



**Together
Training**

**Safeguarding
and Prevent
Policy and
Procedures**

Together Training Safeguarding and Prevent Policy and Procedures

Index	Page No
Reporting a Concern and Safeguarding Contacts	2
General Policy Statement	3
The Designated Safeguarding Team, their roles, and responsibilities	7
Procedures for dealing with disclosure of abuse and reporting concerns	12
Procedures for reporting and dealing with allegations of abuse against staff	23
Human Resources and Designated Senior Persons Safeguarding	24
Enquiries and Investigations with regards to staff	25
Monitoring effectiveness	26
Related policies and procedures	26
The Safeguarding Team	27

1. Reporting a concern

If any member of staff has a concern of a safeguarding or child protection nature about a student, they have a responsibility to share this information and inform a member of the safeguarding team.

Where staff have a concern about a child or Vulnerable adult, they should telephone through any safeguarding concerns to a member of the Safeguarding team immediately and without delay.

In line with usual reporting procedures, a Child Protection/Vulnerable Adult concern form should be completed; the account must be clear, precise and a factual account of observations made. Where relevant, it should include screenshots of online conversations.

This form should only be emailed once the member of staff has spoken to a member of the Safeguarding team and been directed to do so.

Key contacts

Name	Role	Contact Details
Emma Doree	Together Training Designated Safeguarding Lead	07920028361
John McMahon	Deputy Designated Safeguarding Lead	07500126450
Felicity Profit	Safeguarding Officer	07825682923
Dominique Dennemont	Safeguarding Officer	07500 126435
Susan Lomas	Safeguarding Officer	07500 126468
Yasser Mahood	Mental Health First Aider	07500126460
Sarah Knowles	Designated Safeguarding Board Member	07887624964

1. General Policy Statement

Together Training has a statutory duty to ensure that the Together Training functions with a view to safeguarding and promoting the welfare of children, young and vulnerable people receiving education and training. It recognises its role, along with other local services, in facilitating the well-being of children, young and vulnerable people while providing a safe environment to learn in.

Safeguarding and promoting the welfare of children is defined as: protecting children from maltreatment; preventing impairment of children's health or development; ensuring that children grow up in circumstances consistent with the provision of safe and effective care; and acting to enable all children to have the best outcomes.

This policy and procedures have been developed in accordance with guidance issued by the Department for Education, relevant county Safeguarding Children's Board and other relevant bodies. This policy applies to all staff, governors, and external organisations or individuals including contractors working within the Together Training environment or on behalf of the Together Training. The word "staff" is used for ease of description.

In order to safeguard and promote the welfare of children and vulnerable adults, Together Training will act in accordance with the following legislation and statutory guidance:

- [Keeping Children Safe in Education - Statutory Guidance for Schools and Together Trainings \(Sept 2021\)](#)
- [Working together to safeguard children](#)
- departmental advice What to do if you are Worried a Child is Being Abused - Advice for Practitioners; and
- [Departmental advice Sexual Violence and Sexual Harassment Between Children in Schools and Together Trainings](#)
- [Child abuse concerns: guide for practitioners](#)
- [The Children Act 1989](#)
- [The Children Act 2004](#)
- [Education Act 2002 \(section 175 and 57\)](#)
- [Sexual violence and sexual harassment between children in schools and Together Trainings \(Sept 2021\)](#)
- [The Children and Young Person Act 2008](#)
- [The Safeguarding Vulnerable Groups Act 2006](#)

- [The Care Act 2014](#)
- [The Prevent duty](#)
- [Prevent Duty Guidance: Further Education Institutes in England & Wales](#) (April 2021)
- [Counter Terrorism and Security Act 2015](#)
- [Serious Crime Act 2015](#)
- [Work based learners and the prevent Statutory Duty September 2018](#)
- [Hertfordshire Safeguarding Children Board Inter-agency Child Protection and Safeguarding Children Procedures](#)
- [The Procedures of Luton Safeguarding Children Board](#)
- [Working Together to Safeguard Children](#) (July 2018)
- [The Education \(Pupil Information\) \(England\) Regulations 2005](#)
- [Female Genital Mutilation Act 2003](#) (Section 74, [Serious Crime Act 2015](#))
- [Police Act 1997](#)
- [Sharing Nudes and semi nudes; advice for education settings working with children and young people Dec 2020](#)
- [Homelessness Reduction Act \(2017\)](#)
- [Sexual Offences Act \(2003\)](#)
- [School attendance: guidance for schools \(Aug 2020\)](#) and the September 2020_ [Addendum: recording attendance in relation to coronavirus \(COVID-19\) during the 2020 to 2021 academic year](#)
- [Children missing education: Statutory guidance for local authorities \(September 2016\)](#)

Together Training will keep its policy and procedures on children and vulnerable adult protection under review to take account of any new Government legislation, regulations or best practice documents to ensure that staff are kept fully up to date with their responsibilities and duties with regard to the safety and well-being of children, young people and vulnerable adults.

Together Training is committed to ensuring that it:

- Provides a safe environment for all of its students to learn in
- Everybody working in Together Training understands their safeguarding responsibilities and has an awareness of safeguarding issues that can put children at risk of harm. Behaviours linked to issues such as drug taking and or alcohol misuse, deliberately missing education and consensual and non-consensual sharing of nudes and semi-nudes images and/or videos can be signs that children are at risk.
- Identifies children and young or vulnerable people who are suffering, or likely to suffer significant harm, and are protected from maltreatment. Takes appropriate action to help ensure that such children and young or vulnerable people are kept safe, both at home, at the Together Training and online.
- Will refer concerns that a child or young or vulnerable person might be at risk of significant harm to Social Services or an appropriate agency.
- Raises awareness of issues relating to the welfare of children and young or vulnerable people and the promotion of a safe environment for the children and young or vulnerable people learning within the Together Training.
- Staff and managers understand the risks posed by adults or young people who use the internet to bully, groom or abuse children, young people and vulnerable adults and support them in learning how to keep themselves safe.
- Aids the identification of children and young or vulnerable people at risk of significant harm, and provide procedures for reporting concerns
- Establish procedures for reporting and dealing with allegations of abuse against members of staff. Recruits staff and volunteers safely ensuring all necessary checks are made and reviews policies and procedures annually. All Staff and Governors will receive safeguarding awareness training and updates.
- Training all staff working with children and young or vulnerable people adequately to familiarise them with protection issues and responsibilities and the Together Training procedures and policies, attending appropriate refresher training at least every year.

Annual updates will be carried to include changes to government guidelines, local, national, and online Safeguarding trends.

- As a senior member of the management team with lead responsibility for protection issues they will be supported by a designated safeguarding team.
- All staff should be able to reassure victims that they are being taken seriously and that they will be supported and kept safe. A victim should never be given the impression that they are creating a problem by reporting abuse, sexual violence or sexual harassment. Nor should a victim ever be made to feel ashamed for making a report.

Prevent Duty

Protecting students from the risk of radicalisation is seen as part of Together Training's wider safeguarding duties, and is similar in nature to protecting children from other forms of harm and abuse. During the process of radicalisation, it is possible to intervene to prevent vulnerable people being radicalised.

- Ensure Prevent awareness training is delivered as an essential part of safeguarding training to equip staff to identify students at risk of being drawn into terrorism and to challenge extremist ideas.
- Ensure that students are safe from terrorist and extremist material when accessing the internet
- Safeguarding team must understand when it is appropriate to make a referral to the Channel programme.
- Have policies and procedures in place for the management of events held on their premises. The policies should apply to all staff, students and visitors and clearly set out what is required for any event to proceed.
- Consider carefully external speakers and whether the views being expressed, or likely to be expressed, constitute extremist views that risk drawing people into terrorism or are shared by terrorist groups.
- In partnership with local Prevent team carry out a risk assessment which assesses where and how students or staff may be at risk of being drawn into terrorism.

[Prevent duty guidance: for further education institutions in England and Wales](#)

2. Designated Staff with Responsibility for Safeguarding

The ultimate responsibility for safeguarding students and staff rests with the highest level of management. However, responsibilities are delegated throughout all levels of the organisation, identifying individuals with particular responsibilities for safeguarding.

It is important that everyone is aware of the legal responsibilities and works together to maintain high standards with regards to safeguarding. Everyone must know what lines of communication and levels of responsibility exist to ensure that all Safeguarding, safety, health and environment matters are dealt with efficiently and effectively.

This policy is supported by other policies, procedures and guidelines which have been identified as necessary to protect the safety and health of employees, students and other people who may attend campuses, including safeguarding all who learn or work or visit all facilities. It applies to all Together Training employees and Students and covers all locations where they learn or work. The Designated Senior Lead (DSL) with responsibility for safeguarding issues relating to child protection, vulnerable adults and Prevent Duty is:

Emma Doree – Designated Safeguarding Lead Together Training.

Name	Role	Contact Details
Emma Doree	Together Training Designated Safeguarding Lead	07920028361
John McMahon	Safeguarding Officer Managing Director	07500126450

These staff are senior members of the Together Training management team and West Herts College Group have a key duty to take lead responsibility for raising awareness of issues relating to the welfare of children and young or vulnerable people, and the promotion of a safe environment for students.

The DSL's have all received training in child and young or vulnerable learner protection issues and inter-agency working, as required by the Hertfordshire Safeguarding Children Board HSCB, Luton Safeguarding Children Board and children's services will receive appropriate refresher training and or

updates every 2 years. The DSLs should keep up to date with developments in all relevant protection issues.

The designated senior person role is responsible for:

- Overseeing the referral of cases of suspected abuse or allegations to the relevant investigating agencies
- Providing advice and support to other staff on issues relating to child and young or vulnerable people's protection
- Maintaining a proper record of any protection referral, complaint or concern (even where that concern does not lead to a referral)
- Ensuring the Together Training adheres to the [Mandatory Reporting Duty Section 5B](#) of the [Female Genital Mutilation Act 2003](#) (as inserted by [section 74](#) of the [Serious Crime Act 2015](#)). Statutory duty 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. [Statutory guidance: Multi-agency statutory guidance on female genital mutilation](#)
- Ensuring that parents of children and young or vulnerable people within the Together Training are aware of the Together Training's protection policy

- Ensuring the Managing Director, Safeguarding Lead and Marketing Directorate are briefed of any relevant Safeguarding incident or issues that arise.
- Liaising with local authorities, Children's and adult services, Hertfordshire Safeguarding Children's Board (HSCB), Luton Safeguarding Children's Board (LSCB) and other appropriate agencies
- Liaising with external safeguarding and specialist agencies over suspected cases of abuse and contributing to the inter-agency strategy discussions.
- Providing guidance to parents, students and staff about how to obtain suitable support relating to safeguarding issues and how to access the policy.
- Liaising with employers and training organisations that receive children or young or vulnerable people from Together Training on long term placements to ensure that appropriate safeguards are put in place.
- Ensuring that staff receive basic training in protection issues and are aware of the Together Training protection procedures. An annual report will be taken to the governing body of Together Training setting out how Together Training has discharged its duties. The DSL is responsible for reporting deficiencies in procedure or policy identified by the HSCB (or other external agencies) to the governing body at the earliest opportunity.

Designated Staff Members

If the DSL is unavailable there are other designated Deputy Leads with responsibility for safeguarding issues and the wider safeguarding team will provide support as necessary.

Deputy Lead	Safeguarding Team
John McMahon	Felicity Profit Susan Lomas Dominique Dennemont

The Safeguarding team staff members:

- Report to the senior member of staff with lead responsibility
- Will know how to make an appropriate referral after discussion with DSL or safeguarding team prior to referral.
- Will be available to provide advice and support to other staff on issues relating to safeguarding
- Have particular responsibility to be available to listen to children and young or vulnerable people studying at Together Training
- Will deal with individual cases, including attending case conferences and review meetings as appropriate.
- Have received training in child protection issues, Prevent duty and inter-agency working, as required by the HSCB, and will receive relevant refresher training at least every 2 years

The Board

The Board is responsible for ensuring there are sufficient measures in place to safeguard children and vulnerable adults within Together Training. A Designated Safeguarding Governor is responsible for liaising with the Managing Director and Senior Staff Members with Lead Responsibility over matters regarding protection, including:

- Governing body must ensure that they comply with their duties under legislation. Ensuring that Together Training has procedures and policies which are consistent with the National and local Safeguarding Board guidance and that they comply with all their duties under current legislation. They must also have regard to this guidance to ensure that the policies, procedures and training in Together Training are effective and comply with the law at all times.
- Governing bodies should ensure that Together Training contributes to inter-agency working in line with statutory guidance [Working Together to Safeguard Children 2018](#). Ensuring that the Governing Body considers Together Training policy on protection each year
- Ensuring that each year the Governing Body is informed of how Together Training audits staff have complied with the policy, and the training that the staff have undertaken.
- To assist in these duties, the Designated Governor shall receive appropriate training.
- To monitor Together Training's performance against this policy and relevant legislation the Designated Governor will meet termly with the Senior Staff Member with Lead Responsibility, and the meetings will be recorded. In line with the procedures set out for staff suspension and disciplinary matters, the Chair, the Managing Director, staff and student governors are not eligible to be nominated as Designated Governors.
- Governing bodies should consider how students may be taught about safeguarding, including online, through teaching and learning opportunities, as part of providing a broad and balanced curriculum. This may include covering relevant issues through the modern Britain programme (MB).

3. Procedures for dealing with a Disclosure of Abuse and Reporting Concerns: (Responsibility of All Together Training staff)

If any member of staff has a concern of a safeguarding or child protection nature about a student they have a responsibility to share this information and inform a member of the safeguarding team immediately.

Information should be reported on a Child Protection/Vulnerable Adult concern form/referral process. The account must be clear, precise and a factual account of observations made.

Records should include:

- a clear and comprehensive summary of the concern;
- details of how the concern was followed up and resolved;
- a note of any action taken, decisions reached and the outcome.

The safeguarding team and DSL will then decide whether the concerns require referral to any external services/ agencies.

Dealing with a disclosure

If a child or young person tells a member of staff about possible abuse the following guidance should be followed:

- Listen carefully to what is being said without displaying shock. Do not interview the child or person concerned; listen only asking questions when necessary to clarify in order to be sure that you understand what they are telling you.
- Allow the person to speak freely ensuring you do not put words into the child or person's mouth.
- Reassure them that by telling you, they have done the right thing. Do not promise to keep what they tell you confidential.
- Reassure victims that they are being taken seriously and that they will be supported and kept safe. A victim should never be given the impression that they are creating a problem by reporting abuse, sexual violence, or sexual harassment. Nor should a victim ever be made to feel ashamed for making a report.

- Explain to them that you may have to pass the information on to a member of the safeguarding team, but that only those that need to know about it will be told.
- Contact a member of the safeguarding team immediately
- Complete the Child Protection and Vulnerable Adult concern form found on Sharespace. Add as much detail as possible using the students' own words.
- After discussing the concern with the member of the safeguarding team they will arrange for you to pass the concern form on to them either in person or electronically.
- Make a detailed note of the date, time, place, what the child or person said, give a full account of your conversation, including anything else that concerns you. Staff should not investigate concerns or allegations themselves but should report them immediately to the Designated Senior Lead or, a member of the Safeguarding team.
- When appropriate the Safeguarding team will undertake any required discussions and communication with parents and carers
- When a concern is made regarding a Head Start student a member of the Safeguarding team will liaise with the relevant school DSL.

Support

If you wish to discuss concerns or issues that might arise from having a student disclose a safeguarding concern to you support and advice is available to you from the Safeguarding team and Human Resources.

ABUSE AND RELATED ISSUES OF SAFEGUARDING

The definitions and types of abuse and neglect detailed are taken from Keeping Children Safe in Education Statutory guidance for schools and Together Trainings (September 2021):

Abuse: a form of maltreatment of a child. Somebody may abuse or neglect a child or vulnerable adult by inflicting harm, or by failing to act to prevent harm. They may be abused by an adult or adults or another child or children.

Physical abuse: a form of abuse which may involve hitting, shaking, throwing, poisoning, burning or scalding, drowning, suffocating or otherwise causing physical harm. Physical harm may also be caused when a parent or carer fabricates the symptoms of, or deliberately induces, illness in a child or vulnerable adult.

Emotional abuse: the persistent emotional maltreatment of a child or vulnerable adult such as to cause severe and adverse effects on their emotional development. It may involve conveying to a child that they are worthless or unloved, inadequate, or valued only insofar as they meet the needs of another person. It may include not giving them opportunities to express their views, deliberately silencing them or 'making fun' of what they say or how they communicate. It may feature age or developmentally inappropriate expectations being imposed on them. These may include interactions that are beyond their developmental capability as well as overprotection and limitation of exploration and learning, or preventing them participating in normal social interaction. It may involve seeing or hearing the ill-treatment of another. It may involve serious bullying (including cyberbullying), causing them frequently to feel frightened or in danger, or the exploitation or corruption of children. Some level of emotional abuse is involved in all types of maltreatment of a child or vulnerable adult, although it may occur alone.

Sexual abuse: involves forcing or enticing a child, young person or vulnerable adult to take part in sexual activities, not necessarily involving a high level of violence, whether or not they are aware of what is happening. The activities may involve physical contact, including assault by penetration (for example rape or oral sex) or non-penetrative acts such as masturbation, kissing, rubbing and touching outside of clothing. They may also include non-contact activities, such as involving children or vulnerable adults in looking at, or in the production of, sexual images, watching sexual activities, encouraging children or a vulnerable adult to behave in sexually inappropriate ways, or grooming a child, young person or vulnerable adult in preparation for abuse (including via the internet). Sexual abuse is not solely perpetrated by adult males. Women can also commit acts of sexual abuse, as can other children.

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

Neglect may occur during pregnancy as a result of maternal substance abuse. Once a child is born, neglect may involve a parent or carer failing to: provide adequate food, clothing and shelter (including exclusion from home or abandonment); protect a child or vulnerable adult from physical and emotional harm or danger; ensure adequate supervision (including the use of inadequate caregivers); or ensure access to appropriate medical care or treatment. It may also include

neglect of, or unresponsiveness to, a child's basic emotional needs.

There are a number of other specific safeguarding issues and types of abuse, some of which are listed below. If staff need support or are in any doubt they should seek guidance from the DSL.

Mental Health

All staff should be aware that mental health problems can, in some cases, be an indicator that a child or young person has suffered or is at risk of suffering abuse, neglect or exploitation.

Only appropriately trained professionals should attempt to make a diagnosis of a mental health problem. Staff however, are well placed to observe and identify those whose behaviour suggests that they may be experiencing a mental health problem or be at risk of developing one. It is important to refer any concerns through to student support teams to ensure early intervention/support is put in place.

If staff have a mental health concern about a young person that is also a safeguarding concern, immediate action should be taken, following the usual Safeguarding reporting procedures and speak to the designated safeguarding lead or a deputy.

Online Safety

The use of technology has become a significant component of many safeguarding issues. Child sexual exploitation; radicalisation; sexual predation: technology often provides the platform that facilitates harm.

It is Together Trainings responsibility to protect and educate students in their use of technology and establishes mechanisms to identify, intervene in, and escalate any incident where appropriate.

The breadth of issues classified within online safety is considerable, but can be categorised into three areas of risk:

- **content:** being exposed to illegal, inappropriate or harmful material; for example, pornography, fake news, racist or radical and extremist views;
- **contact:** being subjected to harmful online interaction with other users; for example, commercial advertising as well as adults posing as children or young adults; and

- **conduct:** personal online behaviour that increases the likelihood of, or causes, harm; for example, making, sending and receiving explicit images, or online bullying.

When a concern is raised by a member of staff or through IT systems the Safeguarding team work with Technical services to establish details and a record of anything that has been searched. Appropriate action is then taken either informing parents or external services including the Police, National crime agency and students could be managed through managing student behaviour process where required.

Child sexual exploitation is a form of child sexual abuse. It occurs where an individual or group takes advantage of an imbalance of power to coerce, manipulate or deceive a child or young person under the age of 18 into sexual activity (a) in exchange for something the victim needs or wants, and/or (b) for the financial advantage or increased status of the perpetrator or facilitator. The victim may have been sexually exploited even if the sexual activity appears consensual.

Child sexual exploitation does not always involve physical contact; it can also occur through the use of technology.

Like all forms of child sex abuse, child sexual exploitation:

- can affect any child or young person (male or female) under the age of 18 years, including 16- and 17-year-olds who can legally consent to have sex;
- can still be abuse even if the sexual activity appears consensual;
- can include both contact (penetrative and non-penetrative acts) and non- contact sexual activity;
- can take place in person or via technology, or a combination of both;
- can involve force and/or enticement-based methods of compliance and may, or may not, be accompanied by violence or threats of violence;
- may occur without the child or young person's immediate knowledge (e.g. through others copying videos or images they have created and posted on socialmedia);
- can be perpetrated by individuals or groups, males or females, and children or adults. The abuse can be a one-off occurrence or a series of incidents over time, and range from opportunistic to complex organised abuse; and
- is typified by some form of power imbalance in favour of those perpetrating the abuse. Whilst age may be the most obvious, this power imbalance can also be due to a range of other factors including gender, sexual identity, cognitive ability, physical strength,

status, and access to economic or other resources.

Some of the following signs may be indicators of child sexual exploitation:

- children who appear with unexplained gifts or new possessions;
- children who associate with other young people involved in exploitation;
- children who have older boyfriends or girlfriends;
- children who suffer from sexually transmitted infections or become pregnant;
- children who suffer from changes in emotional well-being;
- children who misuse drugs and alcohol;
- children who go missing for periods of time or regularly come home late; and children who regularly miss school or education or do not take part in education.

Child Criminal Exploitation and County Lines

Child Criminal Exploitation of children is a form of abuse where an individual or group takes advantage of an imbalance in power to coerce, manipulate or deceive a child into taking part in criminal activity. Some specific forms of CCE can include children being forced or manipulated into transporting drugs or money through county lines, working in cannabis factories, shoplifting or pickpocketing. They can also be forced or manipulated into committing vehicle crime or threatening/committing serious violence to others.

It is important to note that the experience of girls who are criminally exploited can be very different to that of boys. The indicators may not be the same, however professionals should be aware that girls are at risk of criminal exploitation too. It is also important to note that both boys and girls being criminally exploited may be at higher risk of sexual exploitation.

Key to identifying potential involvement in CCE are missing episodes, when the victim may have been trafficked for the purpose of transporting drugs and a referral to the National Referral Mechanism should be considered. Like other forms of abuse and exploitation, county lines exploitation:

- can affect any child or young person (male or female) under the age of 18 years;
- can affect any vulnerable adult over the age of 18 years;
- can still be exploitation even if the activity appears consensual;

- can involve force and/or enticement-based methods of compliance and is often accompanied by violence or threats of violence;
- can be perpetrated by individuals or groups, males or females, and young people or adults;
- is typified by some form of power imbalance in favour of those perpetrating the exploitation. Whilst age may be the most obvious, this power imbalance can also be due to a range of other factors including gender, cognitive ability, physical strength, status, and access to economic or other resources.

Children Missing from Education

Missing children account for approximately two thirds of national missing cases and the reasons children

go missing and the risks they face are different from adults. The vast majority of missing children cases are repeats with the same child going missing – ‘running’ away from or towards something. Children who go missing from education, particularly on repeat occasions, need to be identified to help prevent the risk of them going missing in future.

All staff should be aware that children going missing, particularly repeatedly, can act as a vital warning sign of a range of safeguarding possibilities.

This may include:

- abuse and neglect, which may include:
 - sexual abuse or exploitation and can also be a sign of child criminal exploitation including involvement in county lines.

It may indicate also:

- mental health problems,
- risk of substance abuse,
- risk of travelling to conflict zones,
- risk of female genital mutilation or
- risk of forced marriage.

Early intervention is necessary to identify the existence of any underlying safeguarding risk and to help prevent the risks of a child going missing in future.

Domestic abuse

The cross-government definition of domestic violence and abuse is:

Any incident or pattern of incidents of controlling, coercive, threatening behaviour, violence or abuse between those aged 16 or over who are, or have been, intimate partners or family members regardless of gender or sexuality. The abuse can encompass, but is not limited to:

- psychological;
- physical;
- sexual;
- financial;
- emotional

Exposure to domestic abuse and/or violence can have a serious, long lasting emotional and psychological impact on children. In some cases, a child may blame themselves for the abuse or may have had to leave the family home as a result.

Domestic abuse affecting young people can also occur within their personal relationships, as well as in the context of their home life.

Female Genital mutilation (FGM) is a criminal offence – it is child abuse and a form of violence against women and girls. Female genital mutilation comprises all procedures involving the partial or total removal of the female external genitalia or other injury to the female genital organs for non-medical reasons. There are many health risks associated with FGM both immediate and longer term, including mental health problems, difficulties in childbirth, causing danger to the child and mother; and/or death.

Section 5B of the Female Genital Mutilation Act 2003 (as inserted by section 74 of the Serious Crime Act 2015) places a statutory duty upon teachers, 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. Under Keeping Children Safe in Education (2016) staff must personally report to the police cases where they discover that an act of FGM appears to have been carried out.

Forced marriage is a criminal offense in England and Wales. A forced marriage is one entered into without the full and free consent of one or both parties and where violence, threats or any other form of coercion is used to cause a person to enter into a marriage. Threats can be physical or emotional and psychological. A lack of full and free consent can be where a person does not consent or where they cannot consent (if they have learning disabilities, for example).

Nevertheless, some communities use religion and culture as a way to coerce a person into marriage.

Homelessness

Being homeless or being at risk of becoming homeless presents a real risk to a child's welfare. The safeguarding team are aware of contact details and referral routes into the Local Housing Authority so they can raise/progress concerns at the earliest opportunity. Indicators that a family may be at risk of homelessness include household debt, rent arrears, domestic abuse and anti-social behaviour, as well as the family being asked to leave a property. Whilst referrals and or discussion with the Local Housing Authority should be progressed as appropriate, this does not, and should not, replace a referral into children's social care where a child has been harmed or is at risk of harm.

The [Homelessness Reduction Act 2017](#) places a new legal duty on English councils so that everyone who is homeless or at risk of homelessness will have access to meaningful help including an assessment of their needs and circumstances, the development of a personalised housing plan, and work to help them retain their accommodation or find a new place to live. The following factsheets usefully summarise the new duties: [Homeless Reduction Act Factsheets](#). The new duties shift focus to early intervention and encourage those at risk to seek support as soon as possible before they are facing a homelessness crisis.

Most Together Training staff will be considering homelessness in the context of children who live with their families, and intervention will be on that basis. However, it should also be recognised in some cases 16- and 17-year-olds could be living independently from their parents or guardians, for example through their exclusion from the family home, and will require a different level of intervention and support. Children's services will be the lead agency for these young people and the designated safeguarding lead (or a deputy) should ensure appropriate referrals are made based on the child's circumstances. The department and the Ministry of Housing, Communities and Local Government have [published joint statutory guidance](#) on the provision of accommodation for 16 and 17 year olds who may be homeless and/ or require accommodation: [here](#).

So called 'Honour' based Abuse encompasses crimes which have been committed to protect or defend the honour of the family and/or the community, including Female Genital Mutilation (FGM), forced marriage, and practices such as breast ironing. All forms are abuse (regardless of the motivation) and should be handled and escalated as such. If in any doubt, staff should speak to the designated safeguarding lead. It can be distinguished from other forms of abuse, as it is often committed with some degree of approval and/or collusion from family and/ community members.

Peer on peer abuse

Children can abuse other children. This is generally referred to as peer-on-peer abuse and can

take many forms. This can include (but is not limited to) bullying (including cyberbullying); sexual violence and sexual harassment; abuse in intimate personal relationships, physical abuse such as hitting, kicking, shaking, biting, hair pulling, or otherwise causing physical harm; sexting and initiating/hazing type violence and rituals.

Sexual violence and sexual harassment

Sexual violence and sexual harassment can occur between two children of **any** age and sex. It can also occur through a group of children sexually assaulting or sexually harassing a single child or group of children. Children who are victims of sexual violence and sexual harassment will likely find the experience stressful and distressing. This will, in all likelihood, adversely affect their educational attainment. Sexual violence and sexual harassment exist on a continuum and may overlap, they can occur online and offline (both physical and verbal) and are never acceptable. It is important that **all** victims are taken seriously and offered appropriate support.

Staff should be aware of the importance of:

- making clear that sexual violence and sexual harassment is not acceptable, will never be tolerated and is not an inevitable part of growing up;
- not tolerating or dismissing sexual violence or sexual harassment as “banter”, “part of growing up”, “just having a laugh” or “boys being boys”;
- challenging behaviours (potentially criminal in nature), such as grabbing bottoms, breasts and genitalia, flicking bras and lifting up skirts. Dismissing or tolerating such behaviours risks normalising them.
- Whilst any report of sexual violence or sexual harassment should be taken seriously, staff should be aware it is more likely that girls will be the victims of sexual violence and sexual harassment and more likely it will be perpetrated by boys.
- Important context to be aware of, including; what is consent, power imbalances, and developmental stages,
- Harmful sexual behaviour (HSB), including that a child displaying HSB may be an indication that they are a victim of abuse themselves

When referring to sexual violence we are referring to sexual offences under the Sexual Offences Act 2003 as described below:

Rape: A person (A) commits an offence of rape if: he intentionally penetrates the vagina, anus or mouth of another person (B) with his penis, B does not consent to the penetration and A does not reasonably believe that B consents.

Assault by Penetration: A person (A) commits an offence if: s/he intentionally penetrates the vagina or anus of another person (B) with a part of her/his body or anything else, the penetration is sexual, B does not consent to the penetration and A does not reasonably believe that B consents.

Sexual Assault: A person (A) commits an offence of sexual assault if: s/he intentionally touches another person (B), the touching is sexual, B does not consent to the touching and A does not reasonably believe that B consents.

What is consent?

Consent is about having the freedom and capacity to choose. Consent to sexual activity may be given to one sort of sexual activity but not another, e.g. to vaginal but not anal sex or penetration with conditions, such as wearing a condom. Consent can be withdrawn at any time during sexual activity and each time activity occurs. Someone consents to vaginal, anal or oral penetration only if s/he agrees by choice to that penetration and has the freedom and capacity to make that choice.

Sexual harassment

When referring to sexual harassment we mean 'unwanted conduct of a sexual nature' that can occur online and offline. When we reference sexual harassment, we do so in the context of child on child sexual harassment. Sexual harassment is likely to: violate a child's dignity, and/or make them feel intimidated, degraded or humiliated and/or create a hostile, offensive or sexualised environment.

Whilst not intended to be an exhaustive list, sexual harassment can include:

- sexual comments, such as: telling sexual stories, making lewd comments, making sexual remarks about clothes and appearance and calling someone sexualised names;
- sexual "jokes" or taunting;
- physical behaviour, such as: deliberately brushing against someone, interfering with someone's clothes (schools and Together Trainings should be considering when any of this crosses a line into sexual violence – it is important to talk to and consider the experience of the victim) and displaying pictures, photos or drawings of a sexual nature;
- online sexual harassment. This may be standalone, or part of a wider pattern of sexual harassment and/or sexual violence.

It may include:

- non-consensual sharing of sexual images and videos;

- sexualised online bullying;
- unwanted sexual comments and messages, including, on social media;
- sexual exploitation; coercion and threats

Expert and professional organisations are best placed to provide up-to-date guidance and practical support on specific safeguarding issues. Together Trainings and all staff can access broad government guidance on the issues listed via the www.gov.uk website, Keeping Children safe in Education guidance.

4. Receiving an Allegation / Concern about a member of staff including agency staff, volunteers and contractors

The two levels of allegation/concern:

- Allegations that may meet the harms threshold.
- Allegation/concerns that do not meet the harms threshold – referred to for the purposes of this guidance as ‘low level concerns’

A safeguarding allegation is any information which indicates that a member of staff may have:

- Behaved in a way that has or may have harmed a child or vulnerable adult
- Possibly committed a criminal offence against/related to a child/ vulnerable adult
- Behaved towards a child or children in a way which indicates they would pose a risk of harm if they work regularly or closely with children and vulnerable adults.
- Behaved or may have behaved in a way that indicates they may not be suitable to work with children.

Any member of staff who receives an allegation of a safeguarding nature about another member of staff should follow the procedures for dealing with a concern and then report the concern immediately to the Designated Senior Person for safeguarding or in their absence the Managing Director.

Concerns that do not meet the harm threshold

A staff member may have acted in a way that:

- Is inconsistent with the staff code of conduct, including inappropriate conduct outside of work;
- Does not meet the allegations threshold or is otherwise not considered serious enough to consider a referral to the LADO.

Examples of such behaviour could include, but are not limited to:

- being over friendly with a student or group of students;
- having favourites;
- taking photographs of students on their personal mobile phone;
- engaging with a student on a one-to-one basis in a secluded area or behind a closed door;
- using inappropriate, intimidating, or offensive language.

5. Responsibilities of Human Resources and Designated Senior Person with regards to Allegations of Abuse against Members of Staff.

Together Training recognises that an allegation of abuse made against a member of staff may be made for a variety of reasons and that the facts of the allegation may or may not be true. It is imperative that those dealing with an allegation maintain an open mind, and that investigations are thorough and dealt with quickly, in a fair and consistent way that provides effective protection for the child and at the same time supports the person who is the subject of the allegation.

Together Training has a duty of care to their employees and will provide effective support for anyone facing an allegation and provide the employee with a named contact if they are suspended.

In the event an allegation of a safeguarding nature is made against a member of staff it must be reported immediately to the Designated Senior Person for Safeguarding who will seek the advice of the Director of Human Resources.

Any necessary disciplinary action or investigation will be conducted in accordance with the existing staff disciplinary procedures.

The Designated Senior Person will notify the Managing Director, unless the Managing Director is the person against whom the allegation is made. In which case the report, should be made to the Senior staff member with Lead Responsibility for safeguarding who will take appropriate advice and inform the Chair of Corporation where/when necessary.

Initial Assessment to be carried out by the Designated Senior Person

The Designated Senior Person should make an initial assessment of the allegation, consulting with the Managing Director and Human Resources. Where the allegation is considered to be either a

potential criminal act or indicates that the child or person has suffered, is suffering or is likely to suffer significant harm, the matter should be reported within 24 hours to the HSCB, Local Authority Designated Officer (LADO) or other appropriate supporting agencies where appropriate.

Obtain written details of the allegation from the person who received it, ensuring they are signed and dated. The written details should be countersigned and dated by the Managing Director (or designated person). Record information about times, dates, locations and names of potential witnesses.

It is important that the designated senior person does not investigate the allegation. The initial assessment should be on the basis of the information received and is to be used to support the decision whether or not the allegation warrants further investigation.

6. Enquiries and Investigations with regards to staff

Child or young or vulnerable adult protection enquiries by social services or the police are not to be confused with internal, disciplinary enquiries by Together Training. Together Training may be able to use the outcome of external agency enquiries as part of its own procedures. The child protection agencies, including the police, have no power to direct Together Training to act in a particular way; however, Together Training should assist the agencies with their enquiries.

Together Training shall hold in abeyance its own internal enquiries while the formal police or social services investigations proceed; to do otherwise may prejudice the investigation. Any internal enquiries will conform with the existing staff disciplinary procedures.

Where an allegation of a safeguarding nature has been made against a member of staff, the Managing Director, Human Recourses' and Designated Senior Person will oversee the investigation jointly and at the conclusion of the investigation or any disciplinary action, consider whether there are any matters arising from it that could lead to the improvement of Together Training's procedures/ policies and if there are any matters arising which should be drawn to the attention of the HSCB.

If there is an investigation by an external agency, for example the police, the Designated Senior Person should normally be involved in, and contribute to, the inter-agency strategy discussions. The Designated Senior Person is responsible for ensuring that Together Training gives every assistance with the agency's enquiries. He/she will ensure that appropriate confidentiality is maintained in connection with the enquiries, in the interests of the member of staff about whom the allegation is

made. Designated person or Managing Director shall advise the member of staff that he/she should consult with a representative, for example, a trade union.

Subject to any conditions set by the police or other investigating agency, the designated person will:

- Inform the child/person or parent/carer alleging that the investigation is taking place and what the likely process will involve.
- Ensure that the parents/carers of a child/vulnerable adult making the allegation have been informed that the allegation has been made and what the likely process will involve.
- Inform the member of staff against whom the allegation was made of the fact that the investigation is taking place and what the likely process will involve.
- Where appropriate inform the Chair of Governors and/or a designated governor of the outcome of the investigation.
- Keep a written record of the action taken in connection with the allegation. Follow latest advice/ Guidance from the Department of Education regarding managing allegations of abuse against teachers and other staff.

7. Monitoring Effectiveness

Where a child protection/ safeguarding allegation has been made against a member of staff, the Managing Director together with the senior staff member with lead responsibility should, at the conclusion of the investigation and any disciplinary procedures, consider whether there are any matters arising from it that could lead to the improvement of Together Training's procedures and/or policies and/or which should be drawn to the attention of the HSCB. Consideration should also be given to the training needs of staff.

8 Related policies and procedures

Safeguarding Managing incidents and emergency service procedures.

Criminal Convictions Procedure Recruitment and Safer Recruitment Policy

Staff Code of Conduct

Staff Disciplinary Policy and Procedure

Managing Student Behaviour Policy and Procedure

8. The Safeguarding Team

Name	Role	Contact Details
Emma Doree	Together Training Designated Safeguarding Lead	07920028361
John McMahon	Deputy Designated Safeguarding Lead Managing Director Together Training Ltd	07500126450
Felicity Profit	Safeguarding Officer Apprenticeship Delivery Manager, Together Training Ltd	07825682923
Dominique Dennemont	Safeguarding Officer	07500 126435
Susan Lomas	Safeguarding Officer	07500 126468
Yasser Mahood	Mental Health First Aider	07500126460
Sarah Knowles	Designated Safeguarding Board member	07887624964

9. Safeguarding Policy Review

Safeguarding Policy Review This policy will be reviewed annually to ensure it remains up to date and compliant with the law. The policy was last updated September 2021 and is due for review September 2022. The policy may also be reviewed if legislation changes or if monitoring information suggests that policy or practices should be altered.

Reviewed and approved by Board, March 2022

For further information, please visit
togethertraining.co.uk

 01923 812150

 John.McMahon@togethertraining.co.uk