

Safeguarding Vulnerable Groups Policy



Mandatory User Notes

The requirements in this document are mandatory. A controlled copy of the current version of this document is located in Staff Essentials:

Doc No:	-Q-I-008	Rev No	20	Next Rev Date	22/06/23
Issue Date:	22/06/22	Rev Date:	22/06/22	Page	1 of 60

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Doc No:	-Q-I-008	Rev No	20	Next Rev Date	22/06/23
Issue Date:	22/06/22	Rev Date:	22/06/22	Page	2 of 60

Contents

1. Purpose	4
2. Scope	5
3. Relationship with other policies	5
4. Definitions	5-6
5. Policy principles	6
6. Guiding principles for working with vulnerable groups	7-8
7. Raising awareness of dangers	8-17
8. Disclosure of a concern	17-21
9. Preventing radicalization	21-25
10. Working in partnership with local authorities	25
11. Training	25
12. Record keeping and sharing information	26-27
13. Discussing concerns with vulnerable people, parents and carers	27-28
14. Investigation	28
15. Support for service users and staff	28
16. Safer recruitment practice	28-29
17. Conduct of workers	29
18. Allegations management	20-31
19. Limited confidentiality policy and procedure	31-35
20. Staff contact with service users	35-36

Annexe A - Safeguarding Vulnerable Groups Referral Process & Contact Details

Annexe B - External Speakers Process

Annexe C - Prospect Training Services IT Help Desk

Annexe D - Prevent and Channel Process

Annexe E - Useful Contact details

Annexe F – COVID-19 Response Plan

Annexe G – Learner Risk Assessment Process

Annexe H – PTS/NCLP Conviction Disclosure Process

Annexe I – PTS/NCLP MAPPA Process

Doc No:	-Q-I-008	Rev No	20	Next Rev Date	22/06/23
Issue Date:	22/06/22	Rev Date:	22/06/22	Page	3 of 60

1. Purpose

1.1 The purpose of this document is to set out in a clear manner the company policy on Safeguarding Vulnerable Groups.

At PTS/NCLP we take the welfare of our learners, customers, and staff very seriously. We are committed to safeguarding and promoting the wellbeing of young people and adults at risk, this is part of our ethos and is a commitment shared across our organisation. Our safeguarding policy and procedures are there to ensure we protect and support those at risk and enable them to work towards a better future. We have a duty to ensure that vulnerable people in our care are protected from significant harm or abuse. The purpose of this policy is to provide clear instructions to people working within the organisation on how to effectively deal with safeguarding concerns. This policy aims to raise awareness and provide clear guidance on protecting our young people and vulnerable adults from significant harm and all other forms of abuse including:

- Neglect
- Emotional Abuse
- Domestic Violence and Abuse
- Sexual Violence and Abuse
- Physical Abuse
- Harmful Sexualised Behaviour (including peer-on-peer abuse)
- Child Sexual Exploitation
- Radicalisation and Extremism
- Bullying (including cyber-bullying)
- Online Dangers
- Female Genital Mutilation
- Honour Based Violence
- Modern Slavery and Trafficking
- Criminal Exploitation
- Financial Abuse
- Discriminative Abuse (including race and homophobic)

(the above list is not exhaustive; we regularly review and update this list in line with local and national risks that arise)

We understand our responsibility to provide a safe and nurturing environment where the wellbeing of our young people, vulnerable adults and workers is at the heart of all we do. We aim to treat people with respect and dignity and provide an open-door policy where concerns can be raised and dealt with confidentially and with the knowledge that they will be addressed.

Doc No:	-Q-I-008	Rev No	20	Next Rev Date	22/06/23
Issue Date:	22/06/22	Rev Date:	22/06/22	Page	4 of 60

2. Scope

This document applies to all operations and employees of PTS/NCLP.

3. Relationship with other policies

This safeguarding vulnerable groups policy should be read in conjunction with other policies and procedures covering equal opportunities and diversity, bullying and harassment and including policies on chaperoning, lone working, business continuity and crisis response, disciplinary procedures, confidentiality, whistle blowing, professional boundaries, allegations management and recruitment of ex-offenders.

Line managers, human resources and occupational health must ensure that personal data, including information about safeguarding matters, is handled in accordance with the organisation's data protection policy / GDPR and child protection protocol.

4. Definitions

For the purpose of this document the term "The Company" refers to the Prospect Training Services (Gloucester) Ltd group of companies

For the purposes of this document the term "young people" or "young person" refers to anyone who is under the age of 18. We also refer to these as "our learners"

We also work with adults either as clients of our services or as members of family units. Some of these adults may from time to time also be subject to actions or behaviour by others either in the family or the community that can cause them harm of some kind. For the purpose of this document these individuals are defined as "vulnerable adults".

The term "vulnerable adult" should also be taken to mean a person over 18 whom: is a user of community care services by reason of mental or other disability, age or illness; and is unable to take care of themselves, or unable to protect themselves against significant harm or exploitation

For the purposes of this document the term "worker" applies to anyone engaged by the organisation to work, whether on a paid or voluntary basis.

For the purposes of this document the terms "vulnerable person", "vulnerable people", "vulnerable groups" and "vulnerable clients" should be taken to indicate children, young people and vulnerable adults unless otherwise listed.

For the purpose of this document the terms "parents" "guardians" and "carers" refer to those who have a caring responsibility for our "young people" or "vulnerable adults"

For the purposes of this document the term "local authority" should be taken to indicate either the Gloucestershire Adult Safeguarding Partnership, Police, Children and Young Person's Directorate, Gloucestershire Safeguarding Childrens Partnership or other organisation dealing with safeguarding vulnerable groups and will be dependent on the age and circumstances of the vulnerable person/people in question.

Doc No:	-Q-I-008	Rev No	20	Next Rev Date	22/06/23
Issue Date:	22/06/22	Rev Date:	22/06/22	Page	5 of 60

For the purpose of this document the term “designated safeguarding lead (DSL)” refers to the nominated person who has overarching responsibility for all safeguarding concerns, this is the “safeguarding manager”

For the purpose of this document the term “safeguarding representative (Rep)” refers to those staff who hold safeguarding responsibility within their centre and act as “deputy designated safeguarding leads (DDSL)”

5. Policy Principles

All vulnerable people have a right to protection from abuse of all types and to expect that adults in positions of responsibility will do everything in their power to foster these rights.

All allegations of abuse will be taken seriously and understood from the viewpoint of the victim.

Our guiding principles follow the Trauma Based Approach, through our work we seek to empower vulnerable groups by valuing their opinions, ensuring that they are aware of the choices that they can make in any given situation, and by responding to their rights to be involved in decisions about their future. This principle will always be exercised within a framework of protecting a vulnerable person from harm.

Because of the nature of our work, it is important to involve parents/guardians/carers where possible at every stage in safeguarding vulnerable group work. However, it must be borne in mind that it is welfare of the vulnerable person that is paramount. Where the vulnerable person is our primary client, it is important that there is trust between them and The Company, however it must be clear that the interests of the vulnerable person must take precedence if there are any protection issues. Where the vulnerable person is the primary client, their interests must be considered separately from the interests of the parents/guardians/carers. The desire to work alongside the parents/guardians/carers must never be allowed to impede the vulnerable person’s protection process.

The Company will work alongside the local authority and other professionals, on a multidisciplinary basis to promote good practice and meet the objective of effectively protecting vulnerable groups.

The Company will work in partnership with Action for ACEs Gloucestershire to promote the understanding of ACEs (Adverse Childhood Experiences) and how this can impact heavily on their learners’ and client’s ability to achieve and enjoy positive mental health and well-being

In all our work The Company will take into consideration the sensitive issues that may arise when working with people of differing race, religion, language, culture, gender, physical and mental abilities.

All workers should remember that duties to protect vulnerable groups apply to all children, young people, and vulnerable adults, not just those with whom we have a direct relationship. This should be remembered when supporting our service users. We may become aware of protection issues for vulnerable people we have never met, e.g., a service user’s younger or older sibling, parent, or grand parent

Doc No:	-Q-I-008	Rev No	20	Next Rev Date	22/06/23
Issue Date:	22/06/22	Rev Date:	22/06/22	Page	6 of 60

6. Guiding Principles for Working with Vulnerable Groups

6.1 Guidance and legislation informing the policies and procedures

Our policies and procedures are set in line with the following:

- Working Together to Safeguard Children Statutory Guidance 2018
- Keeping Children Safe in Education (KCSIE) Statutory Guidance for Schools and Colleges 2022 (all workers who work directly with our youth provision are required to read and understand Part 1 of this guidance upon commencement of their employment)
- Prevent Duty Guidance 2015
- Safeguarding Vulnerable Groups Act 2018
- Equality Act 2010
- Human Rights Act 1998
- Gloucestershire Safeguarding Childrens Partnership Guidance
- Southwest Child Protection Procedures
- Gloucestershire Safeguarding Adult Partnership in working with vulnerable people

6.2 The Company's aim is to:

- Promote their general welfare; and their right to enjoy positive mental health and well-being
- Recognise their rights as individuals and treat them with dignity and respect.
- Provide a safe and welcoming learning environment where they can enjoy trusting relationships with our staff and their peers
- Consistently apply fair and objective methods of selecting workers.
- Plan activities involving children, young people, and vulnerable adults with care to minimise risks to their health and safety.
- Raise awareness of the dangers to which children, young people and vulnerable adults may be susceptible.
- Develop appropriate procedures for responding to accidents, incidents and alleged or suspected harm. Code of Conduct Some actions, no matter how well intentioned, may be misinterpreted and leave all parties vulnerable.

6.3 The following is a quick reference guide to appropriate behaviour when working with vulnerable people. All workers should:

- Remember they are a role model and provide an example for those they work with to follow
- Bear in mind that some actions, no matter how well-intentioned, may be easily misinterpreted and so leave all parties vulnerable.
- Be alert to any potential harm or inappropriate behaviour by vulnerable people
- Ensure they have adequate training if supervising sports or games (e.g., football)
- Respect individuals' rights to privacy
- Provide a safe space for vulnerable people to discuss any concerns they may have
- Speak to the designated safeguarding lead (DSL) if they have concerns about an individual's safety

Doc No:	-Q-I-008	Rev No	20	Next Rev Date	22/06/23
Issue Date:	22/06/22	Rev Date:	22/06/22	Page	7 of 60

6.4 Workers should not:

- Be left alone for substantial periods of time with vulnerable people. Where one-to-one work is necessary, they should inform another worker where they are going, with whom and for how long
- Permit abusive behaviour by others or engage in it themselves (e.g., ridiculing and bullying)
- Show favouritism to or become too closely associated with an individual. Nor should they get drawn into inappropriate attention-seeking behaviour (e.g., crushes)
- Allow or engage in suggestive remarks, gestures or touching of any kind, which could be misunderstood
- Jump to conclusions about others without checking facts
- Hesitate to share concerns on any of these matters with the designated safeguarding lead (DSL)

7. Raising Awareness of Dangers

Guiding principle: raise awareness of the dangers to which vulnerable people are susceptible.

7.1 Significant Harm - Types

Significant harm is generally described under the following headings and is usually referred to in the context of children and young people. For the purposes of this policy the following definitions are also applicable to abuse of vulnerable adults:

7.2 Neglect

Neglect can be defined as a situation in which the vulnerable person suffers significant harm or impairment of development by being deprived of food, clothing, warmth, hygiene, intellectual stimulation, supervision and safety, attachment to and affection from others and medical care. The threshold of significant harm is reached when the person's needs are neglected to the extent that their well-being and/or development are severely affected. We refer to the Gloucestershire Neglect Toolkit to support our referrals in this area [Neglect Toolkit - Gloucestershire Safeguarding Children Partnership](#)

7.3 Emotional Abuse

Emotional abuse occurs when a vulnerable person's need for affection, approval, consistency, and security are not met. Examples of emotional abuse include:

- The imposition of negative attributes on a vulnerable person, expressed by persistent criticism, sarcasm, hostility or blaming.
- Emotional unavailability by the vulnerable persons parent/carer.
- Unrealistic and/or inappropriate expectations of the vulnerable person.
- Failure to show interest in or provide age-appropriate opportunities for the vulnerable persons cognitive and emotional development.
- Unreasonable or over harsh disciplinary measures.
- Exposure to domestic violence
- Exposure to coercive control where one person who is personally connected to another, repeatedly behaves in a way which makes them feel *controlled*, dependent, isolated, or scared.

Doc No:	-Q-I-008	Rev No	20	Next Rev Date	22/06/23
Issue Date:	22/06/22	Rev Date:	22/06/22	Page	8 of 60

7.4 Domestic Violence and Abuse

Domestic violence and abuse are defined as an incident or pattern of incidents of controlling, coercive, threatening, degrading and violent behaviour, including sexual violence, in the majority of cases by a partner or ex-partner, but also by a family member or carer. It is very common.

Domestic abuse can include, but is not limited to, the following:

- Coercive control (a pattern of intimidation, degradation, isolation and control with the use or threat of physical or sexual violence)
- Psychological and/or emotional abuse https://www.womensaid.org.uk/information-support/what-is-domestic-abuse/-_edn1
- Physical abuse
- Sexual abuse
- Financial abuse
- Harassment
- Stalking
- Online or digital abuse

7.5 Sexual Violence and Abuse

- Sexual abuse occurs when a vulnerable person is used by another person for his or her gratification or sexual arousal or for that of others. Examples of sexual abuse include:
 - Exposure of the sexual organs or any sexual act intentionally performed in the presence of a vulnerable person
 - Intentional touching or molesting of the body of a vulnerable person whether by a person or object for the purpose of sexual arousal or gratification
 - Sexual intercourse with a child under 16 years old
 - An adult/professional in a position of trust, or a family member having intercourse with a vulnerable adult of any age or child 16 to 18 years old
 - Sexual exploitation of a vulnerable person
 - This may also include non-contact activities, such as looking at, or in the production of sexual images, watching sexual activities, encouraging vulnerable people to behave in sexually inappropriate ways, or grooming a vulnerable person in preparation for abuse (including via the internet)

7.6 Positions of trust

It is illegal for a person in a position of trust (for example teachers or care workers) to engage in sexual activity with anyone under the age of 18 who is in the care of their organisation – even if they are over 16. This includes:

- sexual activity with a child
- causing or inciting a child to engage in sexual activity
- sexual activity in the presence of a child
- causing a child to watch a sexual act

Doc No:	-Q-I-008	Rev No	20	Next Rev Date	22/06/23
Issue Date:	22/06/22	Rev Date:	22/06/22	Page	9 of 60

The Company will take allegations against a worker very seriously and will follow the guidance in Keeping Children Safe in Education and their own allegations and disciplinary procedures whilst ensuring the victim is treated with dignity and respect.

Guidance can be found:

[The Role of the LADO & The Allegations Management process - Gloucestershire Safeguarding Children Partnership \(gscb.org.uk\)](https://www.gscb.org.uk/role-of-lado)

7.7 Physical Abuse

Physical abuse is any form of non-accidental injury or injury which results from wilful or neglectful failure to protect a vulnerable person. Examples of physical injury include:

- Shaking, smacking/striking, with or without a weapon, and burning including scalding or friction burns.
- Use of excessive force in handling.

7.8 Harmful Sexualised Behaviour (HSB) (Including peer on peer abuse)

Harmful Sexualised Behaviour (HSB) is sexual behaviour displayed by children and young people which may be harmful or abusive. It encompasses a range of behaviours displayed towards younger and older children, peers, and adults. It can be harmful to those who display it and to the victim themselves. It can happen in a range of environments including schools and colleges. It can be displayed in the following ways:

- Unwanted sexual touching
- Lack of awareness of personal boundaries
- Continuously making suggestive and leud comments
- Indecent exposure or 'flashing'
- Coercing of others to perform sexual acts
- Sending sexual online communications
- 'Sexting' sharing of nude photos and images
- Viewing and sharing pornography
- Taking photos under a person's clothing without their consent 'up skirting'

It is important to remember that a young person may not recognise or understand that they have been subjected to HSB. They may also worry about telling someone, so it is important to provide a non-judgemental space for them to share their experience. The perpetrator will also require support, they may benefit from some form of intervention from specialist sexual harm practitioners.

Guidance can be found:

- NSPCC Peer-on-Peer Sexual Abuse
<https://learning.nspcc.org.uk/child-abuse-and-neglect/peer-on-peer-sexual-abuse>
- Sexual Violence and Sexual Harassment Between Children in Schools and Colleges Guidance 2018

7.9 Child Sexual Exploitation

Introduction (extract from GSCP guidelines). See [Child Exploitation and Missing Children - Gloucestershire Safeguarding Children Partnership \(gscb.org.uk\)](https://www.gscb.org.uk/child-exploitation)

Doc No:	-Q-I-008	Rev No	20	Next Rev Date	22/06/23
Issue Date:	22/06/22	Rev Date:	22/06/22	Page	10 of 60

Statement of intent

- Sexual exploitation of children is child abuse and is unacceptable. Tackling child sexual exploitation is one of the key priorities for the Gloucestershire Safeguarding Children's Partnership. Such exploitation can have serious long-term impact on every aspect of the child or young person's life, as well as the lives of their families
- It is our collective multi-agency responsibility to identify those children and young people at risk of exploitation and our joint responsibility to protect them and safeguard them from further risk of harm. We shall also prevent children becoming victims of this form of abuse and reassure our communities that we can perform our duties effectively.
- It is our clear intention to improve the lives of children living in Gloucestershire. We will do so by ensuring children and young people understand the risks of being exploited enabling them to cease contact with the perpetrators of this abuse.

Definition and scope

- The sexual exploitation of children and young people under 18 involves exploitative situations, contexts, and relationships where young people receive „something“ (e.g., food, accommodation, drugs, alcohol, cigarettes, affection, gifts, money) as a result of engaging in sexual activities. This can occur through the use of technology without the child's immediate recognition, for example the persuasion to post sexual images on the internet/mobile phones with no immediate payment or gain. In all cases those exploiting the child/young person have power over them by virtue of their age, gender, intellect, physical strength and/or economic or other resources. Violence, coercion, and intimidation are common, involvement in exploitative relationships being characterised in the main by the child or young person's limited availability of choice resulting from their social/economic and/or emotional vulnerability.
- In recognising child sexual exploitation as child abuse this protocol identifies that children must be protected, and enabled to protect themselves, in all aspects of their lives and relationships. The sexual exploitation of children and young people cross boundaries of culture, community groups, disability, social class, and gender
- Workers with designated safeguarding responsibility will regularly undertake CSE training to ensure they understand the process for detecting and reporting this abuse

7.10 Radicalisation and Extremism

The current threat from terrorism and extremism in the United Kingdom is real and severe and can involve the exploitation of vulnerable people, including children, young people and adults.

Radicalisation is defined as the process by which people come to support terrorism and extremism and, in some cases, to then participate in terrorist groups.

Extremism is 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 (HM Government Prevent Strategy, 2011) Vulnerable people are at risk of becoming radicalised to become involved in acts of terrorism. **(for full guidance see Section 7 Preventing Radicalisation)**

Doc No:	-Q-I-008	Rev No	20	Next Rev Date	22/06/23
Issue Date:	22/06/22	Rev Date:	22/06/22	Page	11 of 60

7.11 Bullying

Bullying can be defined as repeated aggression - be it verbal, psychological, or physical which is conducted by an individual or group against others.

Examples of bullying include:

- Teasing
- Taunting
- Threatening
- Hitting
- Extortion
- Segregation, including malicious ignoring and non-involvement to belittle and undermine

Bullying may take place in any setting - in training, the home or in a work placement. Bullying can also take place online this is known as 'Cyber-Bullying' The more extreme forms of bullying would be regarded as physical or emotional abuse. Bullying can have a serious impact on a person's well-being and can lead to self-harm and suicide.

7.12 Online Dangers

Use of ICT and the Internet can pose a significant risk to young people and vulnerable adults. There are many dangers relating to use of mobile phones and devices, social media and other communication platforms. This can include:

- Cyber bullying
- Grooming and exploitation
- Sexting
- Pornography
- Privacy and security breaches
- Harmful content
- Radicalisation
- Risks from prolonged screen time

To help keep our young people and clients safe from harm in the online world we offer training and education to promote and raise awareness of the dangers posed. We have an open-door policy where any concerns can be raised in a non-judgemental environment and can be dealt with sensitively and in line with company policy and procedures.

7.13 Female Genital Mutilation

Female Genital Mutilation (FGM) comprises all procedures involving partial or total removal of the external female genitalia or other injury to the female genital organs. It is illegal in the UK and a form of child abuse with long-lasting harmful consequences. Professionals in all agencies, and individuals and groups in relevant communities, need to be alert to the possibility of a girl being at risk of FGM, or already having suffered FGM.

There is a range of potential indicators that a girl may be at risk of FGM. Warning signs that FGM may be about to take place, or may have already taken place, can be found on pages 16-17 of the Multi-Agency Practice Guidelines

<https://www.gov.uk/government/publications/female-genital-mutilation-guidelines>

Doc No:	-Q-I-008	Rev No	20	Next Rev Date	22/06/23
Issue Date:	22/06/22	Rev Date:	22/06/22	Page	12 of 60

Section 5B of the Female Genital Mutilation Act (2003) places a statutory duty upon teachers, along with social workers and healthcare professionals, to report to the police where they discover (either through disclosure by the victim or visual evidence) that FGM appears to have been carried out on a girl under 18. Those failing to report such cases will face disciplinary sanctions. It will be rare for teachers to see visual evidence, and they should not be examining pupils, but the same definition of what is meant by “to discover that an act of FGM appears to have been carried out” is used for all professionals to whom this mandatory reporting duty applies.

The Mandatory reporting duty commenced in October 2015; tutors **must** report to the police cases where they discover that an act of FGM appears to have been carried out. Unless the tutor has a good reason not to, they should still consider and discuss any such case with the Company’s Designated Safeguarding Lead and involve children’s social care as appropriate.

7.14 Honour Based Violence

Honour Based Violence (HBV) is a term used to describe violence committed within the context of the extended family which are motivated by a perceived need to restore standing within the community, which is presumed to have been lost through the behaviour of the victim. Most victims of HBV are women or girls, although men may also be at risk.

Women and girls may lose honour through expressions of autonomy, particularly if this autonomy occurs within the area of sexuality. Men may be targeted either by the family of a woman who they are believed to have ‘dishonoured’, in which case both parties may be at risk, or by their own family if they are believed to be homosexual.

Common triggers for HBV include:

- Refusing an arranged marriage
- Having a relationship outside the approved group
- Loss of virginity
- Pregnancy
- Spending time without the supervision of a family member
- Reporting domestic violence
- Attempting to divorce
- Pushing for custody of children after divorce
- Refusing to divorce when ordered to do so by family members

However, some families may resolve to abuse or kill a member on what would appear to be very trivial grounds. It is important to take clients fears of HBV seriously, even when it seems unlikely. Victims of HBV are more likely to underestimate the risks to their safety than overstate them and even the ‘offence’ seems trivial to you, this does not mean it is trivial to his or her family.

7.15 Modern Slavery & Human Trafficking

Modern slavery is a serious and brutal crime in which people are treated as commodities and exploited for criminal gain, this can be devastating for victims. The true extent of modern slavery in the UK, and indeed globally, is unknown. Increased awareness and reporting supports law enforcement to tackle the perpetrators of modern slavery as well as protecting victims. It is your responsibility to be vigilant and recognise the signs that a customer or learner is being exploited in this way.

Types of Modern Slavery

Doc No:	-Q-I-008	Rev No	20	Next Rev Date	22/06/23
Issue Date:	22/06/22	Rev Date:	22/06/22	Page	13 of 60

Modern slavery takes many different forms in the UK. The prevalence of different types of modern slavery in the UK will vary by region and change over time, however currently there are four broad ways in which perpetrators may seek to exploit victims, which Home Office research has further broken down into 17 distinct types. Full details on the 17 types of modern slavery, including case studies, are available on the www.gov.uk website under 'typology report'.

Understanding the different types can be crucial for staff involved in developing toolkits for frontline staff or the operational response for their organisation.

The four broad categories are below – in each case the victim may or may not additionally have been moved (trafficked), either from another country, or within the UK, in order to be exploited.

Labour Exploitation Labour Exploitation usually involves unacceptably low pay, poor working conditions, or excessive wage deductions, but is not solely about this. In order to constitute modern slavery, there will also be some form of coercion meaning that victims cannot freely leave for other employment or exercise choice over their own situation. Where the perpetrator is taking advantage of a child or vulnerable person, an offence can be committed without the element of coercion.

Domestic Servitude Domestic Servitude typically involves victims working in a private family home where they are ill-treated, humiliated, subjected to unbearable conditions or working hours or made to work for little or no pay. The victim could be used in this way by their own family members or partner. Again, it is very difficult for them to leave, for example because of threats, the perpetrator holding their passport, or using a position of power over the victim.

Sexual Exploitation Victims are coerced into sex work or sexually abusive situations. This includes child sexual exploitation. Victims may be brought to the UK on the promise of legitimate employment or moved around the UK to be sexually exploited. In some cases, they may know they will be involved in sex work but are forced into a type or frequency they did not agree to. Victims are more commonly female but can also be male.

Criminal Exploitation Criminal Exploitation is the exploitation of a person to commit a crime for someone else's gain. For example, victims could be coerced into shoplifting, pickpocketing, entering into a sham marriage, benefit fraud, begging or drug cultivation such as cannabis farming. Forced removal and trafficking of human organs is an additional category of modern slavery that occurs globally, however there have been no confirmed cases in the UK.

Illegal Immigration Offences

Where individuals agree to be brought to the UK illegally, but there is no intention to exploit or take advantage of them once they arrive, this is known as smuggling and is an immigration offence rather than modern slavery or human trafficking. These individuals are not victims, although they may be at increased risk of being exploited at a later date.

Victims of modern slavery can be men, women, or children. They can be British citizens living in the UK, EU nationals, or those from outside the EU. Victims of over 100 nationalities have been identified in the UK but the most common originating countries of potential victims are:

1. Albania
2. Vietnam

Doc No:	-Q-I-008	Rev No	20	Next Rev Date	22/06/23
Issue Date:	22/06/22	Rev Date:	22/06/22	Page	14 of 60

3. UK
4. Nigeria
5. China
6. Romania
7. Poland
8. Eritrea
9. India
10. Afghanistan

Signs to look out for

Victims of modern slavery can be found anywhere. There are certain industries where they are currently more prevalent, such as nail bars, car washes, agriculture, and fishing, building sites and the sex industry. Other high-risk situations include when there is a need for a sudden injection of workers into the work force, such as seasonal staff or construction for a major event. However, victims may also pass-through transport hubs, health services and other public places or be found in private homes.

Indicators of a potential victim may include:

- Distrustful of authorities
- Expression of fear or anxiety
- Signs of psychological trauma (including post-traumatic stress disorder)
- The person acts as if instructed by another
- Injuries apparently a result of assault or controlling measures
- Evidence of control over movement, either as an individual or as a group
- Restriction of movement and confinement to the workplace or to a limited area -
Passport or documents held by someone else
- Lack of access to medical care
- Limited social contact/isolation
- Limited contact with family
- Signs of ritual abuse and witchcraft (juju)
- Substance misuse
- Person forced, intimidated or coerced into providing services
- Doesn't know home or work address
- Perception of being bonded by debt
- Money is deducted from salary for food or accommodation
- Threat of being handed over to authorities
- Threats against the individual or their family members
- Being placed in a dependency situation
- No or limited access to bathroom or hygiene facilities

Doc No:	-Q-I-008	Rev No	20	Next Rev Date	22/06/23
Issue Date:	22/06/22	Rev Date:	22/06/22	Page	15 of 60

- Unwanted/underage pregnancy
- Inappropriate sexual behaviour
- Incoherent/changing account of events
- Repeating a story that you have heard elsewhere
- Unexplained eagerness to leave a safe space/to work
- Sexually transmitted diseases
- Missing episodes (especially from care – under 18s)
- Limited/sporadic school attendance (under 18s)

There are a number of indicators that can be signs that someone is a victim of modern slavery. Some of the key indicators are below. However, sometimes it will be a case of acting on your instinct that something is not right and using existing professional skills to talk to a potential victim and find out more information. None of these indicators in isolation or combination can give you complete certainty, however you do not need to be certain to report your concerns.

Any member of staff should report concerns of this nature through the safeguarding reporting process.

Additionally, the case should always be reported by one of the following methods:

- Phoning 999 if there is an immediate risk of harm
- Reporting to the police on 101 or the Modern Slavery Helpline on 08000 121 700 if there is not an immediate risk of harm
- Using the National Referral Mechanism which can be found at:

<https://www.gov.uk/government/publications/human-trafficking-victims-referral-and-assessment-forms>

7.16 Criminal Exploitation (Dangerous Drug Networks)

Dangerous Drug Networks

DDN's are drug dealing gangs who target vulnerable people in order to set up drugs distribution networks. These criminals are using extreme violence to establish a presence, displacing an existing drug supply chain and intimidating rivals, witnesses, and victims, this has resulted in local murders. DDN's exploit vulnerable teenagers to become drug runners for their network. Early intervention and intelligence are key to safeguard and protect the vulnerable. Share information between agencies at the earliest possibility.

Some signs that could indicate criminal exploitation:

- New friends that have the potential to be a bad influence
- Behaving differently or out of character
- Developed a new attitude
- Unexplained injuries
- Continually late to training or forgetting to do homework
- Continually tired
- New expensive possessions such as trainers, jewellery, mobile phone or designer clothes

Doc No:	-Q-I-008	Rev No	20	Next Rev Date	22/06/23
Issue Date:	22/06/22	Rev Date:	22/06/22	Page	16 of 60

- Become withdrawn
- Changes at home that might make them more vulnerable

7.17 Financial Abuse

Financial Abuse is another name for stealing or defrauding someone of goods and/or property. It is always a crime but is not always prosecuted. Sometime the issue is straightforward, for example a care worker stealing from an older person's purse, but at other times it is more difficult to address. This is because very often the perpetrator can be someone's relative, or age/disability prejudice means that people assume it is not happening or that the vulnerable person is confused.

Financial Abuse involves:

- Theft
- Fraud
- Exploitation
- Pressure in connection with wills, property, financial transactions, misuse or misappropriation of property, possessions, or benefits
- Deny money for food, transport, clothes etc. to attempt to isolate and control a vulnerable person

7.18 Discriminative Abuse (including race and homophobic)

Discriminatory abuse is when someone picks on or treats someone unfairly because something about them is different, for example it may be:

- Their clothes
- Their weight
- Their race or skin colour
- Their religion or culture
- Being a man or a woman
- Being a gay man or a lesbian woman
- Their age
- Their health or disability

8. Disclosure of a Concern

Disclosure of concern – See Annexe A for full reporting process

It is important to stress that no one indicator should be seen as a conclusive indication of abuse; it may indeed indicate conditions other than child abuse. A cluster or pattern of signs is more likely to be indicative of abuse.

Informing

By issuing this policy and through its mandatory core training programme, The Company is keen to ensure (without creating unnecessary anxiety) that all relevant employees:

- Know the types of harm to which children, young people and vulnerable adults are susceptible.
- Are alert to behaviour, which suggests something may be wrong.

Doc No:	-Q-I-008	Rev No	20	Next Rev Date	22/06/23
Issue Date:	22/06/22	Rev Date:	22/06/22	Page	17 of 60

- Are able to talk to someone if they become aware of anything, which causes them to feel uncomfortable.
- Know how to deal with alleged or suspected harm.

8.1 Disclosure

A disclosure is when a vulnerable person tells someone that they have been or are being harmed or abused in some way. Staff should:

- Believe the vulnerable person unless proven otherwise by a competent authority – always assume the vulnerable person is being truthful.
- Remain calm and do not ask leading questions.
- Take the disclosure seriously, never underestimate the situation
- Do not minimise the incident.
- Tell the vulnerable person he/she has done the right thing in telling you. **Never** promise to keep it a secret.
- Reassure the vulnerable person no blame or guilt is his or hers. Vulnerable groups of sufficient age and understanding often have a clear perception of what needs to be done to ensure their safety and wellbeing. Most vulnerable people feel loyalty towards those who care for them and have difficulty saying anything against them. Some may fear reprisals and will need a great deal of reassurance.
- Write down exactly what was said to you using the vulnerable person’s **OWN** words immediately after disclosure. Remember to date and to sign the account, which should be given to the designated safeguarding lead (DSL) as soon as possible after disclosure.
- Tell the vulnerable person what you will do with the information. vulnerable people need to understand the extent and nature of their involvement and should be helped to understand the protection process.
- **DO NOT** deal with the matter alone. Report it to your company’s designated safeguarding lead (DSL), it is vital you tell the vulnerable person that you **must** do this.
- Children and young people are entitled to the same duty of confidentiality as adults, provided that, in the case of those under 16 years of age, they have the ability to understand the choices and their consequences. Personal information about children and young people held by professionals is subject to a legal duty of confidence and should not normally be disclosed without consent of the subject. However, the law permits the disclosure of confidential information necessary to safeguard a child or vulnerable adult in the public interest; that is; the public interest in safeguarding vulnerable groups may override the public interest in maintaining confidentiality.
- Seek support for yourself, advice and information on support services can be accessed via the designated safeguarding lead (DSL).

8.2 A vulnerable person under threat

In a situation where a vulnerable person is at immediate risk the member of staff should:

- Respond to secure the safety of the vulnerable person without placing themselves or others in danger
- Discuss the situation with their designated safeguarding lead (DSL) or other designated member of staff. If unavailable direct consultation with the appropriate local

Doc No:	-Q-I-008	Rev No	20	Next Rev Date	22/06/23
Issue Date:	22/06/22	Rev Date:	22/06/22	Page	18 of 60

authority should take place and any steps taken should be reported to designated safeguarding lead as soon as possible. (all local authority contact details are listed at the end of this document)

- Record all details of the incident and what action they have taken.
- If the situation is immediately dangerous, and there is concern about the immediate safety of a vulnerable person, referral should be made to the police in the first instance.
- Where a vulnerable person needs immediate medical assistance, this overrides all other considerations, and it must be sought immediately. In such situations doctors are able to provide emergency treatment to the vulnerable person without parental, guardian, or carer consent. The worker concerned must tell the Doctor or medical staff if they have concerns over the nature of the injuries and vulnerable person’s ongoing welfare. The Company staff should refrain from diagnosing abuse unless the vulnerable person has made a disclosure indicating such.

8.3 A child, young person, or vulnerable adult for whom there is concern

- All staff have a responsibility to consult with their designated safeguarding lead or another designated manager when they have concerns about the safety of a vulnerable person. It is better to share a concern which may prove groundless than to wait for certainty, which may result in irreparable damage to the child, young person, or vulnerable adult.
- Any worker who believes that they have seen possible evidence of abuse, who has concerns that a vulnerable person may be at risk of significant harm, or to whom a vulnerable person makes an allegation of abuse or possible abuse, must consult with their designated safeguarding lead, or another designated manager immediately, and as a maximum within 24 hours of the concern or allegation coming to light. If this is not possible then the worker should consult directly with the appropriate local authority.
- Where the concern raises questions about the immediate safety of the vulnerable person, consultation with the designated safeguarding lead, or directly with the appropriate local authority if a manager is unavailable, should be immediate
- Following consultation with the designated safeguarding lead a decision will be reached on how to proceed. This will include deciding whether, when and how any concerns will be discussed with the vulnerable person or parent, guardian or carer and whether a referral to the appropriate statutory services is necessary. Faced with possible evidence of abuse or the risk of significant harm the relevant manager must take responsibility for ensuring that the appropriate person in the local statutory services is contacted and that the information is passed to them, giving the full context of the incident, any previous interventions, and any relevant information regarding the vulnerable persons history.
- Where a person has disclosed information about abuse or the risk of significant harm to a vulnerable person, The Company designated safeguarding lead should ensure, as far as they are able to, that the “discloser” is kept informed about what will happen next. This will help to re-assure them about what to expect.
- Where there is already active involvement of the local authority in a case, and a worker has concerns about the welfare of a vulnerable person or where a vulnerable person makes an allegation of abuse or possible abuse then a referral to the Local Authority should still be made including details of the active social worker and any

Doc No:	-Q-I-008	Rev No	20	Next Rev Date	22/06/23
Issue Date:	22/06/22	Rev Date:	22/06/22	Page	19 of 60

discussions that may have taken place included in the form.

- Confidentiality is not absolute secrecy The Company operates a limited confidentiality policy in regard to safeguarding vulnerable groups. All vulnerable people receiving services from The Company will be informed of its limited confidentiality policy and the exceptions where a vulnerable person's safety is at risk. No worker should ever give a guarantee of confidentiality to a vulnerable person wishing to disclose abuse. The worker who receives such information should handle the situation sensitively and explain it is necessary to involve other agencies to protect the vulnerable person. Although it is best avoided, the situation may arise where information has to be passed on without the vulnerable person's agreement.
- When an allegation involves another child the designated safeguarding lead should contact the local authority within the set timescales within this policy. Advice should then be followed and recorded.
- All contact with the local authority must be recorded. Referrals of possible abuse to the local authority via the phone must be confirmed in writing within 24 hours. Confirmation should include full details of evidence, action taken, and designations of people contacted. Use of the Multi Agency Request Form (MARF) is required.

8.4 Concern

Inappropriate or unacceptable behaviour or communication, favouritism and negligence are examples of what may constitute a concern and must be reported in line with the SVG Incident reporting process (see annexe A for full process).

8.5 Confession

A confession occurs when a child, young person or adult tells someone that they have been involved in the abuse of a vulnerable person. Confessions must be reported to one of the designated managers unless there is immediate concern for the safety of the victim in such cases the police must be informed straight away

8.6 Allegation

An allegation occurs when someone reports specific unacceptable behaviour where a vulnerable person has been harmed or abused in some way. Allegations must be reported to one of the designated managers

8.7 Evidence

- There may be some cases where a vulnerable person presents on a single occasion with injuries that immediately arouse suspicion of abuse. In all such cases these injuries should be treated as potential evidence of abuse and should result in the case being reported to the Children's helpdesk as a referral for service.
- Examples of possible evidence of abuse may include physical and behavioural signs and signals, comments made vulnerable person, or noticing a pattern from records. Reference should be made to the local authority's guidance on the "signs and signals" of possible abuse and risk factors as listed in the The Company's Guiding Principles for Working with Vulnerable Groups.

8.8 Abusers

- The perpetrator of abuse can be anyone who is in a position to exert power over a child, young person or vulnerable adult, including a natural parent, stepparent,

Doc No:	-Q-I-008	Rev No	20	Next Rev Date	22/06/23
Issue Date:	22/06/22	Rev Date:	22/06/22	Page	20 of 60

relative, foster carer, a partner, respite carer, adoptive parent and teacher, member of staff, sibling, peer, friend or neighbour.

- Vulnerable groups are most often abused by those who are close to them, or who have direct care of them, that is, parents and other family members, or care givers. They may also be abused by other children, by strangers, or by professionals who may do so in the guise of ‘helping’.
- When a vulnerable person has been abused the role of others in the household must be considered. Some parents/carers will have been totally unaware of the abuse and may need support to help come to terms with it. Others may have co-operated with the abuse or have been coerced into accepting it.
- All workers should be alert to any signs that a colleague, including employees of The Company and employees of other organisations, is behaving inappropriately in relation to a child or vulnerable person. Any such suspicion should be discussed with a senior member of staff, who will consider it in light of these procedures. The senior member of staff will decide where applicable, to follow our internal procedures or inform the agency to whom the colleague is attached.
- All workers will be aware that to enter into a social relationship with any service user outside the boundaries of our service specifications is a breach of The Company’s Code of Conduct, this is covered in The Company policy on Professional Boundaries and will be considered as gross misconduct.
- Any personal relationship, sexual or otherwise, with a service user is considered gross misconduct under our policies and will instigate the allegations management procedure.

Please remember:

- The only professional qualified to diagnose whether a physical injury is the result of abuse is a professionally trained medical practitioner. All workers should report their concerns but avoid diagnosing incidents as abuse.
- It is your responsibility to report concerns, NOT to decide whether it is or is not abuse.
- The Company advocates a ‘No Secrets’ approach to the protection of vulnerable groups. If you are unsure about your suspicions discuss them with your line manager anyway. It is better to report and be wrong that to stay quiet and have been right.
- Never promise to keep quiet about your concerns to a victim of abuse or the perpetrator of abuse
- The discovery or disclosure of abuse can result in the vulnerable person experiencing very difficult emotions and can lead to them revisiting previous trauma, it is important that any decisions and referrals made are done so with the vulnerable person at the centre of this process.

9. Preventing Radicalisation

The Company has a wider safeguarding duty to prevent children and vulnerable adults from the risk of radicalisation and extremism. The Company has developed a PREVENT strategy detailed below to support the prevention of extremism and radicalisation [The Prevent Duty].

Doc No:	-Q-I-008	Rev No	20	Next Rev Date	22/06/23
Issue Date:	22/06/22	Rev Date:	22/06/22	Page	21 of 60

Any member of staff or learner at The Company who have any concerns regarding the issues identified within this guidance policy should report those concerns immediately and no later than the end of the working day to the designated safeguarding lead

Designated Safeguarding Lead – Kate Whereat Safeguarding Manager (Prevent & CIC Lead)

9.1 Introduction

The current threat from terrorism and extremism in the United Kingdom is real and severe and can involve the exploitation of vulnerable people, including children, young people and adults. This policy is designed to provide a clear framework to structure and inform our response to safeguarding concerns for those people who may be vulnerable to the messages of extremism. In addition, it provides details of the local inter agency process and expectations in identifying appropriate interventions based on the threshold of need and intervention model and the channel process (see below).

Radicalisation is defined as the process by which people come to support terrorism and extremism and, in some cases, to then participate in terrorist groups.

Extremism is 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 (HM Government Prevent Strategy, 2011).

9.2 Equality, Diversity and Community Cohesion

The company aims to guide our staff and learners to understand others, to promote common values and to value diversity, to promote awareness of human rights and of the responsibility to uphold and defend them, and to develop the skills of participation and responsible action. We take extremely seriously our key role in preparing all our learners for life in modern Britain. We aim to encourage working towards a society with a common vision and sense of belonging by all. Community: a society in which the diversity of people's backgrounds and circumstances is appreciated and valued; a society in which similar life opportunities are available to all; and a society in which strong and positive relationships exist and continue to be developed in the workplace, in education and in the wider community.

9.3 National Guidance and Strategies

PREVENT is a key part of CONTEST, the Government's strategy to stop people becoming terrorists or supporting terrorism. Early intervention is at the heart of PREVENT in diverting people away from being drawn into terrorist activity. PREVENT happens before any criminal activity takes place. It is about recognising, supporting, and protecting people who might be susceptible to radicalisation. The PREVENT strategy objectives are:

- *Ideology*: respond to the ideological challenge of terrorism and the threat we face from those who promote it.
- *Individuals*: prevent people from being drawn into terrorism and ensure that they are given appropriate advice and support.
- *Institutions*: work with sectors and institutions where there are risks of Radicalisation which we need to address.

All staff should have an awareness of the PREVENT agenda and the various forms of radicalisation takes in being able to recognise signs and indicators or concern and respond appropriately.

Doc No:	-Q-I-008	Rev No	20	Next Rev Date	22/06/23
Issue Date:	22/06/22	Rev Date:	22/06/22	Page	22 of 60

9.4 Vulnerability/Risk Indicators

The following lists are not exhaustive and all or none may be present in individual cases of concern. Nor does it mean that vulnerable learners experiencing these factors are automatically at risk of exploitation for the purposes of extremism. The accepted view is that a complex relationship between the various aspects of an individual's identity determines their vulnerability to extremism. There is no such thing as a 'typical extremist' and those involved in extremism come from a range of backgrounds and experiences. The following indicators may help to identify factors that suggest a learner, or their family may be vulnerable or involved with extremism:

- *Vulnerability Identity crisis*: Distance from cultural/religious heritage and uncomfortable with their place in the society around them.
- *Personal crisis*: Family tensions; sense of isolation; adolescence; low self-esteem; disassociating from existing friendship group and becoming involved with a new and different group of friends; searching for answers to questions about identity, faith and belonging.
- *Personal circumstances*: Migration; local community tensions; events affecting country or region of origin; alienation from UK values; having a sense of grievance that is triggered by personal experience of racism or discrimination or aspects of Government policy.
- *Unmet aspirations*: Perceptions of injustice; feeling of failure; rejection of civic life.
- *Criminality*: Experiences of imprisonment; poor resettlement/reintegration, previous involvement with criminal groups.
- *Access to extremist influences, as follows*:
 - Reason to believe that the young person associates with those known to be involved in extremism.
 - Possession or distribution of extremist literature/other media material likely to incite racial/religious hatred or acts of violence.
 - Use of closed network groups via electronic media for the purpose of extremist activity experiences, behaviours, and influences.
 - Experience of peer, social, family or faith group rejection.
- International events in areas of conflict and civil unrest had a personal impact on the young person resulting in a noticeable change in behaviour.
- Verbal or written support of terrorist attacks.
- First-hand experience of racial or religious hate crime.
- Extended periods of travel to international locations known to be associated with extremism.
- Evidence of fraudulent identity/use of documents to support this.
- Experience of disadvantage, discrimination, or social exclusion.
- History of criminal activity.
- Pending a decision on their immigration/national status.

More critical risk factors include:

- Being in contact with extremist recruiters.
- Articulating support for extremist causes or leaders.
- Accessing extremist websites, especially those with a social networking element.
- Possessing extremist literature.
- Justifying the use of violence to solve societal issues.

Doc No:	-Q-I-008	Rev No	20	Next Rev Date	22/06/23
Issue Date:	22/06/22	Rev Date:	22/06/22	Page	23 of 60

- Joining extremist organisations.
- Significant changes to appearance/behaviour.

9.5 Referral and Intervention Process - See Annexe C for full reporting process

Any identified concerns as the result of observed behaviour or reports of conversations to suggest that the person supports terrorism and/or extremism, must be reported to the named designated safeguarding lead immediately and no later than the end of the working day.

Where a person is thought to be in need or at risk of significant harm, and/or where investigations need to be carried out (even though parental consent may be withheld), a referral to the relevant social care agency should be made in line with the company safeguarding policy. However, it should be recognised that concerns of this nature, in relation to violent extremism, are most likely to require a police investigation (as part of the channel process).

As part of the referral process, the designated safeguarding lead will also raise an electronic referral to reported to the local Police Prevent Team using 101 (Ext 2802) and ask for the Counter Terrorist Security Advisor or via the Prevent Coordinator for their region (South West) this is currently: **Cheri Fayers** cheri.fayers@education.gov.uk

Local Police contacts:

101@gloucestershire.police.uk

Adam.large@gloucestershire.police.uk

Matthew.morris@gloucestershire.police.uk

9.6 Channel referrals process

Some concerns which are identified may have a security dimension to them, for this reason, it is important that liaison with the police forms an early part of all investigations.

Gloucestershire Police will carry out an initial assessment and, if appropriate, set up a multiagency meeting to agree actions for supporting the individual. If it is deemed that there are no concerns around radicalisation, appropriate and targeted support will be considered for the person.

9.7 Training

The company will ensure that the designated senior person is suitably competent for this role and that all employees who work with learners receive PREVENT and CHANNEL awareness training to enable early identification of radicalisation and effective referral. The company will ensure full risk assessments are carried out and action plans are in place to mitigate any risks.

9.8 Speaker and Events – See Annexe B for full Risk Assessment Process

The company will ensure that any external speakers engaged by The Company are suitably vetted prior to speaking and monitored throughout their engagement with PTS/NCLP employees and learners. All events will be risk assessed for the potential of radicalisation risk prior to the event and monitored throughout.

9.9 Access to all centres

The company will ensure that all staff wear photographic ID Badges at all times. All visitors must be signed in and out of all sites and be asked to wear a visitor's badge, which must be visible at all times. All staff are responsible for reporting any persons who are not wearing a badge immediately.

Doc No:	-Q-I-008	Rev No	20	Next Rev Date	22/06/23
Issue Date:	22/06/22	Rev Date:	22/06/22	Page	24 of 60

10. Working in Partnership with Local Authorities

(See Annexe E for full list of contacts from the local authority)

The Company will have a **named designated safeguarding lead (DSL)** who is responsible for developing a formal link between the local authority and the company, the aim of which is to promote a clear understanding of accountability and procedures. The DSL will manage a team of safeguarding representatives for each centre

Current named contacts:

- **Kate Whereat** – Safeguarding Manager **DSL** (Prevent & CIC Lead)
- **Sally Cope** – Tutor/Safeguarding Representative
- **Jane Trehearne** – **DDSL** Learner Support Officer/ Safeguarding Representative
- **Jenni Taylor** – Learner Support Officer/ Safeguarding Representative
- **Jo Mathers** – NEET Coordinator/Safeguarding Representative
- **Marcus Grant** – Change Coach/ Safeguarding Representative
- **Emmi Davis** - Employment Advisor / Safeguarding Representative
- **Elaine Sherratt** – Change Coach/MAPPA SPOC

11. Training

Safeguarding vulnerable groups must form a part of staff induction, training, supervision and appraisal process.

All workers who engage with our youth provision learners will read Section 1 of the Keeping Children Safe in Education Guidance as part of their induction

Safeguarding vulnerable groups training is mandatory for all Company staff.

Designated staff within the organisation will undergo relevant safeguarding and child protection training

Designated staff within the organisation will undertake mental health and attachment training

Designated staff within the organisation will undertake safer recruitment training

Designated staff within the organisation will be responsible for the cascading of information and training to the workers within The Company. All staff will be given underpinning knowledge on safeguarding vulnerable groups and the mechanics of The Company's safeguarding vulnerable groups policy and procedures. This will be refreshed every 12 to 15 months

All clients accessing The Company's services will have access to safeguarding vulnerable groups awareness information.

Doc No:	-Q-I-008	Rev No	20	Next Rev Date	22/06/23
Issue Date:	22/06/22	Rev Date:	22/06/22	Page	25 of 60

12. Record Keeping and Sharing Information

12.1 Any records must be kept accurate and factual. Records relating to suspected, possible, or actual abuse must be signed and dated by the worker making the entry. When recording information workers must be sensitive to the fact it may be shared with parent/s or carers.

Where a worker has concerns about possible significant harm to a child, young person or vulnerable adult, the concerns must be clearly recorded on CPOMS (youth) or using the Safeguarding Vulnerable Groups Incident Report Form (adult) and discussed with the designated safeguarding lead, or if they are not available, with the named deputy safeguarding lead. The incident report form should be forwarded to the designated officer who will record the incident.

The only professional qualified to diagnose whether a physical injury is the result of abuse is a professionally trained medical practitioner. The Company as an organisation and its workers should report their concerns but avoid diagnosing incidents as abuse. It is the responsibility of professionals to report concerns, NOT to decide whether it is or is not abuse.

The Company is committed to openness in our work with service users, however in some instances, where sharing information with relatives may put vulnerable people at risk, access will be restricted, and advice should be sought from the appropriate local authority. Sharing of information between practitioners and partner organisation's is essential for effective identification, assessment, risk management and service provision. Fears about sharing information cannot be allowed to stand in the way of the need to safeguard and promote the welfare of children and young people at risk of abuse or neglect.

The GDPR and Data Protection Act 2018 do not prohibit the collection and sharing of personal information. They provide a framework to ensure that personal information is shared appropriately. In particular, the Data Protection Act 2018 balances the rights of the information subject (the individual whom the information is about) and the possible need to share information about them. Never assume sharing is prohibited – it is essential to consider this balance in every case. You should always keep a record of what you have shared.

Wherever possible, you should seek consent and be open and honest with the individual from the outset as to why, what, how and with whom, their information will be shared. You should seek consent where an individual may not expect their information to be passed on. When you gain consent to share information, it must be explicit, and freely given. There may be some circumstances where it is not appropriate to seek consent, either because the individual cannot give consent, it is not reasonable to obtain consent, or because to gain consent would put a child or young person's safety or well-being at risk. Where a decision to share information without consent is made, a record of what has been shared should be kept.

12.2 Requests for information from the Children and Young People's Directorate, Police or Adult Protection Unit.

Doc No:	-Q-I-008	Rev No	20	Next Rev Date	22/06/23
Issue Date:	22/06/22	Rev Date:	22/06/22	Page	26 of 60

Where The Company receives a request from the Police or Children/Adult Protection Unit for information as part of child/adult protection enquiries, workers should follow the guidelines below

- If contacted by phone workers will take contact details and refer the query to the designated safeguarding lead who will manage the disclosing of information in line with the limited confidentiality policy.
 - Relevant information should be shared on a “need to know” basis, within the context that the welfare of the vulnerable person is paramount and overrides issues of confidentiality
 - The designated safeguarding lead will clarify with the requesting agency, where appropriate, whether consent of the vulnerable person has been given for the enquiry, and if not, agreement should be reached on whether it is appropriate to seek consent prior to sharing information
 - Information shared will be recorded. The records should indicate whether the vulnerable person’s consent was obtained to share this information, and if not the reason for this should be recorded.
 - Where The Company receives a request from Children and Young Person’s Directorate for information as part of Child Protection Enquiries under Section 47 of the Children Act, it will follow the above procedures in addition to:
 - The records should indicate whether the parents or guardians’ consent was obtained to share information, if not the reason for this should be recorded.
-

13. Discussing Concerns with Vulnerable People, Parents and Carers

Discussing concerns with the vulnerable person/parents, guardians or carers involved can assist in clarifying the explanation for any injuries or other possible indicators of abuse. Where the explanation is unsatisfactory an honest response, such as advising of the need to discuss this with the appropriate local authority can help prepare the vulnerable person/parents, guardian, or carers for any further assessment.

After discussing concerns with the vulnerable person/parents, guardian or carers, the worker should consult again with their designated safeguarding lead, and a decision will be made as to whether their remains a basis for concern and what further action, if any, needs to be taken. Where consultation with the vulnerable person/parents, guardian or carers alleviates concerns, this should be recorded, and it is likely that no further action will be necessary.

However, in accordance with Department of Health advice contained in “Working together to Safeguard Children” (2010), **“while professionals should, in general, seek to discuss any concerns with the family and, where possible, seek their agreement to making referrals to Children and Young People’s Directorates this should only be done where such discussion and agreement seeking will not place a child at increased risk of significant harm”**. The Company will adopt this procedure for all vulnerable groups.

The local authority should be contacted before contact with parents, guardians or carers and advice sought, where:

Doc No:	-Q-I-008	Rev No	20	Next Rev Date	22/06/23
Issue Date:	22/06/22	Rev Date:	22/06/22	Page	27 of 60

- A vulnerable person has made an allegation of abuse by one or both parents, guardians or carers
- There is evidence of possible violence from one or both carers
- The allegation concerns a professional or volunteer working with the vulnerable person.

The Gloucestershire Safeguarding Childrens Partnership provides guidance on Levels of Intervention
[gloucestershire-revised-loi-guidance-v7-jan-2021.pdf](#)

14. Investigation

During investigation workers must be aware that it is their role to support the local authority in this process by providing accurate information. It is our role to observe and record incidents and not to investigate or evaluate evidence. Inappropriate lines of investigation may jeopardise evidence should a case go to court.

If, following a protection referral, the relevant manager is dissatisfied with the local authority proposed action, or decision not to investigate, they must discuss this with the managing director. The managing director may judge it necessary to contact a senior manager within the local authority to advocate further action, instigating where necessary the “Escalation Policy” available at [www.GSCB.org.uk](#)

15. Support for Service Users and Staff

The Company will ensure that victims of abuse are supported at the time of crisis and on an on-going basis. Where we are unable to provide this support, ourselves we will endeavour to refer service users to appropriate support agencies.

The Company acknowledges that abuse and vulnerable person protection can be traumatic and emotionally draining. It often stirs up feelings of anger, guilt and disgust for the workers involved. Support will be offered to staff through supervision with their line manager and where appropriate the designated safeguarding lead will make referrals to external support agencies such as counselling and in-work mental health support.

16. Safer Recruitment Practice

The Company acknowledges that recruitment plays a key role in successful safeguarding arrangements

We work in line with the Safer Recruitment Guidance in Keeping Children Safe in Education 2022 [Keeping children safe in education 2021 \(publishing.service.gov.uk\)](#)

All workers are required to undergo enhanced DBS checks before commencement of their employment and a single central record is held, these checks are renewed on a 3-yearly basis

Doc No:	-Q-I-008	Rev No	20	Next Rev Date	22/06/23
Issue Date:	22/06/22	Rev Date:	22/06/22	Page	28 of 60

Non-disclosure of previous criminal convictions of any kind will result in workers being engaged in The Company's disciplinary procedures that may result in instant dismissal.

References will be followed up and checked prior to commencement of employment

Verification of identity, and where appropriate qualification documents, will be carried out.

All short-listed applicants for paid or voluntary work must undergo a formal interview, one member of the interview panel will have undergone safer recruitment training

Reference should be made to The Company's Recruitment Policy.

17. Conduct of Workers

All workers must abide by The Company's code of conduct at all times. Workers should not form social relationships outside of our service specification. Workers should not take clients, specifically young people, to their homes, or give out their personal telephone numbers, or add clients as 'Friends' on personal social media accounts. To do so may be viewed as a disciplinary matter.

Workers should not have more favoured or less favoured service users. Every user should be treated equally.

Any inappropriate behaviour towards workers by a young person should be recorded, and if this behaviour was witnessed by others this should be recorded.

Workers should avoid giving lifts to clients, specifically young people except to assist in the provision of support services, or as part of organised activities and should be adequately risk assessed.

Workers should not enter into a close relationship, physical, emotional, or sexual, with any of our service users. This will be viewed as a disciplinary matter and may be reported to the local authority via the LADO

Workers must never threaten or physically punish vulnerable people in their care. Any use of corporal punishment is not permitted. This will be viewed as a disciplinary matter and will be reported to the local authority LADO

The term corporal punishment should be taken to include: any application of force as a punishment; slapping; throwing missiles; rough handling. The term corporal punishment should also be taken to include punching or pushing in the heat of the moment in response to violence from The Company's clients. It does not prevent a worker from taking necessary physical action where any other course of action is likely to fail to avert the immediate danger of personal injury to the client, the worker or another person, or the immediate danger to property.

To be read in conjunction with The Company chaperoning policy and professional boundaries policy

Doc No:	-Q-I-008	Rev No	20	Next Rev Date	22/06/23
Issue Date:	22/06/22	Rev Date:	22/06/22	Page	29 of 60

18. Allegations Management

How to deal with allegations of abuse against staff working with children and vulnerable adults

18.1 KEY PRINCIPLES:

If you manage or supervise staff working with children or vulnerable adults:

- Ensure all staff know to whom to report concerns or allegations i.e., the designated safeguarding lead, supervisor or leader.
- Refer to GSCP (Gloucestershire Safeguarding Children Partnership www.gsrb.org.uk) or the Adults at Risk Procedures (www.gloucestershire.gov.uk) throughout the process.
- Ensure no action is taken that may undermine or jeopardise a police or social care investigation, particularly in the early stages of the process; under no circumstances should the company start an investigation.
- For incidents involving clients under 18 liaise with the local authority designated officer (LADO) throughout the process.
- For incidents involving clients over 18 liaise with social care adult helpdesk.
- Consider the advice, guidance and training you give to The Company staff, including during recruitment and induction, about expectations of behaviour and safe practice.

18.2 If you are a Company staff member working with children and vulnerable adults:

- Make sure you know to whom you should report any concerns or allegations about a colleague or any other adult working with children.
- Report concerns or allegations as soon as possible, do not hold on to information however trivial or insignificant it may seem.
- Make sure you follow The Company codes of practice and be aware of appropriate professional boundaries at all times.

18.3 INITIAL ACTIONS:

By any person receiving an allegation or having a concern:

DO

- Treat the matter seriously and keep an open mind.
- Inform your designated safeguarding lead or senior manager immediately, or their deputy or other manager/supervisor if the senior manager is unavailable or is the subject of the allegation.
- Make a written record of the allegation or concern as soon as possible after receiving information or observing behaviour that causes concern, including the date, time, person/s involved and what was said or observed. Sign and date this record and forward it to your designated manager.

DO NOT

- Attempt to investigate or deal with the situation yourself.
- Make assumptions, offer alternative explanations or diminish the seriousness of the alleged incident/s.

Doc No:	-Q-I-008	Rev No	20	Next Rev Date	22/06/23
Issue Date:	22/06/22	Rev Date:	22/06/22	Page	30 of 60

- Keep the information to yourself or promise confidentiality.
- Discuss the allegation or concerns with anyone other than those defined in The Company, GSCP's or Adults at Risk Procedures for managing allegations against staff.

By the designated senior manager:

DO

- Follow the advice of the LADO and act in a timely manner and follow due process.
- Inform the person reporting the allegation or concern what action you will take, in accordance with procedures and with regard to information sharing protocols.
- Contact the appropriate authority within one working day of receipt of allegation.
- Obtain written details of the allegation from the person reporting the incident/s (see above)
- Countersign and date the written details on receipt and keep secure
- Maintain a written record of any discussions (with whom), action taken, decisions made (with reasons), including dates, times etc and keep secure
- Collate any information you have about (i) the child, vulnerable person, parents/carers, siblings and (ii) the person against whom the allegation has been made e.g. address, dates of birth, previous concerns etc. and (iii) any potential witnesses
- Maintain confidentiality
- Help all parties understand the process.
- Be prepared to attend multi-agency meetings to be an active member of the support team set up for the vulnerable person

DO NOT

- Act alone or disregard GSCP, Adults at Risk or The Company's procedures.
- Dismiss, disbelieve, or minimise the allegation or concern on the basis of your knowledge or opinion of the member of staff/volunteer concerned or the vulnerable person
- Investigate the incident, interview, or discuss with the member of staff, vulnerable person concerned, potential witnesses, unless advised to do so by the appropriate authority or a strategy meeting
- Inform parents/carers of the child/ren/vulnerable adult until advised to do so by the LADO or a strategy meeting
- Automatically suspend or dismiss the member of staff without seeking further advice.

19. Limited Confidentiality and Procedure

19.1 Introduction

Confidentiality is essential within any organisation and, due to the nature of the services we provide, The Company is, at times, privileged to some very confidential information. This guidance document has been produced in line with The Company's, Gloucestershire Safeguarding Children Partnerships (GSCP) and Adult Protection Services protection

Doc No:	-Q-I-008	Rev No	20	Next Rev Date	22/06/23
Issue Date:	22/06/22	Rev Date:	22/06/22	Page	31 of 60

policies and procedures. Under the stated guidelines there can only be a guarantee of limited confidentiality

The principle of this policy is to establish confidentiality as a right and set clear guidelines for The Company to ensure good practice. Where records and information relating to learners and staff are kept, The Company's will need to be clear **why** this information is held and **who** needs to have access to it.

Confidentiality can mean different things to different people, The Company has a policy of 'limited' confidentiality, where information is shared and restricted to certain people in the team, rather than kept by one individual; or where The Company's child protection procedures dictate that information will be shared with relevant statutory bodies. The disclosure of information to external agencies by The Company will be in line with local authorities' policies on sharing information for the protection of vulnerable groups Discussion on issues of confidentiality will be encouraged in team meetings, staff training and in supervision; the purpose of this is to increase the staff team's understanding of limited confidentiality.

19.2 Breaches of Policy

Breaches in confidentiality may jeopardise the wellbeing of staff and learners. When working with vulnerable people it is essential to create a trusting relationship on which some forms of counselling and advisory work depend. However, vulnerable people should think very carefully before making certain types of disclosures and be aware that a limited confidentiality policy is operational.

Breaches in confidentiality, which are contrary to the terms of this policy, may be subject to disciplinary proceedings or in the case of learners, a withdrawal of services.

Staff will be subject to disciplinary proceedings if the following occurs:

- Confidentiality is broken inappropriately
- Inappropriate use of data held by The Company
- Disclosure of client or staff details to unauthorised parties

19.3 General Principles

Disclosure: The ultimate reference point for deciding who should be informed of a piece of confidential information should be the individual concerned.

Informed Consent: It should be stressed that consent should be informed consent i.e., the reasons for sharing/not sharing information should all be discussed with an individual.

19.4 Personnel and Administration

All staff will be given a copy of the confidentiality policy as part of their induction. The implications of the policy for their work will be explained.

Personnel files and other confidential staff records will be kept in a locked cabinet for which the HR manager is the only key holder, in line with good practice guidelines in regard to DBS procedures.

Job application forms, job interview records and job monitoring forms are confidential to The Company. The interview panel will hand in all papers at the end of interviews.

References - when references for new employees are requested, it will be made clear that

Doc No:	-Q-I-008	Rev No	20	Next Rev Date	22/06/23
Issue Date:	22/06/22	Rev Date:	22/06/22	Page	32 of 60

the references will be available only to the staff member concerned, otherwise they will be confined to the line manager/director and members of the interview panel.

Supervision - with the exception of disciplinary action, information discussed in supervision will be confidential to the people concerned in the meeting and the supervisor's line manager.

General office - the centre manager is responsible for ensuring that all staff keep to the office systems procedure. This entails being clear about who has access to what information, that filing cabinets and key boxes are locked when the office rooms are not staffed.

IT - The Company is registered under the Data Protection Act 1998.

- Individuals have the right to:
- be informed if information is held on her/him
- have access to such information within 40 days
- where appropriate to have it corrected or erased
- exemptions:
- mailing lists
- pay details
- statistics, providing persons cannot be identified
- information acquired from statutory agencies, which may cause harm to that individual or another.
- Confidential information stored on disc will be kept in a secure and locked cabinet. Where information is erased on computer for reasons of confidentiality, it must also be erased on all back-up discs and copies.

19.5 Learners

Any information held on learners will be confidential to members of the staff team. They will have access to their own files through appointment with their tutor. All files are kept secure and destroyed after the appropriate contractual time specified.

Records Kept

- Information regarding application details, references, next of kin, previous address, contact numbers etc and on-going correspondence between The Company and any client will be kept in the client's file.
- Age, gender, disability, racial/ethnic origin, referral source, date of departure, training offered and given, how long using The Company's services, reasons for leaving, where moved on to, criminal record and other support needs (where appropriate).

The Company may give information to housing benefit departments when this has been authorised by a client.

The following guidelines should be adhered to: -

- Service user records in hard copy should be kept in, preferably a locked if unsupervised, cabinet with access denied to unauthorised parties.
- Service user records in electronic copy should have access denied to unauthorised parties by use of password protection for logging onto the system for details.
- Data should be kept in line with the Data Protection Act 1984 and 1998 and GDPR.

Doc No:	-Q-I-008	Rev No	20	Next Rev Date	22/06/23
Issue Date:	22/06/22	Rev Date:	22/06/22	Page	33 of 60

- The Company's service users should be informed of the limited confidentiality policy in place through induction
- Any information discussed with service users should be kept confidential unless disclosure is necessary under The Company safeguarding vulnerable groups policies and procedures
- Telephone numbers and addresses of workers and service users are strictly confidential and should never be disclosed.

Information should never be given out over the telephone unless: -

- You are certain that you are aware of whom you are speaking to.
- You return the call so that you are aware of whom you are speaking to.

Service users should never be discussed outside company business hours and only to authorised colleagues in connection with legitimate service user business during business hours.

Through support and advice work with service users, notes and records may be kept, however, the following is to be noted.

If a worker receives a contentious or difficult unsolicited disclosure and is asked to keep it to themselves, they will need to make clear that staff may need to share information with their line manager and that it is possible for staff to:

- Refuse to agree to a contract of absolute confidentiality and
- Not to continue a conversation if they feel that it may be heading to an area of disclosure that they are unhappy to take on board. Wherever possible, consent is sought to share this information.

Discussions with services users should include the following:

- The Company operates a limited confidentiality policy and that information shared is confidential unless it is felt that either the service user themselves or anyone else is at risk.
- Do not promise that you would not disclose the information to other agencies, do explain the reporting procedure for The Company and why you may have to disclose information.

Records are kept on a database in line with the Data Protection Act 1984 and 1998 & GDPR

Learners are expected to respect the rights of other service users in regards personal information on each other. A breach of confidentiality by a service user about another service user may be viewed as harassment and may be seen as cause for a withdrawal of services.

Learners are expected to respect the rights of staff to confidentiality.

Service users taking part in media events must not disclose a project address or names of other service users for public information. They will be clearly informed that they are not obliged to take part in any media events if they do not wish to do so.

Doc No:	-Q-I-008	Rev No	20	Next Rev Date	22/06/23
Issue Date:	22/06/22	Rev Date:	22/06/22	Page	34 of 60

19.6 Contractual paperwork

All paperwork will be considered confidential. This includes all paperwork generated by The Company to aid in contractual compliance as well as paperwork completed by staff to demonstrate good practice in contract compliance.

Any member of staff distributing or lending such paperwork to external non contractual agencies without prior approval from The Company's senior management may be subject to disciplinary proceedings.

The Company will assess when a situation necessitates breaching confidentiality. Confidentiality is rarely broken. The type of instances in which confidentiality may be breached are as follows:

If a service user poses a serious risk to themselves or others. In these instances, The Company may give information to statutory/emergency services. E.g., Police, appropriate local authority departments or to a housing agency or support agency.

Information will be provided to the Police and where relevant insurance companies, when crimes have been committed against staff, service users and property.

20. Staff Contact with Service Users

To be read in conjunction with The Company chaperoning policy, lone working policy, professional boundaries, staff confidentiality and disclosure of information policy and PTS/NCLP grievance and disciplinary procedures.

The Company has clear, accredited procedures for the protection of vulnerable people. The implementation of these procedures is mandatory and staff should ensure they are familiar with the contents. In order to ensure professional and safe practice by staff in their contact with service users and 3rd parties involved in cases, staff should familiarise themselves the directions below.

It is explicitly forbidden for staff to engage in a personal relationship with a vulnerable person, whatever their age who is a service user of The Company. This instruction covers both on duty and off duty time. (Definition of a vulnerable person can be found in the safeguarding vulnerable groups policy).

A personal relationship should be taken to mean 'Any non-work-related contact that might be construed as a friendship or where the employee might reasonably be presumed to be in a position where their actions might bring The Company into disrepute or subject to criticism'.

Such relationships need not be emotional or intimate. Staff must not invite service users to their homes or visit service users in theirs unless it is to carry out work agreed on behalf of The Company. Meeting service users in other venues, except where intended and appropriate for the discharge of The Company's work, is also forbidden.

In any event, staff should ensure they inform their line manager or use the agreed 'whereabouts' procedures so no suggestion of unauthorised contact can be made. **(see lone working policy).**

Staff should not include clients as friends on social networking sites or other online chat forums. This may be considered as a disciplinary issue in line with the safeguarding policy.

Doc No:	-Q-I-008	Rev No	20	Next Rev Date	22/06/23
Issue Date:	22/06/22	Rev Date:	22/06/22	Page	35 of 60

Staff are further reminded that personal relationships with 3rd parties related or known to service users should be avoided. We fully acknowledge the right of employees to privacy in their own affairs. However, experience has shown that such relationships can create conflicts of interest for employees that can compromise the professional integrity of the worker and PTS/NCLP.

If staff members are concerned about any service user seeking a relationship or if staff have reason to believe that any of the above directions are likely to be or have been breached, they should inform their line manager at the first opportunity. Staff are reminded that they have both professional and legal obligations to disclose confidential information in certain circumstances and that The Company has a staff confidential reporting policy that clearly states its commitment to supporting staff with concerns or worries that need reporting to management. (see staff confidentiality and disclosure of information policy)

Staff are reminded that breach of the above directions will potentially result in The Company reporting staff actions to the appropriate local authority in line with its safeguarding vulnerable groups policy and may be subject to disciplinary action under the category of gross misconduct rendering them liable to summary dismissal.

Doc No:	-Q-I-008	Rev No	20	Next Rev Date	22/06/23
Issue Date:	22/06/22	Rev Date:	22/06/22	Page	36 of 60

Annexe A

Safeguarding Vulnerable Groups Referral Process **Youth Provision**

All individuals working with children and families have a duty and responsibility to report any allegations or concerns of a vulnerable person / child protection nature. When such a concern is raised you should follow the process below.

Safeguarding/Prevent/EOD Reporting Process (CPOMS)

Child Protection Online Management System (CPOMS) is an online management system that records all safeguarding, prevent, EOD and causes for concern for our youth programme learners. The information recorded in this system can be used to inform other agencies in-line with child protection i.e. serious case reviews

When a member of staff starts with PTS/NCLP they will be taken through CPOMS training with the safeguarding manager and will be issued with a log-in and password.



When a safeguarding/prevent/EOD or cause for concern arises, the member of staff that has identified the incident/concern is required to log-in into CPOMS and record the incident/concern in line with the CPOMS training. This must be completed within 24 hours. You are obliged to ensure that the information is accurate, factual with no omissions or any missing vital information. Please note you should contact the safeguarding manager by phone if you require immediate support or advice.



CPOMS will notify the safeguarding manager immediately. The safeguarding manager will acknowledge receipt of the concern within 24 hours at this stage you will be notified by

CPOMS that the referral has been processed along with any identified actions. If an EOD concern is reported the EOD officer will be notified. It is important that these actions are carried out within the timescales specified. In the case of a prevent concern the safeguarding manager will refer to the prevent and channel process



Please remember that your responsibility is to report concerns to the safeguarding manager via CPOMS, do not deal with the concern yourself: you will be involved throughout the process in order to support the learner (where appropriate) You may be required to attend meetings with the learner and other parties involved throughout the support process for this learner.

You will find all relevant training documents, processes and any safeguarding guidance upon the Prospect Training Services Cloud in the Safeguarding Folder.

Adult Provision

When a safeguarding/prevent concern arises, the safeguarding manager must be informed immediately, either verbally over the phone or by using the safeguarding incident referral form electronically; in either case, a hard copy of the referral form must be submitted within 48 hours. We are obliged to ensure that these forms are fully completed with no omissions or any missing vital information.



The staff member should submit the safeguarding incident referral form with an electronic copy being held by the staff member in a secure password protected folder. Please ensure that no sensitive information is ever retained in a learner/customer file – the safeguarding incident number can be held on file



The safeguarding manager will acknowledge receipt of the concern within 24 hours by email and will assign an incident number as well as advising the staff member of the proposed review schedule. In the case of a Prevent concern the safeguarding manager will refer to the prevent and channel process



Please remember that your responsibility is to report concerns to the safeguarding manager, do not deal with the concern yourself: you will be involved throughout the process in order to support the learner/customer (where appropriate)

You will find all relevant paperwork, processes, and any safeguarding guidance upon the Prospect Training Services Cloud in the Safeguarding Folder.

Doc No:	-Q-I-008	Rev No	20	Next Rev Date	22/06/23
Issue Date:	22/06/22	Rev Date:	22/06/22	Page	38 of 60

Annexe B

External Speakers Process

When a member of staff has identified an external organisation/speaker to attend a planned session they are required to complete the external speakers risk assessment in order to create a safe learning environment and remove the potential risk of radicalisation in line with our SVG/prevent policy. If the external organisation/speaker is expressing a specific ideology, then the member of staff must ensure that those views are counteracted within the same session.



It is the member of staff's responsibility to ensure that enough time is given to fully complete the risk assessment in order for the SVG rep to approve the external organisation/speaker prior to the planned session. If the external organisation/speaker has previously attended a planned session the staff member must request a copy of the external speaker's evaluation form from the SVG manager as part of the risk assessment.



It is not mandatory for an external organisation/speaker to have a DBS as it is a requirement for ALL external organisations/speakers, regardless of whether they have a DBS to be supervised at all times. The staff member supervising should ensure that no photographs are taken by the external organisation/speaker at any time.



Once the SVG rep has approved the external organisation/speaker the risk assessment must be sent to the SVG manager to be added to the SVG referral register.



Following the session, it is the responsibility of the member of staff to complete the external speaker's evaluation form and send to the SVG manager. The SVG manager will add the details to the SVG referral register. If the feedback on the evaluation form raises any concerns with the SVG manager and it is decided that PTS/NCLP would not use them again in the future an email will be sent out to all staff to update.

Please Note: If any Safeguarding/Prevent concerns arises during the session please refer to the SVG/Prevent Referral process and report the concern immediately.

Annexe C

Prospect Training Services IT Help Desk

- When a learner/customer uses any PC or laptop in any of the training rooms this must be logged on the **PC/laptop room plan** for that session (see example plan)
- It is the responsibility of all staff to monitor learners/customer usage
- If a learner/customer is observed accessing a prohibited site (see **prohibited sites list**) the member of staff must ask the learner/customer to take a seat away from the PC and where possible, try to record the details of the site i.e. website address then close the page so no other learners/customers can see it. It would be useful to make a log of the time and date of the incident too
- If the learner/customer closes down the site before you get the chance to obtain the details, please just record the time, the date and what you have witnessed
- The learner/customer should then be restricted from using the PC/laptop for the remainder of that session and informed that this will be reported to the safeguarding team
- When the session ends the member of staff should complete a **Safeguarding Incident Referral Form**, indicating whether this is a Prevent concern
- The member of staff should also report the incident using the Freshdesk reporting system, access for this is provided during every member of staff's induction.
- Please ensure you record the incident under the correct heading and give as much detail as possible and also attach a scanned copy of **PC/laptop room plan**
- Please also ensure you keep the **PC/laptop room plan** to pass onto the safeguarding team

Prohibited Sites

- All social media sites
- Any sites with adult content
- Any sites promoting alcohol, tobacco or narcotics
- Any sites containing violence, profanity or obscenity

Doc No:	-Q-I-008	Rev No	20	Next Rev Date	22/06/23
Issue Date:	22/06/22	Rev Date:	22/06/22	Page	40 of 60

- Any sites containing weapons, explosives, pyrotechnics
- Any gambling sites
- Pornographic
- Any sites promoting extremist material
- Any online shops and commerce
- Any sites promoting self-harm or bullying
- Gaming sites

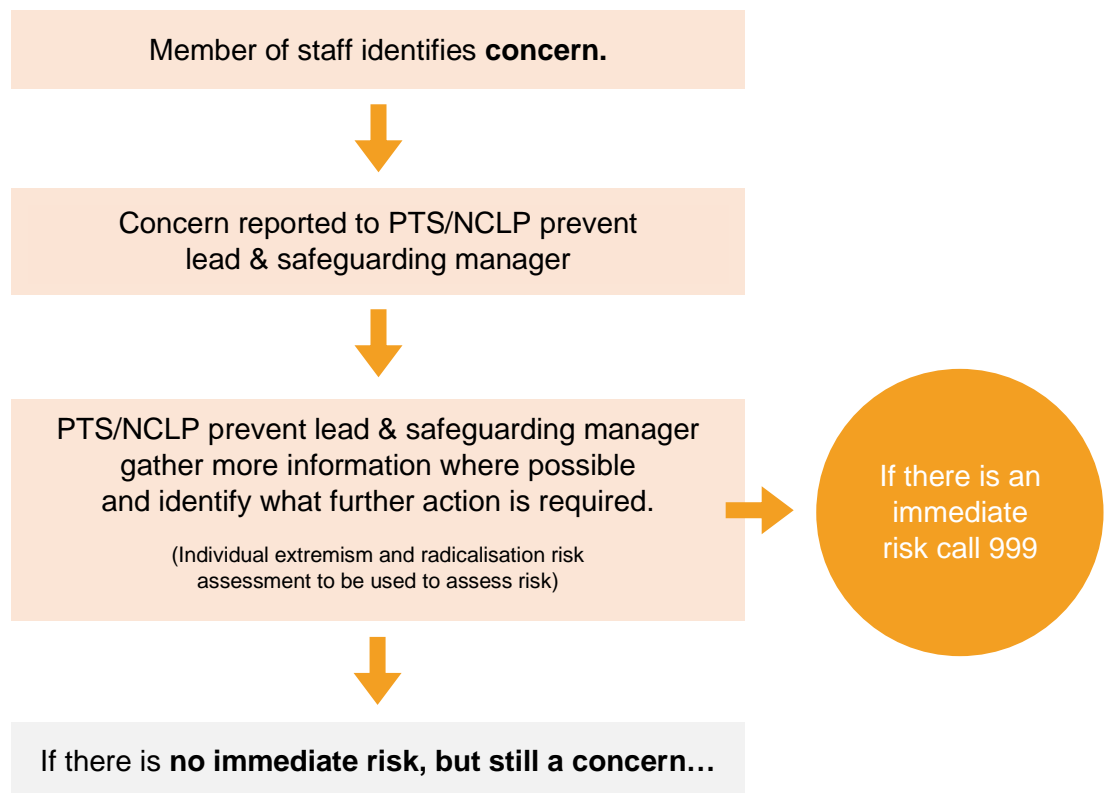
This list is not exhaustive if you feel a website is inappropriate and you are concerned about what you have seen please report it.

Annexe D

Prevent and Channel

Process map for reporting a concern of a vulnerable individual

It is important for you as a member of staff know where to go if you have a concern that someone may be on the route to radicalisation. Below is a flow chart which aims to show the process as to which you can follow:



Doc No:	-Q-I-008	Rev No	20	Next Rev Date	22/06/23
Issue Date:	22/06/22	Rev Date:	22/06/22	Page	41 of 60

1. Prevent lead to contact HE/FE prevent coordinator
– Cheri Mayers cheri.mayers@education.gov.uk



Or your other options are...

2. Call 101 and ask for
Local Policing Team.

5. Call the Anti-terrorist
hotline on 0800 789 321.

3. Contact your Prevent team
on 01392452555

4. Email:
channelsw@avonandsomerset.pnn.police.uk

Once a referral has been made and enters the channel process,
the below process map illustrates what happens next...

Further information gathering with your institution
and other key agencies that the individual is involved
with. Are there shared concerns between partners?
Is there a vulnerability to radicalisation?

No

If it is deemed there
is low risk –further
action within normal
support. Key agency
progresses with
further monitoring.

Yes

Police will organise a multi-agency channel meeting
which will be made of key partners. The meeting will
be chaired by Gloucestershire County Council.

It is important to remember that
consent is gained with the
individual to be part of channel
support and intervention.

Implement bespoke support plan

Regularly review process – channel panel members
work together to review progress and reduce risks.

Doc No:	-Q-I-00	Rev	22/06/23
Issue Date:	22/06/22		42 of 60

The individual will exit the channel process when all
partner agencies feel that the vulnerability to
radicalisation has been significantly reduced.

Once a referral has exited the process, it will be reviewed at 6 and 12 months.
If concerns remain, the individual can be re-referred.

Annexe E

Useful Contact details

Organisation	When to contact	Contact Number	Name/post
1. GSCP (Gloucestershire Safeguarding Children Partnership)	Information Advice and Guidance (IAG) Staff Training	01452 583 629 Training & Development - Gloucestershire Safeguarding Children Partnership gsep@gloucestershire.gov.uk	Administration
2. Gloucestershire's LADO (Local Authority Designated Officer)	Reporting abuse allegations/concerns against professionals (Members of staff and other professionals)	01452 426994 LADO@gloucestershire.gov.uk	Nigel Hatten Nigel.hatten@gloucestershire.gov.uk
4. Children and Families Helpdesk (Social Services)	Making a child welfare referral Urgent referrals by phone; where a child is at risk of significant harm.	01452 426565 childrenshelpdesk@gloucsetershire.gov.uk Gloucestershire Childrens Services Portal	Front Door Service Team

Doc No:	-Q-I-008	Rev No	20	Next Rev Date	22/06/23
Issue Date:	22/06/22	Rev Date:	22/06/22	Page	43 of 60

4a. Emergency Duty Number Out of Hours	For a general referral where there is a concern for the welfare of a child a MARF (Multi Agency Service Request Form) should be completed via the portal	01452 614194	Duty social worker
6. Child Line	IAG	0800 1111	N/a
7. NSPCC (Glos)	IAG	01452 300616	N/a
8. Police Control Room	Non-Emergencies	101	Control Room

Adult Services 18 Years +

Organisation	When to contact	Contact Number	Name/post
1. Adult Helpdesk (Social Services)	Reporting welfare concerns	01452 426868 Safeguarding Adults Board - Safeguarding Adults in Gloucestershire	Duty Social Worker

Annexe F

COVID-19 Safeguarding Response Plan

The Coronavirus Pandemic has temporarily changed the way in which our staff work with our learners, customers, partners, and other external agencies. Our safeguarding vulnerable groups policy is still at the forefront of how we support and safeguard our learners and customers. We are continuing to follow UK Government guidance and will review this addendum regularly. A summary of our COVID-19 safeguarding response plan is below:

1. Vulnerable Groups

We work with vulnerable groups across our organisation and understand that at this time of uncertainty their vulnerability increases, they may become more isolated from their communities, they may struggle financially, and their health and well-being may be impacted.

1.1 Our Adult Provision – Work & Health Programme

Following UK Government advice, we have made the decision to close our centre which has led to no face-to-face contact with our customers. Each change coach is responsible for keeping in regular contact with their customers, this is via the telephone. Telephone contact is logged using our existing systems and our safeguarding incident reporting process is in place for any concerns that result from this contact. Our safeguarding manager has provided the staff with her contact details and is available for concerns to be reported, these will be actioned within the timeframes outlined in our policy, and considerations will be made to our partner agencies new COVID-19 working patterns. We understand that ongoing staff

Doc No:	-Q-I-008	Rev No	20	Next Rev Date	22/06/23
Issue Date:	22/06/22	Rev Date:	22/06/22	Page	44 of 60

contact with our vulnerable customers without the usual support of their colleagues can impact on staff well-being. Therefore, our staff have direct contact with their line manager each day and all staff have been informed of the support in place for them via our staff wellbeing officer.

1.1.2 Adult Provision – Work & Health Programme – Centre Re-opening

From 6th July 2020 the WHP staff team have returned to work in the centre, full health and safety risk assessments are in place to minimise the risk to the staff and our visitors to the centre. Our priority has been to ensure that our staff can adapt to this new way of working and feel comfortable within their working environment before we reintroduce customer appointments. During this stage of transition our customers continued to have regular contact with their change coach and the company safeguarding processes remained the same. From 27th July 2020 our WHP customers have started to attend appointments in the centre, ahead of these appointments each customer is provided with up-to-date H&S information and will continue to be provided with the health and well-being support required to help them manage this transition. We have a full track and trace system in place. Our staff team have undergone training in the use of Microsoft TEAMS for the purpose of offering 1:1 meetings and interventions should the customer not be able to attend their appointment in the centre. There is a full document set relating to the safeguarding risks, which includes a TEAMS risk assessment, TEAMS code of conduct and a TEAMS narrative. We understand that this approach will not work for all customers and may not be appropriate for our high-risk customers, therefore this service is offered on an individual basis. Our staff team are aware that the Coronavirus Pandemic may have caused a great deal of trauma and distress to our customers, this will be at the forefront of their minds when supporting the customer to re-frame and work towards their career targets.

1.1.3 Adult Provision – Work & Health Programme/JETS – revert to working from home

From 05/10/2021 in line with the national lockdown all staff will resume working from home. The support and contact that we will have with our customers is outlined in Section 1.1 this will be in place until further updates from the UK Government.

1.2 Our Youth Provision – Study Programmes & NEET Provision

The UK Government has instructed the closure of all schools, colleges, and further education providers. Therefore, from the 23/03/2020 and until further notice our delivery centres are closed. We understand that many of our learners fall into the vulnerable children category which includes:

- children who are supported by social care,
- those with safeguarding and welfare needs,
- those on child in need plans,
- on child protection plans,
- 'looked after' children,
- young carers,
- disabled children and
- those with [education, health and care \(EHC\) plans](#).

We will continue to support this group of learners; we have contacted all learners within this group to establish how we might safely continue to offer face-to-face delivery. Many of this group are required to use public transport or they or their family members fall into the At-risk category so are unable to attend sessions safely in-line with UK Government social distancing guidance. Our support offer to this group of young people is tailored to their individual needs which includes regular telephone contact, access to contact with their

Doc No:	-Q-I-008	Rev No	20	Next Rev Date	22/06/23
Issue Date:	22/06/22	Rev Date:	22/06/22	Page	45 of 60

existing mentors and learning materials being sent to them. Extra support is available for those with identified additional needs, and we will continue to support them to work towards preparing for adulthood outcomes. All of this contact is logged using our child protection online management system (CPOMS) which is monitored by our safeguarding manager who is working closely with the 3 Gloucestershire Safeguarding Children Partnership (GSCP) Partner Agencies. Child protection plans and child in need plans will continue to be adhered to, our safeguarding manager will attend telephone and video conferencing meetings in a timely manner to ensure the outcomes of these plans are being worked towards. EHCP annual reviews will also be held via telephone and video conferencing. Our organisation will continue to support the frontline social workers, the virtual school and other local authority staff to track and monitor our vulnerable learners.

1.2.2 Partial re-opening of centre to vulnerable learners as of 22/06/2020

The UK Government has instructed that we can partially open our centres to offer our most vulnerable learners 1:1 time with their tutors, this should run in addition to our online delivery model. A learner survey has been carried out with these learners and their parents/carers to determine if it is safe for them to return. The results of this survey have enabled us to identify a group of learners who can return to our centre. From the 22/06/2020 individual 1:1 tutor led sessions will be offered to this group. These sessions will run from Mill Place. All H&S risk assessments have been carried out in line with COVID-19 guidance. Learners & their parents/carers have all been provided with an information letter and guide to using public transport (for those who have no alternative form of transport) There will be a health and Safety and well-being briefing for each learner when they are in the centre. The learner's well-being and emotional needs will be considered at all times, tutors will offer time to the learners to discuss concerns and will call upon the designated safeguarding lead (DSL) to support with any safeguarding, well-being or mental health concerns that are disclosed or recognised. **(safeguarding reporting process detailed in section 2)** Our tutors have also been provided with support and guidance on how to support the learners as they return.

1.2.3 Offer of 1:1 support to mainstream learners as of 06/07/2020

Following a carefully managed reintroduction of our vulnerable learners to our centre we have opened up our offer of 1:1 support for our mainstream learners. The same processes and safeguards are in place as they have been for the vulnerable group. These sessions will take place at our London Road centre and our test centre will be open for the purpose of functional skills examinations being undertaken.

We will continue to provide support to all learners, which includes regular weekly telephone contact, online and paper-based learning resources and support from tutors where required. Our staff have been instructed to be mindful that at this time all of our learners may feel anxious, isolated and their well-being may be impacted. Therefore, any concerns for our learners should be logged using our existing safeguarding incident reporting process (CPOMS)

1.2.4 Full time provision for all learners from September 2020

The UK Government has instructed that all schools, colleges, and training providers should be ready to offer their full provision at the start of the new term in September. Our staff have had time to adapt to this new way of working and have had full health and safety training to ensure that we can keep our learners as safe as possible. All staff have been fully briefed on the importance of supporting our learners with this difficult transition back into education. We realise that after such a long absence, staff awareness of key issues such as isolation, anxiety and any trauma brought on by the pandemic is vital if we are to successfully support our learners back into a

Doc No:	-Q-I-008	Rev No	20	Next Rev Date	22/06/23
Issue Date:	22/06/22	Rev Date:	22/06/22	Page	46 of 60

group environment. All learners will be required to take our learner return to training survey, with this information being held centrally so we can offer a tailored response to their health and well-being needs should there be further local lockdowns or the need for the clinically vulnerable to shield again. Our training offer will be a blend of on-site delivered learning and virtual learning through Microsoft TEAMS Education, this has now been rigorously tested and we have in-depth safeguarding risk assessments/processes in place to support this. We are aware that this model will be invaluable should there be further restrictions placed on our organisation.

1.2.5 Suspension of face-to-face delivery, remote learning to commence from Jan 2021

The UK Government has instructed that all schools, colleges, and training providers should suspend face to face learning and deliver remote learning. Only vulnerable learners (as outlined above) will return to face-to-face delivery; these learners will be contacted and informed of their return date. All other learners will access their sessions remotely via Microsoft TEAMS. All learners in work placements will be informed by their placement officer if they are expected to continue attending their placement. During this time, those learners who are not attending the centre will be contacted on a daily basis by our learner support officers to check on well-being and offer pastoral support. Our learning mentor will carry out home visits (COVID Safe) to check on the welfare of learners whom we are concerned about. All learners who qualify for free school meals will continue to receive their allowance; this will be paid directly to them via their bank account. Bursary payments will continue to be paid based on individual engagement in virtual learning. This will be in place until further instruction from the UK Government.

1.2.6 Return of learners for face-to-face delivery commencing 08/03/21

The UK Government has instructed that all schools, colleges, and training providers can return to face-to-face learning. Our centres will re-open to all learners on 08/03/21, previous COVID-19 H&S controls will be in place, with the addition of all learners (unless exempt) wearing a face covering at all times when inside the centre, training providers will be given the resources to offer lateral flow testing to learners by the end of March 21, PTS/NCLP staff are taking part in voluntary testing on a twice weekly basis. Our main delivery will consist of face-to-face classes, with an option to learn remotely on Microsoft TEAMS if local infection rates rise or in the case of learners being required to self-isolate. All staff have undertaken psychological 1st aid training through Public Health England to equip them with the knowledge and skills to support our young people with settling back into the classroom.

1.3 Apprenticeship Learners

In line with UK Government advice the PTS/NCLP Apprenticeship Team have been moved to working from home and our centres are closed. Which has led to no face-to-face contact with apprentices since the 23rd March 2020

We are in regular contact with all apprentices and employers to agree the best way to move forward and support the apprentice. We are utilising various forms of technology to help us to deliver teaching and learning, carry out 3-way reviews and gateway where possible.

Where an employer has placed an apprentice on furlough leave for more than 4 weeks, PTS/NCLP are working with the employer to agree a planned break in learning.

Each tutor/assessor is responsible for keeping in regular contact with their apprentices via the telephone, video calls and/or emails. All contact is recorded using an email version of the PTS/NCLP progress report. All staff would raise any safeguarding issues via CPOMS.

Our safeguarding manager has provided the staff with her contact details and is available for concerns to be reported, these will be actioned within the timeframes outlined in our policy.

Our staff have direct contact with their line manager each day and all staff have been

Doc No:	-Q-I-008	Rev No	20	Next Rev Date	22/06/23
Issue Date:	22/06/22	Rev Date:	22/06/22	Page	47 of 60

informed of the support in place to them via our staff wellbeing officer and safeguarding manager.

1.3.1 The UK Government has advised that face to face delivery for apprentices can continue during this 3rd national lockdown. Any delivery of this nature will be heavily risk assessed in line with our COVID safe control measures.

1.4 NCLP

All NCLP learners are over the age of 19, therefore fall under the organisations adult safeguarding process, which the NCLP staff team are fully aware of; this process remains in place during the COVID-19 Pandemic. The learners are supported via weekly telephone calls, which are all logged in line with Herefordshire County Council's contact policy. The learners are being provided with access to virtual learning via Zoom, this has been risk assessed for safeguarding purposes in line with Herefordshire County Council's policy. For those learners who would prefer other methods of learning, telephone support is provided.

2. Arrangements for Designated Safeguarding Lead (DSL)

The organisations DSL is known as the safeguarding manager. The safeguarding manager will be available for all staff to report any safeguarding concerns during the hours of 8.45am to 4.45pm Monday to Friday, these can be reported in the following ways:

- By email katew@PTS/NCLPYouth.co.uk
- By phone 07515 596957
- Via CPOMS. Kate Whereat should be alerted in all logs recorded (youth provision)

In the case of the DSL contracting the virus or for any other sickness or annual leave, the deputy designated safeguarding lead (DDSL) Jane Trehearne will be available and is contactable during the same working hours:

- By email janet@prospect-training.org.uk
- By phone 07500 962071
- Via CPOMS staff should alert Kate Whereat and Jane Trehearne in any logs (youth provision)

It is advised that staff do not have contact with our learners or customers outside of these hours, all work mobile phones should be switched off out of normal working hours. In the exceptional circumstances where contact is made with a learner or customers outside of these hours and an urgent safeguarding concern should arise, if the DSL or DDSL are not available, the concern should be reported to either:

- Police via 101
- Out of hours Gloucestershire Safeguarding Children Partnership via 01452 614194

All records and details of this contact should then be reported and logged in line with our safeguarding incident reporting process as soon as possible on the following working day.

3. Updates to advice from our 3 GSCP partners:

3.1 Gloucestershire Safeguarding Children Partnership (GSCP)

The GSCP have advised on their change to working practices, many of their staff are working from home. The arrangements for making referrals to the Multi-Agency Safeguarding Hub (MASH) remain the same, using the Liquid Logic Portal to complete a Multi-Agency Request Form (MARF). During the hours of 9am to 5pm all enquiries should

Doc No:	-Q-I-008	Rev No	20	Next Rev Date	22/06/23
Issue Date:	22/06/22	Rev Date:	22/06/22	Page	48 of 60

go via email: childrenshelpdesk@gloucestershire.gov.uk out of hours reporting should go via 01452 614194.

The process for reports of concerns about a professional working with a child (Allegations Management) remain the same but this should be completed via <https://ges-online.com/Gloucestershire/eLADO/Live#!/Public>

All face-to-face GSCP training events have been cancelled until further notice, this will be reviewed regularly. Therefore, any staff that are booked on to any training events during this time will not be required to attend and should await further guidance from the safeguarding manager as to when this will be rebooked.

3.2 Gloucestershire NHS Clinical Commissioning Group

Our NHS staff are currently working front-line to safeguard and protect us from the Coronavirus Outbreak, this will mean that some of the NHS services which we refer to will have changed their working practices and their availability of services. Information on this can be found at www.gloucestershireccg.nhs.uk/nhs-in-gloucestershire-stepping-up-covid-19-response/

Our safeguarding manager will keep in regular contact with our NHS partners such as Children and Young Peoples Services (CYPS), Sexual Assault Referral Centre (SARC) Teens in Crisis (TIC) and 2gether Trust (Mental Health Services) to keep up to date with their working practices and the referral mechanisms put in place by these services to continue to support our vulnerable groups.

3.3 Gloucestershire Constabulary

Our local police are currently working front-line to keep us safe and ensure we are all adhering to Coronavirus lockdown measures set out by the UK Government, information on this can be found at www.gloucestershire.police.uk/ Their advice is to only use their 999 telephone number in an emergency. For any other matters their 101 telephone and online service is available. We still have a duty to report any concerns of a criminal nature and we may also require the police to carry out welfare checks on our customers and learners if we have any serious concerns about their well-being, this should only be done in a proportionate manner and where possible should always be requested via the safeguarding manager.

4. Working from Home Safeguarding Protocol

Many of our staff are now working from home. This is a new way of working for many of us, staff may feel isolated and the uncertainty relating to the Coronavirus Pandemic may have an impact on staff well-being. The advice and guidance provided below is to ensure staff are safeguarding themselves and our learners/customers:

- All staff should only contact learners/customers during work hours using work email or phones, personal mobiles, landlines, or email addresses should not be used
- All managers should report twice daily on their staff whereabouts reporting on any sickness and leave to our central line manager reporting system on Microsoft Teams
- All staff should ensure they log any contact they have had with our learners and customers, with particular importance paid to the reporting of any safeguarding concerns
- Any virtual contact with our learners such as online delivery should not take place before being agreed by senior management, this is to ensure safeguarding protocol is followed.

The following considerations should be made:

- No 1:1 video chat's, groups only

Doc No:	-Q-I-008	Rev No	20	Next Rev Date	22/06/23
Issue Date:	22/06/22	Rev Date:	22/06/22	Page	49 of 60

- Staff and children must wear suitable clothing, as should anyone else in the household.
 - Any computers used should be in appropriate areas, for example, not in bedrooms and where possible be against a neutral background.
 - The live class should be recorded and backed up elsewhere, so that if any issues were to arise, the video can be reviewed.
 - Live classes should be kept to a reasonable length of time, or the streaming may prevent the family 'getting on' with their day
 - Language must be professional and appropriate, including any family members in the background
 - Safeguarding risk assessments have been carried out for the use of live learning using webcams
 - Senior management are sure that any teaching/learning software and/or platforms are suitable and raise no privacy issues; or use cases against the providers terms and conditions (for example, no business use of consumer products)
- All staff should pay particular attention to their own health and well-being, this includes ensuring they have regular breaks and stop for refreshments whilst working. All staff should know that they can discuss any worries or concerns about their own well-being with either the safeguarding manager katew@PTS/NCLPyouth.co.uk or the staff wellbeing Officer ettyw@trainandrecruit.com

Etty Wellington is the organisations well-being champion, who is in daily contact with all of our staff.

- a) From 6th July 2020 there has been a managed approach to staff returning to work in the centres, this has been introduced on a case-by-case basis, with consideration for any caring commitments, shielding guidelines and the capacity of each centre to ensure we adhere to social distancing. The staff have been consulted and supported throughout this process with the message from senior management still being to work from home where possible. The same safeguarding reporting processes should be used for staff who are in the centre and working from home.
- b) From 05/01/2021 there will be a national lockdown the guidance is to work from home (where possible) All staff have been reminded of this advice; when they are not required in their designated centre to support the service delivery to our vulnerable learners and customers they should work from home and continue to follow the above protocol

Timeline of reviews and updates:

12/05/2020 – Draft

Code of Conduct – eLearning Over 18 Apprenticeships & Risk Assessment Virtual Classroom Teaching – Apprenticeships

19/05/2020 Final Version

Code of Conduct – eLearning Over 18 Apprenticeships & Risk Assessment Virtual Classroom Teaching – Apprenticeships

27/05/2020 – COVID-19 survey completed with vulnerable learners to establish safety for face to face delivery

Doc No:	-Q-I-008	Rev No	20	Next Rev Date	22/06/23
Issue Date:	22/06/22	Rev Date:	22/06/22	Page	50 of 60

https://docs.google.com/forms/d/e/1FAIpQLSdsJhGBuqeNAJsQXVI1ZqT_1SP_eU8N7UZjvYhFhTYetrQOEw/viewform?usp=sf_link

27/05/2020 – Risk assessment completed for individual on work experience with accountants
SVG Risk Assessment Virtual TEAMS Meetings – JS & Virtual Meeting Code of Conduct - JS

04/06/2020 – advice issued to Apps Tutors on secure saving of recorded sessions

10/06/2020 – NCLP shared risk assessment – *PTS/NCLP Risk Assessment Collecting Completed Portfolios* – review of this to take place for PTS/NCLP Study Programme Team

16/06/2020 – Lone working and home visits risk assessment created and circulated
MP - Lone Working Risk Assessment 2020 (3) - Covid-19 version

17/06/2020 – COVID-19 Centre Protocols Document circulated
PTS/NCLP COVID-19 Centre Protocols

18/06/2020 – Update made to Annexe F to detail partial opening of centre to learners -
PTS/NCLP Safeguarding Vulnerable Groups Policy – Annexe F COVID-19 Section 1.2.2 Top tips for staff for supporting return to centre

01/07/2020 – Update made to Annexe F to detail further re-opening of centre to mainstream learners
PTS/NCLP Safeguarding Vulnerable Groups Policy – Annexe F COVID-19 Section 1.2.3

06/07/2020 – Update made to Annexe F to detail re-opening of adult centre with the following documents created
PTS/NCLP Safeguarding Vulnerable Groups Policy – Annexe F COVID-19 Section 1.1.2 TEAMS Risk Assessment, TEAMS Code of Conduct and a TEAMS Narrative

06/07/2020 – Update made to Annexe F to detail staff returning to work in the centres
PTS/NCLP Safeguarding Vulnerable Groups Policy – Annexe F COVID-19 Section 4.1

12/08/2020 – Update made to Annexe F to detail full youth provision re-opening in Sept 2020
PTS/NCLP Safeguarding Vulnerable Groups Policy – Annexe F COVID-19 Section 1.2.4 PTS/NCLP Safeguarding Risk Assessment Virtual Learning SP, Virtual Learning Code of Conduct, Virtual Learning Parent Form 16+, Virtual Learning Parent Form Pre-16

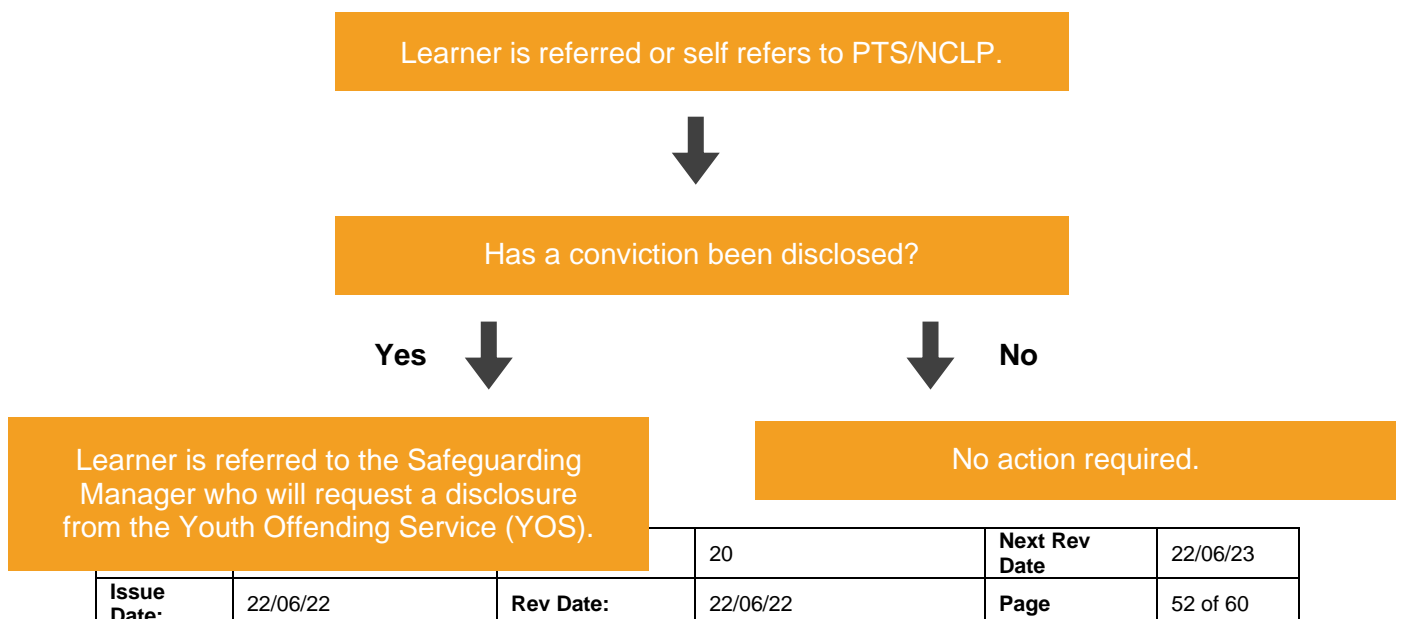
04/01/2021 – Update made to Annexe F to detail closure of centres and commencement of remote learning

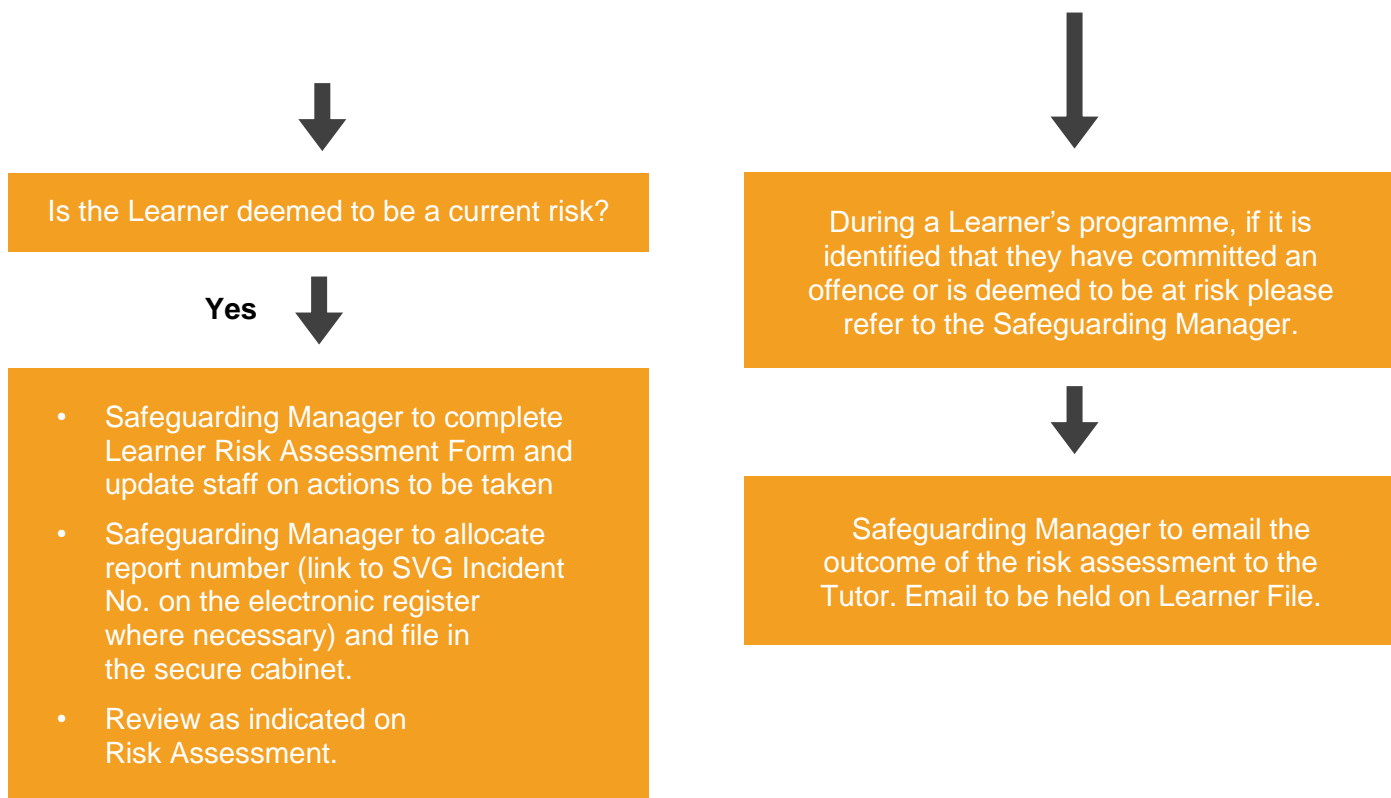
08/03/21 – Update made to Annexe F to detail commencement of face-to-face delivery for youth programme learners

Doc No:	-Q-I-008	Rev No	20	Next Rev Date	22/06/23
Issue Date:	22/06/22	Rev Date:	22/06/22	Page	51 of 60

Annexe G

Learner Risk Assessment Process





Annexe G

Learner Risk Assessment Form

Activity date Assessment date

Assessment subject & venue
General management control measures
Persons at risk

Doc No:	-Q-I-008	Rev No	20	Next Rev Date	22/06/23
Issue Date:	22/06/22	Rev Date:	22/06/22	Page	53 of 60

Details of Hazards	Risk Rating	Hazard Management Control	Residual Risk

Risk Assessment	
Date of Review	
Acceptable (Risks under control)	<input type="checkbox"/> Yes <input type="checkbox"/> No

Assessor details					
Name		Address			
Title					
Signature		Telephone number			
Doc No:	-Q-I-008	Rev No	20	Next Rev Date	22/06/23
Issue Date:	22/06/22	Rev Date:	22/06/22	Page	54 of 60

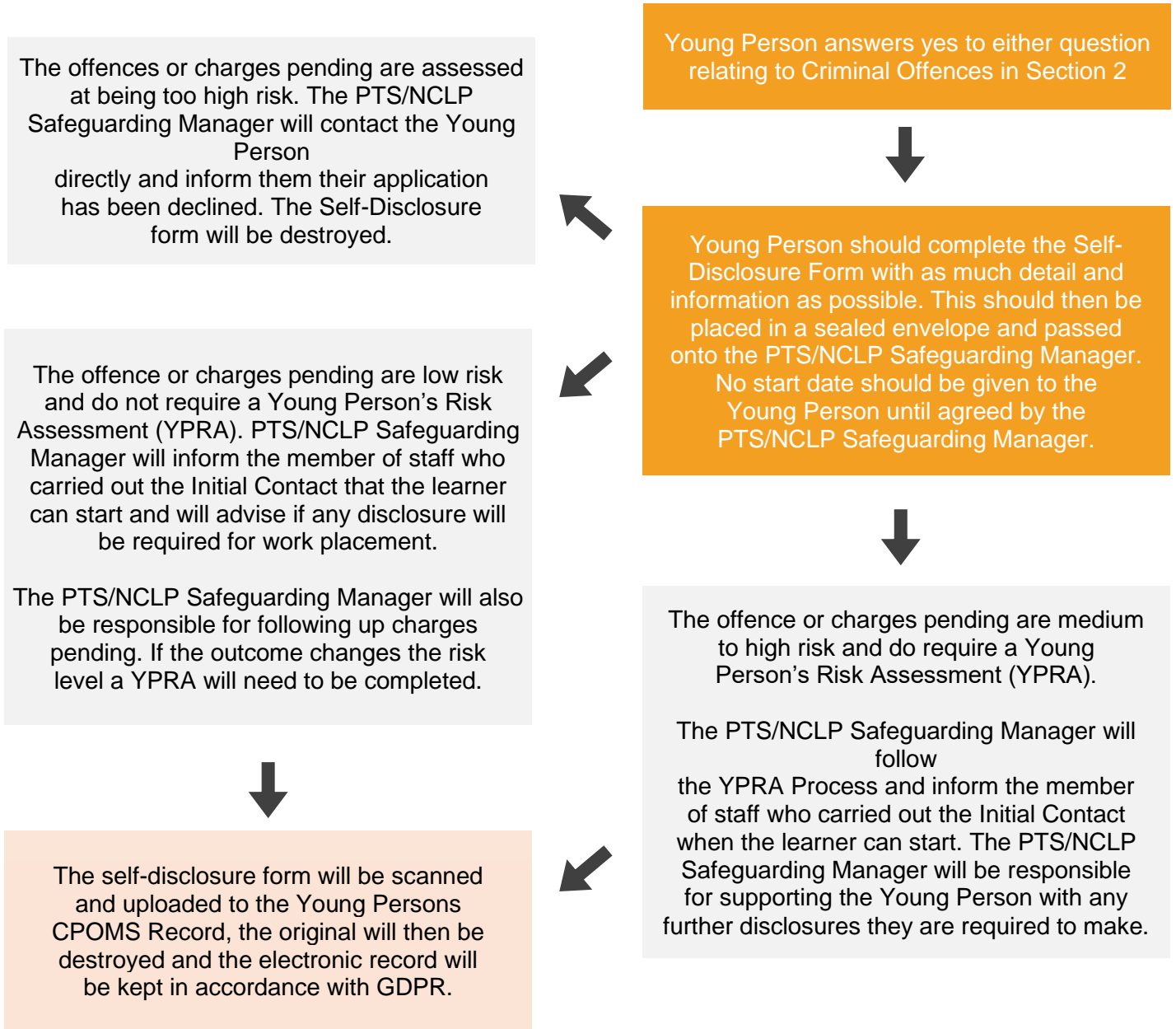
Action taken			
Date of briefing			
Contents of Risk Assessment briefed to relevant staff and pupils	<input type="checkbox"/>	Yes	<input type="checkbox"/> No
Verification by SLT			
Name/Location			
Signed		Dated	

Staff have read Risk Assessment, will abide by its contents at all times and respect its confidentiality.		
Name	Date	Signature

Doc No:	-Q-I-008	Rev No	20	Next Rev Date	22/06/23
Issue Date:	22/06/22	Rev Date:	22/06/22	Page	55 of 60

Annexe H

PTS/NCLP Conviction Disclosure Process



Doc No:	-Q-I-008	Rev No	20	Next Rev Date	22/06/23
Issue Date:	22/06/22	Rev Date:	22/06/22	Page	56 of 60

Annexe H

Criminal Record Self-Disclosure

Please refer to our Learner Inclusion Policy if you require any guidance prior to completing this form.

Your Name	
Your DOB	
Course you have applied for	

Do you have any offences which are currently 'Unspent' under the Rehabilitation of Offenders Act 1974? (you do not need to disclose anything that is deemed 'Spent')

Please provide details of the offence/s dates, dates of conviction/caution, offence type and sentence received below:

Please beware that if the work experience role that you plan to undertake requires you to undergo an Enhanced DBS Check, you will be required to disclose all convictions at this stage, including those that are 'deemed' spent (unless filtered)

Do you have any criminal charges pending?

Please provide details of arrest date, nature of arrest, expected court date, please indicate if it is magistrates, crown or youth court (if known) below:

Doc No:	-Q-I-008	Rev No	20	Next Rev Date	22/06/23
Issue Date:	22/06/22	Rev Date:	22/06/22	Page	57 of 60

Probation/Youth Offending Worker Name	
Probation/ Youth Offending Worker Contact Details	
Social Worker/Key Worker Name	
Social Worker/Key Worker Contact Details	

By signing below, I can confirm that the information I have provided is accurate to the best of my knowledge. I understand that this information will not necessarily prevent me from being offered a place on the course and that I will be given the opportunity to discuss any concerns that PTS/NCLP may have before they make a final decision on my suitability for the course. **I am also giving consent for the PTS/NCLP Safeguarding Manager to contact the agencies highlighted above to obtain further information and risk assessments where required.**

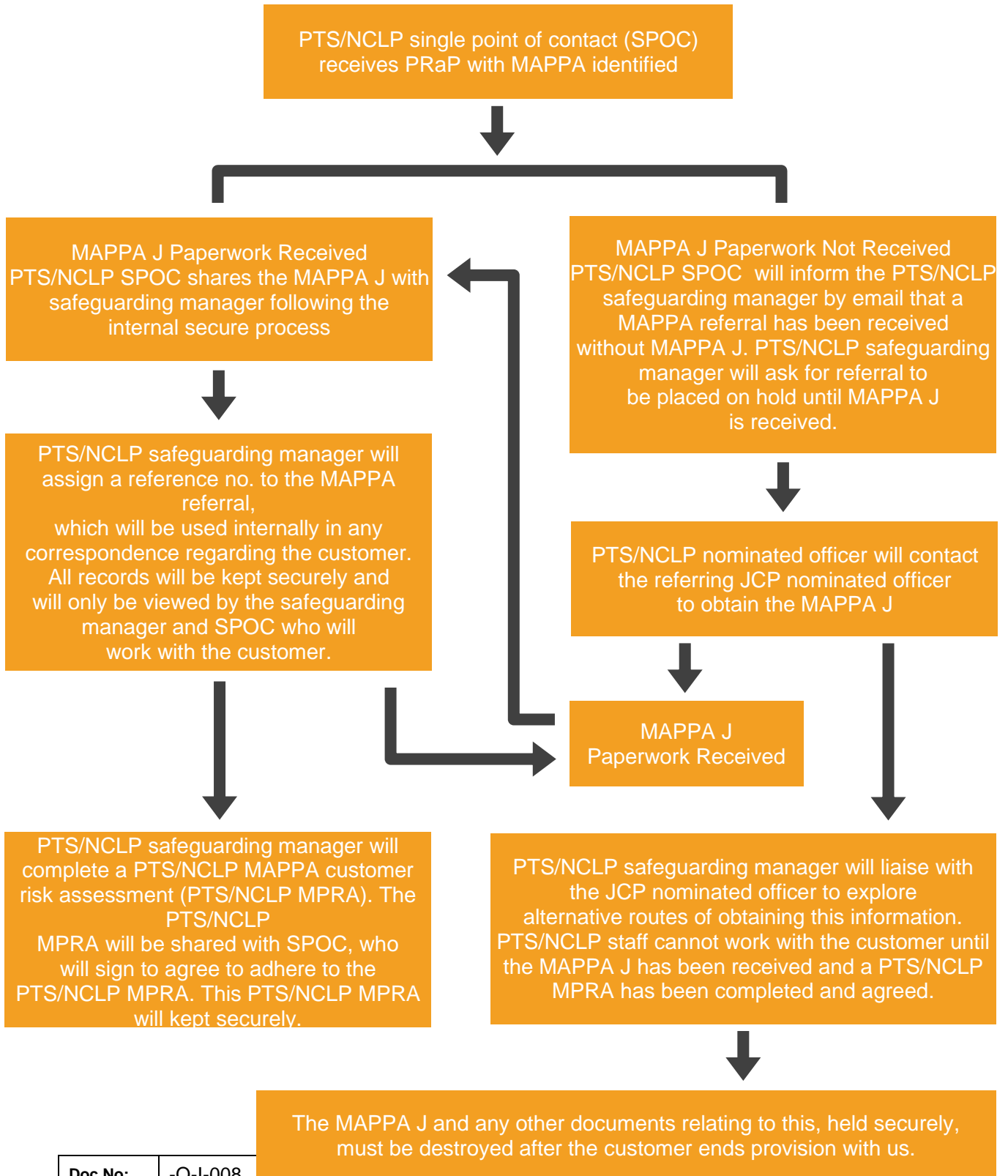
Signed

Date

Doc No:	-Q-I-008	Rev No	20	Next Rev Date	22/06/23
Issue Date:	22/06/22	Rev Date:	22/06/22	Page	58 of 60

Annexe I

PTS/NCLP MAPPA Referral Process



Doc No:	-Q-I-008	Rev Date:	22/06/22	Date	
Issue Date:	22/06/22	Rev Date:	22/06/22	Page	59 of 60

Doc No:	-Q-I-008	Rev No	20	Next Rev Date	22/06/23
Issue Date:	22/06/22	Rev Date:	22/06/22	Page	60 of 60