunteers through supervision, support and training
- o ensuring plans are in place to minimise the potential for acts of violent extremism.

Designated Safeguarding / Prevent Lead

The designated lead is Amanda Robert-Shaw and is the single point of contact for Safeguarding and Prevent, to support the Senior Management Team to fulfil their responsibilities and to ensure that:

- o this policy is implemented across the organisation
- o any concerns are shared with the relevant organisations in order to minimise the risk of people becoming involved in terrorism
- o appropriate training is in place that is relevant and regularly reviewed and updated
- o develop and work with partners and support networks to ensure up to date information and resources are received, acted on and cascaded
- o practices are reported on for the Senior Management Team and the Board of Directors on a quarterly basis
- o reviews the implementation and effectiveness of the policy on an annual basis

Additional responsibilities

- Take lead responsibility for managing child protection issues and cases in their centre,

operation or team.

- Provide advice and support to other staff, making referrals to and liaising with external parties as necessary, such as the local authority and other agencies, like the DBS or Police.
- Be aware of the Local Safeguarding Young people's Board (LSCB) and Safeguarding Adults Board (SAB) be familiar with local referral procedures.
- Ensure that appropriate information is available at the time of a referral and that the referral is confirmed in writing, under confidential cover as quickly as possible (e.g. within a working day).
- Liaise with the local designated officer over safeguarding issues and in all cases where allegations relate to an employee or member of staff.
- Keep the Safeguarding & Prevent Risk Register updated at all times with all concerns, no matter how major or minor the concern
- Deal with the aftermath of an incident in the organisation.
- Attend regular training and networking events relating to safeguarding issues.
- Ensure the effective and consistent communication and embedding of safeguarding policies within their operation/team.
- Ensure that learners/service users and their parents/guardians/carers know where to go if they need support or have concerns about the behaviour of an employee, contractor or volunteer.
- Provide regular briefings and updates at staff meetings to ensure that all staff are kept up to date and regularly reminded of their responsibilities.
- Have an awareness of vulnerable service users within their operation.
- Ensure that all staff know how to raise concerns about people who are vulnerable or at risk of abuse and neglect.
- Ensure all staff know how to assess the risk of individuals being drawn into terrorism and understand how to identify those who may be at risk of radicalisation and what to do to support them.

HR Department

- The HR department monitors and records the DBS process for employees, casuals, volunteers and self-employed contractors
- The HR department also ensures that Safeguarding and Prevent training is provided and completion is monitored
- The HR department provides advice and guidance to managers on safeguarding issues in relation to recruitment, employees and volunteers

Training and Learning Staff

Teaching and learning staff will be involved in the delivery of a learning and apprenticeship curriculum which promotes knowledge, skills and understanding to build the resilience of learners, promote British values and enable them to challenge extremist views. This will include:

- embedding equality, diversity and inclusion, wellbeing and community cohesion
- promoting wider skill development such as social and emotional aspects of learning and the strengthening of critical thinking skills
- recognising local needs, challenging extremist narratives, stereotypes and anti-social

- behaviour and by promoting universal rights
- encouraging active citizenship and participation
- promoting values of openness and respect and facilitating opportunities to contribute, challenge and debate
- responding appropriately to events in local, national or international news that may impact on learners and communities making sure that learners are supported and listened to and are helped to access support internally and/ or through community partner.

REVIEW

This policy will be reviewed on an annual basis or following changes to Government updates and statutory guidance in relation to Covid-19 and company risk assessment policies and processes.

Managing Director's Signature



Marios Chrysostomou

Date: 01/01/2022

APPENDIX A

- Government advice of Safeguarding Young people:
<https://www.gov.uk/topic/schools-colleges-young-peoples-services/safeguarding-young-people>
- Keeping Children Safe in Education September 2021:
 - <https://www.gov.uk/government/publications/keeping-children-safe-in-education--2>
 - **HM Government Prevent Duty Guidance:**
https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/417943/Prevent_Duty_Guidance_England_Wales.pdf
 - **Online general awareness training module on Channel:**
http://course.ncalt.com/Channel_General_Awareness/01/index.html

Local Contacts

More information on safeguarding young people from radicalisation including links to online resources and training can be found on the [Leeds Safeguarding Children's Partnership](#) website. Contact details for Prevent concerns are [Leeds Prevent Team](#) or:

Phone: 0113 535 0810 (Monday to Friday, 9am to 4pm)

Email: prevent@leeds.gov.uk

You can call the police Prevent team on 0113 241 3386.

APPENDIX B

The Procedure

Dealing with reported suspicions and allegations

Concerns for the safety and wellbeing of young people and vulnerable adults could arise in a variety of ways and in a range of situations. For example, a child/vulnerable adult may report or show signs of abuse, someone may hint that a child/vulnerable adult is at risk or that a colleague is an abuser, or someone may witness abuse.

According to the Department for Education and Skills, there are eight main types of abuse, which are outlined above. It is not always easy to recognise a situation where abuse may occur or has taken place and employees are not experts at such recognition. However, each person has a responsibility to act if they have any concerns about someone's behaviour towards a child or vulnerable adult. It is important that the recipient of any complaint or accusation that a child or vulnerable adult has been or is being abused listens carefully without making or implying any judgment as to the truth of the complaint or accusation.

To ensure that all of the details of an allegation are captured for any future investigation, a detailed record should always be made at the time of the matter being raised.

It is impossible to promise complete confidentiality when a concern is raised, or an accusation made. This is because Talented Training Ltd owes a duty of care to anyone employed by them and their associates/contractors in relevant positions, and that cannot be fulfilled unless Talented Training Ltd takes action on the basis of information that may have been provided in confidence. The duty of confidentiality must be weighed against the duty of care, in case of potential or actual harm of an individual. However, at all stages, only those people who need to be made aware of an incident or concern, whether internal or external, should be informed.

Where an individual suspects or is informed that a child or vulnerable adult has been, is being or could be harmed as a result of taking place in an activity/event or through contact with anyone employed by Talented Training Ltd and their associates/contractors in relevant positions, it is not the responsibility of that person to decide whether abuse has taken place. Instead, the individual aware of these suspicions or allegations must make immediate contact with the Designated Safeguarding Lead for guidance and assistance on the action that must be taken. Staff who are worried about sharing concerns about abuse are encouraged to speak with an appropriate agency for further advice (for example, the NSPCC Child Protection Helpline on 0808 800 5000 or Childline on 0800 1111).

Where a complaint of abuse is reported, the Designated Safeguarding Lead will carefully consider the information available and decide on the appropriate course of action. Such situations may require contact with the relevant external agencies (including social services and the police) for them to investigate the matter and determine any necessary action. This may include invoking Talented Training Ltd's employee disciplinary procedures.

In emergency circumstances (for example, where there is certain immediate and significant danger to an individual or a criminal act has been witnessed), staff should make referrals to the police, social services or other appropriate authorities themselves prior to consulting with the group's Designated Safeguarding Lead. In such cases, a criminal investigation may follow.

Talented Training Ltd has a duty to refer an individual to the DBS if they have been removed from working in regulated activity with young people and/or adults because they caused harm to young people/adults or posed a risk of causing harm. The duty to refer is absolute and overrides any concerns about data protection.

All cases for possible referral must be raised with the Designated Safeguarding Lead in the first instance as soon as harm or a risk of harm is identified. The Designated Safeguarding Lead should

complete the DBS referral form found on the DBS's web pages.

The completed form must then be provided to the Managing Director for review and a final decision on whether the referral is required.

APPENDIX C

Code of Practice

When working with young people and/or vulnerable adults, staff, trainers, assessors and associates are expected to take account of the guidance below in the way that they conduct themselves.

- Consider the wellbeing and safety of event participants in advance through proper planning and development of safe methods of working/activities;
- Wherever possible, work in an open environment with young people where they can be seen by others;
- Avoid unnecessary physical contact;
- Avoid taking a child or vulnerable adult alone in a car on journeys, however short;
- Avoid taking a child or vulnerable adult to the toilet, unless another adult is present, or another adult is aware (this may include a parent, group leader or other responsible person);
- In a situation where you are alone with a child or vulnerable adult, make sure that others can clearly observe you;
- Set expectations of the standards of behaviour required from participants in an activity/event and encourage them to accept responsibility for their own performance and behaviour;
- Ask participants in an activity/event to take reasonable steps to ensure their own safety and that of others, and to report any inappropriate behaviour they experience/witness or any concerns that they may have;
- Avoid showing favouritism towards particular participants;
- Report incidents of alleged abuse to the Designated Safeguarding Lead and ensure that any allegations are recorded;
- Report any concerns about poor practice to the Designated Safeguarding Lead;
- Report any accidents to the designated person in the department for recording and investigation where required;
- Avoid personal relationships with a child or vulnerable adult;
- It is not appropriate for staff to have a physically or emotionally intimate relationship with a young person under the age of 18. Particular attention is drawn to the provisions of the Sexual Offences Act 2003 which created a new criminal offence of abuse of “a position of trust”;
- Staff, trainers, assessors and associates should remember that inappropriate behaviour can also occur over the telephone, email, social media or internet;
- Only Talented Training Ltd’s official social media should be used for engaging with the wider community. Inappropriate or abusive comments should be removed swiftly, and abusive individuals blocked/reported to the social media concerned. Facebook instant chat and other similar functions should not be used to interact with young people or vulnerable adults. Wherever possible, communication should be only public pages and avoid colloquial language/abbreviations which may be misinterpreted (e.g., LOL);
- Do not make suggestive or inappropriate remarks to or about a child or vulnerable adult, even in fun, as this could be misinterpreted;
- Participate in training available to you to support you in your work with young people and vulnerable adults;

- First aid treatment should be given with more than one adult present unless a delay would be life-threatening;
- Do not take young people or vulnerable adults to your home;
- Maintain confidentiality about sensitive information;
- Where it is necessary for staff, trainers, assessors and associates to take photographs or video images of young people or vulnerable adults, written consent must be obtained (from parents/guardians in the case of young people) before these images are taken in order to comply with the Data Protection Act 1998. Personal details and photos which clearly identify an individual must only be published where they (or their parent/guardian) have given specific agreement.

APPENDIX D

RISK ASSESSMENT FORM							
Name of individual:				Who has completed the risk assessment?		Date:	
Activity/Task/Situation	What are the risks?	Who might be harmed and how?	What are you already doing?	What further action is necessary?	Action by whom	Action by when	Completed

Agreed by:	
Date:	