

## SAFEGUARDING PROCEDURE 2020

This procedure should be read in conjunction with the Safeguarding Policy and the Equality, Diversity and Inclusion Policy. This provides guidance of what is included when we use the term “safeguarding”.

### 1. Guiding principles

- 1.1. Staff should be guided by the following principles:
  - 1.1.1. children and vulnerable adults have a right to be safe and should be protected from all forms of abuse and neglect;
  - 1.1.2. safeguarding is everyone’s responsibility;
  - 1.1.3. it is better to help children and vulnerable people as early as possible, before issues escalate and become more damaging; and
  - 1.1.4. children and families are best supported and protected when there is a co-ordinated response from all relevant agencies
  - 1.1.5. staff should maintain an attitude of “it could happen here”

### 2. Roles

- 2.1. The Designated Safeguarding Lead and Prevent Lead (DSL) and deputy will manage the referral process for any concerns raised. Details are:
  - **Beverley Ellis – 07749 270840 (Designated Safeguarding Lead and Prevent Lead)**
  - **Sue Lloyd – 07841 444537 (Deputy Designated Safeguarding Lead)**
- 2.2. The procedure applies to all personnel working in and on behalf of TRS Training Limited (including volunteers, contracted employees and sub-contracted provision and off-site delivery partners).
- 2.3. Staff should make sure that they are alert to the signs of abuse and neglect, that they question the behaviour of children, vulnerable adults and parents/carers and don’t necessarily take what they are told at face value. However, they are not responsible for diagnosing, investigating or providing a therapeutic response to abuse.
- 2.4. Staff should make sure they know where to turn to if they need to ask for help, and that they refer to children’s social care or to the police via the Designated Safeguarding Lead, if you suspect that a child is at risk of harm or is immediate danger.
- 2.5. Staff should not let other considerations, like the fear of damaging relationships with adults, get in the way of protecting children and vulnerable adults from abuse and neglect. If staff think that referral to children’s social care or other support agencies is necessary, they should view it as the beginning of a process of inquiry, not as an accusation.
- 2.6. All staff should complete mandatory training as directed by the DSL.
- 2.7. TRS Training Ltd hold Safeguarding Policies and details of designated persons for all subcontractors at Head Office.
- 2.8. ESFA should be contacted for any referrals that are made that relate to government funded learners.

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### 3. Protecting Learners in the Workplace

- 3.1. All learners are given a workplace and TRS Training Ltd induction on commencement of their programme, which includes raising awareness of our commitment towards Safeguarding, equality, diversity and inclusion and details of the support services offered and contact details for the DSL.
- 3.2. The understanding of all aspects of Safeguarding and safe working practices is checked at each review and the opportunity to discuss any issues is given.
- 3.3. Health and Safety checks of employer's premises and health and safety management arrangements are completed, including insurance details before commencement of the programme. These are checked throughout learning on a risk rated basis
- 3.4. Two sets of emergency contact details are kept for learners who are under 18 years of age and an additional review section is completed at week 4.
- 3.5. Employers are made aware of relevant TRS policies
- 3.6. Safer recruitment practices are consistently used when recruiting TRS staff. The requirements for DBS checks are assessed and the relevant processes undertaken where required
- 3.7. Employers are offered free training sessions on safeguarding, the Prevent Duty and mentoring.

### 4. Concerns

- 4.1. Any concern that relates to a learner, employer, member of staff or associate should be reported to the DSL regardless of whether the referrer believes it is a safeguarding issue. This will ensure that degrees of perception or concern do not interfere the referral process.
- 4.2. Referrals should be made to the DSL within 24 hours of a concern occurring using the referral forms at the end of this document.

### 5. Responding to a disclosure or suspicion of abuse

- 5.1. The process is outlined in Appendix A.
- 5.2. If a member of staff is made aware that a child or vulnerable adult is being abused and neglected, they should listen to them, take their allegation seriously, and reassure them that you will take action to keep them safe.
- 5.3. Any member of staff who has knowledge of, or a suspicion that, a child / vulnerable adult is or has been suffering significant harm must refer their concern to the DSL as soon as possible **but within 24 hours at the latest**. They must also pass any written notes to the DSL and not retain any written information. All allegations or suspicions must be taken seriously. The learner must be advised that this information cannot be kept confidential and will be passed on to the DSL in the first instance.
- 5.4. The member of staff who receives the allegation or disclosure of abuse should make an immediate written record of the conversation, including the following information:
  - o date and time of report

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- staff name and name of referrer
- name and DOB of child/vulnerable adult alleged to have been abused
- nature of alleged abuse
- description of any injuries observed, if any
- any other information given, including siblings if relevant (their full names and DOB if possible)
- confirmation that the learner has been advised of the next steps
- It is also important to make a record of conversations with the vulnerable person using the same language the vulnerable person used, especially when referring to any body parts of sexual acts
- The referral form at the end of this document can be used to record the information

5.5. Questions should be kept to the minimum required for clarity, and leading questions must be avoided.

5.6. Staff should explain to the child or vulnerable adult what action that they are taking. It is important to maintain confidentiality, but they should not promise that you won't tell anyone, as you may need to do so in order to protect the person.

5.7. If abuse is suspected but not disclosed, it may be appropriate to remind the learner about the availability of the external support services (see referral list in Useful Information Sections).

5.8. Disclosures of female genital mutilation must be reported to the police

5.9. The DSL should advise the referrer of the action taken. If the referrer does not believe that the response is adequate or requires further intervention, they have the right to report this to the Senior Management Team or contact the specialist referral agencies themselves.

## 6. Responding to a concern about radicalisation or extremism

6.1. Any member of staff who has knowledge of or a suspicion that, a child / vulnerable adult is or has been suffering significant harm or concern that someone may be on the route to radicalisation or might be at risk of extremism must refer their concern to a DSL as soon as possible but within 24 hours at the latest.

6.2. They must also pass any written notes to the DSLs and not retain any written information.

6.3. All allegations or suspicions must be taken seriously.

6.4. The learner must be advised that this information cannot be kept confidential and will be passed on to the designated member of staff, in the first instance.

6.5. The person who receives the allegation or disclosure of abuse should make an immediate written record of the conversation, including the following information:

- date and time of report
- your name and name of referrer
- name and DOB of person at risk/vulnerable person alleged to be at risk of extremism or radicalisation.
- nature of alleged concern or disclosure
- any other information given, including siblings if relevant (their full names and DOB if possible)
- confirmation that the learner has been advised of the next steps

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- It is also important to make a record of conversations with the vulnerable person using the same language the vulnerable person used.
- 6.6. Questions should be kept to the minimum required for clarity, and leading questions must be avoided. If uncertain about any situation, advice (which should be documented) should be sought from relevant organisations, for example from Police, Counter Terrorism Unit, DfE Prevent Co-ordinator, etc.
- 6.7. If the DSL cannot be contacted within two hours of the initial concern arising, the member of staff making the report should contact the local prevent team and notify the DSL as soon as possible about the action taken.
- 6.8. If a learner is in immediate danger or at risk of serious harm, for example in a life threatening situation, call the emergency services by dialling 999 and immediately inform a member of the senior management team.
- 6.9. A flowchart describing the referral process is attached at Appendix B.
- 6.10. The DSL should advise the referrer of the action taken. If the referrer does not believe that the response is adequate or requires further intervention, they have the right to report this to the Senior Management Team or contact the specialist referral agencies themselves.

## 7. Confidentiality

### 7.1. The Basic Principles

- 7.1.1. As a fundamental principle, staff will offer a confidential service to learners, with information only being disclosed with the learner's consent or where there are legal requirements to do so.
- 7.1.2. The boundary of confidentiality for each staff member is that information is only passed to somebody who is authorised to receive it from someone who is authorised to disclose it. Regarding disclosure or sharing information, the main principle to be observed is that any disclosure should be kept to a minimum and on a need to know basis (the minimum necessary is the maximum permissible).

### 7.2. Limits to Confidentiality

- 7.2.1. Young people, including those aged under 16, generally have the same right to confidentiality as do adults. However, staff cannot offer or guarantee absolute confidentiality to any learners in the following circumstances:
- where safeguarding issues are involved;
  - where there is significant threat to life (the learner's own life or someone else's);
  - where a person needs urgent medical treatment; and or
  - where potential or actual serious criminal offences are involved
- 7.2.2. Limits to confidentiality will be made clear to learners at the earliest opportunity. Where confidentiality has to be broken, the staff member should seek to ensure that the learner is informed first or as soon as possible afterwards.

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## 8. TRS Training Ltd Staff

### 8.1. Safe Recruitment of Staff

8.1.1. TRS Training Ltd has a Safer Recruitment Policy which follows good practice guidelines (please see Safer Recruitment Policy). A policy has been approved by senior management that sets out guidelines for DBS requirements. Where a DBS disclosure is not available prior to commencement of employment by TRS Training Ltd, in exceptional circumstances, the directors can agree a start and a risk assessment of the individual will be completed.

8.1.2. Safe working practices require regular checks on driving licences, DBS, emergency contacts and the updating of knowledge through mandatory training.

### 8.2. Allegations Against Staff

8.2.1. Allegations against a trainer who is no longer teaching should be referred to the police.

8.2.2. TRS Training Ltd has a Staff Handbook which sets out clearly its expectations in terms of staff behaviour and provides staff with information on keeping themselves safe. Nevertheless, allegations against staff may occur.

8.2.3. It is a criminal offence for a person over the age of 18, in a position of trust, to enter into a sexual relationship with any learner under 18 years old, even if the relationship is consensual.

8.2.4. If allegations are made against a member of staff, the DSL must be informed immediately and relevant disciplinary procedures may be invoked. TRS Training Ltd must also advise the local authority partner who may undertake a suitability assessment. If the allegation concerns the DSL a member of the senior management team will be appointed to investigate.

8.2.5. If a learner makes a malicious allegation about a member of staff (or others) this may be dealt with under TRS Training Ltd's Disciplinary Procedure.

8.2.6. If an allegation about a member of staff is upheld, the DSL must report this to the DBS service.

### 8.3. Support for Staff

8.3.1. This policy document is available on TRS Training Ltd website, T Drive and OneFile.

8.3.2. Where a member of staff finds a disclosure particularly distressing, they may wish to access counselling services, this can be organised and funded by contacting the Training Director at Head Office.

8.3.3. The DSL has an open door policy for any staff who wish to discuss their concerns, staff will need to be mindful that the DSL cannot as give absolute confidentiality to any disclosures that staff make.

## 9. Malicious or unsubstantiated allegations

9.1. Where it is subsequently found that an allegation was made with malice aforethought, the Senior Management Team will determine an appropriate course of action. This may include disciplinary action against the accuser, acceptance of a written apology (subject to agreement about future behaviour) or other such sanctions as are deemed appropriate.

9.2. Despite the distress caused, vulnerable adults who make false allegations may still be entitled to continue to receive full access to their learning programme.

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9.3. Where remaining in the same organisation as the falsely accused member of staff would be prejudicial either to that member of staff or the vulnerable adult, consideration should be given to moving the member of staff to a different site or allocating the vulnerable adult another trainer, where there is capacity to do so.

9.4. Permanent exclusion should be considered only as a last resort

## 10. Written Records

10.1. The DSL shall retain a copy of any notes, memoranda, reports or correspondence relating to the matter securely and for a period of 7 years.

10.2. Where there has been an allegation about a member of staff that are found to have been malicious should be removed from personnel records. However, for all other allegations, it is important that a clear and comprehensive summary of the allegation, details of how the allegation was followed up and resolved, and a note of any action taken and decisions reached, is kept on the confidential personnel file of the accused, and a copy provided to the person concerned.

10.3. The purpose of the record is to enable accurate information to be given in response to any future request for a reference, where appropriate. It will provide clarification in cases where future DBS checks reveal information from the police about an allegation that did not result in a criminal conviction and it will help to prevent unnecessary re-investigation if, as sometimes happens, an allegation re-surfaces after a period of time. The record should be retained at least until the accused has reached normal pension age or for a period of 10 years from the date of the allegation if that is longer.

10.4. Cases in which an allegation was proven to be false, unsubstantiated or malicious should not be included in employer references. A history of repeated concerns or allegations which have all been found to be false, unsubstantiated or malicious should also not be included in any reference.

## 11. Making a Referral

11.1. The DSL has the responsibility of informing the relevant social services department of concerns over the abuse or neglect of vulnerable adults. Detailed referral arrangements may differ between localities and, therefore, the Regional Safeguarding Network should be consulted.

11.2. In cases relating to suspected radicalisation or involvement in terrorism, the DSL will implement the guidance from the Government and escalate our concerns to the local authority Prevent co-ordinator and the police Channel coordinator. They will identify the type of support required and refer to a Multi-Agency Channel Panel (see Appendix B).

11.3. Multi-Agency Channel Panel is made up of external agencies based around the persons vulnerabilities (health, employment, housing, education, etc.) – who will arrange for tailored support approved through the Channel intervention to be implemented

11.4. The DSL will work within the following timescales for reporting allegations or suspicions of abuse:

- Immediately if the vulnerable person is at risk of serious physical harm, or a serious criminal act has taken place, and evidence will need to be kept safe.

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- Within 2 hours of disclosure of FGM following the safeguarding procedure.
- Within 24 Hours if it relates to a specific incident which is, or may be still going on, or may happen again.
- Within 7 Days if it is a more general concern, which does not indicate immediate harm or danger to others.

11.5. Anyone can make a referral directly to social services if they feel that their referral is not being dealt with effectively by their DSL.

## 12. Whistleblowing

12.1. If a member of staff feels that their concerns are not being dealt with effectively or they have concerns about the failure of internal practices, they should refer to the Whistleblowing Policy.

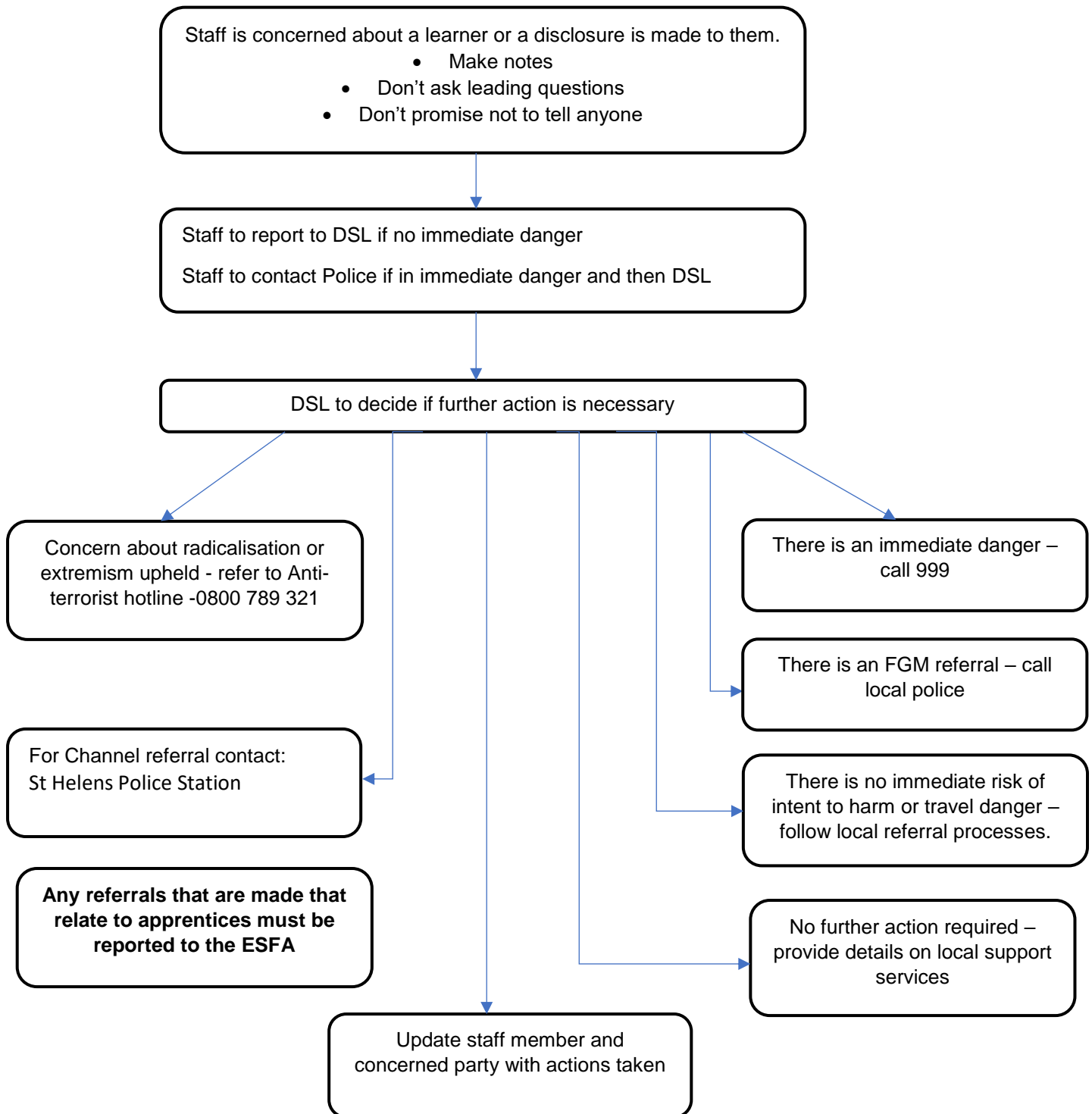
Further details about referrals, support, advice and whistleblowing can be found in Keeping Children Safe in Education 2019 Part 1 -

[https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\\_data/file/836144/Keeping\\_children\\_safe\\_in\\_education\\_part\\_1\\_2019.pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/836144/Keeping_children_safe_in_education_part_1_2019.pdf)

This procedure will be reviewed annually.

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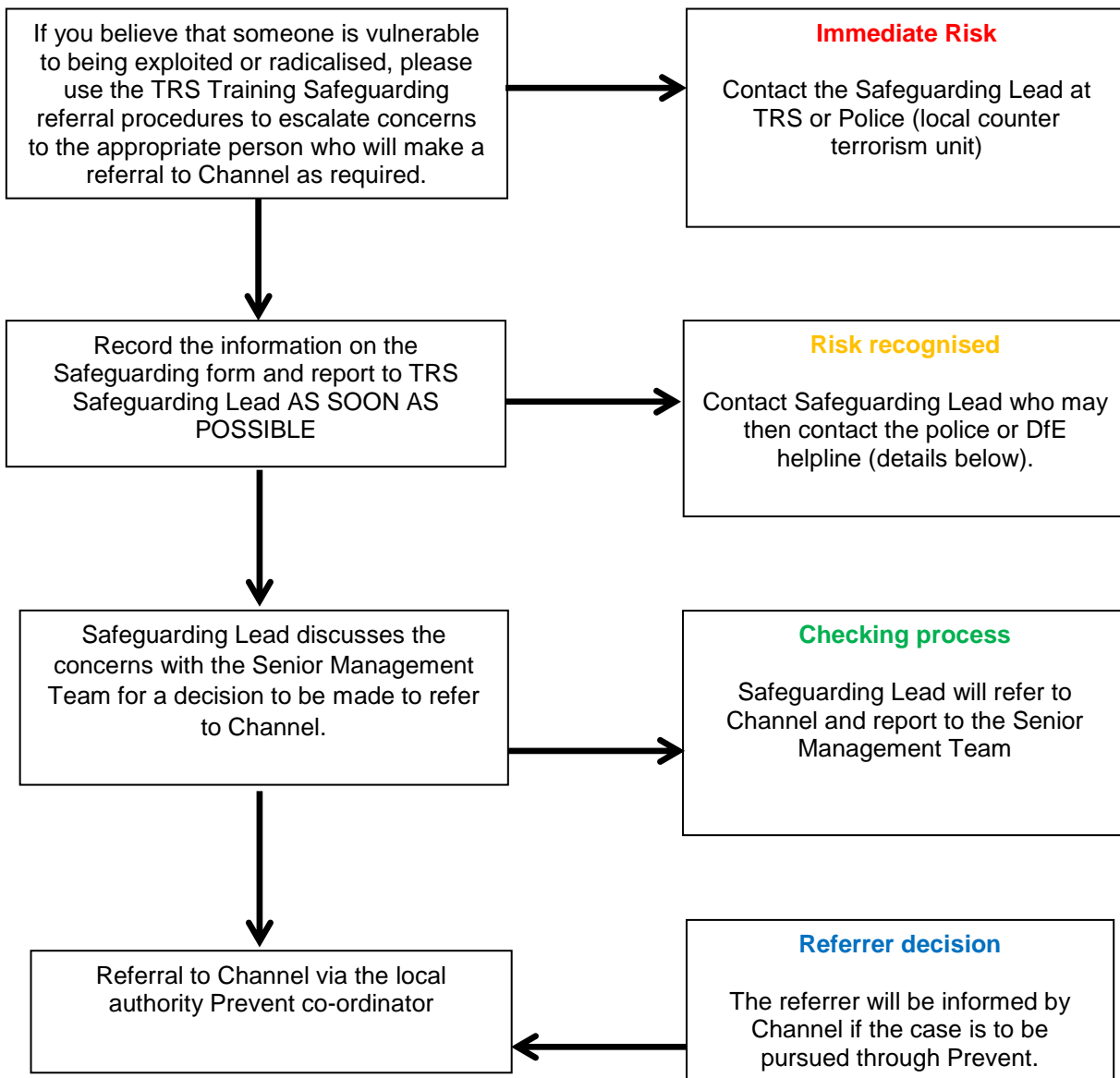
## APPENDIX A – REFERRAL FLOWCHART



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## APPENDIX B: TRS Training - referral to Channel process



ANYONE can make a referral to Channel.

Channel is an early intervention process – who will gather information as to determine whether there is a specific risk of radicalisation and whether the threat is malicious.

The local authority Prevent co-ordinator and the police Channel co-ordinator will identify the type of support required and refer to a Multi-Agency Channel Panel.

A Multi-Agency Channel Panel is made up of external agencies based around the persons vulnerabilities (health, employment, housing, education, etc) – who will arrange for tailored support approved through the Channel intervention to be implemented.

The Department for Education has launched a helpline for anyone concerned about a **child who may be at risk of extremism**, or about extremism within an organisation working with children and young people. Email: [counter.extremism@education.gsi.gov.uk](mailto:counter.extremism@education.gsi.gov.uk). Telephone: 020 7340 7264.

**Merseyside Police can be contacted by Email on [prevent@merseyside.police.uk](mailto:prevent@merseyside.police.uk) or telephone on 0151 7778311 or use the anti-terrorist help line number – 0800789321.**

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## Appendices

### Concerns Form



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### Safeguarding Reporting Form



Safeguarding%20Referral%20Form%20i

### Regional Safeguarding Network



Regional%20Safeguarding%20Network

### Prevent Referral Form



Prevent-Safeguarding-Referral-Form\_Di

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## USEFUL RESOURCES AND EXTERNAL ORGANISATIONS

### Resources

- When to suspect child maltreatment (National Institute for Health and Care Excellence, 2009)
- Working Together to Safeguard Children (2015)
- Keeping Children Safe in Education (2019)
- Information Sharing – Advice for practitioners providing safeguarding services to vulnerable children, young people, parents and carers (2015)
- Multi-Agency Practice Guidelines: Female Genital Mutilation (2014)
- Statutory framework for the early years foundation stage (2014)
- [https://www.gov.uk/government/uploads/system/uploads/attachment\\_data/file/609874/6\\_2939\\_SP\\_NCA\\_Sexting\\_In\\_Schools\\_FINAL\\_Update\\_Jan17.pdf](https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/609874/6_2939_SP_NCA_Sexting_In_Schools_FINAL_Update_Jan17.pdf)

### Modern Slavery

- To call free from landlines and mobiles: Modern Slavery Helpline 0800 0121 700
- For advice and information on any trafficking matter: Call UK Human Trafficking Centre 0844 7782406
- For victim reporting: Police Trafficking Helpline 0800 783 2589 or local Police 101
- For anonymous reporting: Call Crimestoppers 0800 555 111

To find out more about reporting online:

- [www.modernslaverypartnership.org.uk](http://www.modernslaverypartnership.org.uk)
- The Homeless Link Guidance on Trafficking and Forced Labour
- Human Trafficking Foundation Survivor Care Standards.
- <http://www.nationalcrimeagency.gov.uk/about-us/what-we-do/specialist-capabilities/uk-human-trafficking-centre/national-referral-mechanism>
- <https://www.gov.uk/government/publications/human-trafficking-victims-referral-and-assessment-forms>
- <http://medaille-trust.org.uk/>
- <http://www.salvationarmy.org.uk/human-trafficking>
- [www.stophetraffik.co.uk](http://www.stophetraffik.co.uk)

### General support services

- NSPCC – 0808 800 5000
- Childline – 0800 111

### Counselling services

- Salvation Army 0300 303 8151 (24/7 helpline)
- CALM – 0800 585858
- Relate – 0300 100 1234

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## Domestic Abuse

- National Domestic Violence Helpline – 0800 2000 247
- Victim Support – 0808 16 89 111

## Financial hardship

- Turn2Us - <https://www.turn2us.org.uk/>
- Money Advice Service – 0800 138 7777

## Esafety

- Keeping children free from radicalisation - <https://www.internetmatters.org/issues/radicalisation/>
- CEOP - <https://www.ceop.police.uk/safety-centre/>

## Health and wellbeing

Acas - <http://www.acas.org.uk/index.aspx?articleid=1361>

The Family Doctor - <https://familydoctor.org/nutrition-tips-for-improving-your-health/>

## Honour based violence and Forced Marriage

- Halo Project – 01642 683 045
- True Honour - 07480 621711
- Freedom Charity - 0845 607 0133

## FGM

- What is FGM - <http://www.desertflowerfoundation.org/en/what-is-fgm.html>
- NHS Supporting Girls - [https://www.gov.uk/government/uploads/system/uploads/attachment\\_data/file/472694/FGM\\_leaflet.pdf](https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/472694/FGM_leaflet.pdf)

## Radicalisation and Terrorism

- The Home Office Prevent Strategy - <https://www.elearning.prevent.homeoffice.gov.uk/>
- Reporting a concern - <https://www.gov.uk/report-terrorism>

## Legal aid

- Government - <https://www.gov.uk/legal-aid>
- Citizens advice bureau - <https://www.citizensadvice.org.uk/law-and-courts/legal-system/taking-legal-action/help-with-legal-costs-legal-aid/>

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