



The
Development
Manager Ltd.

Safeguarding Policy

This is a core policy that forms part of the induction for all staff. It is a requirement that all members of staff have access to this policy and confirm in writing by email to the DSL, that they have read and understood its contents.

Key Contacts

Designated Safeguarding Lead (DSL)

Stuart O'Rourke

Deputy Designated Safeguarding Lead Also Designated Safeguarding Officer (DSO)

Jennifer Johnson

CEO

Derrin Kent

1. Scope

This policy applies to all staff, senior managers, senior leaders, volunteers, learners and anyone working on behalf of TDM.

2. Introduction and Ethos

TDM recognises our statutory responsibility to safeguard and promote the welfare of all children, young people and adults at risk. Safeguarding is everybody's responsibility and all those directly connected (staff, volunteers, governors, leaders, parents, families and learners) are an important part of the wider safeguarding system for children and have an essential role to play in making our learning community safe and secure. Staff working with learners should maintain an attitude of 'it could happen here' where safeguarding is concerned. They should also remember that 'safeguarding is everyone's business.'

TDM believes that the best interests of children/young people always come first. All children (defined as those up to the age of 18) have a right to be heard and to have their wishes and feelings taken into account and all children regardless of age, gender, ability, culture, race, language, religion or sexual identity, have equal rights to protection.

TDM recognises the importance of providing an ethos and environment that will help children/young people to be safe and feel safe. In our organisation, young people are respected and encouraged to talk openly. TDM expects that any member of our organisation, who has a safeguarding concern about any child, young person or adult, should act and act immediately.

This policy is implemented in accordance with our compliance with the statutory guidance from the Department for Education, 'Keeping Children Safe in Education' 2020 (KCSIE) which requires individual schools and colleges to have an effective child protection policy.

The procedures contained in this policy apply to all staff, including and governors, temporary or third-party agency staff and volunteers) and are consistent with those outlined within KCSIE 2020.

3. Policy Context

This policy has been developed in accordance with the principles established by the Children Acts 1989 and 2004 and related guidance. This includes: DfE Keeping Children Safe in Education 2020 (KCSIE), Working Together to Safeguard Children 2018 (WTSC) and Ofsted: Education Inspection Framework' 2019.

Section 175 of the Education Act 2002 requires school governing bodies, local education authorities and further education institutions to make arrangements to safeguard and promote the welfare of all children who are pupils at a school, or who are students under 18 years of age. Such arrangements will have to have regard to any guidance issued by the Secretary of State.

This policy has been written with due regard for the following legislation:

- Counter Terrorism and Security Act 2015
- Data Protection Act 1998 and 2018 (GDPR)

- Keeping Children Safe in Education 2020 & (January 2021 Post EU exit update)
- Mental Capacity Act 2005
- Prevent Duty Guidance 2015 (updated 2019)
- Safeguarding Disabled Children: Practice Guide 2009
- The Care Act 2014
- The Children's Act 1989 & 2004
- The Education and Skills Act 2008
- The Equality Act 2010
- Voyeurism (Offences) Act 2019
- Working Together to Safeguard Children 2018

4. Definitions

In line with KCSIE 2020, safeguarding and promoting the welfare of children is defined for the purposes of this policy as:

- protecting children from maltreatment;
- preventing impairment of children's mental and physical health or development;
- ensuring that children grow up in circumstances consistent with the provision of safe and effective care; and
- taking action to enable all children to have the best outcomes.

Contextual Safeguarding is an approach to understanding, and responding to, young people's experiences of significant harm beyond their families. It recognises that the different relationships that young people form in their neighbourhoods, schools and online can feature violence and abuse.

The Children Act 1989 definition of a child is: anyone who has not yet reached their 18th birthday, even if they are living independently, are a member of the armed forces or is in hospital.

5. Safeguarding Adults

An **adult at risk** of harm (Care Act 2014), previously referred to as a vulnerable adult, is an individual aged 18 years and over who:

- has needs for care and support (whether or not the local authority is meeting any of those needs) AND;
- is experiencing, or at risk of, abuse or neglect, AND;
- as a result of those care and support needs is unable to protect themselves from either the risk of, or the experience of abuse or neglect.

When a Local Authority has reason to believe there is an adult at risk, they have a responsibility to find out more about the situation and decide what actions need to be taken

to support the adult. The actions that need to be taken might be by the Local Authority and/or by other agencies, for example the Police and Health organisations. TDM may need to take action as part of safeguarding an adult, for example, to use the disciplinary procedures in relation to a member of staff or member who has been reported to be harming a participant.

6. Child and adult abuse:

Children and adults may be vulnerable to neglect and abuse or exploitation from within their family and from individuals they come across in their daily lives. There are **4 main categories of abuse, which are: sexual, physical, emotional abuse, and neglect.** However, within these categories, there are other types of abuse such as the following:

- Bullying and cyberbullying
- Child sexual exploitation
- Child Criminal exploitation
- Child trafficking
- Domestic abuse
- Female genital mutilation
- Grooming
- Historical abuse
- Honour based abuse
- Online abuse

Further clarifications:

- **Domestic abuse** – witnessing domestic abuse is child abuse, and teenagers can suffer domestic abuse in their relationships
- **Sexual abuse** – a child is sexually abused when they are forced or persuaded to take part in sexual activities. This doesn't have to be physical contact, and it can happen online
- **Neglect** – an ongoing failure to meet the basic needs of a child/adult at risk of harm
- **Online abuse** – any type of abuse that happens on the Web, whether through social networks, playing online games or using mobile phones
- **Physical abuse** – deliberately hurting a child/adult at risk causing injuries such as bruises, broken bones, burns or cuts
- **Emotional abuse** – children/adults at risk who are emotionally abused suffer emotional maltreatment or neglect. It's sometimes called psychological abuse and can cause learners serious harm
- **Child Sexual Exploitation** – a type of sexual abuse in which children are sexually exploited for money, power or status
- **Female Genital Mutilation** – the partial or total removal of external female genitalia for non-medical reasons
- **Forced marriage** -A forced marriage is where one or both people do not or cannot consent to the marriage, and pressure or abuse is used to force them into marriage.
- **Bullying and cyberbullying** – bullying can happen anywhere – at school/college, at home or online. It's usually repeated over a long period of time and can hurt a learner both physically and emotionally
- **Child trafficking** – a type of abuse where children are recruited, moved or transported, and then exploited, forced to work or sold

- **Grooming** – children and young people can be groomed online or in the real world, by a stranger or by someone they know – for example a family member, friend or professional
- **Harmful sexual behaviour** – children and young people who develop harmful sexual behaviour, harm themselves and others.
- **Upskirting** – Upskirting is a highly intrusive practice, which typically involves someone taking a picture under another person’s clothing without their knowledge, with the intention of viewing their genitals or buttocks (with or without underwear).. It is now a specific criminal offence in England and Wales.

For further information see Appendix 1.

Members of staff should recognise that concerns may arise in many different contexts and can vary greatly in terms of their nature and seriousness. The indicators of child abuse and neglect can vary from child to child. Children develop and mature at different rates, so what appears to be worrying behaviour for a younger child might be normal for an older child.

It is important to recognise that indicators of abuse and neglect do not automatically mean a child/young person is being abused however all concerns should be taken seriously and explored by the DSL on a case by case basis.

Safeguarding incidents and/or behaviours can be associated with factors outside of TDM. Children and young people can be at risk of abuse or exploitation in situations outside their families. Extra-familial harms take a variety of different forms and children can be vulnerable to multiple harms including (but not limited to) sexual exploitation, criminal exploitation, and serious youth violence.

7. Prevent duty

Safeguarding students who are vulnerable to extremism

TDM follows the statutory guidance in relation to the Prevent Duty. We are aware that there have been occasions, both locally and nationally, in which extremist groups have attempted to radicalise vulnerable children/young people to hold extreme views including those justifying political, religious, sexist, or racist violence, or to steer them into a rigid and narrow ideology that is intolerant of diversity and leaves them vulnerable to future radicalisation. The Prevent strategy aims to stop people from becoming terrorists or supporting terrorism. It is rare for children to become involved in terrorist activity. However, some students from an early age can be exposed to terrorist and extremist influences or prejudiced views. Consequently, TDM takes the view that early intervention is always preferable and includes this in its procedures as it does for all safeguarding concerns.

In line with fundamental British Values, the following key principles underpin the TDM learning community – inclusion, tolerance, freedom of speech, the expression of beliefs and ideology. Both students and teachers have the right to speak freely and voice their opinions. However, freedom comes with responsibility. Free speech that is designed to manipulate the vulnerable or that leads to violence and harm of others goes against the moral principles in which freedom of speech is valued. Free speech is subject to treating others with respect, understanding differences, equality, an awareness of human rights, community safety, and community cohesion.

TDM is committed to working with the local authority and other local partners, families, and communities to play a key role in ensuring young people and our communities are safe from the threat of terrorism. The DSL will keep up to date with all local policies and procedures relating to Prevent. Staff must consider the level of risk to identify the most appropriate referral, which could include reference to Channel or Children's Social Care

Potential signs of radicalisation and extremism

Some of the indicators staff should look out for include: vulnerability, identity crisis, personal crisis, migration, unmet aspirations, and history of criminality. *Access to extremist influences:* friendship groups, internet activity, activities abroad i.e. military camps, and vocalised support of illegal or extremist/militant groups. *Experiences and influences:* social rejection, personal impact from civil unrest and wide spread media coverage of international events, change in appearance and behaviour, family conflict over religious reviews, and verbal or written evidence of support for terrorist activities *Travel:* pattern of regular extended travel, evidence of falsifying identity documents, and unexplained absences. *Social factors:* disadvantaged background, lack of empathy and/or affinity with others, severe learning difficulties or mental health, being a child of a foreign national or refugee, experience of trauma or sectarian conflict, and extremist views of a significant other.

The DSL will be the key contact for safeguarding in relation to radicalisation and involvement in terrorism.

8. Related policies

This policy should be read and actioned in conjunction with the policies as listed below:

- Anti-Bullying and harassment policy
- Attendance policy
- Behaviour management/code of conduct for learners
- Code of practice/staff integrity policy
- Complaints policy
- Data protection and Information security policies which includes Acceptable Use of Technology Policies
- Disciplinary & Grievance policy
- Equality and Diversity policy
- Health and safety including fire safety, first aid and accidents
- Learners Acceptable Use Policy including online safety, social media and mobile technology
- Prevent, British Values and Critical Incident policy
- Risk assessments
- Safer recruitment policy
- Whistleblowing policy

9. Policy Compliance, Monitoring and Review

TDM will review this policy at least annually and it will be revised following any national or local policy updates, any local child protection concerns and/or any changes to our procedures.

All staff (including temporary staff and volunteers) will be provided with a copy of this policy and part one of KCSIE.

The Designated Safeguarding Leads and CEO will ensure regular reporting on safeguarding activity and systems to governors /senior leaders.

10. Key Responsibilities:

Designated Safeguarding Lead (DSL)

Stuart O' Rourke is the Designated Safeguarding Lead (DSL).

Jennifer Johnson is the Deputy Designated Safeguarding Lead and will have delegated responsibilities and act in the DSL's absence.

The Deputy Designated Safeguarding Lead is also the Designated Safeguarding Officer (DSO).

Stuart O'Rourke (DSL)

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Direct Line: 03331010040 (Extension 812)

Jennifer Johnson (DDSL & DSO)

jenny@tdm.co.uk

Direct Line: 0333 101 00 74

The DSL has overall responsibility for the day-to-day oversight of safeguarding and child protection systems in TDM. Whilst the activities of the DSL may be delegated to the deputies or DSO, the ultimate lead responsibility for safeguarding and child protection remains with the DSL and this responsibility will not be delegated.

The DSL will undergo appropriate and specific training to provide them with the knowledge and skills required to carry out their role. Deputy DSLs are trained to the same standard as the DSL. The DSL and any deputy DSLs training will be updated formally every two years, but their knowledge and skills will be updated through a variety of methods at regular intervals and at least annually.

The CEO will be kept informed of any significant issues by the DSL.

The DSL (and deputies) will be provided with sufficient time so they can provide appropriate support to staff and children regarding any new safeguarding and welfare concerns following Covid-19. This may include handling of referrals to integrated social care and working with other agencies where appropriate.

It is the role of the DSL to:

- Act as the central contact point for all staff to discuss any safeguarding concerns
The DSL may delegate the day-to-day responsibility to the DSO.
- Maintain a confidential recording system for safeguarding and child protection concerns. This may be done in conjunction with the DSO who supports the DSL.
- Liaise with other agencies and professionals in line with KCSIE 2020 and WTSC 2018
- Ensure that locally established procedures, including referrals, are followed, as necessary.

- Represent, or ensure the TDM is appropriately represented at multi-agency safeguarding meetings (including Child Protection conferences)
- Manage and monitor the TDM role in any multi-agency plan for a child.
- Be available during term time (during TDM hours) for staff in the TDM to discuss any safeguarding concerns.
- Ensure adequate and appropriate DSL cover arrangements in response to any closures and out of hours and/or out of term activities.
- Ensure all staff access appropriate safeguarding training and relevant updates in line with the recommendations within KCSIE (2020)

TDM’s nominated governors for safeguarding are:

- Derrin Kent (as Nominated Governor for Safeguarding)
- Kim Cook (as Deputy Governor for Safeguarding)

The nominated governors will support the DSL and have oversight in ensuring:

- that TDM has an effective policy which interlinks with other related policies;
- that locally agreed procedures are in place and being followed; and
- that the policies are reviewed at least annually and when required.

Senior leaders will ensure that the Designated Safeguarding Lead and the Designated Safeguarding Officer are supported in their role.

A full list of TDM Safeguarding Staff can be seen in appendix 5

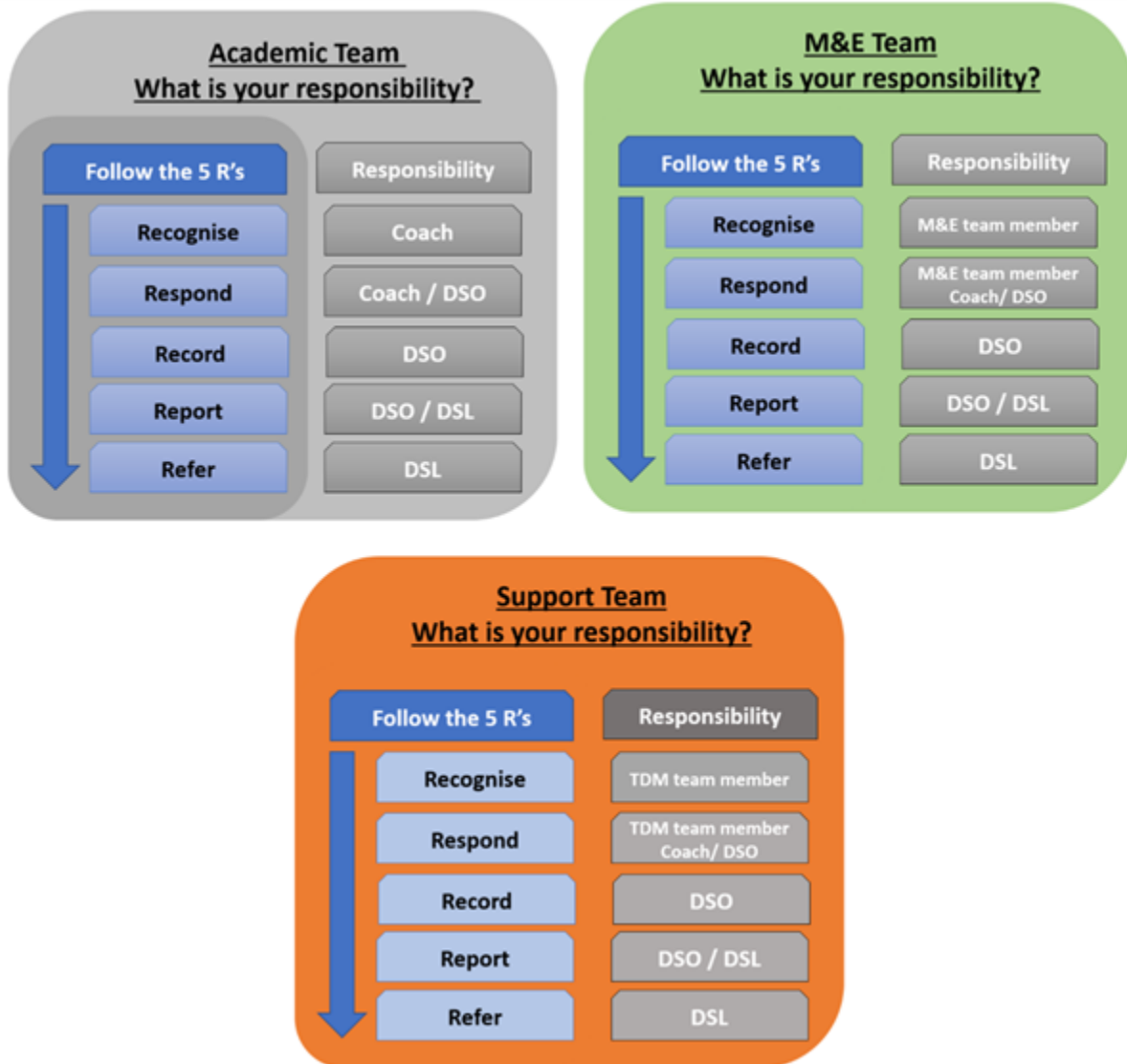
Members of Staff

All members of staff have a responsibility to:

- Provide a safe environment in which young people can learn.
- Be prepared to identify children/young people who may benefit from early help, intervention or support.
- Understand TDM’s safeguarding policies and procedures.
- Undertake regular and appropriate training which is regularly updated.
- Be aware of the process of making referrals to children’s social care and statutory assessment under the Children Act 1989.
- Know what to do if a child/young person tells them that he or she is being abused or neglected and understand the impact abuse and neglect can have upon a child/young person/adult at risk.
- Be able to identify and act upon indicators that /young people are, or at risk of developing mental health issues.
- Know how to maintain an appropriate level of confidentiality.
- Be aware of the indicators of abuse and neglect so that they can identify cases of children/young people who may need help or protection.

See flowcharts below

Members of Staff Responsibilities -The 5R's - Flowchart



Children and Young People

Children and young people (learners) have a right to:

- Feel safe, be listened to, and have their wishes and feelings taken into account.
- Contribute to the development of TDM safeguarding policies.
- Receive help from a trusted adult.
- Learn how to keep themselves safe, including online.

11. Child Protection Procedures

TDM recognises that in situations where there are immediate child protection concerns it is NOT the role of TDM to investigate as a single agency but to act in line with local authority guidance which may involve multi-agency decision making.

If a child is in immediate danger or is at risk of harm, a request for support should be made immediately to the police. The DSL may also seek advice or guidance from the **Local Authority Designated Officer (LADO)** before deciding next steps. If the DSL is not immediately available to discuss an urgent concern, staff can seek advice from the Deputy DSL.

12. Record Keeping

All safeguarding concerns, discussions and decisions, and reasons for those decisions, must be recorded in writing on TDM's safeguarding incident/concern form/system and then passed without delay to the DSL with copy to the DDSL. A body map will be completed if injuries have been observed. If members of staff are in any doubt about recording requirements, they should discuss their concerns with the DSL. Incident/Welfare concern forms are logged on a secure platform. Records must be completed as soon as possible after the incident/event, using the child/young person's words and will be signed and dated by the member of staff. If there is an immediate concern the member of staff should consult with a DSL before completing the form as reporting urgent concerns takes priority.

Safeguarding records for individual young people are maintained separately from all other records relating to the young person. Safeguarding records are kept in accordance with data protection legislation and are retained centrally and securely by the DSL. Safeguarding records are shared with staff on a 'need to know' basis only.

13. Multi-Agency Working

TDM recognises and is committed to its responsibility to work within local multi-agency safeguarding arrangements. The leadership team and DSL will work to establish strong and co-operative local relationships with professionals in other agencies in line with statutory guidance. TDM recognises the importance of multi-agency working and is committed to working alongside partner agencies to provide a coordinated response to promote children's welfare and protect them from harm. This includes contributing to local safeguarding processes as required e.g relevant safeguarding multi-agency plans and meetings, including Child Protection Conferences, Core Groups, Strategy Meetings, Child in Need meetings or other early help multi-agency meetings.

14. Confidentiality and Information Sharing

TDM recognises its duty to share relevant information with appropriate agencies in matters relating to child protection at the earliest opportunity as per statutory guidance outlined within KCSIE 2020. Staff must be aware that they cannot promise confidentiality in situations which might compromise a child's safety or wellbeing. The CEO or DSL will disclose information about a learner on a 'need to know' basis. All members of staff must be aware that whilst they have duties to keep any information confidential, they also have a professional responsibility to share information with other agencies to safeguard children.

TDM has an appropriately trained Data Protection Officer (DPO) as required by the General Data Protection Regulations (GDPR) to ensure that our company complies with all matters relating to confidentiality and information sharing requirements.

TDM's Data Protection Officer is: Elizabeth Hoyos

The Data Protection Act 2018 and GDPR do not prevent the sharing of information for the purposes of keeping children safe. Fears about sharing information must not be allowed to stand in the way of the need to safeguard and promote the welfare and protect the safety of children (KCSIE 2020). DfE Guidance on Information Sharing (July 2018) provides further detail.

15. Complaints

TDM has a Complaints Policy/Procedure which can be found on the staff intranet. All reported concerns will be taken seriously and considered within the relevant and appropriate process. Anything that constitutes an allegation against a member of staff or volunteer will be dealt with under the Managing Allegations against Staff section of this policy. See also disciplinary/grievance policy.

16. Staff Induction, Awareness and Training

All members of staff have been provided with a copy of part one of 'Keeping Children Safe in Education' (2020) which covers safeguarding information for all staff. All staff including the DSL are required to read the entire document and must complete required activities to confirm that they have read and understood KCSIE.

The DSL will ensure that all new staff and volunteers (including agency and third-party staff) receive safeguarding/child protection training to ensure they are aware of TDM's internal safeguarding processes as part of their induction.

All staff members (including agency and third-party staff) will receive appropriate training to ensure they are aware of a range of safeguarding issues. This training will include online safety and will take place at least annually. In addition to specific safeguarding training, all staff will receive regular safeguarding and child protection updates through regular briefings, bulletins, emails and/or staff meetings. All staff members (including agency and third-party staff) will be made aware of TDM's expectations regarding safe and professional practice via the staff behaviour policy/code of conduct and Acceptable Use Policy (AUP).

Staff will be encouraged to contribute to and shape safeguarding arrangements and child protection policies through sharing of good practice both within TDM and locally through provider networks etc.

The DSL/CEO will provide an annual safeguarding report to the governors. The report will include details of safeguarding training undertaken by all staff. The DSL will maintain and up to date register of who has been trained. All senior leaders will access appropriate safeguarding training which covers their specific strategic responsibilities on a regular basis.

17. Safer Working Practice

All members of staff are required to work within our clear guidelines on safer working practice as outlined in the TDM code of practice. All staff will be made aware of the professional risks associated with the use of social media and electronic communication

(such as email, mobile phones, texting, social networking). Staff will adhere to relevant policies including staff behaviour, acceptable use and social media policies.

18. Staff Supervision and Support

Any member of staff affected by issues arising from concerns for children's welfare or safety can seek support from the DSL.

The induction process will include familiarisation with child protection responsibilities and procedures to be followed if members of staff have any concerns about a child's safety or welfare. TDM will provide appropriate supervision and support for all members of staff to ensure that:

- All staff are competent to carry out their responsibilities for safeguarding and promoting the welfare of children
- All staff are supported by the DSL in their safeguarding role.
- All members of staff have regular reviews of their own practice to ensure they improve over time.

The DSL will signpost staff to external agencies for professional support if they so wish.

19. Safer Recruitment

TDM is committed to ensure that everyone develops a safe culture and that all steps are taken to recruit staff and volunteers who are safe to work with our learners and staff. As a minimum, TDM will follow relevant guidance in Keeping Children Safe in Education 2020 (Section 3 'Safer Recruitment') and from The Disclosure and Barring Service (DBS). The TDM leadership team is responsible for ensuring that the company adheres to safe recruitment processes outlined within guidance. This includes the following:

- Maintaining an accurate Single Central Record (SCR) in line with statutory guidance.
- Ensuring that at least one of the persons who conducts an interview has completed safer recruitment training.

We advise all staff to disclose any reason that may affect their suitability to work with children including convictions, cautions, court orders, cautions, reprimands and warnings.

TDM will ensure that all staff and volunteers have read the staff behaviour policy/code of conduct and understand that their behaviour and practice must comply with it

20. Allegations Against Members of Staff and Volunteers

TDM recognises that it is possible for any member of staff, including volunteers, governors, contractors, agency and third party staff (including supply teachers) and visitors to behave in a way that:

- Indicates they have harmed a child, or may have harmed a child;
- Means they have committed a criminal offence against or related to a child;
- behaved towards a child or children in a way that indicates he or she may pose a risk of harm to children; or

- behaved or may have behaved in a way that indicates they may not be suitable to work with children.

Any allegation of abuse made against a member of staff (including supply trainers, coaches, support staff and volunteers) in relation to a young person must immediately be brought to the attention of the CEO and, where appropriate, the DSL. The CEO will act in a co-ordinating role. Should the CEO be the subject of the allegation, the DSL will immediately report to Governor Kim Cook to establish “the nature, content and context of the allegation” and agree the appropriate course of action. In some cases, allegations may be so serious that they will require immediate intervention by the police and/or children’s social care services.

If the allegation against a member of staff (including supply trainers, coaches, support staff and volunteers) meets any of the criteria below, the CEO (or other lead person) must report it to the Local Authority Designated Officer (LADO) the same day:

- They have behaved in a way that has harmed a child, or may have harmed a child
- They possibly committed a criminal offence against or related to a child
- They have behaved towards a child or children in a way that indicates they may pose a risk of harm to children
- They have behaved towards a child or children in a way that indicates he/she is unsuitable to work with children

For other allegations, the CEO and DSL will decide if further enquiries are required prior to referral to the Local Authority Designated Officer. Where the CEO considers that a referral may be warranted under Child Protection Procedures and an allegation appears to meet the criteria, the CEO will inform the LADO who can consult the police and children’s social care professionals as appropriate.

The LADO should also be informed of any allegations that are made directly to the police or to children’s social care. All alleged physical injuries must be investigated by the appropriate external agencies. All staff and volunteers should feel able to raise concerns about poor or unsafe practice and potential failures in the safeguarding regime.

In the event of allegations of abuse being made against the CEO, staff are advised that allegations should be reported to the governors Derrin Kent and Kim Cook who will contact the LADO.

All staff and volunteers should feel able to raise concerns about poor or unsafe practice and such concerns will always be taken seriously by the leadership team.

All members of staff should be aware of TDM’s Whistleblowing Policy and procedure. It is a disciplinary offence not to report concerns about the conduct of a colleague that could place a child/young person at risk.

Staff can access the NSPCC whistleblowing helpline if they do not feel able to raise concerns regarding child protection failures internally. (See NSPCC website or email help@nspcc.org.uk).

21. DBS referrals

TDM has a legal duty to refer to the Disclosure and Barring Service (DBS) anyone who has harmed, or poses a risk of harm, to a child, or if there is reason to believe the member of staff has committed one of a number of listed offences, and who has been removed from working (paid or unpaid) in regulated activity, or would have been removed had they not left. The DBS will consider whether to bar the person. If these circumstances arise in relation to a member of staff at our TDM, a referral will be made as soon as possible after the resignation or removal of the individual in accordance with advice from the LADO or other statutory agency.

If there are any changes to their criminal record e.g driving or other offences, TDM employees are expected to update the Operations Director (in charge of HR) immediately. Any failure to disclose an offence, if discovered subsequently, will be/may be treated as a potential act of gross misconduct and could lead to disciplinary action.

22. Safeguarding learners with Special Educational Needs and Disabilities

TDM acknowledges that children/young people with special educational needs (SEN) and disabilities can face additional safeguarding challenges as they may have an impaired capacity to resist or avoid abuse. The DSL will work closely with the **Professional Development Coach (in charge of supporting SEND and ALS needs)** to plan support as required. TDM will ensure that children/young people with SEN and disabilities, specifically those with communication difficulties will be supported to ensure that their voice is heard and acted upon.

Members of staff are encouraged to be aware that children/young people/ with SEN and disabilities can be disproportionately impacted by safeguarding concerns, such as bullying and exploitation. All members of staff will be encouraged to appropriately explore possible indicators of abuse such as behaviour/mood change or injuries and not to assume that they are related to the child's disability and be aware that children/young people with SEN and disabilities may not always outwardly display indicators of abuse. To address these additional challenges, TDM will always consider extra pastoral support for children with SEN and disabilities.

23. Peer on Peer Abuse

All members of staff recognise that children/young people are capable of abusing their peers. TDM believes that abuse is abuse and it will never be tolerated. All victims will be taken seriously and offered appropriate support, regardless of where the abuse takes place. TDM recognises that peer on peer abuse can take many forms, including but not limited to:

- bullying (including cyberbullying)
- physical abuse which can include hitting, kicking, shaking, biting, hair pulling, or otherwise causing physical harm
- sexual violence and 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, or cause the victim humiliation, distress or alarm
- sexting (also known as youth produced sexual imagery)
- initiation/hazing type violence and rituals.

TDM recognises youth produced sexual imagery (also known as “sexting”) as a safeguarding issue; all concerns will be reported to and dealt with by the DSL (or deputy). We will follow the advice as set out in the non-statutory UKCIS guidance: ‘Sexting in schools and colleges: responding to incidents and safeguarding young people’ and the local KSCMP guidance: “Responding to youth produced sexual imagery”. When responding to concerns relating to child on child sexual violence or harassment, TDM will follow guidance outlined in part five of KCSIE 2020 and ‘Sexual Violence and Sexual Harassment Between Children in Schools and Colleges’.

Staff and leadership are mindful that some peer on peer abuse issues may be affected by gender, age, ability and culture of those involved. All allegations of peer on peer abuse will be recorded, investigated, and dealt with in line with associated TDM policies, including anti-bullying and behaviour. Alleged victims, perpetrators and any other child affected by peer on peer abuse will be supported as follows. TDM will provide and/or signpost children/young people to sources/agencies for pastoral support/ counselling and in cases of sexual assault will inform the police

24. Gangs, County Lines, Serious violence, Crime and Exploitation

TDM recognises the impact of gangs, county lines, serious violence, crime and exploitation. It is recognised that the initial response to child victims is important and that staff will take any allegation seriously and work in ways that support children and keep them safe. All staff have been trained and recognise the need to be vigilant for the signs that may include, but not exclusively:

- Unexplained gifts/new possessions – these can indicate children have been approached by/involved with individuals associated with criminal networks/gangs.
- Children who go missing for periods of time or regularly come home late
- Children who regularly miss training or do not take part in education
- Change in friendships/relationships with others/groups
- Children who associate with other young people involved in exploitation
- Children who suffer from changes in emotional well-being
- Significant decline in performance
- Signs of self-harm/significant change in wellbeing
- Signs of assault/unexplained injuries

25. Online Safety

TDM recognises that the use of technology presents challenges and risks to children and adults both inside and outside of TDM. TDM will therefore empower, protect and educate learners in their use of technology and establish mechanisms to identify, intervene in, and escalate any incident where appropriate.

TDM identifies that the breadth of issues classified within online safety is considerable, but can be categorised into three areas of risk:

- **content:** being exposed to illegal, inappropriate or harmful material; for example, pornography, fake news, racist or radical and extremist views;
- **contact:** being subjected to harmful online interaction with other users; for example, commercial advertising as well as adults posing as children or young adults; and
- **conduct:** personal online behaviour that increases the likelihood of, or causes, harm; for example, making, sending and receiving explicit images, or online bullying.

The DSL has overall responsibility for online safeguarding within the learning environment but will liaise as necessary with other members of staff.

TDM uses a wide range of technology. This includes computers, laptops, tablets and other digital devices, the internet, our learning platform, intranet and email systems. All TDM owned devices and systems will be used in accordance with our acceptable use policies and with appropriate safety and security measures in place.

TDM recognises the specific risks that can be posed by mobile technology, including mobile phones and cameras. TDM will do all it reasonably can to limit young people's exposure to online risks through our IT systems and will ensure that appropriate filtering and monitoring systems are in place. If learners or staff discover unsuitable sites or material, they are required to: turn off the monitor/screen, use a screen cover widget, report the concern immediately to a member of staff, report the URL of the site to technical staff/services.

All users will be informed that use of our systems can be monitored, and that monitoring will be in line with data protection, human rights and privacy legislation. Filtering breaches or concerns identified through our monitoring approaches will be recorded and reported to the DSL and technical staff, as appropriate. Any access to material believed to be illegal will be reported immediately to the appropriate agencies, such as the [Internet Watch Foundation](#) and the police. TDM will ensure that online safety training for all staff is integrated, aligned and considered as part of our overarching safeguarding approach.

The DSL will respond to online safety concerns in line with the safeguarding and other associated policies such as anti-bullying and behaviour. Internal sanctions and/or support will be implemented as appropriate. Where necessary, concerns will be escalated and reported to relevant partner agencies in line with local policies and procedures.

If learners are asked to learn online at home in response to a full or partial closure:

TDM will ensure any remote sharing of information, communication and use of online learning tools and systems will be in line with privacy and data protection requirements

All communication with learners and employers/mentors will take place using TDM provided or approved communication channels; for example, TDM provided email accounts and phone numbers and agreed systems e.g. TDM's virtual Learning Environment (VLE). Any pre-existing relationships or situations which mean this cannot be complied with will be discussed with the DSL. Staff and learners will engage with remote teaching and learning in line with existing behaviour principles as set out in the TDM code of practice and Acceptable Use Policies. Staff and learners will be encouraged to report issues experienced at home and concerns will be responded to in line with our child protection and other relevant policies.

When delivering remote learning, staff will follow statutory DfE guidance such as [Safeguarding and remote education during coronavirus \(COVID-19\)](#)

26. Procedures for Learners on Apprenticeships, Traineeships or other Work Based Placements

- Learners' work-placement companies/employers will be furnished at the outset with a 'Sign-up Safeguarding' agreement which outlines TDM's responsibility to report any incidents of inappropriate practice or safeguarding issues.
- Learners should report safeguarding concerns to their coach or any other member of TDM management team
- Staff members will notify the DSL and DSO
- Staff should be clear on reporting a safeguarding or welfare issue as illustrated in appendix 3
- The DSL/DSO must notify the employer or an authorised person from the work-placement company, and together they will decide on next steps, taking advice where necessary, if the information is such that the matter should be referred immediately to Social Services.
- The DSL/DSO or coach will provide the learner with advice and/or support and, if necessary, signpost them to external support services where appropriate.

When a learner is concerned that the above procedures for placement-based setting staff have not been carried out appropriately or adequately, the following should apply:

- Learner reports concern to TDM's coach or staff member who informs the DSL/DSO
- The DSL/DSO will initially discuss the concern with the learner where necessary and maintain a written record of the details.
- The DSL/DSO will discuss the concern with the coach and together they will decide, taking advice where necessary and maintaining a written record where appropriate if the information is such that the matter should be referred immediately to the Social Services.
- If agreement cannot be reached, the decision should be made by the DSL but where there is doubt, a referral may be made by the coach to the CEO of TDM.
- Communication between TDM and the employer should be maintained.
- Whatever the decision, the learner should be informed of actions taken.

See appendix 4 for infographic on process

Any member of coaching staff who follows the procedures in this guidance in making a report of suspected abuse by any person (whether or not connected with the educational or other setting), is acting within the course of his/her employment, and in such circumstances, where he/she has acted in good faith, will receive the full support of TDM and will not be legally or financially liable should any consequential action be brought against him/her.

27. Off-The-Job Training

Safeguarding will be promoted to all learners as follows:

- During onboarding – learners will be introduced to Safeguarding and Prevent and how to recognise and report a concern at orientation

- During training sessions – safeguarding will be embedded in the curriculum as appropriate
- During progress reviews – learners’ understanding about safeguarding and Prevent will be checked and reinforced

28. Security

All members of staff have a responsibility for maintaining awareness of buildings and grounds security and for reporting concerns that may come to light. Learners are required to wear ID badges on the TDM training site and follow security guidelines of their places of work.

Staff will be expected to adhere to any safety arrangements implemented because of Covid-19 restrictions. Appropriate checks will be undertaken in respect of visitors and volunteers coming onto TDM premises as outlined within guidance. Visitors will be expected to, sign in and out via the office visitors log and to display a visitor’s badge whilst on site. Visitors will be expected to adhere to any safety arrangements implemented because of Covid-19 restrictions. Any individual who is not known or identifiable on site should be challenged for clarification and reassurance.

TDM will not accept the behaviour of any individual that threatens security or leads others (child or adult) to feel unsafe. Such behaviour will be treated as a serious concern and may result in a decision to refuse access for that individual to TDM sites.

Contact details for the LADO

Telephone,
Birmingham: 0121 675 1669
Worcestershire: 01905 822666/768053

Local Police

101 or 999 if there is an immediate risk of harm

For national support organisations and TDM contact details see appendix 2

Policy Version Control

| Issue Date | Version | Revision Number | Revision Date | Revision Changes | Initials |
|------------|---------|-----------------|---------------|--|--------------|
| 01/10/09 | 1 | 18 | 10/02/2021 | Various changes according to legislation. Revision table improved to track changes better. | JJ, EH |
| 19/04/21 | 2 | Reissued | n/a | The policy was changed entirely to bring in line with current legislation and best practice. The Leaders in Safeguarding Association supported us with the new policy. | JJ,SO,E H |

Appendix 1: Categories of Abuse

All staff should be aware that abuse, neglect and safeguarding issues are rarely standalone events that can be covered by one definition or label. In most cases multiple issues will overlap with one another.

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. They may be abused by an adult or adults or another child or children. It should be noted that abuse can be carried out both on and offline and be perpetrated by men, women and children.

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 (including via the internet). Sexual abuse is not solely perpetrated by adult males. Women can also commit acts of sexual abuse, as can other children.

Signs that MAY INDICATE Sexual Abuse

- Sudden changes in behaviour and performance
- Displays of affection which are sexual and age inappropriate
- Self-harm, self-mutilation or attempts at suicide
- Alluding to secrets which they cannot reveal
- Tendency to cling or need constant reassurance
- Regression to younger behaviour for example thumb sucking, playing with discarded toys, acting like a baby
- Distrust of familiar adults e.g. anxiety of being left with relatives, a childminder or lodger
- Unexplained gifts or money
- Depression and withdrawal
- Fear of undressing for PE
- Sexually transmitted disease
- Fire setting

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.

Signs that MAY INDICATE physical abuse

- Bruises and abrasions around the face
- Damage or injury around the mouth
- Bi-lateral injuries such as two bruised eyes
- Bruising to soft area of the face such as the cheeks
- Fingertip bruising to the front or back of torso

- Bite marks
- Burns or scalds (unusual patterns and spread of injuries)
- Deep contact burns such as cigarette burns
- Injuries suggesting beatings (strap marks, welts)
- Covering arms and legs even when hot
- Aggressive behaviour or severe temper outbursts.
- Injuries need to be accounted for. Inadequate, inconsistent or excessively plausible explanations or a delay in seeking treatment should signal concern.

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 capability as well as overprotection and limitation of exploration and learning, or preventing the child participating in normal social interaction. It may involve seeing or hearing the ill-treatment of another. It may involve serious bullying (including cyberbullying), causing children frequently to feel frightened or in danger, or the exploitation or corruption of children. Some level of emotional abuse is involved in all types of maltreatment of a child, although it may occur alone.

Signs that MAY INDICATE emotional abuse

- Over reaction to mistakes
- Lack of self-confidence/esteem
- Sudden speech disorders
- Self-harming
- Eating Disorders
- Extremes of passivity and/or aggression
- Compulsive stealing
- Drug, alcohol, solvent abuse
- Fear of parents being contacted
- Unwillingness or inability to play
- Excessive need for approval, attention and affection

Neglect: the persistent failure to meet a child's basic physical and/or psychological needs, likely to result in the serious impairment of the child's health or development. Neglect may occur during pregnancy as a result of maternal substance abuse. Once a child is born, neglect may involve a parent or carer failing to: provide adequate food, clothing and shelter (including exclusion from home or abandonment); protect a child from physical and emotional harm or danger; ensure adequate supervision (including the use of inadequate care-givers); 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 that MAY INDICATE neglect.

- Constant hunger
- Poor personal hygiene
- Constant tiredness
- Inadequate clothing
- Frequent lateness or non-attendance
- Untreated medical problems

- Poor relationship with peers
- Compulsive stealing and scavenging
- Rocking, hair twisting and thumb sucking
- Running away
- Loss of weight or being constantly underweight
- Low self esteem

Appendix 2: National Support Organisations

The following links may help DSLs provide further advice and support to their learners, staff and parents/carers. Additional links can be found in KCSIE 2020 in Annex A and C.

Support for staff

Education Support Partnership: www.educationsupportpartnership.org.uk
Professional Online Safety Helpline: www.saferinternet.org.uk/helpline

Support for Learners

ChildLine: www.childline.org.uk
Papyrus: www.papyrus-uk.org
The Mix: www.themix.org.uk
Shout: www.giveusashout.org
Fearless: www.fearless.org

Support for adults

Family Lives: www.familylives.org.uk
Crime Stoppers: www.crimestoppers-uk.org
Victim Support: www.victimsupport.org.uk
The Samaritans: www.samaritans.org
NAPAC (National Association for People Abused in Childhood): www.napac.org.uk
MOSAC: www.mosac.org.uk
Action Fraud: www.actionfraud.police.uk
Shout: www.giveusashout.org

Support for Learning Disabilities

Respond: www.respond.org.uk
Mencap: www.mencap.org.uk

Domestic Abuse

Domestic abuse services: www.domesticabuseservices.org.uk
Refuge: www.refuge.org.uk
Women's Aid: www.womensaid.org.uk
Men's Advice Line: www.mensadvice.org.uk
Mankind: www.mankindcounselling.org.uk
National Domestic Abuse Helpline: www.nationaldahelpline.org.uk
Respect Phonenumber: <https://respectphonenumber.org.uk>

Honour Based Abuse

Forced Marriage Unit: www.gov.uk/guidance/forced-marriage
FGM Factsheet:
https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/496415/6_1639_HO_SP_FGM_mandatory_reporting_Fact_sheet_Web.pdf
Mandatory reporting of female genital mutilation: procedural information:
www.gov.uk/government/publications/mandatory-reporting-of-female-genital-mutilation-procedural-information

Contextual Safeguarding, Peer on Peer abuse, Sexual Exploitation and Criminal Exploitation:

Contextual Safeguarding Network: <https://contextualsafeguarding.org.uk>

National Crime Agency: www.nationalcrimeagency.gov.uk/who-we-are
Rape Crisis: <https://rapecrisis.org.uk>
Lucy Faithfull Foundation: www.lucyfaithfull.org.uk
Brook: www.brook.org.uk
Victim Support: www.victimsupport.org.uk
Anti-Bullying Alliance: www.anti-bullyingalliance.org.uk
Disrespect Nobody: www.disrespectnobody.co.uk
Upskirting – know your rights: www.gov.uk/government/news/upskirting-know-your-rights

Substance Misuse

We are with you (formerly Addaction):
www.wearewithyou.org.uk/services/kent-for-young-people/
Talk to Frank: www.talktofrank.com

Mental Health

Mind: www.mind.org.uk
Moodspark: <https://moodspark.org.uk>
Young Minds: www.youngminds.org.uk
We are with you (formerly Addaction):
www.wearewithyou.org.uk/services/kent-for-young-people/

Online Safety

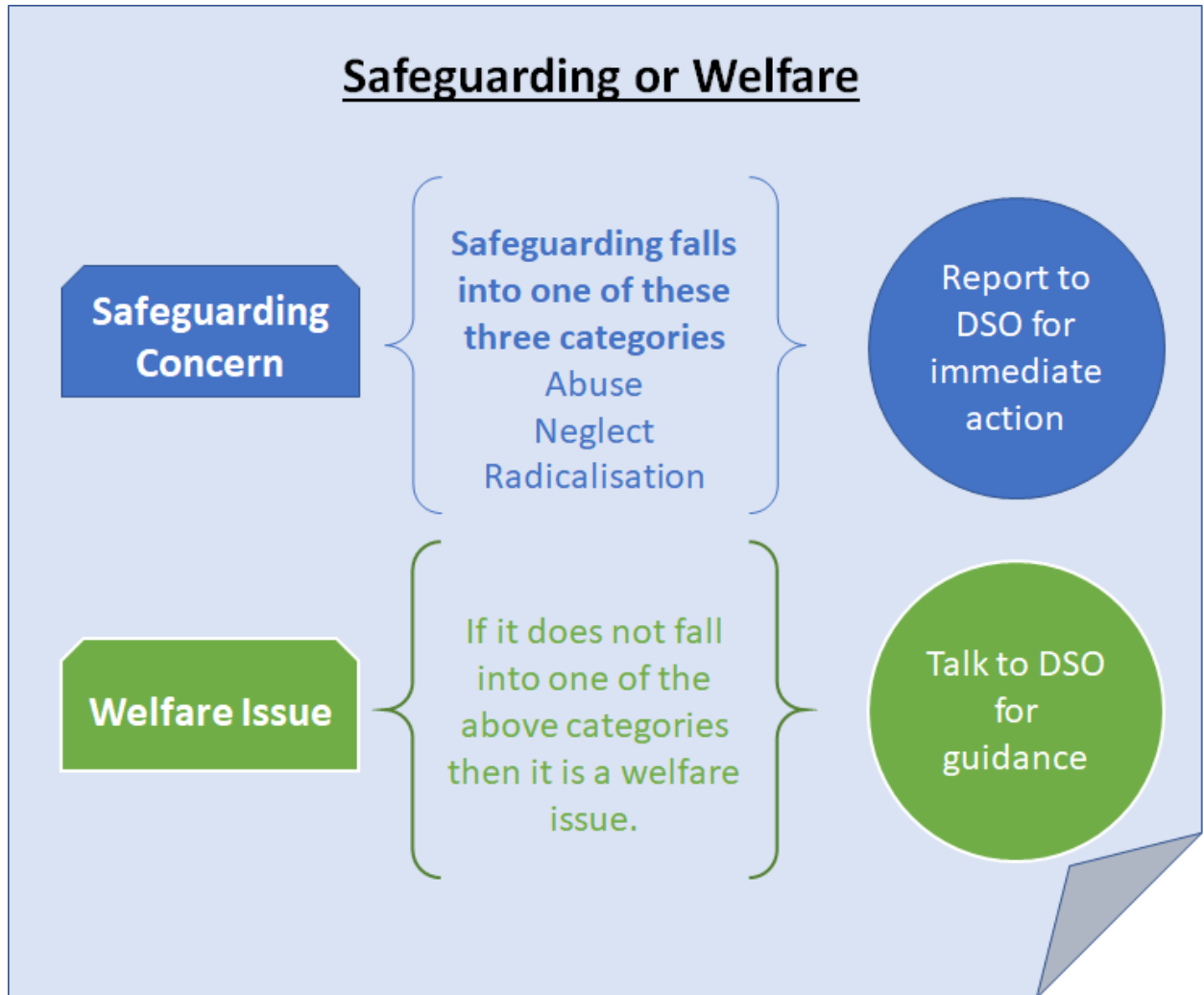
CEOP: www.ceop.police.uk
Internet Watch Foundation (IWF): www.iwf.org.uk
Think U Know: www.thinkuknow.co.uk
Childnet: www.childnet.com
UK Safer Internet Centre: www.saferinternet.org.uk
Report Harmful Content: <https://reportharmfulcontent.com>
Parents Info: www.parentinfo.org
Marie Collins Foundation: www.mariecollinsfoundation.org.uk
Internet Matters: www.internetmatters.org
NSPCC/ Net Aware: www.nspcc.org.uk/onlinesafety and www.net-aware.org.uk
Get safe Online: www.getsafeonline.org
Stop it Now!: www.stopitnow.org.uk
Parents Protect: www.parentsprotect.co.uk

Radicalisation and hate

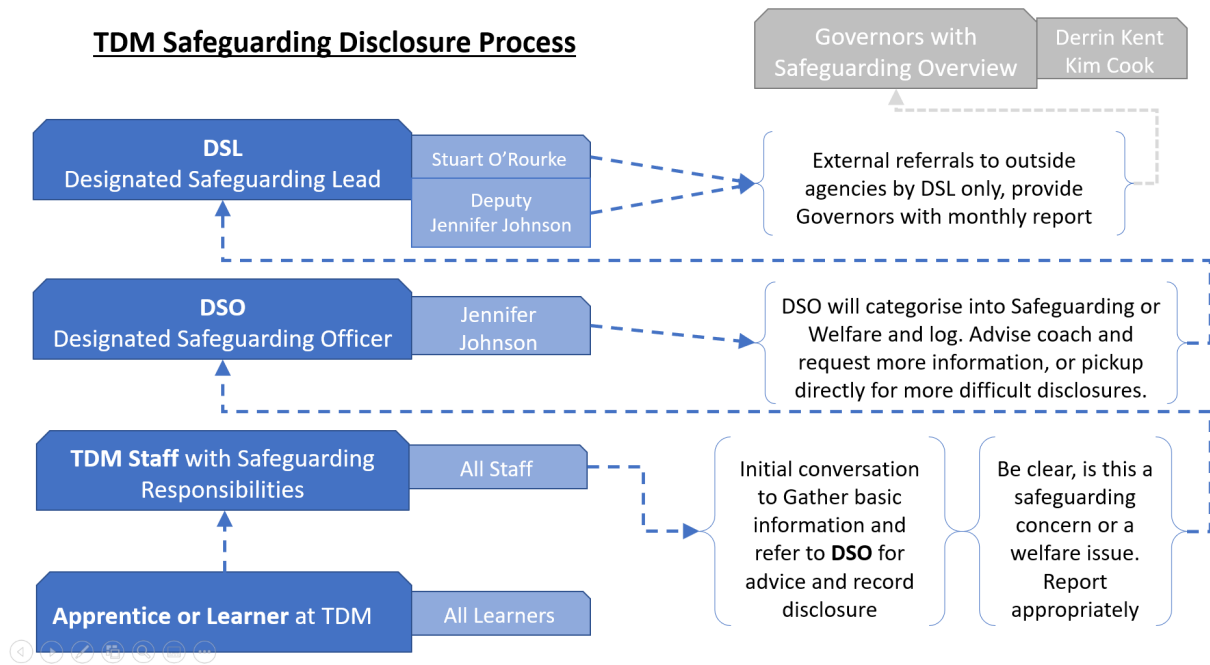
Educate against Hate: www.educateagainsthate.com
Counter Terrorism Internet Referral Unit: www.gov.uk/report-terrorism
True Vision: www.report-it.org.uk

Appendix 3: Safeguarding vs Welfare

Staff and especially those working directly with learners (coaches) should be clear on what they are reporting and understand if this is a safeguarding concern or a welfare issue. Appropriate reporting is essential, and the DSLs will make the final decision on whether a concern raised is a safeguarding issue or a welfare issue.



Appendix 4: Safeguarding Disclosure Process



Safeguarding Officers/Champions:

Provide support to DSO and act in an advisory capacity when other team members request it.

- Melanie Eastwood
- Tabitha Jones

Appendix 5: TDM Safeguarding Staff Contact Details

| Name | Role | Email | Phone |
|------------------|--|--|-----------------------------|
| Stuart O'Rourke | Designated Safeguarding Lead | stuart@tdm.co.uk | 03331010040 (Extension 812) |
| Jennifer Johnson | Deputy Designated Safeguarding Lead Designated Safeguarding Officer | jenny@tdm.co.uk | 0333 101 00 74 |
| Melanie Eastwood | Safeguarding Officer-Advisory role (In Training) | mel@tdm.co.uk | 07432632269 |
| Tabitha Jones | Safeguarding Officer Advisory role (In Training) | tabi@tdm.co.uk | 07939530735 |
| Derrin Kent | Governor for Safeguarding | derrin@tdm.co.uk | n/a |
| Kim Cook | Deputy Governor for Safeguarding | kim@hwstpa.co.uk | n/a |