Train Plus Safeguarding and Promoting the Welfare of Children & Vulnerable Adults Policy

Lead Responsibility	Lisa Short	Approved by	Lisa Short, James Chance
Version	V15 - 2026	Date of Approval	04/09/2026
Effective from	04/09/2026	Next review date	04/09/2027
Policy applicable to	**ALL EMPLOYEES and FREELANCE STAFF and LEARNERS**		
Record of Changes:	• Updated Keeping Children Safe in Education to 2026 • Updated Working Together to Safeguard Children to 2026		

SAFEGUARDING AND PROMOTING THE WELFARE OF CHILDREN & VULNERABLE ADULTS

1. Policy Statement

TrainPlus is committed to safeguarding and promoting the welfare our learners ensuring that our learners can access premises and facilities free from fear of harm and are protected from mistreatment and abuse.

TrainPlus requires all staff to demonstrate high standards in their management of risk and in the active protection of children and vulnerable adults from discrimination and avoidable harm.

Staff are required to fulfil their/our duties for young people under 18 in accordance with Keeping Children Safe in Education 2026, the United Nations Convention on the rights of the Child (UNCRC) 1990 and our duties towards vulnerable adults in accordance with the National framework of standards for safeguarding adults, ADSS 2005.

This policy should be read in conjunction with, Safeguarding Children and Vulnerable Adults: Procedures and Guidelines for Staff, The Anti-Bullying Policy and Procedures, Whistle Blowing Policy, Disability Disclosure and Confidentiality Procedures, Staff Code of Conduct and the Prevent Strategy.

The purpose of this policy is to provide a framework that informs procedures relating to TrainPlus' legal obligation to safeguard and protect children and vulnerable adults who are suffering forms of abuse as defined in the Childcare Act 2016, Every Child Matters 2003, Education Act 2011, Children and Families Act 2014, through the application of principles outlined in the Childcare Act 2016, Children & Young Person's Act 2008 and Safeguarding Vulnerable Groups Act 2006.

This policy provides clear direction to all members of our administration, assessing and teaching team to ensure child protection and vulnerable adult concerns, referrals and monitoring of actions are handled sensitively, professionally and in ways that promote the welfare of the learners and support their needs ensuring learners are encouraged to talk and are listened to. The policy also makes commitment to the development of good practice and sound procedures. Accordingly, all staff receive a copy of this policy and 'Keeping Children Safe in Education' 2026.

We recognise that the welfare of the learner is paramount and that all learners regardless of age, disability, gender reassignment, race, religion/belief, sex, sexual orientation, marriage and maternity have the right to protection from all types of harm or abuse. Working in partnership with children, vulnerable adults, their parents, carers and other agencies is essential in promoting the welfare of individuals.

TrainPlus has a statutory duty to create a safe learning environment for all but specifically in relation to children and vulnerable adults under the Childcare Act 2016; the Education Act 2011; the Technical and Further Education Act 2017 and the Safeguarding Vulnerable Groups Act 2006. It is the intention of this policy, and supporting procedures, to ensure that appropriate action is taken to discharge these duties. Further reference sources used in producing this policy and supporting procedures include; 'Working Together to Safeguard Children' (2026), 'Safeguarding Children and Safer Recruitment in Education' (2012) (DfE), Prevent Duty Guidance for England issued under section 29 of the Counter terrorism and security Act 2015.

All complaints, allegations or suspicions of abuse will be dealt with due regard to our Safeguarding of Children and Vulnerable Adults Policy.

TrainPlus has a statutory responsibility under the Education Act 2011 to:

Safeguard and promote the welfare of children.
Work together with other agencies to ensure adequate arrangements are in place to identify, assess and support those who are suffering from harm. The Statutory guidance 'Working Together to Safeguard Children' (2026) covers the legislative requirements and expectations on individual services to safeguard and promote the welfare of children. The statutory guidance 'Keeping Children Safe in Education' 2026 is issued under section 175 of the Education Act 2011, the Education (Independent School Standards) (England) Regulations 2014 and the Non-Maintained Special Schools (England) Regulations 2015. Schools and colleges must have regard to this guidance when carrying out their duties to safeguard and promote the welfare of children; along with non-statutory guidance 'What to do if you are worried a child is being abused' (March 2015) and 'Information Sharing: advice for practitioners providing safeguarding services' (July 2018). Safeguarding also covers vulnerability to violent extremism. Since 2011 when the Government published the Prevent Strategy which is part of CONTEST, the United Kingdom's counter terrorism strategy, there has been an awareness of the specific need to safeguard children and young people from extremism and potential radicalisation. Section 26 of the Counter Terrorism and Security Act 2015 places a duty to have "due regard to the need to prevent people from being drawn into terrorism". Safeguarding also encompasses issues such as learner health and safety, bullying, arrangements to meet medical need, provision of first aid, college security, access to and use of information technology.

2. Purpose

The protection of children and the safeguarding of vulnerable adults are concerned with preventing emotional, physical or sexual abuse to learners whether that abuse is happening inside or outside of our centre. This Policy sets out what we are committed to do with regards to Safeguarding children and vulnerable adults. It is a contractual requirement for all staff/subcontractors that this policy is adhered to.

This procedure seeks to promote the welfare of children and vulnerable adults by making clear the responsibilities of all staff.

3. Scope

All employees and freelance staff of TrainPlus have a duty to comply with this Policy.

This Safeguarding and Promoting the Welfare of Children and Vulnerable Adults Policy covers:

- Learners aged 16 and 18.
- Learners who are eighteen years of age and over, and who either permanently or temporarily may need community care services by reasons of mental or other disability, age or illness and who are unable to take care of themselves or protect themselves against significant harm or exploitation.
- All learners regarding Prevent where there is concern regarding people who are at risk of being drawn into terrorist activity.

All staff should be aware of the associated risks and understand the measures in place to manage these. Advice for schools and colleges is provided in the Home Office's Preventing youth violence and gang involvement and its Criminal exploitation of children and vulnerable adults: county lines guidance.

Where a staff member feels unable to raise an issue with their employer, or feels that their genuine concerns are not being addressed, other whistleblowing channels are open to them:

- general guidance on whistleblowing can be found in the Whistleblowing Procedure;
- the NSPCC's what you can do to report abuse dedicated helpline is available as an alternative route for staff who do not feel able to raise concerns regarding child protection failures internally or have concerns about the way a concern is being handled by their school or college. Staff can call 0800 028 0285 – line is available from 8:00 AM to 10:00 PM, Monday to Friday and email: help@nspcc.org.uk.

4. Safeguarding and Protection Procedures

4.1: Members of Centre Staff and Disclosures of Abuse, Safeguarding or Prevent Concerns by Learners.

A learner may disclose abuse or fear of abuse or a safeguarding cause for concern to any member of staff at any time. When this happens, they must follow the procedure set out below.

4.1.1: If a child/vulnerable adult learner say they have been abused or at risk due to a safeguarding concern report this as soon as possible, and within 24 hours to the Lead / Designated Safeguarding Persons with responsibility for Safeguarding using the form attached in **Appendix 4**.

4.1.2: When a learner discloses abuse or a safeguarding cause for concern, talk to the learner with tact and sympathy. The learner has a right to expect their situation to be dealt with sensitively and sympathetically. For guidance on types of abuse, please see **Appendix 1.**

4.1.3: Do not offer confidentiality. Make the child/vulnerable adult learner aware as early as possible that you will need to contact the Designated Safeguarding Person. Reassure them that only those who 'need to know' will be given the information. For guidance on how to conduct the conversation with the learner please see **Appendix 3.**

4.1.4: Do not ask the learner to make a written statement.

4.1.5: Make a full written record as soon as possible, including date, time, location of incident, full factual details of the cause for concern or disclosure from the learner and the action you have taken (using the form in **Appendix 4**) and where necessary using the body map (**Appendix 6**) and inform the Lead / Designated Safeguarding Person.

4.1.6: A learner may disclose to you that another learner or other learners are being abused or that they have been abusing someone. In both cases, points 4.1.1 to 4.1.5 apply and the form attached as **Appendix 4** must be filled in as instructed on the form.

4.1.7: If any member of staff at TrainPlus is suspected/reported to be enduced on drugs during working hours, then a drug testing kit will be issued to the member of staff to be used and recorded immediately.

4.2: Suspected abuse or safeguarding concern not disclosed by a learner.

TrainPlus recognises that children, young people and vulnerable adults cannot be expected to raise concerns in an environment where staff fail to do so. If you have suspicions that a learner is being abused or is at risk due to a safeguarding issue, but they are keeping it to themselves, do not hesitate to disclose your suspicion to the Lead / Designated Safeguarding Person using the form in **Appendix 4**.

4.3: The Designated Safeguarding Person and Disclosures of Abuse, Safeguarding or Prevent Cause for Concern.

4.3.1: On receiving a completed form (**Appendix 4**) reporting alleged abuse or safeguarding cause for concern the Lead / Designated Safeguarding Person will decide, whether to report the matter to the Essex Safeguarding Children Board http://www.escb.co.uk/1129 or Essex Safeguarding Adults Board http://www.essexsab.org.uk/ or Clinical Commissioning Group https://midessexccg.nhs.uk/ (the three safeguarding partners). For learners who are able to make choices and decisions, information must not be passed on to external authorities unless the learner agrees or unless the Lead / Designated Safeguarding Officer is satisfied that there is a serious risk of harm to self or others. Social Services or the Police will conduct an investigation.

4.3.2: The Lead / Designated Safeguarding Person will decide what action will be taken to inform the parents/guardian or carer of the learner and a note of that conversation will be made, together with confirmation of any steps TrainPlus has agreed to take regarding interviews or retaining control until the appropriate person arrives.

4.3.3: A written record of the date and time of the report will be made, and the report will include the name and position of the person to whom the matter is reported. The telephone report will be confirmed in writing to the College partner or ESFA (where applicable) within 48 hours. The confirmation may be handwritten, posted or emailed (encryption must be used) but, in any event, a copy of the letter will be kept (confidentially)on the learner's file.

4.3.4: The Lead / Designated Safeguarding Person will notify the Directors as soon as practicable and in any event within 48 hours of the initial concern arising.

4.3.5: Written Records - The Designated Safeguarding Person will complete a written report and retain a copy of:

• The report.

• Any notes, memoranda or correspondence dealing with the matter Copies of reports, notes etc should be kept securely locked at all times, and kept for a period of 7 years.

5. Prevent

Prevent is 1 of the 4 elements of **CONTEST**, the government's counter-terrorism strategy. It aims to stop people becoming terrorists or supporting terrorism.

The Prevent Strategy:

• Responds to the ideological challenge we face from terrorism and aspects of extremism, and the threat we face from those who promote these views.

• Provides practical help to prevent people from being drawn into terrorism and ensure they are given appropriate advice and support.

• Works with a wide range of sectors (including education, criminal justice, faith, charities, online and health) where there are risks of radicalisation that we need to deal with.

The strategy covers all forms of terrorism, including far right extremism and some aspects of non-violent extremism. The Home Office works with local authorities, a wide range of government departments, and community organisations to deliver the Prevent strategy. The police also play a significant role in Prevent, in much the same way as they do when taking a preventative approach to other crimes.

The Home Offices uses a range of measures to challenge extremism in the UK, including:
• Where necessary, preventing apologists for terrorism and extremism from travelling to this country.
• Giving guidance to local authorities and institutions to understand the threat from extremism and the statutory powers available to them to challenge extremist speakers.
• Funding a specialist police unit which works to remove online content that breaches terrorist legislation.
• Supporting community based campaigns and activity which can effectively rebut terrorist and extremist propaganda and offer alternative views to our most vulnerable target audiences - in this context they work with a range of civil society organisations.
• Supporting people who are at risk of being drawn into terrorist activity through the Channel process, which involves several agencies working together to give individuals access to services such as health and education, specialist mentoring and diversionary activities.

TrainPlus is committed to supporting vulnerable students through its safeguarding agenda in order to prevent potential radicalisation.

TrainPlus has engaged positively to provide training to all staff, assessors / subcontractors to raise awareness of Prevent to ensure key staff have the skills and knowledge to refer any concerns appropriately. TrainPlus staff communicate and promote the importance of the duty and TrainPlus ensure staff implement the duty effectively.

TrainPlus is committed to delivering British Values and Prevent to all students which covers: Democracy, Rule of Law, Mutual Respect, Liberty, CONTEST counter-terrorism strategy, and the Prevent duty.

Learners are given the opportunity to discuss concerns regarding the Prevent Duty and any person at risk of radicalisation is given the appropriate support. Ensuring the rights of individuals are fully protected and the centre remains a safe space in which young people can understand and discuss sensitive topics, including terrorism and the extremist ideas that are part of terrorist ideology, and learn how to challenge these ideas.

TrainPlus refers to Prevent using the safeguarding referral process.

Possible signs of radicalisation include:

- The individual's views become increasingly extreme regarding another section of society or government policy
- They are observed downloading, viewing or sharing extremist propaganda from the web
- They become withdrawn and focused on one ideology
- The individual becomes increasingly intolerant of more moderate views
- The individual may change their appearance, their health may suffer (including mental health) and they may become isolated from family, friends, peers or social groups
- The individual expresses a desire/intent to take part in or support extremist activity

6. Suspicion, allegation or actual abuse or a safeguarding cause for concern of a learner/child/vulnerable adult by a member of staff

Staff need to be prudent about their own conduct and vigilant about the conduct of others, so that their relationships with children and vulnerable adults remain entirely appropriate and professional. It is recognised that staff can be vulnerable to the possible consequences of their close professional relationships with children and vulnerable adults and to the potential for malicious and misplaced allegations being made, whether deliberately or innocently, arising from the normal and appropriate associations that staff may have with them.

All staff should be aware of their duty to raise concerns, where they exist, about the unsafe practice of colleagues in regard to children and young people and vulnerable adults.

6.1.1: Any allegation or suspicion of abuse or a safeguarding concern by a member of staff must be reported to the Lead / Designated Safeguarding Person, as soon as possible or within 2 hours using **Appendix 4**.
If the allegation meets any of the criteria set out in paragraph 5.1 of 'Safeguarding Children & Safer Recruitment in Education' 2012, the Lead / Designated Safeguarding Person shall report it where necessary the College Partner or ESFA on the same day.

6.1.2: If the allegation concerns a vulnerable adult learner the Lead / Designated Safeguarding Person must report the matter to college partner or ESFA, where the vulnerable adult is considered to be suffering or is likely to suffer significant harm.

6.1.3: It is not necessary to make a referral to the College or ESFA where an allegation can be shown beyond doubt to be demonstrably false. It is also not necessary to make a referral to Social Services where the allegation is judged to be of a trivial nature.

6.1.4: In any case the Lead / Designated Safeguarding Person must take such steps that they consider necessary to ensure the safety of the learner who has made the allegation and any other vulnerable adult or child or learner who might be at risk. They must follow TrainPlus's Staff Disciplinary Codes and Procedures. These steps may include:

Staff Suspension
Suspension is deemed a neutral act - safeguarding both the child/vulnerable adult making the allegation and the member of staff Suspension is recommended in the following circumstances:

- A person would be at risk.
- The allegation is so serious that summary dismissal for gross misconduct is possible.
- It is necessary to allow unimpeded investigation.

Alternatives to Suspension

- Leave of absence (paid).
- Allocating different duties without contact with the child or vulnerable adult.
- Providing a colleague to be present during all contact time
- Allocating administrative duties only.

6.1.5: At an early stage, staff subject to an allegation should be advised to seek advice and support from their professional association or trade union. The matter should remain confidential and information should be disclosed on a need to know basis only.

6.2: Suspected Abuse, Safeguarding or Prevent Concern

A member of staff may make an allegation of suspected abuse or a safeguarding cause for concern of a learner by another member of staff even if the learner does not disclose this abuse. The member of staff who suspects the abuse or safeguarding cause for concern should complete the form in **Appendix 4** and discuss their suspicions with their Lead / Designated Safeguarding Person who will, if appropriate, report the suspicion to the Director.

The Director and the Lead / Designated Safeguarding Person will decide how the matter is to be investigated and what is the most appropriate action to be taken during the period of investigation.

6.3: Managing the aftermath of unfounded and unsubstantiated allegations

6.3.1: Where it is subsequently found that an allegation was made with malice and aforethought, the Lead / Designated Safeguarding Person will determine an appropriate course of action according to the centre procedures. This may include disciplinary action against the accuser, acceptance of a written apology (subject to agreement about future behaviour or other such sanctions the Lead / Designated Safeguarding Person may deem appropriate).

6.3.2: Despite the distress caused, children/vulnerable adults who make false allegations may still be entitled to continue to receive full access to training. The circumstances of each case will be reviewed on an individual basis.

6.3.3: Where remaining in the same organisation as the falsely accused member of staff would be prejudicial either to that member of staff or the child/vulnerable adult, consideration should be given to the child/vulnerable adult studying elsewhere. Permanent exclusion should be considered only as a last resort.

6.3.4: The Lead / Designated Safeguarding Person will make sure that members of staff, who have been subject to false or unsubstantiated allegations, receive either personal or professional support or both.

6.3.5: If investigations have revealed any competency issues then, following disciplinary or capability procedures, support mechanisms or other professional support may be offered e.g. training, in line with the Centre's procedures and processes.

7. The Role and Responsibilities of the Director and the Lead / Designated Safeguarding Person

The Director will:

7.1.1: On receipt of a completed **Appendix 4** Form alleging abuse of a child, or vulnerable adult by persons known or unknown, the Director will inform the Lead / Designated Safeguarding Person and ensure that they receive a copy of the completed Form **Appendix 4** within 24 hours.

7.1.2: On receipt of a completed **Appendix 4** Form accusing a member of staff of abusing a child or vulnerable adult, the Lead / Designated Safeguarding Person will take action in accordance with the staff Disciplinary codes and procedures of the Centre.

7.1.3: Ensure that everyone with substantial access to children and vulnerable adults will have training on indicators of abuse, good practice, practices never to be sanctioned and any changes in legislation.

7.2: The Role and Responsibilities of the Lead / Designated Safeguarding Person

The Designated Safeguarding Person will:

7.2.1: Ensure the Centre meets its statutory duties defined within the:

• 'Safeguarding Children and Safer Recruitment in Education' (2012) (DfE).

• Working together to safeguard children: A guide to inter-agency working to safeguard and promote the welfare of children' (2026) (DfE).

• Education Act 2011.

• Prevent Duty Guidance for England issued under section 29 of the Counter terrorism and security Act 2015.

7.2.2: Also, the National Framework of Standards for Safeguarding Adults, ADSS 2005, by:

• Providing professional advice, support and guidance to staff regarding any suspicion of abuse, if a young person or vulnerable adult makes a disclosure or in relation to the possible abuse of trust.

• Provide professional advice, support and guidance to staff regarding causes for concern other than abuse with regards to children and vulnerable adults.

• Gathering statements and information regarding child and vulnerable adult safeguarding issues and ensure that records are kept safely and securely.

• Making decisions, in consultation with the Director, regarding appropriate action.

• Sharing information and making referrals with Children's Social Care or the Safeguarding Vulnerable Adult Coordinator at Social Services, where appropriate, to support child protection enquiries and children in need assessments as well as safeguarding vulnerable adult learner enquiries.

- Report the matter to the Essex Safeguarding Children Board http://www.escb.co.uk/1129 or Essex Safeguarding Adults Board http://www.essexsab.org.uk/ or Clinical Commisioning Group https://midessexccg.nhs.uk/ (the three safeguarding partners).

• Monitoring learners after a referral is made and ensuring that the Centre is adhering to any work agreed with Social Services or other agencies.

• Producing an annual report, that reviews how the duties have been discharged.

• Liaising with the Local Safeguarding Children Boards.

• Ensuring that everyone with substantial access to children and vulnerable adults will have training on indicators of abuse, good practice, practices never to be sanctioned and any changes in legislation.

• Undertaking annual training on Safeguarding.

7.3: The Role and Responsibilities of Centre staff/subcontractors will:

7.3.1: Accept and recognise their responsibilities in relation to good practice and the reporting of suspected poor practice and allegations or concerns about abuse.

7.3.2: Be ready and receptive to learners who wish to make a disclosure of abuse and to comply with this procedure.

7.3.3: Disclose to the Lead / Designated Safeguarding Person all relevant information.

7.3.4: Provide clearly written statements of the concern or disclosure on the same day to the Directors.

7.3.5: Attend meetings as required.

7.3.6: Undertake training on Safeguarding as part of induction and as required for updating.

8. Confidentiality

8.1: The child or vulnerable adult should be informed at the earliest possible stage of the disclosure and that the information will be passed on. Staff must not discuss the case with anyone other than those involved in the case.

8.2: TrainPlus complies with the requirements of the General Data Protection Regulation (GDPR) 2018, which allows for disclosure of personal data where this is necessary to protect the vital interests of a child or vulnerable adult.

9. Training – Staff Development

9.1: All staff working within the centre will undergo yearly training and development so that they are fully aware of this policy and their responsibilities to the safeguarding requirement of children, young people and venerable adults. This training will be updated as required.

9.2: The Leaad / Designated Safeguarding Person will receive additional training so that they can effectively fulfil their responsibilities to the protection of young people and vulnerable adults at TrainPlus. This training will be updated as required.

10. Review and Monitoring of the Policy and Procedures

10.1: The delivery of the Safeguarding Policy will be monitored through lesson observations.

10.2: The outcome of learner questions will be reported to the Lead / Designated Safeguarding Person.

10.3: The Lead / Designated Safeguarding Person and Director will review and monitor the policy and procedures on an annual basis and will recommend and implement approved changes where necessary. A revised version of the policy will be submitted on an annual basis.

10.4: The Lead / Designated Safeguarding Person will produce a termly report on safeguarding for the Director.

11. Individual Risk Assessments – Identifying high risk potential

11.1: The intention of this policy and procedure (see **Appendix 5**) is to recognise the importance of a positive and balanced approach to Individual Risk Assessments where reasonably possible in the process of recruiting learners to courses where information has been disclosed that indicates that an applicant may pose a risk to the health and safety of others and or themselves. It can also be used to risk access learners 'on course' at TrainPlus Ltd.

11.2: Where an applicant has disclosed information (e.g. a particular physical condition) or information has otherwise been disclosed to the Centre) which reasonably indicates that they may be vulnerable to particular risks to their or others' health or safety in the context of Centre activities, The Lead / Designated Safeguarding Person will conduct a risk assessment in accordance with this policy, using the Learner Risk Assessment Form (See **Appendix 5a**).

11.3: Staff who feel that a current learner/s may require an Individual Risk Assessment should contact the Lead / Designated Safeguarding Person.

12. e-Safety

12.1 The internet is an important education tool, but also carries risks associated with unwanted contact and bullying, inappropriate content, commercial exploitation and radicalisation toward extremism and terrorism.

12.2 The safeguarding responsibilities extend to the online world so that we can maximise the opportunities of digital technology and help young people and vulnerable adults to use the internet safely and responsibly.

12.3 At TrainPlus there is a focus on raising awareness and understanding of e-Safety issues amongst learners via the safeguarding and the assessor/subcontracting team. This will include the availability of e-safety resources for learners.

APPENDIX 1

DEFINITIONS OF ABUSE AND SAFEGUARDING ISSUES

Physical Abuse is usually the use of force to cause pain and injury, and signs might include burns, bruising, scratches, or accidents that cannot be explained. Also included is misuse of medication or when a parent or carer fabricates the symptoms of, or deliberately induces illness in a child or vulnerable adult.

Emotional Abuse is the persistent emotional ill treatment such as to cause severe and persistent adverse effects on emotional development.

Psychological Abuse such as threats of harm or abandonment, humiliation, blaming or controlling behaviour, verbal insults, enforced isolation, intimidation and coercion.

Discriminatory Abuse includes any sort of abuse based on vulnerable adults or child's race, gender or impairment such as their mental or physical health.

Sexual Abuse includes rape, sexual comment, remarks, online sexual harassment, upskirting (which typically involves taking a picture under a person's clothing without them knowing, with the intention of viewing their genitals or buttocks to obtain sexual gratification) and sexual assaults to which the vulnerable adult or child/vulnerable adult has not consented, or could not consent, or was pressurised into. Signs can include changes in behaviour, using sexual language or physical discomfort. It may also include encouraging children and vulnerable adults to behave in sexually inappropriate ways.

Sexploitation is the commercial exploitation of sex, sexual attractiveness, or sexually explicit material.

Female Genital Mutilation (FGM) includes partially or completely removing female genitalia for non-medical reasons, also known as cutting or female circumcision. FGM mandatory reporting duty for teachers 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 along with regulated health and social care professionals in England and Wales, 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.

Peer on Peer Abuse is the exploitation, bullying (cyberbullying), physical abuse such as hitting, kicking, shaking, biting, hair pulling, harming and/or harassing of a young person by their peers of the same or similar age, usually under the age of 18.

Neglect and Acts of Omission are when a vulnerable adult or child does not have their basic needs met, such as adequate food or warmth or help with personal hygiene. It may also include inadequate shelter including exclusion from home or abandonment, failure to ensure adequate supervision including the use of inadequate carers, or the failure to ensure access to appropriate medical care or treatment. Signs might include deteriorating health, appearance or mood.

Institutional Abuse: this is poor professional practice in an institution designed to safeguard both children and adults, including neglect, and can take the form of isolated incidents right through to ill treatment or gross misconduct.

Financial or Material Abuse: this is when a child/vulnerable adult is exploited for financial gain. It includes theft, fraud, exploitation, misuse or misappropriation of property/finance etc.

Radicalisation, Extremism and Terrorism: In respect of safeguarding individuals from radicalisation, TrainPlus works to the Prevent element of the Government's Counter Terrorism Strategy, and where deemed appropriate seeks external support for learners through referrals to the Channel Programme. This programme aims to work with the individual to address their specific vulnerabilities, prevent them becoming further radicalised and possibly entering the criminal justice system because of their actions. It is recognised that radicalisation can occur to an individual from any section of society and is not particular to any racial, ethnic or social group. It is further recognised that in many instances the process of radicalisation is essentially one of grooming by others.

Extremism: The Government has defined extremism in the Prevent strategy as; "vocal or active opposition to fundamental British values, including democracy, the rule of law, individual liberty and mutual respect and tolerance of different faiths and beliefs. We also include in our definition of extremism calls for the death of members of the armed forces"

County Line: A common feature in county lines drug supply is the exploitation of young and vulnerable people. The dealers will frequently target children and adults - often with mental health or addiction problems - to act as drug runners or move cash so they can stay under the radar of law enforcement.

In some cases the dealers will take over a local property, normally belonging to a vulnerable person, and use it to operate their criminal activity from. This is known as cuckooing.

People exploited in this way will quite often be exposed to physical, mental and sexual abuse, and in some instances will be trafficked to areas a long way from home as part of the network's drug dealing business.

As we have seen in child sexual exploitation, children often don't see themselves as victims or realise they have been groomed to get involved in criminality. So it's important that we all play our part to understand county lines and speak out if we have concerns

Incels: Involuntary celibates (incels) are men who define themselves by their inability to form or access sexual relationships with women. They believe this is the combined result of genetic factors, evolutionarily determined traits in women, and inequitable social structures. Incels are predominantly interested in accessing sex with women**.** Incels sometimes take their views to violent extremism within their ideology.

Some examples of common terminology used by incels are:

- **Chad:** A Chad is an archetypal white alpha male contrasting incels in both their physicality and unlimited access to sex.
- **Stacy:** A Stacy is the female counterpart to a Chad. She is a female archetype at the apex of the social and sexual hierarchy. Stacys have their pick of sexual and romantic partners; for this reason, they are hated by incels, and are a target for online vitriol, humiliation, and physical violence.
- **Beckys and Betas:** Beckys are the majority of the female population and are subordinate to Stacys. They are 'average' looking and have lower social status.
- **Bluepill:** According to incels, a bluepilled male engages in conventional dating practices, unaware of the 'real' society incels inhabit.
- **Redpill:** 'Swallowing the redpill' refers to a man waking up to the real world, where women are better off than men, female oppression is a myth, and women actually desire traditional gender roles.

Misogyny: Misogyny is hatred of, contempt for, or prejudice against women. It is a form of sexism that is used to keep women at a lower social status than men, thus maintaining the social roles of patriarchy.

Safeguarding issues may also be recognised in the specific circumstances identified below:

- Child pornography and the Internet.
- Forced marriage of a child. (honour based violence HBV) staff can contact the Forced Marriage Unit if they need advice or information: Contact: 020 7008 0151 or email fmu@fco.gov.uk.
- Young carers.
- Looked after children and children living away from home.
- Pregnancy of a child.
- Self-harming and suicidal behaviour.
- Radicalisation and extremism.

This list is not exhaustive.

APPENDIX 2

Indicators

All staff should be aware of indicators, which may signal that children are at risk from, or are involved with serious violent crime.

These may include:

- increased absence from school
- a change in friendships or relationships with older individuals or groups,
- a significant decline in performance,
- signs of self-harm or a significant change in wellbeing
- signs of assault or unexplained injuries.
- unexplained gifts or new possessions could also indicate that children have been approached by, or are involved with, individuals associated with criminal networks or gangs.

APPENDIX 3

GUIDELINES FOR CENTRE STAFF ON DEALING WITH DISCLOSURES OF ABUSE OR ABUSE OF TRUST

Do

- Be ready to listen to what the person is saying. Reassure the person; acknowledge that they have been brave to tell you.
- Make sure the person is comfortable in a secure environment where they cannot be overheard or interrupted.
- Take what they say seriously.
- Offer practical help i.e. glass of water or tissues
- Remind the child, young person or vulnerable adult that you have a duty to follow procedure in order to safeguard and support them and that you will inform the Designated Safeguarding Person. Reassure them that only those who 'need to know' will be aware of the information.
- Tell them what the next steps will be after you have spoken to the Lead / Designated Safeguarding Person.
- Refer the matter to the Lead / Designated Safeguarding Person immediately.
- Confirm the details of the disclosure in writing as soon as possible, as accurately as possible and ensure that the time, place and date are noted and that the account is signed.
- Avoid any delay in reporting the cause for concern or disclosure to the Lead / Designated Safeguarding Person as this could increase the risk to the learner and to other family members or other learners.
- Where abuse is suspected but not disclosed by the learner, the member of staff should report their concerns to the Lead / Designated Safeguarding Person.

Don’t

- Do not offer confidentiality or to keep what you are being told secret.
- Don’t appear to be shocked or upset by what the child, young person or vulnerable adult is telling you, even if what they are saying is distressing.
- Don’t touch the person to comfort or reassure them.
- Don’t question the person about the alleged abuse, beyond the minimum necessary to understand what is being alleged
- Don’t give false reassurances in order to comfort the person.
- Don’t take the person back home.

APPENDIX 4

REPORTING ALLEGED OR SUSPECTED ABUSE OR OTHER CAUSE FOR CONCERN (INCLUDING PREVENT) OF A CHILD, VULNERABLE ADULT OR OTHER LEARNER TO THE DIRECTORS

To be completed by a member of staff who is reporting the disclosure of abuse of a learner or suspected abuse or a cause for concern under the Safeguarding Policy.
To be completed and forwarded to the Lead / Designated Safeguarding Person as soon as possible but within 48 hours of disclosure or identified cause for concern.

Form Completed by		**Tel no.**	
Position		**Date**	
Sector/Service		**Manager**	

1) Alleged Victim or Safeguarding Cause for Concern Learner. If there is more than one learner, please fill in a separate sheet for each person						
Surname						
Forenames						
Current Address & Postcode						
Date of birth			Mobile No:		Tel No:	
Has the learner consented to the referral?	Yes		No			
Has the learner the capacity to consent to this.	Yes		No		Not known	

Is the learner aware of this referral?	Yes		No		Not known	

2) Alleged abuser or person creating the safeguarding cause for concern. If there is more than one person please give details of each		
Surname		
Forenames		
Current Address & Postcode		
Mobile:		Tel:
More than one alleged individual? (Please specify)		

3) The Abuse/Safeguarding/Prevent Cause for Concern

Type of abuse/safeguarding cause for concern suspected:

(Please tick as many as apply)

Physical abuse		Sexual abuse		Financial or material abuse	
Emotional Abuse		Psychological abuse		Institutional abuse	
Neglect		Discriminatory abuse		Prevent referral (radicalisation, extremism, terrorism)	

Cause for concern: please specify		

Place where suspected abuse/safeguarding cause for concern took place:

Alleged victim's own home		Alleged victim's parents home		Residential care home	
Alleged victim's relative's home		Alleged perpetrator's (give details) own home		Training Centre (give details)	
Adult placement scheme		Other (please specify)			
Address where suspected abuse/safeguarding cause for concern took					

Are there witnesses? If yes, provide contact details.

Name and address of witness	
Tel:	Mobile:

Name and address of witness	
Tel:	Mobile:

4) Additional Information: please provide as much detail as possible about the abuse/safeguarding cause for concern you are reporting

5) Actions taken **Have you taken any actions other than completing this form? Please specify**

APPENDIX 5

Individual Risk Assessment

Policy and Procedures

1 Introduction

1.1 The intention of this policy and procedure is to recognise the importance of a positive and balanced approach to Individual Risk Assessments where reasonably possible in the process of admission of students to courses where information has been disclosed that indicates that an applicant may pose a risk to the health and safety of others and or themselves. It can also be used to risk access learners 'on course' at the Centre.

2 Purpose

2.1 To take reasonably practicable steps to promote and protect the health and safety of all staff and learners.

2.2 To enable TrainPlus to identify its most vulnerable learners (such as those in public care, those with learning difficulties, and or disabilities, learner with health problems, those in provider day care facilities, learners on the child protection register), manage risks relevant to their Safety and Welfare and ensure the appropriate mechanism(s) are in place for them.

2.3 To ensure that where risk assessments are made on individual learners, they are conducted in a fair and consistent manner, without undue influence of personal prejudice, therefore promoting inclusive practices and widening participation.

2.4 To respect the rights and needs of individuals to be allowed to take certain risks without presenting an unreasonable risk to the health and safety of others the Centre or to themselves

2.5 To establish where reasonably possible and appropriate to do so, the level of risk that the individual may pose towards themselves or others.

2.6 Where risks have been identified by the Centre, to take reasonable steps identify and examine realistic and enforceable ways in which the risks can be minimised to enable the learners to continue with their chosen course or programme.

2.7 To ensure that the risk minimisation plan (Risk Assessment Proforma) is communicated effectively with the learner and any staff involved in, or responsible for, its implementation.

2.8 To ensure that any non-compliance to the plan, for whatever reason, is brought to the attention of both the student and Director and if appropriate in the particular circumstances of the case, to consider whether disciplinary proceedings should be commenced if the learner has already been accepted onto the course.
2.9 To recognise that occasionally, having completed the Risk Assessment and thoroughly investigated alternative solutions, it may not be possible to minimise the risks sufficiently to protect the health and safety of the individual, fellow learners or staff. In such extreme cases, it may be necessary to accept that we may be unable to accommodate that person and to refuse the individual's application, subject to complying with TrainPlus Ltd duties under equality legislation.

3 Quality Reporting cycle

3.1 As part of quality reporting cycle, the Risk Assessment findings need to be reported to the following boards, in conjunction with the complaints and disciplinary reports.

- Director
- Quality Assurance Team
- College Partner / ESFA

4 Persons responsible

4.1 The Lead / Designated Safeguarding Person is responsible for conducting the Individual Risk Assessments of learners in their school.

4.2 The Lead / Designated Safeguarding Person may elect representatives to act on their behalf to carry out the assessment.

5 Support for staff

5.1 TrainPlus will ensure appropriate training is provided for staff carrying out Individual Risk Assessments.

5.2 Staff who, specialise in a wide variety of fields, can help to answer specific queries about Individual Risk Assessments.

5.3 Designated staff that feel unable to deal with a particular risk assessment in a non-discriminatory way, are advised to contact their Lead / Designated Safeguarding Person.

6 Identifying high risk potential

6.1 Where an applicant has disclosed information (e.g. a particular physical condition, criminal record) or (information has otherwise been disclosed to TrainPlus) which reasonably indicates that they may be vulnerable to particular risks to their or others' health or safety in the context of training activities, The Lead / Designated Safeguarding Person will conduct a risk assessment in accordance with this policy.

6.2 Staff who feel that a current learner may require an Individual Risk Assessment should contact their Lead / Designated Safeguarding Person.

7 Appeals against a risk assessment

7.1 Applicants who have been refused a place at TrainPlus as a result of a risk assessment may appeal against the decision in the form of a letter to be sent to the Lead / Designated Safeguarding Person within 10 days of the recommendation. The Director/Designated Safeguarding Person will consider each individual case and confirm the decision to the applicant in writing.

7.2 Should a learner later discover that their circumstances have changed to such a degree that they feel the original Individual Risk Assessment is no longer valid they are able to request that they be assessed again for a subsequent course.

7.3 Similarly TrainPlus reserves the right to re-assess a learner at any time or following a disciplinary hearing.

8 Time frame in dealing with risk assessment

8.1 As part of TrainPlus's commitment to providing a quality assured process in relating to Risk Assessments the following time scales need to be adhered to and monitored.

• Following the receipt of the application - the Risk Assessment Proforma needs to be sent out where reasonably possible within 2 weeks.
• Once the Proforma has been completed and sent back, the Risk Assessment exercise must take place within 4 weeks.
• Priority must be given to applicants, whose course start dates are within 6 weeks or (sooner).
• Risk Assessments of current learners can be conducted immediately after a concern has been raised.

9 Procedure - need for a risk assessment

9.1 Reasons for carrying out an Individual Risk Assessment may include:

• Previous offences of a violent or sexual nature.
• Current court License Conditions.
• Current Community Orders
• Previous exclusions from education.
• Previous cause for concern expressed by staff or students.
• Medical conditions such as epilepsy or diabetes.
• Behavioural issues such as aggression, lack of danger awareness.
• Disabilities such as mobility issues, visual or hearing impairment in order to assess what, if any, adjustments in addition to those routinely made by TrainPlus may be reasonably necessary to prevent the applicant/student suffering substantial disadvantage as a result of their disability.
• Persons who are neither students nor staff, such as parents or carers who wish to accompany a student whilst at work/training/assessment.
• Mental Health conditions and learning difficulties that could impact on the learners' social behaviour.

9.2 Pregnancy would also require a risk assessment. The Health and Safety manager deals with this, using an alternative specialised form.

Information Gathering

9.3 Should the learner be currently working in partnership with external support agencies, some information pertaining to risk levels and previous successful management, may be obtainable, with the learner's permission.

9.4 Information on issues that may exacerbate the identified risk also needs to be gathered with regard to the intended course, and subsequent activities involved within it.

Risk Assessment Meeting

9.5 The staff members conducting the risk assessment must consider each applicants individual circumstances and all perceived risks, triggers or contributing factors fully addressed.

9.6 Likelihood, severity and existing controls should be examined and assessed and realistic and practical solutions discussed. TrainPlus learner risk assessment form can be used to establish a risk rating. (See **Appendix 5a**).

9.7 It is not always possible to make a final decision during the first Risk Assessment activity. Further information may be required from course tutors, supporting external agencies or line manager. You may wish to consider previous performance e.g. had the learner been withdrawn in the past.

Final decision that risk is manageable

9.8 The final decision that the risk can be minimised and/or managed in a safe, realistic, and sustainable manner must be a joint decision. This can be agreed between the member of staff conducting the assessment, the Lead / Designated Safeguarding Person and Director (or other specialist staff maybe invited to the meeting) who will sign off the Learner Risk Assessment Form.

Final decision that risk is too high and therefore unmanageable

9.9 The final decision that the risk is too high and not manageable must be a joint decision between the staff member conducting the assessment, the Lead / Designated Safeguarding Person and Director or other appropriate member of staff. In this instance, the Risk Assessment Proforma is not completed. Instead, a letter is sent to the student explaining why the risk is unmanageable. Copies of the letter are sent to other external support, should the student permit the involvement of external agencies.

9.10 Once a final decision is made in relation to the Risk Assessment the Director must be notified so an alert can be placed on the system. This will ensure that the individual can be recognised as going through a Risk Assessment and declined a place. The Lead / Designated Safeguarding Person is also informed.

Completing and distributing the Risk Assessment

9.11 Any instructions of how the risk is to be minimised should be clearly written, explained to, and agreed by, the learner.
9.12 The names or titles of people with whom the assessment is to be shared should also be documented on the Risk Assessment Form.
9.13 Copies of the Individual Risk Assessment need to be distributed to the relevant staff involved.
9.14 The Assessment must have a review date. Usually every six months; more frequently, should issues be of a more changeable nature.
9.15 Learners using wheelchairs who are unable to bear their own weight whilst being transferred into an Evacuation Chair; will require a full Individual Risk Assessment, due to Manual Handling regulations.

APPENDIX 5a Learner Risk Assessment Form

Individual assessed. **Course.**

Location. **Form completed by.**
Date of Assessment.

Signature……

Likelihood	**Impact**	**Outcome**
1 = Not possible or unlikely	1. Insignificant / Minimal	Application Accepted [ ]
2 = Possible	2. Moderate	Application Rejected [ ]
3 = Certain or inevitable.	3. High or extreme	

NATURE OF RISK	LIKELIHOOD	POTENTIAL IMPACT	RISK SCORE	ACTION NEEDED TO MITIGATE RISK	RISK ACCEPTABLE Y/N	DATE OF NEXT REVIEW

Risk Scoring Low: less than 9 **Medium: 9-14 inclusive** **High: More than 14**

Completed form must be returned to the: Directors and Designated Safeguarding Person.

Appendix 6:

Safeguarding Adults and Children Protection Body Map

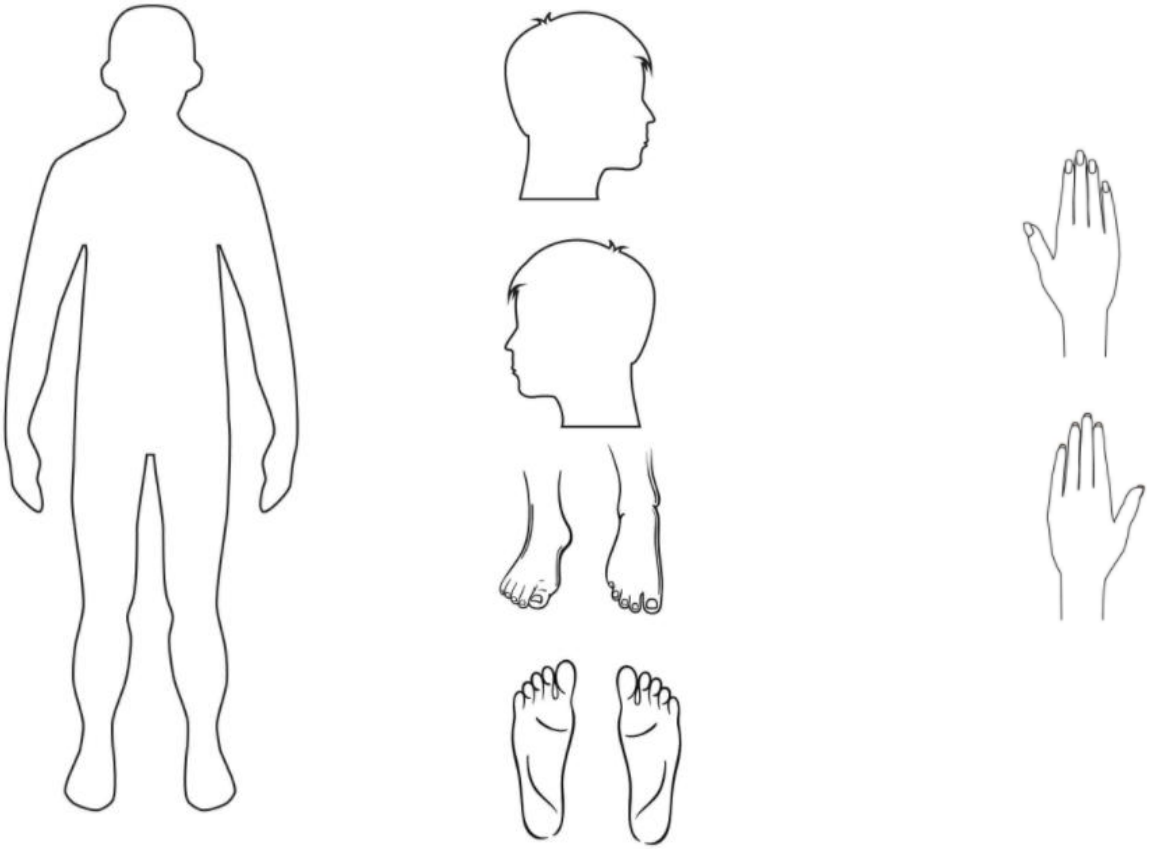
Name of Individual:

Date of Birth:

Name of Individual completing this form:

Date Recorded:

Observations:



APPENDIX 7

Safeguarding Signpost

Organisation	Service	Website	Email	Phone Number
NSPCC (National Society for the Prevention of Cruelty to Children)	National helpline for anyone worried about a child's safety or wellbeing.	www.nspcc.org.uk	help@nspcc.org.uk	0808 800 5000
Childline	Free, confidential support service for children and young people under 19.	www.childline.org.uk		0800 1111
UK Safer Internet Centre	Supports professionals dealing with online safety or harmful online content involving children or young people.	https://www.saferinternet.org.uk	helpline@saferinternet.org.uk	0344 381 4772
ECPAT UK	Supports children affected by trafficking and sexual exploitation; advocates for policy change.	www.ecpat.org.uk	enquiries@ecpat.org.uk	020 7607 2136
The Safeguarding Alliance	Provides safeguarding consultancy, audits, and accredited training for organisations across education, charity, and business sectors.	www.thesafeguardingalliance.org.uk	info@thesafeguardingalliance.org.uk	020 3488 6940
SACPA (Safeguarding and Child Protection Association)	Professional membership body offering safeguarding resources, policy guidance, and training for children and adults at risk.	www.sacpa.org.uk	info@sacpa.org.uk	020 7798 1585
Local Authority Safeguarding Teams	Local councils' Children's Services and Adult Social Care departments handle referrals, investigations, and protection measures.	https://www.gov.uk/find-local-council		
Equality and Human Rights Commission (EHRC)	Regulatory body for equality, human rights and non-discrimination across protected characteristics (age, disability, gender reassignment, race, religion/belief, sex, sexual orientation, etc). Offers enforcement, guidance, oversight.	www.equalityhumanrights.com	https://www.equalityadvisoryservice.com/app/contact-us	0808 800 0082
Galop	UK's LGBT+ anti-abuse charity supports LGBT+ victims/survivors of domestic abuse, hate crime, sexual violence, conversion therapy, other abuse.	galop.org.uk	help@galop.org.uk	0800 999 5428