



SAFEGUARDING POLICY AND PROCEDURE Document update location matrix

earlyLocation	Website	EAL smarter touch	HABC Portal	Myhrtoolkit	Atlas	other
Update required	Yes	yes				

This updated **safeguarding policy** incorporates new requirements from the Ofsted Toolkit 2025, Ofqual Recognition 2025, ISO/IEC 27001:2022, and updates to UK Health and Safety legislation for 2025. It strengthens governance, digital safety, mental health provisions, and compliance with national standards.

Scope:

Qualitrain is committed to safeguarding all, and we expect everyone who works for us to share this commitment. Safeguarding is not just about protecting children, learners, staff, associates, visitors and vulnerable adults from deliberate harm or neglect and failure to act; it relates to broader aspects of care and education. In relation to our learners, safeguarding and promoting their welfare is defined as protecting learners from maltreatment, preventing impairment of learners' mental and physical health or development, and ensuring that learners are learning in circumstances consistent with the provision of safe and effective care.

Qualitrain will take action to enable all learners to have the best outcomes and will always act in the best interests of a child.

This policy covers all Qualitrain learners, staff, associates, and visitors, and applies to all aspects of a learner's programme, regardless of where it takes place. The policy is our overarching safeguarding policy, which includes references to our **Safer Recruitment, Health and Safety Policy, Equality and Diversity Policy, and Prevent and British Values Policy.**

This policy covers the following areas:

- 1.0 Legislative Duty
- 2.0 Policy Statement
- 3.0 Safeguarding: Identifying and reporting concerns
- 4.0 Health and Safety: Particularly compliance with the Health and Safety at Work Act
- 5.0 Broader care
- 6.0 Key Principles
- 7.0 Learners' Entitlement
- 8.0 Governance and Reporting
- 9.0 **Modern Slavery Policy**
- 10.0 County Lines



SAFEGUARDING POLICY AND PROCEDURE Document update location matrix

1.0 Legislative Duty – Qualitrain has a moral duty and statutory obligation to provide a safe and inclusive learning environment for all, to comply with legislation such as the Health and Safety at Work (1974) Act, Equality Act (2010), The Education Act 2002, Prevent Duty, and has additional legal responsibilities regarding children and vulnerable adults. A key legal enforcement framework is provided by the Safeguarding Vulnerable Groups Act (2006) and the Protection of Freedoms Act (2012), which stipulate our additional safeguarding responsibilities when children, vulnerable adults, learners with additional needs and/or disabilities undertake regulated activities.

Relevant staff maintain awareness in respect of Qualitrain Ltd Safeguarding duty through the following Gov.uk guidance;

Keeping Children Safe in Education 2025: Update – 1st September 2025: Statutory guidance for schools and colleges:

https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/1101454/Keeping_children_safe_in_education_2025.pdf

and Working Together to Safeguard Children;

[Working together to safeguard children 2023: statutory guidance](#)

1.1 Children, Young People and Vulnerable Adults

1.1.1 Children and Young People

We are committed to safeguarding and protecting the welfare of all children, particularly in ensuring compliance with legal requirements related to regulated activities. Regulated activity with children can broadly be defined as:

(i) Teaching, training, instructing, caring for or supervising children, or providing advice/ guidance on wellbeing, or driving a vehicle only for children.

(ii) Any work establishments with an opportunity for contact with children.

In accordance with the Children Act 1989 and 2004, a child is any person who has not yet reached their 18th birthday. However, an exception applies to any employed 16- and 17-year-olds, who are classified as young people rather than children. For young people at work, health and safety law defines a child as anyone who has not yet reached the official minimum school leaving age (MSLA). Pupils will reach the MSLA in the school year in which they turn 16 years old.

We are committed to prevent child on child abuse. Please refer to; **Child on Child Abuse Policy & Risk Assessment**

1.1.2 Vulnerable Adults

We are committed to preventing the abuse and neglect of vulnerable adults. A vulnerable adult is defined by the Protection of Freedoms Act 2012 as a person aged 18 or over who receives regulated activity. Regulated activity for adults is divided into six categories, each with detailed subcategories and a definition of who is to be treated as a vulnerable adult recipient in each case. Providing personal care 3. Providing social work 4.



SAFEGUARDING POLICY AND PROCEDURE Document update location matrix

Assistance with general household activities 5. Assistance with the conduct of a person's own affairs 6. Conveying (transporting from one place to another).

Our Duty: Our duty to safeguard and protect the welfare of all children, young people and vulnerable adults is to:

- Safeguard and promote the welfare of children, young people, and vulnerable adults
- Work to provide an environment in which children, young people and vulnerable adults feel safe, secure, valued and respected, and feel confident that any complaint, allegation or suspicion of abuse will be taken seriously
- Ensure that there are adequate procedures and arrangements within Qualitrain to identify, assess, make referrals, and support children, young people and vulnerable adults who are suffering from harm.
- Work in partnerships with parents and other agencies (e.g., Police, Social Care and Funding Providers) to meet these obligations.
- Maintain a safe environment

Referrals: Qualitrain recognises that it is an agent of referral, not investigation. It is not our responsibility to investigate abuse. Staff should not extend an offer of confidentiality, but should clearly inform the person that if information about abuse is disclosed, there is a duty on staff to follow reporting procedures.

1.2 Martyn's Law/Terrorism (Protection of Premises) Act 2025) requirements, including risk assessments are implemented and monitored in respect of classroom settings; ***Martyn's Law Policy & Procedure/Terrorism/Lockdown Policy & Risk Assessment***

2.0 Policy Statement

Qualitrain will:

2.1 Appoint and train a Designated Safeguarding Officer (DSO) who will coordinate Qualitrain's **Safeguarding Policy and Procedure** and make these known to all. The DSO will attend regular updating training (minimum 2 years).

2.2 Ensure all staff and associates receive training on health and safety, the Prevent strategy, recognising abuse and neglect, how to respond appropriately to concerns relating to suspected, alleged or disclosed abuse, reporting, information sharing and confidentiality, as appropriate.

2.3 As an organisation using the Disclosure and Barring Service (DBS) checking service to help assess the suitability of applicants for positions of trust. Before commencing the role, the candidate must complete a DBS check and then renew it every 2 years. Qualitrain Limited complies fully with the code of practice regarding the correct handling, use, storage, retention and disposal of certificates and certificate information

2.4 Make all staff and associates aware of safeguarding issues through our induction process.



SAFEGUARDING POLICY AND PROCEDURE Document update location matrix

- 2.5 Select and train staff and associates to adopt best practices to safeguard our learners and themselves from false allegations. Appropriate safeguarding checks and screening are conducted during the selection process.
- 2.6 Provide opportunities for learners to talk about concerns relating to their welfare
- 2.7 Provide support for learners who have disclosed abuse, and for staff who have experienced disclosure
- 2.8 Develop and promote effective working relationships with other agencies
- 2.9 Respond promptly to allegations of any abuse or abuse of trust made against employees, or incidents of Suspicious poor practice
- 3.0 To ensure that all learners are aware of what safeguarding means
- 3.1 To ensure that learners, employers and other stakeholders are aware of and supported to understand the safeguarding policy and procedure

Procedure

1. Selection, Pre-Start, Vetting and Induction: Qualitrain will:

- 1.1 Appoint and train a DSO. The nominated person must be displayed in all Qualitrain premises
- 1.2 Screen applicants, to assess suitability for the position applied for, by following Applicant Selection and Pre-Start and Vetting in conjunction with Safer Recruitment.
- 1.3 On successful completion of the appointment, pre-start and vetting process:
 - 1.3.1 An applicant is recorded on the Safeguarding Master

Location: Monday.com

- 1.3.2 All new starters complete an induction which incorporates safeguarding requirements and an Induction Record (QT3P2WI3WR1) is completed.

2. Staff Development: It is the responsibility of the company to provide all staff and

associates with adequate safeguarding training, so they understand their role in supporting safeguarding across the provision.

- 2.1 All staff and associate safeguarding training, as stipulated by the DSO and/ or funding provider, and explained in Safeguarding Training, is undertaken, recorded within CPD records, and added to the Safeguarding Master, Location: Monday.com
- 2.2 All individuals are expected always to act professionally and be familiar with Qualitrain's guidance on safe practice. This includes the need to:



SAFEGUARDING POLICY AND PROCEDURE Document update location matrix

2.2.1 Behave, dress, and talk to learners in an appropriate way (non-sexual, non-aggressive, and not abusing a position of trust...)

2.2.2 Avoid situations where they may be at risk of false allegations or take action to reduce that risk.

2.2.3 Report and seek the advice of their line manager or, if they are concerned about a situation, such as a learner having a crush on them, or believe an incident may have been misconstrued.

2.2.4 Be vigilant and sensitive to situations where a child, young person or vulnerable adult may be at risk. Develop their understanding of the signs and indicators of abuse.

2.2.5 Know Qualitrain procedures, including how to respond to a learner who discloses abuse.

2.2.6 Know and comply with requirements for recording all concerns and comments, and passing them onto the Safeguarding Lead.

Page 4 of 15

2.2.7 Treat all information received with sensitivity and with due regard to confidentiality and its limits in safeguarding matters.

2.2.8 Respect and promote the rights, wishes and feelings of children, young people and vulnerable adults and be sensitive to their developmental needs and capabilities.

2.2.9 Regard all children, young people and vulnerable adults as having an equal right to protection.

2.2.10 Regard the interests and safety of a young person as the prime concern. (Where there is a conflict of interest between a young person and a parent or other adult, the welfare of the young person will be considered paramount).

2.2.11 Work in partnership with children, young people and vulnerable adults and their parents.

2.2.12 Contribute to the provision of a safe environment by raising concerns where any premises used by Qualitrain and health and safety procedures appear to fall short of acceptable standards.

2.2.13 Be aware of their duty to raise concerns, where they exist, about the attitude or actions of colleagues, or recruitment processes, using the **Whistleblowing Policy** if necessary.

2.3 Safeguarding training is updated, as needed, then CPD files are updated, and training is recorded on the Safeguarding Master by the Safeguarding Lead and monitored for compliance. Location: Monday.com.

3. Safeguarding: Identifying and reporting concerns (Appendix A contains further information on signs and symptoms, including those of FGM, Abuse and Neglect)

Qualitrain operates within the following key safeguarding requirements, some of which relate specifically to children, young people and vulnerable adults, but also anything linked to radicalisation or extremist behaviour (Prevent), or a concern about discrimination, harassment and victimisation linked to the nine protected characteristics under the Equality Act.

Age



SAFEGUARDING POLICY AND PROCEDURE Document update location matrix

Disability

Marriage and Civil partnership

Gender reassignment

Pregnancy and maternity

Race

Religion or belief

Sex

Sexual orientation

Qualitrain will act when needed to protect learners from:

3.1 Neglect

3.2 Physical abuse

3.3 Sexual abuse/violence/harassment

3.4 Emotional abuse

3.5 Bullying, including online bullying and prejudice-based bullying

3.6 Racist, disability and homophobic or transphobic abuse

3.7 Gender-based violence/violence against women and girls

3.8 Radicalisation and/ or extremist behaviour

3.9 Child sexual exploitation (and trafficking) and Child Criminal Exploitation

3.10 The impact of new technologies on sexual behaviour, for example, 'sexting' and accessing pornography

3.11 Teenage relationship abuse

3.12 Substance misuse

3.13 Issues that may be specific to an area or population, for example, County Lines, gang activity and youth violence

3.14 Domestic abuse

3.15 Female genital mutilation

3.16 Forced marriage



SAFEGUARDING POLICY AND PROCEDURE Document update location matrix

3.17 Fabricated or induced illness

3.18 Poor parenting, particularly in relation to babies and young children

3.19 Honour-based abuse - The concept of 'honour' is, for some communities, deemed to be extremely important. To compromise a family's 'honour' is to bring dishonour and shame, and this can have severe consequences. The punishment for bringing dishonour can be emotional abuse, physical abuse, family disownment and in some cases even murder.

3.20 E-safety is covered under the **Security of Data Policy**.

3.21 Peer-on-peer abuse: Qualitrain would address what support is needed for victims and what support might be needed for perpetrators.

3.22 Children missing in education: Poor or irregular attendance could be an indicator of abuse and neglect, and must be followed up on.

3.23 Other issues or behaviours that cause concern not listed here but pose a safeguarding risk to children, young people and vulnerable adults and an awareness that:

- Mental health problems can, in some cases, be an indicator that a person has suffered or is at risk of suffering abuse, neglect or exploitation
- Children who have a social worker are potentially at greater risk of harm
- Children with special educational needs and disabilities can face additional safeguarding challenges
- Depression is the most common mental health problem. Safeguarding Incident Reporting: If staff have a safeguarding concern or well-being concern regarding a learner or a staff member, the guidance in the Reporting an Incident or Safeguarding Concern Form or Reporting a Well-Being Concern Form should be followed, and the form should be completed and returned to the Designated Safeguarding Officer & Deputy Designated Safeguarding Officer immediately. Location: You can request this from DSO Claire Lewis or DSO Leah Murden, or access it on SharePoint under Quality & Compliance > Reporting an Incident or Safeguarding Concern Form/Reporting a Well-Being Concern Form. If the DSO/DDSO are not available, staff should speak to a member of the Senior Management Team.

The Equality and Diversity Policy and Prevent and British Values Policy should be referred to as applicable. The Data Protection Act 2018 and the GDPR do not prevent the sharing of information for the purposes of keeping children safe, which allows practitioners to share information without consent for a child. The Safeguarding Lead will access advice as required from external agencies, including MASH, LADO, Local Authority Children's Board, and Regional Prevent Teams. The Safeguarding Reporting Process and contact details for all delivery areas can be found in the Safeguarding & Prevent Information Contacts List document.

*Note: We recognise that adults working in our provision may harm children. Any concerns should be reported to the CEO without delay (or, where that is not possible, to the Safeguarding Lead). Any concerns about the CEO should be directed to the Chair of Governors.



SAFEGUARDING POLICY AND PROCEDURE Document update location matrix

4.0 Health and Safety: Particularly compliance with the Health and Safety at Work Act:

4.1 A Health and Safety officer is appointed. The nominated person must be displayed in the boardroom.

4.2 Health and safety are of paramount importance to us, and as such, all facilities and resources comply with legislative requirements for health and safety.

4.3 Health and safety within Qualitrain's facility is upheld through the Health and Safety Statement of Intent. The Training Matrix was updated to reflect policy agreement (Location: Finance Main Office), but MYHRToolkit is now used to obtain electronic agreement.

4.4 External facilities are vetted for health and safety requirements by following the requirements within Sales Enquiries and Partnership Flowchart. The completed documents are stored in the customer's office.

4.5 All delivery platforms, whether within internal or external facilities, where members of staff may be subject to violent behaviour, will be fully risk-assessed to ascertain and mitigate risks to staff members and other candidates.

Health and Safety Incident Reporting: Any injuries, diseases, or dangerous incidents must be reported. To do so, follow the guidance in the Reporting an Incident or Safeguarding Concern Form, in conjunction with the **Health and Safety Policy**, and complete and return the form to the Safeguarding Lead.

5. Broader care and education: Qualitrain strives to ensure the following learner needs are met, and signposts learners to specialists, such as health care professionals, as appropriate:

5.1 Learners' health and safety and well-being, including their mental health

5.2 Needs of learners who have special educational needs and/or disabilities are met

5.3 The use of reasonable force: Staff must use effective de-escalation techniques and promote a positive culture. Reasonable force, including restraint, must only be used to protect a learner and those around them. Poor behaviour must be recorded and reported to the Safeguarding Lead, as it could be a sign that a learner is suffering harm or has been traumatised by abuse.

5.4 Needs of learners with medical conditions are met

5.5 Adequate first aid is available

5.6 Learners are safe on educational visits; includes the completion of pre-visit risk assessments

5.7 Emotional well-being and intimate care needs

5.8 Online safety and associated issues.

5.9 Appropriate arrangements to ensure learners' security, taking into account the local context

6. Key Principles

6.1 All people will be treated with respect and with courtesy by staff and learners in an environment that is free from harassment or discrimination.



SAFEGUARDING POLICY AND PROCEDURE Document update location matrix

6.2 All training rooms, communal areas, facilities, and equipment will comply with legislative health and safety standards.

6.3 Qualitrain will work with learners and other agencies to promote a safe and healthy culture.

6.4 Qualitrain will develop partnerships to proactively protect young people and adults at risk from abuse or neglect.

6.5 Staff and associates will be trained and will have a clear understanding of personal safety and good safeguarding practices.

6.6 Qualitrain will work with learners to promote their own personal health, well-being and safety, including their safety on the internet, so that learners are taught to recognise when they are at risk and how to get help if needed. Learners will be provided with advice on staying safe online, including raising awareness of the Prevent Duty and the dangers of being drawn into radicalisation through online applications, as well as who to contact about concerns.

6.7 Learners will be signposted to external agencies where specialist support is required.

7. Learners' Entitlement: To promote a healthy and safe environment, our learners will be entitled to the following:

7.1 The right to make a disclosure to any member of staff and know that the disclosure will be dealt with quickly, sensitively and appropriately.

7.2 To learn in an inclusive environment free from bullying or harassment; mutual respect for all is promoted.

This is promoted through our Equality and Diversity, Prevent, and British Values (QT076P4) policies, which are covered during Learner inductions and through staff always challenging inappropriate behaviour or attitudes.

Anti-Bullying policy

7.3 During remote learning sessions:

- Staff and learners must wear suitable clothing, as should anyone else in the household.
- Any computers used should be in appropriate areas, for example, not in bedrooms, and the background should be blurred.
- The live session should be recorded so that if any issues were to arise, the video can be reviewed.
- Live sessions should be kept to a reasonable length of time
- Language must be professional and appropriate
- Staff must only use platforms specified by senior managers and approved by our IT network manager/provider to communicate with learners
- Staff should record the length, time, date, and attendance of any sessions held



SAFEGUARDING POLICY AND PROCEDURE Document update location matrix

7.4 To be made aware of the basic principles of safer learning and safeguarding relevant to the programme that the learner is completing, through health and safety being embedded into all training programmes from induction onwards.

7.5 To be made aware of how to access support on personal health and safety issues. The Student Handbook contains a Health, Welfare, and Safety Section, and your trainer can explain how to access the health and safety support available to you.

7.6 To be provided with up-to-date information on personal safety issues. Delivery programmes are designed to embed this information.

7.7 The opportunity to comment and provide feedback on the extent to which Qualitrain and our courses promote and maintain well-being and personal safety, particularly through learner feedback surveys.

7.8 Learn about interpersonal and communication skills that promote and establish a welcoming, safe, and respectful environment, such as in the ways suggested in our **Prevent and British Values policy**.

7.9 Empowered to create communities that are resilient to extremism and to protect those who may be vulnerable to being drawn into violent extremism or crime. The values of respect and tolerance are embedded within teaching and learning sessions, and in accordance with our Prevent and British Values

Policy: Any learner who may be at risk of radicalisation would be supported and signposted to further external sources of support where appropriate.

7.10 To have a clear understanding of safeguarding, and what this means to them. Safeguarding awareness is delivered throughout the programme and recorded within the ILP, Progress Reviews & Wider Learning Sheet

7.11 To have awareness of and support to understand the **Safeguarding Policy**. Please refer to point 7.10, which is also covered during induction and referenced in the Student Handbook. Employers are made aware of the **Safeguarding Policy** through Employer Engagement before the start of the programme, Learner & Staff/Associate Safeguarding, including Prevent, Incident reporting:

This is explained during each Learner/Staff/Associate induction: Learners/Staff/Associates are encouraged to raise a safeguarding concern with any member of Staff (Learners) or Line Manager (Staff/Associates), and the disclosure will be forwarded to the DSO or, in the DSO's absence, to the Deputy Designated Safeguarding Officer (DDSO). Safeguarding concerns can be reported by learners or staff directly using the contact details below:

Safeguarding Contact Details

Claire Lewis; 01773 417340

Leah Murden; 01773 417340

Claire Lewis email; safeguardinglead@qualitrain.co.uk; Claire.lewis@qualitrain.co.uk

Leah Murden; leah.murden@qualitrain.co.uk



SAFEGUARDING POLICY AND PROCEDURE Document update location matrix

Alan Bates, Quality Director, has overall responsibility for Safeguarding. Contact details; 01773 417340 or alan.bates@qualitrain.co.uk

Employer Safeguarding, Inclusive of Prevent, Incident Reporting:

To fully comply with Safeguarding and Prevent requirements, we work with employers to raise awareness of Safeguarding and the Prevent Duty. The above Safeguarding contact details are provided in the Employer Handbook, which is provided before the start of learning programmes, following the same process as above. Alternatively, complaints can be raised by completing our Complaints Form. A copy is available in our Learner Handbook and can be obtained from your trainer. You can forward this directly to Claire Lewis either through the email address above, or via post marked for her attention, Confidential to: Claire Lewis Genesis Business Centre, King St, Alfreton, Derbyshire, DE55 7DQ

8.0 Governance and Reporting

8.1 The Directors work with the DSO to closely monitor and respond to any safeguarding issues; they are responsible for the approval of relevant safeguarding policies. The DSO is responsible for ensuring that processes and procedures for the protection of children, young people, vulnerable adults, and all learners are robust and consistently applied so that Qualitrain fulfils its legal duties. Qualitrain will work with Local Safeguarding Children Boards, the Local Authority Designated Officer, and other agencies to provide advice when required, ensuring a comprehensive safeguarding network is in place.

Reporting to External Bodies: Reporting an Incident or Safeguarding Concern Form (QT076WR2) is used to record internal safeguarding concerns raised by Qualitrain Staff/Associates and must be submitted to the DSO. When deciding how to proceed, the DSO follows the QT076WI1 Reporting Safeguarding Reporting Process and the Safeguarding and Prevent Information Contacts List (QT76WI3), which outlines the process for making referrals to external bodies, as applicable.

8.2 The Directors are responsible for ensuring that all staff have an understanding of safeguarding, receive appropriate training and development and that the **safe recruitment policy** is followed at all times. They will ensure that safeguarding is given high priority within their teams.

8.3 All Staff/Associates – Are responsible for working in keeping with our Code of Conduct and Core Values and completing safeguarding training, as requested by the DSO or directors, and must familiarise themselves with this policy. Once completed, training activities are recorded on the Safeguarding Master by the DSO and monitored for compliance with the relevant standards. Location: Monday.com/

Safeguarding Master.

8.4 All teaching Staff/Associates – Keep up to date with HM Government requirements through training. Including reading the following document:

Keeping Children Safe in Education September 2024: statutory guidance for schools and colleges

<https://www.gov.uk/government/publications/keeping-children-safe-in-education--2>

Understanding;

The Prevent Duty



SAFEGUARDING POLICY AND PROCEDURE Document update location matrix

Prevent duty guidance: England and Wales (2023) - GOV.UK (www.gov.uk)

Channel Guidance

<https://www.gov.uk/government/publications/channel-guidance#history>

Contest Strategy

<https://www.gov.uk/government/collections/contest> and any other related safeguarding policies, to ensure that they understand their own role in the promotion of safeguarding and the appropriate action should they receive a disclosure.

DSO/DDSO completes Level 3 Designated Safeguarding Training course every 2 years, refresher training during standardisation meetings and relevant training to reflect new legislation and updates where required.

All delivery staff and associates complete online Safeguarding Training every two years, Prevent Training annually, and further training during standardisation meetings, as well as relevant training to reflect new legislation and updates as required. Safer Recruitment training is available to all relevant staff and governors who are involved in the recruitment process.

9. Modern Slavery Policy

Modern slavery is an unquestionable and indefensible violation of an individual's fundamental human rights.

Qualitrain recognises that, as a commercial organisation, it has a moral and social responsibility to take a zero-tolerance approach to modern slavery in all forms. We are committed to preventing slavery and human trafficking in our activities, and to ensuring, as far as we are able, that our supply chains are free from slavery and human trafficking.

10. County Lines

In the United Kingdom, the county lines drug supply model is the practice of trafficking drugs into rural areas and smaller towns, away from major cities. Criminal gangs recruit and exploit vulnerable children, sometimes including children in pupil referral units (alternative education provision) and those who have been excluded from school, and exploit them to deal drugs. Some young people are recruited via debt bondage, whereby they enter county lines to pay off drug debts. The term county lines refers to the phone numbers, or lines, dedicated to this activity. The practice is also known by those involved as "going country" ("cunch") or "going OT" ("outta town").

Staff and associates will work with learners to raise awareness of this issue.

Appendix A: Signs and Symptoms of Abuse and Neglect, including Additional Specific Forms of Abuse

Definitions

There are four kinds of child abuse and neglect. Indicators of abuse and neglect are defined in Keeping Children Safe in Education as follows:

1. Abuse: a form of maltreatment of a child. Somebody may abuse or neglect a child by inflicting harm or by failing to act to prevent harm. Children may be abused in a family or in an institutional or community setting

SAFEGUARDING POLICY AND PROCEDURE Document update location matrix

by those known to them or, more rarely, by others. Abuse can take place wholly online, or technology may be used to facilitate offline abuse. Children may be abused by an adult or adults, or by another child or children.

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

3. Emotional abuse: the persistent emotional maltreatment of a child, such as to cause severe and adverse effects on the child's 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 the child 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 children. These may include interactions that are beyond a child's developmental capabilities, as well as overprotection and limitations on exploration and learning, or preventing the child from participating in everyday social interactions. It may involve seeing or hearing the ill-treatment of another. It may involve severe bullying (including cyberbullying), causing children to feel frightened or in danger frequently, or the exploitation or corruption of children. Some level of emotional abuse is involved in all types of maltreatment of a child, although it may occur alone.

4. Sexual abuse: involves forcing or enticing a child or young person to take part in sexual activities, not necessarily involving a high level of violence, whether or not the child is 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 in looking at, or in the production of, sexual images, watching sexual activities, encouraging children to behave in sexually inappropriate ways, or grooming a child in preparation for abuse. Sexual abuse can take place online, and technology can be used to facilitate offline abuse. Adult males do not solely perpetrate sexual abuse. Women can also commit acts of sexual abuse, as can other children. The sexual abuse of children by other children is a specific safeguarding issue in education (see peer-on-peer abuse).

5. Neglect: the persistent failure to meet a child's basic physical and/or psychological needs, likely to result in the severe impairment of the child's health or development. Neglect may occur during pregnancy, for example, 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 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.

Signs of abuse

Recognising child abuse is not easy. It is not your responsibility to decide whether or not child abuse has taken place or if a child is at significant risk of harm from someone. You do, however, have both a responsibility and a duty, as set out in your organisation's child protection procedures, to act so that the appropriate agencies can investigate and take any necessary action to protect a child.



SAFEGUARDING POLICY AND PROCEDURE Document update location matrix

The following information should help you be more aware of the signs of possible abuse.

Physical Abuse

Most children will collect cuts and bruises as part of the rough-and-tumble of daily life. Injuries should always be interpreted in light of the child's medical and social history, developmental stage and the explanation given. Most accidental bruises are seen on bony parts of the body, such as the elbows, knees, and shins, and are often located on the front of the body. Some children, however, will have bruising that is more likely to be inflicted rather than accidental. Important indicators of physical abuse are bruises or injuries that are either unexplained or inconsistent with the explanation given, or visible on the 'soft' parts of the body where accidental injuries are unlikely, e.g., cheeks, abdomen, back and buttocks. A delay in seeking medical treatment when it is obviously necessary is also a cause for concern. However, this can be more complicated with burns, as these often present later due to blistering.

The physical signs of abuse may include:

Unexplained bruising, marks or injuries on any part of the body, multiple bruises- in clusters, often on the upper arm, outside of the thigh, cigarette burns, human bite marks, broken bones, scalds, with upward splash marks, multiple burns with a clearly demarcated edge.

Changes in behaviour that can also indicate physical abuse:

fear of parents being approached for an explanation, aggressive behaviour or severe temper outbursts, flinching when approached or touched, reluctance to get changed, for example, in hot weather, depression

withdrawn behaviour

running away from home.

Emotional Abuse

Emotional abuse can be challenging to measure, as there are often no outward physical signs. There may be a developmental delay due to failure to thrive and grow. However, this will usually only be evident if the child gains weight under different circumstances, such as when hospitalised or away from their parents' care. Even so, children who appear well-cared for may nevertheless be emotionally abused by being taunted, put down or belittled. They may receive little to no love, affection, or attention from their parents or caregivers. Emotional abuse can also take the form of children not being allowed to mix or play with other children.

Changes in behaviour which can indicate emotional abuse include:

neurotic behaviour, e.g. sulking, hair twisting, rocking

being unable to play

fear of making mistakes

sudden speech disorders



SAFEGUARDING POLICY AND PROCEDURE Document update location matrix

self-harm

fear of parent being approached regarding their behaviour

developmental delay in terms of emotional progress

Sexual Abuse

Adults who use children to meet their own sexual needs abuse both girls and boys of all ages, including infants and toddlers. Usually, in cases of sexual abuse, it is the child's behaviour that may cause you to become concerned, although physical signs can also be present. In all cases, children who tell about sexual abuse do so because they want it to stop. It is essential, therefore, that they are listened to and taken seriously.

The physical signs of sexual abuse may include:

Pain or itching in the genital area

Bruising or bleeding near the genital area

sexually transmitted disease

vaginal discharge or infection

stomach pains

discomfort when walking or sitting down

pregnancy

Changes in behaviour which can also indicate sexual abuse include:

Sudden or unexplained changes in behaviour e.g. becoming aggressive or withdrawn fear of being left with a specific person or group of people having nightmares running away from home sexual knowledge which is beyond their age, or developmental level sexual drawings or language bedwetting eating problems such as overeating or anorexia self-harm or utilation, sometimes leading to suicide attempts saying they have secrets they cannot tell anyone about substance or drug abuse suddenly having unexplained sources of money not allowed to have friends (particularly in adolescence) acting in a sexually explicit way towards adults.

Neglect

Neglect can be a complex form of abuse to recognise, yet it has some of the most lasting and damaging effects on children.

The physical signs of neglect may include:

Constant hunger, sometimes stealing food from other children, constantly dirty or 'smelly, loss of weight, or being constantly underweight, and inappropriate clothing for the conditions. Changes in behaviour that can also indicate neglect may include: complaining of being tired all the time, not requesting medical assistance, and/or failing to attend appointments; having few friends; mentioning being left alone or unsupervised. Some examples of specific forms of abuse and safeguarding issues are: Extremism and radicalisation:

SAFEGUARDING POLICY AND PROCEDURE Document update location matrix

- Extremism is the vocal or active opposition to our fundamental values, including democracy, the rule of law, individual liberty and the mutual respect and tolerance of different faiths and beliefs. This also includes calling for the death of members of the armed forces.
- Radicalisation refers to the process by which a person comes to support terrorism and extremist ideologies associated with terrorist groups.

There is no single way of identifying whether a person is likely to be susceptible to an extremist ideology. Background factors combined with specific influences such as family and friends may contribute to a person's vulnerability. Similarly, radicalisation can occur through many different methods (such as social media or the internet) and settings (such as within the home). However, it is possible to protect vulnerable people from extremist ideology and intervene to prevent those at risk of radicalisation from being radicalised. As with other safeguarding risks, staff should be alert to changes in learners' behaviour, which could indicate that they may need help or protection. Staff should use their judgement in identifying those who might be at risk of radicalisation and act proportionately, which may include the designated safeguarding lead (or deputy) making a Prevent referral. There is additional guidance: Prevent Duty Guidance for Further Education Institutions. We are committed to providing our learners with a broad and balanced curriculum that aims to prepare them for life in modern Britain. Teaching the company's core values alongside the fundamental British Values supports quality teaching and learning, whilst making a positive contribution to the development of a fair, just and civil society.

Recognising Extremism: Early indicators of radicalisation or extremism may include:

- showing sympathy for extremist causes
- glorifying violence, especially to other faiths or cultures
- making remarks or comments about being at extremist events or rallies
- evidence of possessing illegal or extremist literature
- advocating messages similar to illegal organisations or other extremist groups
- out of character changes in dress, behaviour and peer relationships (but there are also compelling narratives, programmes and networks that young people can come across online, so involvement with particular groups may not be apparent.)
- secretive behaviour
- online searches or sharing extremist messages or social profiles
- intolerance of difference, including faith, culture, gender, race or sexuality
- graffiti, artwork or writing that displays extremist themes
- attempts to impose extremist views or practices on others
- verbalising anti-Western or anti-British views

SAFEGUARDING POLICY AND PROCEDURE Document update location matrix

- advocating violence towards others

Peer on Peer Abuse: any form of physical, sexual, emotional and financial abuse, and coercive control. Exercised between individuals and within relationships (both intimate and non-intimate), friendships, and wider peer associations. Whilst peer-on-peer abuse is more likely to occur within educational settings, it can sometimes be relevant within the workplace. This is most likely to include, but may not be limited to:

- bullying (including cyberbullying, prejudice-based and discriminatory bullying)
- abuse in intimate personal relationships between peers
- physical abuse, which can include hitting, kicking, shaking, biting, hair pulling, or otherwise causing physical harm
- sexual violence and sexual harassment
- causing someone to engage in sexual activity without consent, such as forcing someone to strip, touch themselves sexually, or to engage in sexual activity with a third party
- consensual and non-consensual sharing of nude and semi-nude images
- causing someone to engage in sexual activity without consent, such as forcing someone to strip, touch themselves sexually, or to engage in sexual activity with a third party
- upskirting (which is a criminal offence), which typically involves taking a picture under a person's clothing without their permission, with the intention of viewing their genitals or buttocks to obtain sexual gratification, or cause the victim humiliation, distress, or alarm; and o initiation/hazing type violence and rituals.

Serious Violence: 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, or 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.

Mental Health: Mental health problems can, in some cases, be an indicator that a child has suffered or is at risk of suffering abuse, neglect or exploitation. School staff are not expected or trained to diagnose mental health conditions or issues, but may notice behaviours that may be of concern. Where staff have a mental health concern about a child that may also be a safeguarding concern, they should raise the issue by informing the designated safeguarding lead or a deputy.

Child Sexual Exploitation (CSE) and Child Criminal Exploitation (CCE): Both CSE and CCE are forms of abuse, and both occur where an individual or group takes advantage of an imbalance in power to coerce, manipulate or deceive a child into sexual or criminal activity. Whilst age may be the most obvious, this power imbalance can

SAFEGUARDING POLICY AND PROCEDURE Document update location matrix

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. In some cases, the abuse will be in exchange for something the victim needs or wants and/or will be to the financial benefit or other advantage (such as increased status) of the perpetrator or facilitator. Individuals or groups, males or females, and children or adults can perpetrate the abuse. The abuse can be a one-off occurrence or a series of incidents over time, and range from opportunistic to complex organised abuse. It can involve force and/or enticement-based methods of compliance and may or may not be accompanied by violence or threats of violence.

Victims can be exploited even when activity appears consensual, and it should be noted that exploitation, as well as being physical, can be facilitated and/or take place online.

Some of the following can be indicators of CCE:

- children who appear with unexplained gifts or new possessions;
- children who associate with other young people involved in exploitation; • 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.

The above CCE indicators can also be indicators of CSE, as can:

- children who have older boyfriends or girlfriends; and
- children who suffer from sexually transmitted infections or become pregnant. The department provides: Child sexual exploitation: a guide for practitioners.

Female Genital Mutilation (FGM): FGM comprises all procedures involving partial or total removal of the external female genitalia or other injury to the female genital organs. It is always illegal in the UK under any circumstances and a form of child abuse with long-lasting harmful consequences. Whilst all staff should speak to the designated safeguarding lead (or deputy) about any concerns about female genital mutilation (FGM), there is a specific legal duty on teachers. If a teacher, in the course of their work in the profession, discovers that an act of FGM appears to have been carried out on a girl under the age of 18, the teacher must report this to the police. The duty does not apply in relation to at-risk or suspected cases (i.e. where the teacher does not discover that an act of FGM appears to have been carried out, either through disclosure by the victim or visual evidence) or in cases where the woman is 18 or over. In these cases, teachers should follow local safeguarding procedures. Staff should not assume that FGM only happens outside the UK.

Risk factors for FGM include:

- low level of integration into UK society
- a mother or a sister who has undergone FGM
- visiting a female elder from the country of origin

SAFEGUARDING POLICY AND PROCEDURE Document update location matrix

- being taken on an extended holiday to the country of origin
- talk about a 'special' procedure to become a woman

Indications that FGM may have already taken place may include:

- difficulty walking, sitting or standing and may even look uncomfortable.
- spending longer than usual in the toilet due to difficulties urinating.
- spending long periods of time away from a classroom during the day with bladder or menstrual problems.
- frequent urinary, menstrual or stomach problems.
- prolonged or repeated unexplained absences, especially with noticeable behaviour changes (e.g. withdrawal

or depression) on the girl's return

- confiding in a professional without being explicit about the problem due to embarrassment or fear.
- talking about pain or discomfort between her legs

County Lines: Exploitation is an integral part of the county lines offending model, with children and vulnerable adults exploited to move and store drugs and money. Offenders will often use coercion, intimidation, violence (including sexual violence) and weapons to ensure compliance of victims.

One of the ways of identifying potential involvement in county lines is missing episodes (both from home and school), when the victim may have been trafficked for the purpose of transporting drugs, and a referral to the National Referral Mechanism should be considered. If a child is suspected to be at risk of or involved in county lines, a safeguarding referral should be considered alongside consideration of the availability of local services/third sector providers who offer support to victims of county lines exploitation.

Domestic Abuse: 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, and emotional.

All children can witness and be adversely affected by domestic abuse in the context of their home life, where domestic abuse occurs between family members. Exposure to domestic abuse and/or violence can have a profound, 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.

Bullying: Bullying may be defined as deliberately hurtful behaviour, usually repeated over a period of time, where it is difficult for those bullied to defend themselves. It can take many forms, but the three main types are physical (e.g. hitting, kicking, theft), verbal (e.g. racist or homophobic remarks, threats, name-calling) and emotional (e.g. isolating an individual from the activities and social acceptance. The damage inflicted by bullying can frequently be underestimated.

SAFEGUARDING POLICY AND PROCEDURE Document update location matrix

It can cause considerable distress to children to the extent that it affects their health and development or, at the extreme, causes them significant harm (including self-harm). All settings in which children are provided with services or are living away from home should have in place rigorously enforced anti-bullying strategies.

Bullying is not always easy to recognise as it can take several forms. A child may encounter bullying attacks that are: physical: pushing, kicking, hitting, pinching and other forms of violence or threats, verbal: name-calling, sarcasm, spreading rumours, persistent teasing, emotional: excluding (sending to Coventry), tormenting, ridiculing, and humiliating.

Persistent bullying can result in:

depression

low self-esteem

shyness

poor academic achievement

isolation

threatened or attempted suicide

Signs that a child may be being bullied can be:

coming home with cuts and bruises

torn clothes

asking for stolen possessions to be replaced

losing dinner money

falling out with previously good friends

being moody and bad-tempered

wanting to avoid leaving their home

aggression with younger brothers and sisters

doing less well at school

sleep problems

anxiety and becoming quiet and withdrawn

Please note, as a Training Provider, it is our mandatory duty to report disclosures on FGM regarding a female under the age of 18.

These definitions and indicators are not meant to be definitive, but only serve as a guide to assist you. It is essential, too, to remember that many children may exhibit some of these indicators at some time, and that the presence of one or more should not be taken as proof that abuse is occurring. There may well be other



SAFEGUARDING POLICY AND PROCEDURE Document update location matrix

reasons for changes in behaviour, such as a death or the birth of a new baby in the family, or relationship problems between parents/carers. In assessing whether indicators are related to abuse or not, the authorities will always want to understand them in relation to the child's development and context.

11.0 Ofsted Toolkit 2025 Enhancements

- Safeguarding will be graded as 'Met' or 'Not Met' and reviewed during internal audits.
- A Single Central Record (SCR) must be maintained and accessible for inspection.
- Digital safety measures, including social media monitoring and online safeguarding, are mandatory.
- Suspend-and-return policy allows correction of minor safeguarding issues within 3 months.

12.0 Ofqual Recognition 2025 Requirements

- Responsible Officers must oversee safeguarding governance and breach reporting.
- All data breaches and safeguarding incidents must be reported to Ofqual.
- Contracts with third parties must include safeguarding and data protection clauses.
- Assessment confidentiality and learner data protection must be ensured.

13.0 ISO/IEC 27001:2022 Integration

- Incorporate 11 new controls, including Threat Intelligence, Cloud Security, and Data Masking.
- Ensure secure coding practices and information deletion protocols.
- Monitor safeguarding-related activities and maintain audit trails.
- Align safeguarding document control with ISO Clause 7.5.3.

14.0 Health and Safety Legislation 2025 Updates

- Mental health support must be embedded in safeguarding practices.
- Fire safety and Building Safety Regulator compliance must be documented.
- Risk assessments must include safeguarding and emotional well-being.
- Staff must be trained in trauma-informed practices and emergency response.