



SAFEGUARDING POLICY

Nominated Safeguarding Person: Anita Fresson

All data held in relation to the GDPR requirements.

STATEMENT OF PURPOSE

Talented Training Ltd fully recognises its responsibility for the protection of young people or vulnerable adults and adults at risk and for safeguarding and promoting welfare to all learners and staff. Talented Training Ltd is committed to providing a secure environment for learners, and staff where learners feel safe and are kept safe. All staff at Talented Training Ltd are aware and have explained that safeguarding is everyone's responsibility irrespective of the role they undertake or whether their role has direct contact or responsibility for learners or not.

Talented Training Ltd aims to create and maintain a safe environment for all learners, staff, volunteers, contractors and visitors to our training centre or delivery premises.

SCOPE

The policy applies to all staff at Talented Training Ltd including contractors.

OBJECTIVES OF THE POLICY

- To promote an environment that is safe, where staff and learners treat each other with mutual respect and develop good relationships built on trust.
- To raise the awareness of all staff, teaching and non-teaching, of the need to safeguard young people and adults at risk and of their rights and responsibilities in identifying and reporting possible cases of abuse or neglect.
- To provide a systematic means of supporting young people and adults at risk, known or thought to be at risk of harm.
- To ensure that appropriate risk assessments are undertaken by Talented Training Ltd and other managers to ensure that learners are safeguarded.
- To ensure that relevant safeguarding information about a young person or adult at risk is disseminated to appropriate staff within the centre on a 'need to know' basis.
- To ensure that partner organisations who support the delivery of our programmes have appropriate safeguarding and young person / vulnerable adult protection policies and procedures in place.
- To involve learners in the decisions on safeguarding concerns and ensure they are shared with relevant agencies when appropriate. Also, with parents of young people or vulnerable adults (unless advised against this by the Local Safeguarding Partnerships (LCSP))
- To ensure that all staff who have access to young people or adults at risk have been checked for their suitability through safer recruitment procedures.
- To ensure all staff will receive appropriate training over a period of time including an introduction at all staff inductions.

- The Managing Director will be responsible for the implementation of the young person / vulnerable adult and adults at risk protection policy and procedures.

PREVENT

Prevent is part of a government initiative to develop a robust counter terrorism programme,

CONTEST. The Prevent strategy seeks to:

- Respond to the ideological challenge of terrorism and aspects of extremism, and the threat we face from those who promote these views.
- Provide practical help to prevent people from being drawn into terrorism and ensure they are given appropriate advice and support.
- Work with a wide range of sectors where there are risks of radicalisation which needs to be addressed, including education, criminal justice, faith, charities, the internet and health.

Talented Training Ltd has been looking to do this prior to these requirements and refers to the following:

- Prevent Action Plan
- Safeguarding Policy and Procedure
- Wellbeing
- Safe learners Policy and Procedure
- Equality and Diversity and Equal Opportunity Policy and Procedure
- Prevent Policy and Procedure

LEGISLATION & GUIDANCE

This policy has been written to ensure our safeguarding arrangements comply with statutory requirements and current good practice, and pays particular regard to:

- Keeping Children Safe in Education (September 2021)
- UN Convention on the Rights of the Child
- Data Protection Act 1998
- GDPR 2018
- Sexual Offences Act 2003
- Protection of Freedom Act 2012
- Safeguarding Vulnerable Groups Act 2006
- Working Together to Safeguard Children 2015 – Amended February 2017
- Equality Act 2010

DEFINITIONS

Safeguarding: Preventative or precautionary planning and measures against potential harm or damage to someone.

Child Protection: The policy and procedures in place to protect and/or remove a young person / vulnerable adult from harm or risk of harm.

Abuse: Any treatment that causes harm. This can include physical, sexual, emotional abuse, and/or neglect.

Child protection issue: An issue raising a concern about harm or risk of harm to a young person / vulnerable adult or young person.

Child: A young person / vulnerable adult is defined in law as a person under the age of 18 years.

Adult at risk: An adult aged 18 and over who is unable to protect themselves from abuse and neglect, due to a care and support need which is permanent or temporary which is either met or not met by the local authority.

Young person: A person aged up to 25 years old.

Staff: 'Staff' means all employees, full-time and fractional, and all agency, franchise, contract, and volunteer staff working for Talented Training Ltd.

DSO: Designated Safeguarding Lead.

KEY SAFEGUARDING PRINCIPLES

- All learners have the right to be safeguarded from harm and exploitation so all complaints, allegations or suspicions must be taken seriously.
- The procedures laid out in this document must be followed whenever an allegation is made that a learner has been abused.
- Absolute promises of confidentiality should not be given as the matter may develop in such a way that these might not be able to be honoured.
- If the complaint comes directly from the learner, questions should be kept to the minimum necessary to understand what is being alleged. Leading questions must always be avoided.
- A full record of any discussions must be made immediately after any conversations with the learner and referred to the DSL that same day.
- Talented Training Ltd have a responsibility to provide a safe environment and minimise risks of harm to learners' welfare

Keeping Young people or vulnerable adults Safe in Education 2021

Talented Training Ltd are aware of their responsibility to align their safeguarding practices with the statutory guidance Keeping Children Safe in Education 2021. All staff are issued with a copy of the document and confirmation of reading it is kept on file. All new staff that join the organisation will be issued with the document as part of their Induction, alongside the safeguarding policy and mandatory safeguarding training.

Definitions of Abuse

- Physical abuse may take many forms e.g., hitting, shaking or poisoning. It may also be caused when a parent or carer feigns the symptoms of, or deliberately causes ill health.
- Emotional abuse is the persistent emotional ill treatment, such as to cause severe and persistent effects on emotional development. Some level of emotional abuse is involved in most types of ill treatment though emotional abuse may occur alone.
- Sexual abuse involves forcing or enticing someone to take part in sexual activities. This may include non-contact activities such as looking at, or in the production of pornographic materials, watching sexual activities or encouraging others to behave in sexually inappropriate ways.
- Neglect involves the persistent failure to meet someone's basic physical and/or psychological needs, likely to result in the serious impairment of their health and development. This may involve failure to ensure access to appropriate medical care or treatment. It may also include neglect of basic emotional needs.

THE CONTEXT OF ABUSE

Young people or vulnerable adults who are particularly vulnerable

Talented Training Ltd recognises that individuals are more vulnerable to abuse and neglect and that additional barriers exist when recognising abuse for some young people or vulnerable adults. We understand that this increase in risk is due more to societal attitudes and assumptions or young person / vulnerable adult protection procedures which fail to acknowledge young people or vulnerable adults' diverse circumstances, rather than the individual's personality, impairment or circumstances.

Some young people or vulnerable adults may also find it harder to disclose abuse due to communication barriers, lack of access to a trusted adult or not being aware that what they are experiencing is abuse.

Any individual may benefit from early help, but all staff should be particularly alert to the potential need for early help for a learner / apprentice who:

- is disabled and has specific additional needs
- has special educational needs (whether or not they have a statutory education, health and care plan)
- is a young carer
- is showing signs of being drawn in to 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 misusing drugs or alcohol themselves
- is at risk of modern slavery, trafficking or exploitation
- is in a family circumstance presenting challenges for the young person / vulnerable adult, such as substance abuse, adult mental health problems or domestic abuse
- has returned home to their family from care
- is showing early signs of abuse and/or neglect
- is at risk of being radicalised or exploited
- has an imprisoned parent
- is experiencing mental health, wellbeing difficulties
- is persistently absent from education
- is at risk of 'honour' based abuse such as FGM or Forced Marriage

Anti-Bullying/Cyberbullying

Our company policy on anti-bullying is set out in a separate document. This includes all forms e.g., cyber, racist, homophobic and gender related bullying. We keep a record of known bullying incidents which is shared with and analysed by the Governance Group and Managing Director. All staff are aware that young people or vulnerable adults with SEND and / or differences/perceived differences are more susceptible to being bullied / victims of abuse.

If the bullying is particularly serious, or the anti-bullying procedures are seen to be ineffective, the Director and the DSL will consider implementing young person / vulnerable adult protection procedures.

The subject of bullying is addressed at regular intervals in PHSE education.

RADICALISATION AND EXTREMISM

The Prevent Duty for England and Wales (2015) under section 26 of the Counterterrorism and Security Act 2015 places a duty on education and other young people or vulnerable adults' services to have due regard to the need to prevent people from being drawn into terrorism.

Extremism is defined as 'as 'vocal or active opposition to fundamental British values, including democracy, the rule of law, individual liberty and mutual respect and tolerance of different faiths and beliefs. We also include in our definition of extremism calls for the death of members of our armed forces, whether in this country or overseas.

Some young people or vulnerable adults are at risk of being radicalised; adopting beliefs and engaging in activities which are harmful, criminal or dangerous.

Talented Training Ltd is clear that exploitation of vulnerable young people or vulnerable adults and radicalisation should be viewed as a safeguarding concern and follows the Department for Education guidance for company and training providers on preventing young people or vulnerable adults and young people from being drawn into terrorism¹.

Talented Training Ltd seeks to protect young people or vulnerable adults and young people against the messages of all violent extremism including, but not restricted to, those linked to Islamist ideology, or to Far Right / Neo Nazi / White Supremacist ideology, Irish Nationalist and Loyalist paramilitary groups, and extremist Animal Rights movements.

Staff receive training to help identify early signs of radicalisation and extremism.

Opportunities are provided in the curriculum to enable learners / apprentices to discuss issues of religion, ethnicity and culture as part of promoting British Values.

The Governance Group, Managing Director, and the Designated Safeguarding Lead (DSL) will assess the level of risk within the company and put actions in place to reduce that risk. Risk assessment may include the use of company premises by external agencies, anti-bullying policy and other issues specific to the company's profile, community and philosophy.

When any member of staff has concerns that an individual may be at risk of radicalisation or involvement in terrorism, they should speak with the DSL. They should then follow normal safeguarding procedures. If the matter is urgent then the police must be contacted by dialling 999. In non-urgent cases where police advice is sought then dial 101. The Department of Education has also set up a dedicated telephone helpline for staff to raise concerns around Prevent (020 7340 7264).

DOMESTIC ABUSE

Domestic abuse represents one quarter of all violent crime. It is actual or threatened physical, emotional, psychological or sexual abuse. It involves the use of power and control by one person over another. It occurs regardless of race, ethnicity, gender, class, sexuality, age, and religion, mental or physical ability. Domestic abuse can also involve other types of abuse.

We use the term domestic abuse to reflect that a number of abusive and controlling behaviours are involved beyond violence. Slapping, punching, kicking, bruising, rape, ridicule, constant criticism, threats, manipulation, sleep deprivation, social isolation, and other controlling behaviours all count as abuse.

Living in a home where domestic abuse takes place is harmful to young people or vulnerable adults and can have a serious impact on their behaviour, wellbeing and understanding of healthy, positive relationships. Young people or vulnerable adults who witness domestic abuse are at risk of significant harm and staff are alert to the signs and symptoms of a young person / vulnerable adult suffering or witnessing domestic abuse (See Appendix 5).

¹ [The Prevent duty](#)

CHILD SEXUAL EXPLOITATION (CSE) AND CHILD CRIMINAL EXPLOITATION (CCE)

Both CSE and CCE are forms of abuse and both occur where an individual or group takes advantage of an imbalance in power to coerce, manipulate or deceive someone into sexual or criminal activity. This power imbalance could be due to age, gender, sexual identity, cognitive ability, physical strength, status, and /or access to economic or other resources. The abuse could be linked to an exchange for something the victim perceives that they need or want and/or will be to the financial benefit or other advantage (such as increase status) of the perpetrator or facilitator.

The abuse can be perpetrated by individuals or groups, males or females, and adults or young people or vulnerable adults (who themselves may be experiencing exploitation). The abuse can be a one-off occurrence or a series of incidents over time and range from opportunistic to complex organised abuse. It may involve force and/or enticement-based methods of compliance and may, or may not, be accompanied by violence or threats of violence.

Victims can be exploited even when the activity appears consensual, and it should be noted exploitation as well as being physical can be facilitated and/or take place online. The experience of girls who are criminally exploited can be very different from boys, the indicators may not be the same and both boys and girls that are being criminally exploited may be at higher risk of sexual exploitation.

CSE can occur over time or be a one-off occurrence. CSE can affect any young person / vulnerable adult, who has been coerced into engaging in sexual activities. This includes 16- and 17-year-olds who can legally consent to have sex.

Any concerns that a young person / vulnerable adult is being or is at risk of being sexually or criminally exploited should be passed without delay to the DSL. The DSL will use the on all occasions when there is a concern that a young person / vulnerable adult is being or is at risk of being sexually or criminally exploited or where indicators have been observed that are consistent with a young person / vulnerable adult who is being or who is at risk of being sexually or criminally exploited. In all cases if the assessment identified any level of concern the DSL should contact their local Safeguarding Board. If the individual is in immediate danger the police should be called on 999.

Talented Training Ltd is aware that sometimes the individual is unable to recognise the coercive nature of the abuse and does not see themselves as a victim. As a consequence, they may resent what they perceive as interference by staff. However, staff must act on their concerns as they would for any other type of abuse.

Learners / apprentices will be supported in terms of recognising and assessing risk in relation to CSE/CCE, including online, and knowing how and where to get help.

FEMALE GENITAL MUTILATION (FGM)

Female Genital Mutilation (FGM) is illegal in England and Wales under the FGM Act (2003). It is a form of young person / vulnerable adult abuse and violence against women. A mandatory reporting duty requires teachers to report 'known' cases of FGM in under 18s, which are identified in the course of their professional work, to the police².

The duty applies to all persons in Talented Training Ltd who is employed or engaged to carry out 'teaching work' in the company, whether or not they have qualified teacher status. The duty applies to the individual who becomes aware of the case to make a report. It should not be transferred to the Designated Safeguarding Lead, however the DSL should be informed.

If a teacher is informed by a girl under 18 that an act of FGM has been carried out on her or a teacher observes physical signs which appear to show that an act of FGM has been carried out on a girl under 18 and they have no reason to believe the act was necessary for the girl's physical or

² [FGM procedural information](#)

mental health or for purposes connected with labour or birth, the teacher should personally make a report to the police force in which the girl resides by calling 101. The report should be made by the close of the next working day.

School staff are trained to be aware of risk indicators of FGM which are set out in Appendix 4. Concerns about FGM outside of the mandatory reporting duty should be reported as per Talented Training Ltd's young person / vulnerable adult protection procedures. Staff should be particularly alert to suspicions or concerns expressed by female learners / apprentices about going on a long holiday during the summer vacation period. There should also be consideration of potential risk to other girls in the family and practicing community.

Where there is a risk to life or likelihood of serious immediate harm the teacher should report the case immediately to the police, including dialling 999 if appropriate.

There are no circumstances in which a teacher or other member of staff should examine a girl.

FORCED MARRIAGE

A forced marriage is a marriage in which one or both people do not (or in cases of people with learning disabilities cannot) consent to the marriage but are coerced into it. Coercion may include physical, psychological, financial, sexual and emotional pressure. It may also involve physical or sexual violence and abuse.

Forced marriage is an appalling and indefensible practice and is recognised in the UK as a form of violence against women and men, domestic/young person / vulnerable adult abuse and a serious abuse of human rights. Since June 2014 forcing someone to marry has become a criminal offence in England and Wales under the Anti-Social Behaviour, Crime and Policing Act 2014.

A forced marriage is not the same as an arranged marriage which is common in several cultures. The families of both spouses take a leading role in arranging the marriage but the choice of whether or not to accept the arrangement remains with the prospective spouses.

School staff should never attempt to intervene directly as a company or through a third party. Contact should be made with MASH.

HONOUR-BASED ABUSE

Honour based abuse (HBV) can be described as a collection of practices, which are used to control behaviour within families or other social groups to protect perceived cultural and religious beliefs and/or honour. Such abuse can occur when perpetrators perceive that a relative has shamed the family and/or community by breaking their honour code.

Honour based abuse might be committed against people who:

- become involved with a boyfriend or girlfriend from a different culture or religion
- want to get out of an arranged marriage
- want to get out of a forced marriage
- wear clothes or take part in activities that might not be considered traditional within a particular culture.

It is a violation of human rights and may be a form of domestic and/or sexual abuse. There is no, and cannot be, honour or justification for abusing the human rights of others.

MENTAL HEALTH

Staff will be aware that mental health problems can, in some cases, be an indicator that someone has suffered or is at risk of suffering abuse, neglect or exploitation. Whilst we recognise that only appropriately trained professionals can diagnose mental health problems; staff are able to make day to day observations of young people or vulnerable adults and identify such behaviour that may

suggest they are experiencing a mental health problem or be at risk of developing one. If staff have a mental health concern about a young person / vulnerable adult that is also a safeguarding concern they will share this with the DSL or deputy.

Looked after young people or vulnerable adults and previously looked after young people or vulnerable adults

The most common reason for young people or vulnerable adults becoming looked after is as a result of abuse and neglect. Talented Training Ltd ensures that staff have the necessary skills and understanding to keep looked after/previously looked after young people or vulnerable adults safe. Appropriate staff have information about a young person / vulnerable adults looked after legal status and care arrangements, including the level of authority delegated to the carer by the authority looking after the young person / vulnerable adult and contact arrangements with birth parents or those with parental responsibility.

The designated teacher for looked after young people or vulnerable adults and the DSL have details of the individual's social worker and the name and local contact details responsible for young people or vulnerable adults in care.

YOUNG PEOPLE OR VULNERABLE ADULTS MISSING EDUCATION

Attendance, absence and exclusions are closely monitored. The company will hold more than one emergency contact number for learners / apprentices where reasonably possible. A young person / vulnerable adult going missing from education is a potential indicator of abuse and neglect, including sexual abuse and sexual exploitation.

The DSL will monitor unauthorised absences and take appropriate action. Staff must be alert to signs of young people or vulnerable adults at risk of travelling to conflict zones, female genital mutilation and forced marriage.

ONLINE SAFETY

Our learners / apprentices increasingly use electronic equipment on a daily basis to access the internet and share content and images via social media sites such as Facebook, twitter, Instagram, Snapchat.

Unfortunately, some people use these technologies to harm young people or vulnerable adults. The harm might range from sending hurtful or abusive texts or emails, to grooming and enticing young people or vulnerable adults to engage in sexual behaviour such as webcam photography or face-to-face meetings. Learners / apprentices may also be distressed or harmed by accessing inappropriate material such as pornographic websites or those which promote extremist behaviour, criminal activity, suicide or eating disorders.

Talented Training Ltd has an online safety policy which explains how we try to keep learners / apprentices safe and how we respond to online safety incidents. Talented Training Ltd will also provide advice to parents when learners being asked to learn online at home and consider how best to safeguard all learners and staff.

Learners / apprentices are taught about online safety throughout the curriculum and all staff receive online safety training which is regularly updated.

PEER ON PEER ABUSE INCL SEXUAL VIOLENCE AND SEXUAL HARASSMENT

The DSL, Governance Group and Managing Director will take due regard to Part 5, KCSiE 2021

In most instances, the conduct of learners / apprentices towards each other will be covered by our behaviour policy. However, some allegations may be of such a serious nature that they may raise safeguarding concerns. Talented Training Ltd recognise that young people or vulnerable adults are capable of abusing their peers. It will not be passed off as 'banter' or 'part of growing up'. The forms of peer-on-peer abuse are outlined below.

- domestic abuse – an incident or pattern of actual or threatened acts of physical, sexual, financial and/or emotional abuse, perpetrated by an adolescent against a current or former dating partner regardless of gender or sexuality
- bullying (including cyberbullying, prejudice-based and discriminatory bullying)
- young person / vulnerable adult sexual exploitation – young people or vulnerable adults under the age of 18 may be sexually abused in the context of exploitative relationships, contexts and situations by peers who are also under 18
- harmful sexual behaviour – Young people or vulnerable adults and young people presenting with sexual behaviours that are outside of developmentally ‘normative’ parameters and harmful to themselves and others (For more information, please see Appendix 2)
- upskirting – which typically involves taking a picture under a person’s clothing without them knowing, with the intention of viewing their genitals or buttocks to obtain sexual gratification, or cause the victim humiliation, distress or alarm
- serious youth violence³ – Any offence of most serious violence or weapon enabled crime, where the victim is aged 1-19’ i.e., murder, manslaughter, rape, wounding with intent and causing grievous bodily harm. ‘Youth violence’ is defined in the same way, but also includes assault with injury offences. All staff will receive training so that they are aware of indicators which may signal that young people or vulnerable adults are at risk from, or involved with serious violence and crime
- initiation/hazing type violence and rituals (this could include activities involving harassment, abuse or humiliation used as a way of initiating a person into a group and may also include an online element); and
- consensual and non-consensual sharing of nudes and semi nudes’ images and or videos (also known as sexting or youth produced sexual imagery).

The term peer-on-peer abuse can refer to all of these definitions and a young person / vulnerable adult may experience one or multiple facets of abuse at any one time. Therefore, our response will cut across these definitions and capture the complex web of their experiences. There are also different gender issues that can be prevalent when dealing with peer-on-peer abuse (i.e. girls being sexually touched/assaulted or boys being subjected to initiation/hazing type violence).

Talented Training Ltd aims to reduce the likelihood of peer-on-peer abuse through:

- the established ethos of respect, friendship, courtesy and kindness
- high expectations of behaviour
- clear consequences for unacceptable behaviour
- providing an appropriate curriculum which develops learners / apprentices’ understanding of healthy relationships, acceptable behaviour, consent and keeping themselves safe
- systems for any learner / apprentice to raise concerns with staff, knowing that they will be listened to, valued and believed
- robust risk assessments and providing targeted work for learners / apprentices identified as being a potential risk to other learners / apprentices and those identified as being at risk.

Research indicates that young people rarely disclose peer on peer abuse and that if they do, it is likely to be to their friends. Therefore, Talented Training Ltd will also educate learners / apprentices

³ [Preventing youth violence and gang involvement](#)

in how to support their friends if they are concerned about them, that they should talk to a trusted adult in the company and what services they can contact for further advice.

Any concerns, disclosures, or allegations of peer-on-peer abuse in any form should be referred to the DSL using Talented Training Ltd's set procedures. Where a concern regarding peer-on-peer abuse has been disclosed to the DSL(s), advice and guidance will be sought from MASH and where it is clear a crime has been committed or there is a risk of crime being committed the Police will be contacted.

Working with external agencies the company will respond to the unacceptable behaviour. If an individual's behaviour negatively impacts on the safety and welfare of other learners / apprentices, then safeguards will be put in place to promote the well-being of the learners / apprentices affected and the victim and perpetrator will be provided with support.

YOUTH PRODUCED SEXUAL IMAGERY (SEXTING)

The practice of young people or vulnerable adults sharing images and videos via text message, email, social media or mobile messaging apps has become commonplace. However, this online technology has also given young people or vulnerable adults the opportunity to produce and distribute sexual imagery in the form of photos and videos. Such imagery involving anyone under 18 is illegal.

Youth produced sexual imagery refers to both images and videos where:

- A person under the age of 18 creates and shares sexual imagery of themselves with a peer under the age of 18.
- A person under the age of 18 shares sexual imagery created by another person under the age of 18 with a peer under the age of 18 or an adult.
- A person under the age of 18 is in possession of sexual imagery created by another person under the age of 18.

All incidents of this nature should be treated as a safeguarding concern and in line with the UKCIS guidance

Cases where sexual imagery of people under 18 has been shared by adults and where sexual imagery of a person of any age has been shared by an adult to a young person is young person / vulnerable adult sexual abuse and should be responded to accordingly. If a member of staff becomes aware of an incident involving youth produced sexual imagery, they should follow the young person / vulnerable adult protection procedures and refer to the DSL as soon as possible. The member of staff should confiscate the device involved and set it to flight mode or, if this is not possible, turn it off. Staff should not view, copy or print the youth produced sexual imagery.

The DSL should hold an initial review meeting with appropriate company staff and subsequent interviews with the young people or vulnerable adults involved (if appropriate). Parents should be informed at an early stage and involved in the process unless there is reason to believe that involving parents would put the young person / vulnerable adult at risk of harm. At any point in the process if there is concern a young person has been harmed or is at risk of harm a referral should be made to MASH or the Police as appropriate.

Immediate referral at the initial review stage should be made to MASH/Police if:

- The incident involves an adult
- There is good reason to believe that a young person has been coerced, blackmailed or groomed or if there are concerns about their capacity to consent (for example, owing to special education needs)
- What you know about the imagery suggests the content depicts sexual acts which are unusual for the individual's development stage or are violent

- The imagery involves sexual acts
- The imagery involves anyone aged 12 or under
- There is reason to believe someone is at immediate risk of harm owing to the sharing of the imagery, for example they are presenting as suicidal or self-harming.

If none of the above apply then the DSL will use their professional judgement to assess the risk to learners / apprentices involved and may decide, with input from the Director, to respond to the incident without escalation to MASH or the police. Such decisions will be recorded.

In applying judgement, the DSL will consider if:

- there is a significant age difference between the sender/receiver
- there is any coercion or encouragement beyond the sender/receiver
- the imagery was shared and received with the knowledge of the individual in the imagery
- the individual is more vulnerable than usual i.e. at risk
- there is a significant impact on the young people or vulnerable adults involved
- the image is of a severe or extreme nature
- the situation is isolated or if the image been more widely distributed
- there other circumstances relating to either the sender or recipient that may add cause for concern i.e., difficult home circumstances
- the young people or vulnerable adults have been involved in incidents relating to youth produced imagery before.

If any of these circumstances are present the situation will be escalated according to our young person / vulnerable adult protection procedures, including reporting to the police or MASH. Otherwise, the situation will be managed within the company. The DSL will record all incidents of youth produced sexual imagery, including both the actions taken, actions not taken, reasons for doing so and the resolution in line with safeguarding recording procedures.

CONFIDENTIALITY

- Talented Training Ltd recognises that in order to effectively meet a young person's / vulnerable adult need, safeguard their welfare and protect them from harm , we must contribute to inter-agency working in line with Working Together to Safeguard Children (2018) and share information between professionals and agencies where there are concerns.
- All staff must be aware that they have a professional responsibility to share information with other agencies in order to safeguard young person / vulnerable adults and that the Data Protection Act 2018⁴ is not a barrier to sharing information where the failure to do so would place an individual at risk of harm.
- All staff must be aware that they cannot promise to keep secrets which might compromise the person's safety or wellbeing.
- However, we also recognise that all matters relating to protection of an individual are personal. Therefore, in this respect they are confidential, and the Director or DSLs will only disclose information about an individual or members of staff on a need-to-know basis.

⁴ The UK Data Protection Act 2018 (DPA 2018) is supplementary to the General Data Protection Regulation 2016 (the GDPR) and replaces DPA 1998.

If in any doubt about sharing information, staff should speak to the DSL or a deputy. Fears about sharing information must not be allowed to stand in the way of the need to promote the welfare and protect the safety of children, young people and vulnerable adults. (KCSIE 2021)

CONFIDENTIALITY AND STORAGE OF SAFEGUARDING REPORTS

All staff must maintain confidentiality about safeguarding cases and are shared internally on a need-to-know basis. Learners must be informed that any disclosures or concerns that are raised cannot be kept secret and may have to be referred to the Designated Safeguarding Lead and external agencies. The safeguarding report must be completed fully and accurately, using word for word information wherever possible. This must be saved using a password protection and emailed within the same day to the Designated Safeguarding Lead. The DSL will keep a central record of all safeguarding reports that are in a lockable cabinet or restricted access online folder that complies with GDPR. Active cases will be regularly reviewed and updated as necessary for each individual circumstance and closed cases will be signed off by the DSL and archived.

RESPONSIBILITIES

Senior Management Team

- 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 Anita Fresson, 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 Trustees on a quarterly basis

- reviews the implementation and effectiveness of the policy on an annual basis
- Take lead responsibility for managing young person / vulnerable adult 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 local safeguarding and referral procedures, the Local Safeguarding Young people or vulnerable adults' Board (LSCB) and Safeguarding Adults Board (SAB).
- 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 that all staff know how to assess the risk of young people or vulnerable adults being drawn into terrorism and understand how to identify individual young people or vulnerable adults who may be at risk of radicalisation and what to do to support them.

The Deputy Designated Safeguarding Lead(s): Naseem Shah

- The Deputy DSL is trained to the same standard as the Designated Safeguarding Lead and, in the absence of the DSL, carries out those functions necessary to ensure the ongoing safety and protection of learners / apprentices. In the event of the long-term absence of the DSL the deputy will assume all of the functions above.

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

Line Managers

- Support and encourage completion of required Safeguarding Awareness and Prevent Training
- Ensure all direct reports working in a regulated activity have read and familiarised themselves with Part 1 of the statutory guidance Keeping Children Safe in Education (September 2021)
- Adopt Talented Training Ltd's culture of vigilance and lead by example

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.

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 young person / vulnerable adult, 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 the statutory guidance Keeping Children Safe in Education (September 2021)
- If you feel that you could benefit from further training on safeguarding or young person / vulnerable adult protection, then please contact your Safeguarding Lead

SAFER RECRUITMENT PROCEDURES

Talented Training Ltd takes appropriate measures to ensure the appointment of new staff is in line with a safer recruitment practice⁵ which includes scrutinising applicants, verifying identity and

⁵ Also reference Safeguarding Vulnerable Groups Act 2006

qualifications, obtaining professional and character references, checking previous employment history and ensuring they have the health and physical capacity for the job.

We will prevent people who pose risks to children, young people and vulnerable adults from working at our company by making sure that all individuals working in any capacity at Talented Training Ltd have been subjected to relevant safeguarding checks and risk assessment in line with *Keeping Children Safe in Education: Statutory Guidance for Schools and Colleges, September 2021*. We will ensure that agencies and third parties supplying staff provide us evidence that they have made the appropriate level of safeguarding checks on individuals working at the company. The single central record must cover the following people: all staff, agency and third-party and supply staff who work at Talented Training Ltd.

Applicants seeking employment under the Skilled Worker Route (replaces existing *Tier 2 route*) for education, health or social care sectors will be required to provide a criminal record certificate. Guidance will be checked regularly for any updates⁶

Every job description and person specification, and job advertisement will have a clear statement about the safeguarding responsibilities of the post holder. The company website will echo this within our 'work for us' section.

We will ensure that at least one member of every interview panel has completed safer recruitment training within the last 5 years and will ask a min of 2 safeguarding questions. Training on safeguarding current practice must be completed within 2 weeks of starting with the organisation and must be updated every 2 years.

We have a procedure in place to manage allegations against members of staff, supply staff and volunteers. There is an agreed staff behaviour policy code of conduct) which is compliant with 'Safer Working Practices', and includes - acceptable use of technologies, staff/learner relationships and communications including the use of social media.

RECRUITMENT OF STAFF WITH CRIMINAL CONVICTIONS

The Rehabilitation of Offenders Act 1974 (ROA) entitles all employers to take into account unspent convictions when determining whether an applicant is suitable for the role applied for. Talented Training Ltd will not discriminate unfairly against applicants with a criminal record. Having a criminal record will not necessarily bar an applicant from working for Talented Training Ltd, the nature of a disclosed conviction and its relevance to the post in question, will be considered.

Where a conviction has been disclosed in an individual's application for a post at the company, a discussion will take place regarding the offence and its relevance to the position. Failure to reveal information relating to convictions could lead to withdrawal of an offer of employment.

Talented Training Ltd uses the Disclosure and Barring Service (DBS) to obtain information to enable it to assess the suitability of applicants for employment in positions of trust. The company complies fully with the DBS code of practice and does not discriminate unfairly against any subject of a DBS disclosure on the basis of conviction or other information revealed.

The only circumstances in which an employer may not legally recruit a person with a certain type of offending history, is where the offending history has led to the individual being barred from regulated activity with either children, adults or both. If you are recruiting for a role that is defined as regulated activity with children or adults, it is your responsibility to check the barred status of your employees and you may not employ a person who has been barred from working with the relevant group.

⁶ <https://www.gov.uk/government/publications/criminal-records-checks-for-overseas-applicants/guidance-on-the-application-process-for-criminal-records-checks-overseas>

Talented Training Ltd complies with the DBS code regarding the secure storage, handling, use, retention & disposal of DBS disclosures and disclosure information and with its obligations under the Data Protection Act.

STAFF LEARNING AND DEVELOPMENT

Learning about safeguarding is given a high priority at Talented Training Ltd. Expertise is extended effectively, and internal capacity is built up through performance management. Managers ensure that all staff regularly undertake a comprehensive range of learning to promote safe practice in and off site.

All new staff to the company have a comprehensive induction, this includes reading and understanding:

- i. Information sharing: advice for practitioners who are providing safeguarding services
- ii. Part one and Annex A of 'Keeping children safe in education, September 2021'
- iii. Company Behaviour Policy
- iv. Staff Code of Conduct
- v. This Safeguarding & Child Protection Policy
- vi. The role of the designated safeguarding lead

Designated staff are trained in specialist areas of work, such as:

- i. Designated Safeguarding Lead
- ii. Mental Health Champion
- iii. Domestic Abuse Champion etc.
- iv. Designated Teacher for Looked After Children

A variety of learning materials on safeguarding are made available to ensure staff continually develop their understanding and practice around safeguarding, these include:

- i. Safeguarding in Education Bulletins
- ii. Multi-Agency Learning and Development Programme
- iii. Leaflets
- iv. Mentoring
- v. Online learning
- vi. Posters in the staff room detailing referral processes and key topics
- vii. Shadowing
- viii. Staff handbook
- ix. Staff induction pack
- x. Standing agenda item staff meetings
- xi. In-house training
- xii. Video
- xiii. Workbooks
- xiv. NSPCC (monthly) and email updates for staff and governors

All learning and training are documented as part of the member of staff's personnel file, which also helps us map learning needs across the staff team for further development. A checklist is used as part of the induction process, and thereafter in the performance management process to ensure all compulsory learning has taken place. Safeguarding is always re-visited at least on an annual basis in staff performance management sessions, to ensure they are as confident and competent in carrying out their safeguarding responsibilities as they possibly can be.

All staff should know what to do if a young person / vulnerable adult tells them he/she/they are being abused, exploited, or neglected including peer on peer abuse. Staff should know how to manage the requirement to maintain an appropriate level of confidentiality. This means only involving those who need to be involved, such as the designated safeguarding lead. Staff should never promise a young person / vulnerable adult that they will not tell anyone about a report of any form of abuse, as this may ultimately not be in their best interests.

All staff should be able to reassure victims that they are being taken seriously and that they will be supported and kept safe. A victim should never be given the impression that they are creating a problem by reporting abuse, sexual violence or sexual harassment. Nor should a victim ever be made to feel ashamed for making a report.

2. All staff should be aware that young person / vulnerable adult can abuse other young person / vulnerable adult (often referred to as peer-on-peer abuse). And that it can happen both inside and outside of the training centre and online. It is important that all staff recognise the indicators and signs of peer-on-peer abuse and know how to identify it and respond to reports.
3. All staff should understand, that even if there are no reports in company it does not mean it is not happening, it may be the case that it is just not being reported. As such it is important if staff have any concerns regarding peer-on-peer abuse, they should speak to their Designated Safeguarding Lead (or deputy).
4. As and when required, other external agencies may be consulted to assist with staff learning and development.

PROMOTING SAFEGUARDING AND THE WELFARE OF LEARNERS

The safeguarding agenda involves the protection of young people or vulnerable adults and adults at risk but also requires providers to promote and encourage the welfare of learners as a preventative measure to harm. This is achieved at Talented Training Ltd by:

- A culture of vigilance that is taken seriously by senior managers and included within meeting agendas
- Safeguarding training is included within staff and learner inductions and reinforced in both handbooks
- Embed into the curriculum including relevant focus topics such as online safety, lone working, self-care and stress management, fraudulent activity and scams, harassment at work, financial abuse, the prevent agenda and health and safety.
- Embed into the curriculum the promotion of equality and diversity and British Values to reinforce the acceptance of a diverse community and following the expectations of a British citizen.

USE OF EXTERNAL AGENCIES AND SPEAKERS

At Talented Training Ltd we encourage the use of external agencies or speakers to enrich the experiences of our learners; however, we will positively vet those external agencies, individuals or speakers who we engage to provide such learning opportunities or experiences for our learners.

Such vetting is to ensure that we do not unwittingly use agencies that contradict each other with their messages or that are inconsistent with, or are in compete opposition to, our values and ethos. Talented Training Ltd will assess the suitability and effectiveness of input from external agencies or individuals to ensure that:

- Any messages communicated to learners are consistent with the ethos of the company and do not marginalise any communities, groups or individuals
- Any messages do not seek to glorify criminal activity or violent extremism or seek to radicalise learners through extreme or narrow views of faith, religion or culture or other ideologies
- Activities are matched to the needs of learners
- Activities are carefully evaluated by Talented Training Ltd to ensure that they are effective

We recognise, however, that the ethos of our Company and learning is to encourage learners to understand opposing views and ideologies, appropriate to their age, understanding and abilities, and to be able to actively engage with them in informed debate, and we may use external agencies or speakers to facilitate and support this. Therefore, by delivering a broad and balanced tutorial programme, augmented by the use of external sources where appropriate, we will strive to ensure our learners recognise risk and build resilience to manage any such risk themselves where appropriate to their age and ability but also to help learners develop the critical thinking skills needed to engage in informed debate.

WHISTLE BLOWING

Whistle blowing protects all staff, contractors and learners from fear of victimisation or discrimination when raising serious concerns. It is intended to enable a safe environment to encourage discussions rather than allowing these to be overlooked or discussed externally. Anyone who raises a genuine concern will have significant legal protection under the Employment Rights Act 1996 – Part IVA, Part V and Part X and the Public Interest Disclosure Act 1998. The concern should be raised with the Managing Director who will conduct any internal investigations in line with the organisation's procedures.

MANAGING ALLEGATIONS AGAINST STAFF

Any suspicion, allegation, or actual abuse of a learner by a member of staff must be reported to the Designated Safeguarding Lead as soon as possible and in any case that same day of the initial concern arising. The member of staff raising the concern should follow the standard safeguarding process and complete the report form. The Designated Safeguarding Lead shall:

- Take such steps, as they consider necessary to ensure the safety of the learner in question and any other person who is considered at risk.
- Immediately notify the Managing Director who will follow procedures to inform the member of staff that they may be suspended on full pay pending an investigation. The length of any suspension will be in line with organisational policies and will be as short as possible while ensuring the safety of the learner.
- Report the matter to the Local Authority Safeguarding Board and if necessary, the DBS.
- Any investigation relating to a member of staff will follow organisational procedure
- Once the outcome is determined the Managing Director will take action in line with its disciplinary policies if necessary.

LONE WORKING

Talented Training Ltd recognises it has a responsibility for the health, safety and welfare of all workers including contractors and those who are self-employed. The specific risks involved with lone

working are assessed in consultation with employees and recorded in an annual risk assessment. Actions to reduce and control the risks will include as a minimum:

- Managers at Talented Training Ltd use a system that clearly identifies where all employees are located on each day, contact details, times of sessions, list of learners in the group
- Employees are accompanied to any new venues on the first day of delivery by another member of Talented Training Ltd
- The venue is aware of the employee's visit, number of learners expected and have contact details of managers at Talented Training Ltd
- The employee and on duty Designated Safeguarding Lead have each other's contact details
- The employee is aware of the domestic and health and safety arrangements at the venue
- High risk learners are assessed, and team teaching/coaching is considered
- Vulnerable employees such as those with disabilities, medical conditions, pregnancy or English as a second language will require further measures put in place
- The staff induction and handbook include expectations and procedures for lone workers
- Managers at Talented Training Ltd will periodically monitor lone workers through visits, observations and other contact via phone, text and email

CONFIDENTIALITY, SHARING INFORMATION AND GDPR

All staff will understand that protection issues warrant a high level of confidentiality, not only out of respect for the individual and staff involved but also to ensure that information being released into the public domain does not compromise evidence.

All staff at Talented Training Ltd should be proactive in sharing as early as possible to help identify, assess and respond to risks or concerns about the safety and welfare of young people and vulnerable adults when problems are first emerging, or where a young person / vulnerable adult is already known to local authority social care.

Staff should only discuss concerns with the DSL, Director. That person will then decide who else needs to have the information and they will disseminate it on a 'need-to-know' basis. Information will be stored and handled in line with the Data Protection Act 2018 ⁷ and HM Government Information Sharing and Advice for practitioners providing safeguarding services to young person / vulnerable adults, parents and carers, July 2018

Information sharing is guided by the following principles:

- necessary and proportionate
- relevant
- adequate
- accurate
- timely
- secure

Fears about sharing information cannot be allowed to stand in the way of the need to promote the welfare and protect the safety of young people and vulnerable adults (KCSIE, 2021).

⁷ The UK Data Protection Act 2018 (DPA 2018) is supplementary to the General Data Protection Regulation 2016 (the GDPR) and replaces DPA 1998.

COMPLAINTS

If staff or learners have a complaint about this safeguarding policy, they should refer to the organisation's complaints policy.

If a member of staff or learner feels the organisation or other external agencies are not handling a safeguarding concern appropriately, they should contact the Local Authority Safeguarding Board.

MONITORING AND REVIEW OF THE POLICY

Talented Training Ltd will review its policies and procedures to ensure that they comply with the relevant legislation. The Safeguarding Policy will be reviewed annually and updated in line with legal or statutory requirements or to remedy any deficiencies or weakness in regard to young person / vulnerable adult and adults at risk protection arrangements that are identified without delay.

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

APPROVAL OF AN EXTERNAL SPEAKER: Application Form

Event Title:			
Event Date:		Start Time:	
Name of Event Organiser:			
Event Organiser's contact details:			
	Tel:		Email:
NOTE: If more than one speaker, please complete a separate form for each speaker.			
Speakers Name:			
Is the speaker known by any other name?			
Speakers Organisation: <i>(Include full title & website URL)</i>			
Speakers contact details: <i>(Address)</i>	Tel:		Email:
Title of talk:			
Subject matter:			
Language the talk will be delivered in:			
Does the event have any controversial subjects?	Yes <input type="checkbox"/> No <input type="checkbox"/>		
	If yes, provide date and details:		
Arrival date:		Time:	
Departure date:		Time:	
Has the speaker spoken at Talented Training Ltd previously?	Yes <input type="checkbox"/> No <input type="checkbox"/>		
	If yes, provide date and details:		
Has the speaker been refused to speak publicly or at any educational establishment before?	Yes <input type="checkbox"/> No <input type="checkbox"/>		
	If yes, provide date and details:		
Have any previous speeches by this speaker generated media interest?			
Who is the event open to?	Staff <input type="checkbox"/> Students <input type="checkbox"/> General public <input type="checkbox"/> <u>OR</u> a restricted group/society <input type="checkbox"/>		
Expected number of attendees:		How many of these are likely to be external to the company?	

Is the event being sponsored?	Yes <input type="checkbox"/> No <input type="checkbox"/>
	If yes, provide date and details:
How will the event be advertised?	Email <input type="checkbox"/> Social Media <input type="checkbox"/> Leaflets <input type="checkbox"/> Posters <input type="checkbox"/>
	Other <input type="checkbox"/> No Advertising <input type="checkbox"/>
	If other, please provide details:
Are there any other details that should be noted?	
<i>(Security required & informed / Marketing informed / entry by ticket only)</i>	
ORGANISER TO SIGN:	DATE:

APPENDIX B**Safeguarding- Incident Report Forms**

Please use the following two Templates to record and report an incident or disclosure. Please send it to the Designated Safeguarding Lead Anita Fresson.

Safeguarding Incident Recording Template 1	
Your Details:	
<ul style="list-style-type: none"> • Name: 	
<ul style="list-style-type: none"> • Job Role 	
<ul style="list-style-type: none"> • Date 	
<ul style="list-style-type: none"> • Contact Details (Phone and e-mail) 	
Details of Incident / disclosure	
<ul style="list-style-type: none"> • Date of initial raising of concern / incident 	
<ul style="list-style-type: none"> • Who raised the concern? <ul style="list-style-type: none"> ○ Name ○ Contact details 	
<ul style="list-style-type: none"> • Who is the vulnerable person? <ul style="list-style-type: none"> ○ Name ○ Age (if applicable in the case of Under 18) ○ Contact details ○ Parents contact details 	
<ul style="list-style-type: none"> • Where did the incident occur? 	
<ul style="list-style-type: none"> • When did the incident occur? <ul style="list-style-type: none"> ○ Date and time 	
<ul style="list-style-type: none"> • What happened? 	
<ul style="list-style-type: none"> • Were there witnesses? <ul style="list-style-type: none"> ○ Name ○ Age (if applicable in the case of Under 18s) 	

○ Contact details	
After the incident/ disclosure	
<ul style="list-style-type: none"> ● Were there any witnesses to the referral? <ul style="list-style-type: none"> ○ Name ○ Contact details 	
<ul style="list-style-type: none"> ● Who have you discussed this incident with? <ul style="list-style-type: none"> ○ Name ○ Contact details 	
Please save this report securely and send it to Anita Fresson, Designated Safeguarding Lead.	

Guidance for handling a Disclosure or Concern

- Take all complaints, allegations or suspicions seriously
- Ensure the immediate safety of the person affected
- Stay calm, and offer support and reassurance to the person making the disclosure
- Do not make any promises regarding confidentiality
- Listen, keep questions to a minimum, make brief but careful notes and check the person affected agrees with them (where applicable)
- Explain what you will do.

Safeguarding Incident Recording Template 2	
Detailing discussion with Multi Agency Safeguarding Hub	
To be used in conjunction with Template 1	
Your Details:	
● Name:	
● Job Role	
● Date	
<ul style="list-style-type: none"> ● Contact Details (Phone and e-mail)	
Details of Incident / disclosure	Refer to Template 1
<ul style="list-style-type: none"> ● Name of Victim ● Date of incident 	
Notes on discussion with MASH	

<ul style="list-style-type: none"> • What was discussed • Agreed outcomes • Further action <ul style="list-style-type: none"> ○ By whom? 	
<p>Please save this report securely and send it to Anita Fresson, Designated Safeguarding Lead.</p>	

APPENDIX C

Recognising signs of abuse

Categories of Abuse:

- Physical Abuse
- Emotional Abuse (including Domestic Abuse)
- Sexual Abuse (including young person / vulnerable adult sexual exploitation)
- Neglect

Signs of Abuse

The following non-specific signs may indicate something is wrong:

- Significant change in behaviour
- Extreme anger or sadness
- Aggressive and attention-needing behaviour
- Suspicious bruises with unsatisfactory explanations
- Lack of self-esteem
- Self-injury
- Depression and/or anxiousness
- Age-inappropriate sexual behaviour
- Child Sexual Exploitation
- Criminality
- Substance abuse
- Mental health problems
- Poor attendance

RISK INDICATORS

The factors described in this section are frequently found in cases of abuse. Their presence is not proof that abuse has occurred, but:

- Must be regarded as indicators of the possibility of significant harm
- Justifies the need for careful assessment and discussion with designated / named / lead person, manager, (or in the absence of all those individuals, an experienced colleague)
- May require consultation with and / or referral to Children's Services

The absence of such indicators does not mean that abuse or neglect has not occurred.

In an abusive relationship the young person / vulnerable adult may:

- Appear frightened of the parent/s
- Act in a way that is inappropriate to her/his age and development (though full account needs to be taken of different patterns of development and different ethnic groups)

The parent or carer may:

- Persistently avoid young person / vulnerable adult health promotion services and treatment of episodic illnesses
- Have unrealistic expectations of the young person / vulnerable adult
- Frequently complain about/to the young person / vulnerable adult and may fail to provide attention or praise (high criticism/low warmth environment)
- Be absent or misusing substances
- Persistently refuse to allow access on home visits
- Be involved in domestic abuse

Staff should be aware of the potential risk to young person / vulnerable adults when individuals, previously known or suspected of abuse move into the household.

RECOGNISING PHYSICAL ABUSE

The following are often regarded as indicators of concern:

- An explanation which is inconsistent with an injury
- Several different explanations provided for an injury
- Unexplained delay in seeking treatment
- The parents/carers are uninterested or undisturbed by an accident or injury
- Parents are absent without good reason when their young person / vulnerable adult is presented for treatment
- Repeated presentation of minor injuries (which may represent a “cry for help” and if ignored could lead to a more serious injury)
- Family use of different doctors and A&E departments
- Reluctance to give information or mention previous injuries

BRUISING

Individuals can have accidental bruising, but the following must be considered as non-accidental unless there is evidence, or an adequate explanation provided:

- Any bruising to a pre-crawling or pre-walking baby
- Bruising in or around the face and mouth; in small babies may indicate force feeding
- Two simultaneous bruised eyes, without bruising to the forehead, (rarely accidental, though a single bruised eye can be accidental or abusive)
- Repeated or multiple bruising on the head or on sites unlikely to be injured accidentally
- Variation in colour possibly indicating injuries caused at different times
- The outline of an object used e.g., belt marks, handprints or a hairbrush
- Bruising or tears around, or behind, the earlobe/s indicating injury by pulling or twisting
- Grasp marks on small young person / vulnerable adults
- Bruising on the arms, buttocks and thighs may be an indicator of sexual abuse

BITE MARKS

Bite marks can leave clear impressions of the teeth. Human bite marks are oval or crescent shaped. Those over 3 cm in diameter are more likely to have been caused by an adult or older young person

/ vulnerable adult. A medical opinion should be sought where there is any doubt over the origin of the bite.

BURNS AND SCALDS

It can be difficult to distinguish between accidental and non-accidental burns and scalds and will always require experienced medical opinion. Any burn with a clear outline may be suspicious e.g.:

- Circular burns from cigarettes (but may be friction burns if along bony protuberance of the spine)
- Linear burns from hot metal rods or electrical fire elements
- Burns of uniform depth over a large area
- Scalds that have a line indicating immersion or poured liquid (a young person / vulnerable adult getting into hot water is his/her own accord will struggle to get out and cause splash marks)
- Old scars indicating previous burns/scalds which did not have appropriate treatment or adequate explanation

Scalds to the buttocks of a small young person / vulnerable adult, particularly in the absence of burns to the feet, are indicative of dipping into a hot liquid or bath.

FRACTURES

Fractures may cause pain, swelling and discolouration over a bone or joint. Non-mobile young person / vulnerable adults rarely sustain fractures.

There are grounds for concern if:

- The history provided is vague, non-existent or inconsistent with the fracture type
- There are associated old fractures
- Medical attention is sought after a period of delay when the fracture has caused symptoms such as swelling, pain or loss of movement
- There is an unexplained fracture in the first year of life

SCARS

A large number of scars, different sizes or ages, on different parts of the body, may suggest abuse.

RECOGNISING EMOTIONAL ABUSE

Emotional abuse may be difficult to recognise, as the signs are usually behavioural rather than physical. The manifestations of emotional abuse might also indicate the presence of other kinds of abuse. The indicators of emotional abuse are often also associated with other forms of abuse.

The following may be indicators of emotional abuse:

- Developmental delay
- Abnormal attachment between a young person / vulnerable adult and parent/carer e.g. anxious, indiscriminate or not attachment
- Indiscriminate attachment or failure to attach
- Aggressive behaviour towards others
- Scapegoated within the family
- Frozen watchfulness, particularly in pre-school young person / vulnerable adults

- Low self-esteem and lack of confidence
- Withdrawn or seen as a “loner” – difficulty relating to others

RECOGNISING SIGNS OF SEXUAL ABUSE

Boys and girls of all ages may be sexually abused and are frequently scared to say anything due to guilt and/or fear. This is particularly difficult for a young person / vulnerable adult to talk about, and full account should be taken of any cultural sensitivities. Recognition can be difficult, unless the young person / vulnerable adult discloses and is believed. There may be no physical signs and indications are likely to be emotional/behavioural.

Some behavioural indicators associated with this form of abuse are:

- Inappropriate sexualised conduct
- Sexually explicit behaviour, play or conversation, inappropriate to the young person / vulnerable adult’s age
- Continual and inappropriate or excessive masturbation
- Self-harm (including eating disorder), self-mutilation and suicide attempts
- Involvement in prostitution or indiscriminate choice of sexual partners
- An anxious unwillingness to remove clothes e.g., for sports events (but this may be related to cultural norms or physical difficulties)

Some physical indicators associated with this form of abuse are:

- Pain or itching of genital area
- Blood on underclothes
- Pregnancy in a younger girl where the identity of the father is not disclosed
- Physical symptoms such as injuries to the genital or anal area, bruising to buttocks, abdomen and thighs, sexually transmitted disease, presence of semen on vagina, anus, external genitalia or clothing

RECOGNISING NEGLECT

Evidence of neglect is built up over time and can cover different parenting aspects. Indicators include:

- Failure by parents or carers to meet the basic essential needs e.g., adequate food, clothes, warmth, hygiene and medical care
- A young person / vulnerable adult seen to be listless, apathetic and irresponsible with no apparent medical cause
- Failure of young person / vulnerable adult to grow within normal expected pattern, with accompanying weight loss
- Individual thrives away from home environment
- Individual frequently absent from education and training
- Individual left with adults who are intoxicated or violent
- Individual abandoned or left alone for excessive periods

APPENDIX D

SEXUAL ABUSE & SEXUAL HARASSMENT

The boundary between what is abusive and what is part of normal adulthood or youthful experimentation can be blurred. The determination of whether behaviour is developmental, inappropriate or abusive will hinge around the related concepts of true consent, power imbalance and exploitation. This may include young person / vulnerable adults who exhibit a range of sexually problematic behaviour such as indecent exposure, obscene telephone calls, fetishism, bestiality and sexual abuse against adults, peers or young person / vulnerable adults. Staff should be vigilant to:

- bullying (including cyberbullying)
- physical abuse such as hitting, kicking, shaking, biting, hair pulling, or otherwise causing physical harm
- sexual violence and sexual harassment
- sexting (also known as youth produced sexual imagery)
- initiation/hazing type violence and rituals
- upskirting

DEVELOPMENTAL SEXUAL ACTIVITY

Encompasses those actions that are to be expected from young people / vulnerable adults as they move from infancy through to an adult understanding of their physical, emotional and behavioural relationships with each other. Such sexual activity is essentially information gathering and experience testing. It is characterised by mutuality and of the seeking of consent.

INAPPROPRIATE SEXUAL BEHAVIOUR

Can be inappropriate socially, in appropriate to development, or both. In considering whether behaviour fits into this category, it is important to consider what negative effects it has on any of the parties involved and what concerns it raises about a young person / vulnerable adult. It should be recognised that some actions may be motivated by information seeking, but still cause significant upset, confusion, worry, physical damage, etc. It may also be that the behaviour is “acting out” which may derive from other sexual situations to which the young person / vulnerable adult has been exposed. If an act appears to have been inappropriate, there may still be a need for some form of behaviour management or intervention. For some young person / vulnerable adults, educative inputs may be enough to address the behaviour.

Abusive sexual activity included any behaviour involving coercion, threats, aggression together with secrecy, or where one participant relies on an unequal power base. In order to more fully determine the nature of the incident the following factors should be given consideration. The presence of exploitation in terms of:

Equality – consider differentials of physical, cognitive and emotional development, power and control and authority, passive and assertive tendencies

Consent – agreement including all the following:

- Understanding that is proposed based on age, maturity, development level, functioning and experience
- Knowledge of society’s standards for what is being proposed
- Awareness of potential consequences and alternatives
- Assumption that agreements or disagreements will be respected equally

- Voluntary decision
- Mental competence

Coercion – the young perpetrator who abuses may use techniques like bribing, manipulation and emotional threats of secondary gains and losses that is loss of love, friendship, etc. Some may use physical force, brutality or the threat of these regardless of victim resistance.

APPENDIX E

Exploitation (including Child Sex Exploitation, Child Criminal Exploitation and County Lines)

The following list of indicators is not exhaustive or definitive, but it does highlight common signs which can assist professionals in identifying young person / vulnerable adults or young people who may be victims of sexual or criminal exploitation.

Signs include:

- going missing from home or education
- regular absence/truancy
- underage sexual activity
- inappropriate sexual or sexualised behaviour
- sexually risky behaviour, 'swapping' sex
- repeat sexually transmitted infections
- in girls, repeat pregnancy, abortions, miscarriage
- receiving unexplained gifts or gifts from unknown sources
- having multiple mobile phones and worrying about losing contact via mobile
- online safety concerns such as youth produced sexual imagery or being coerced into sharing explicit images.
- having unaffordable new things (clothes, mobile) or expensive habits (alcohol, drugs)
- changes in the way they dress
- going to hotels or other unusual locations to meet friends
- seen at known places of concern
- moving around the country, appearing in new towns or cities, not knowing where they are getting in/out of different cars driven by unknown adults
- having older boyfriends or girlfriends
- contact with known perpetrators
- involved in abusive relationships, intimidated and fearful of certain people or situations
- hanging out with groups of older people, or anti-social groups, or with other vulnerable peers
- associating with other young people involved in sexual exploitation
- recruiting other young people to exploitative situations
- truancy, exclusion, disengagement with education and training, opting out of education altogether
- unexplained changes in behaviour or personality (chaotic, aggressive, sexual)
- mood swings, volatile behaviour, emotional distress
- self-harming, suicidal thoughts, suicide attempts, overdosing, eating disorders

- drug or alcohol misuse
- getting involved in crime
- police involvement, police records
- involved in gangs, gang fights, gang membership
- injuries from physical assault, physical restraint, sexual assault.

Child Criminal Exploitation can include young person / vulnerable adults being forced or manipulated into transporting drugs or money through county lines, working in cannabis factories, shoplifting or pickpocketing. They can also be forced or manipulated into committing vehicle crime or threatening/committing serious violence to others

County lines is a term used to describe gangs and organised criminal networks involved in the exporting of 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 young person / vulnerable adults and vulnerable adults being exploited to move (and store) drugs and money. The same grooming models used to coerce, intimidate and abuse individuals for sexual and criminal exploitation are also used for grooming vulnerable individuals for county lines.

CSE is a form of young person / vulnerable adult sexual abuse. Sexual abuse may involve physical contact, including assault by penetration (for example, rape or oral sex) or nonpenetrative acts such as masturbation, kissing, rubbing, and touching outside clothing. It may include non-contact activities, such as involving young person / vulnerable adults in the production of sexual images, forcing young person / vulnerable adults to look at sexual images or watch sexual activities, encouraging young person / vulnerable adults to behave in sexually inappropriate ways or grooming a young person / vulnerable adult in preparation for abuse including via the internet.

For further information on signs of a young person / vulnerable adult's involvement in sexual exploitation: [Child sexual exploitation: guide for practitioners](#)

For further information on County Lines: [Criminal exploitation of young person / vulnerable adults and vulnerable adults: county lines guidance](#)

APPENDIX F

Female Genital Mutilation (FGM)

It is essential that staff are aware of FGM practices and the need to look for signs, symptoms and other indicators of FGM. If a member of staff, in the course of their work, discovers that an act of FGM appears to have been carried out, the member of staff must report this to the Police.

Female Genital Mutilation (FGM) is illegal in England and Wales under the FGM Act 2003 (“the 2003 Act”). It is a form of young person / vulnerable adult abuse and violence against women. FGM comprises all procedures involving partial or total removal of the external female genitalia for non-medical reasons.

Section 5B of the 2003 Act¹ introduces a mandatory reporting duty which requires regulated health and social care professionals and teachers in England and Wales to report ‘known’ cases of FGM in under 18s which they identify in the course of their professional work to the police. The duty came into force on 31 October 2015.

What is FGM?

It involves procedures that intentionally alter/injure the female genital organs for non-medical reasons.

4 types of procedure:

Type 1 Clitoridectomy – partial/total removal of clitoris

Type 2 Excision – partial/total removal of clitoris and labia minora

Type 3 Infibulation entrance to vagina is narrowed by repositioning the inner/outer labia

Type 4 all other procedures that may include: pricking, piercing, incising, cauterising and scraping the genital area.

Why is it carried out?

Belief that:

- FGM brings status/respect to the girl – social acceptance for marriage
- Preserves a girl’s virginity
- Part of being a woman / rite of passage
- Upholds family honour
- Cleanses and purifies the girl
- Gives a sense of belonging to the community
- Fulfils a religious requirement
- Perpetuates a custom/tradition
- Helps girls be clean / hygienic
- Is cosmetically desirable
- Mistakenly believed to make young person / vulnerable adult birth easier

Is FGM legal?

FGM is internationally recognised as a violation of human rights of girls and women. It is illegal in most countries including the UK.

Circumstances and occurrences that may point to FGM happening are:

- Child talking about getting ready for a special ceremony
- Family taking a long trip abroad
- Child's family being from one of the 'at risk' communities for FGM (Kenya, Somalia, Sudan, Sierra Leon, Egypt, Nigeria, Eritrea as well as non-African communities including Yemeni, Afghani, Kurdistan, Indonesia and Pakistan)
- Knowledge that the young person / vulnerable adult's sibling has undergone FGM
- Child talks about going abroad to be 'cut' or to prepare for marriage

Signs that may indicate a young person / vulnerable adult has undergone FGM:

- Prolonged absence from education and other activities
- Behaviour changes on return from a holiday abroad, such as being withdrawn and appearing subdued
- Bladder or menstrual problems
- Finding it difficult to sit still and looking uncomfortable
- Complaining about pain between the legs
- Mentioning something somebody did to them that they are not allowed to talk about
- Secretive behaviour, including isolating themselves from the group
- Reluctance to take part in physical activity
- Repeated urinal tract infection
- Disclosure

APPENDIX G

INDICATORS OF VULNERABILITY TO RADICALISATION

1. Radicalisation refers to the process by which a person comes to support terrorism and forms of extremism leading to terrorism.
2. Extremism is defined by the Government in the 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 different faiths and beliefs. We also include in our definition of extremism calls for the death of members of our armed forces, whether in this country or overseas.
3. Extremism is defined by the Crown Prosecution Service as:
The demonstration of unacceptable behaviour by using any means or medium to express views which:
 - Encourage, justify or glorify terrorist violence in furtherance of particular beliefs
 - Seek to provoke others to terrorist acts
 - Encourage other serious criminal activity or seek to provoke others to serious criminal acts; or
 - Foster hatred which might lead to inter-community violence in the UK.

There is no such thing as a “typical extremist”: those who become involved in extremist actions come from a range of backgrounds and experiences, and most individuals, even those who hold radical views, do not become involved in violent extremist activity.

Individuals may become susceptible to radicalisation through a range of social, personal and environmental factors - it is known that violent extremists exploit vulnerabilities in individuals to drive a wedge between them and their families and communities. It is vital that staff are able to recognise those vulnerabilities.

Indicators of vulnerability include:

- Identity Crisis – the young person / vulnerable adult is distanced from their cultural / religious heritage and experiences discomfort about their place in society
- Personal Crisis – the young person / vulnerable adult may be experiencing family tensions; a sense of isolation; and low self-esteem; they may have dissociated from their existing friendship group and become involved with a new and different group of friends; they may be searching for answers to questions about identity, faith and belonging
- Personal Circumstances – migration; local community tensions; and events affecting the young person / vulnerable adult’s country or region of origin may contribute to a sense of grievance that is triggered by personal experience of racism or discrimination or aspects of Government policy
- Unmet Aspirations – the young person / vulnerable adult may have perceptions of injustice; a feeling of failure; rejection of civic life
- Experiences of Criminality – which may include involvement with criminal groups, imprisonment, and poor resettlement / reintegration

- Special Educational Need – young person / vulnerable adult may experience difficulties with social interaction, empathy with others, understanding the consequences of their actions and awareness of the motivations of others.

However, this list is not exhaustive, nor does it mean that all young people experiencing the above are at risk of radicalisation for the purposes of violent extremism.

More critical risk factors could include:

- Being in contact with extremist recruiters
- Accessing violent extremist websites, especially those with a social networking element
- Possessing or accessing violent extremist literature
- Using extremist narratives and a global ideology to explain personal disadvantage
- Justifying the use of violence to solve societal issues
- Joining or seeking to join extremist organisations; and
- Significant changes to appearance and / or behaviour
- Experiencing a high level of social isolation resulting in issues of identity crisis and / or personal crisis.

The Prevent duty ensures providers have 'due regard' to the need to prevent people from being drawn into terrorism.

Channel is the voluntary, confidential support programme which focuses on providing support at an early stage to individuals that have been identified as being vulnerable to radicalisation. Prevent referrals may be passed to the multi-agency Channel panel to determine whether individuals require support.

[The Prevent Duty can be accessed via this link.](#)

[The Prevent Duty, for Further Education Institutions](#)

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

Further information can be obtained from the Home Office website.

APPENDIX H

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.

ADDITIONAL RESOURCES

Further advice on young person / vulnerable adult protection is available from:

NSPCC: <http://www.nspcc.org.uk/>

Childline: <https://www.childline.org.uk/>

Anti-Bullying Alliance: <http://anti-bullyingalliance.org.uk/>

Beat Bullying: <http://www.beatbullying.org/>

Childnet International –making the internet a great and safe place for young person / vulnerable adults. Includes resources for professionals and parents <https://www.childnet.com/>

Thinkuknow (includes resources for professionals and parents) <https://www.thinkuknow.co.uk/>

Safer Internet Centre <http://www.saferinternet.org.uk/>

Transgender <http://www.mermaidsuk.org.uk/>

APPENDIX I

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:							