
	Policy HS-03B	Page 1 of 19	Version 19	Date: 17/11/2025
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Safeguarding Policy				

## Aim

TRN is committed to providing a safe environment for all its learners and staff free from discrimination on any ground and any form of harm, abuse and harassment including sexual harassment in the workplace, learning environment, at home, through on-line computer networks or in relationships.

## 1. Scope

- 1.1. The overarching purpose of this policy is to promote wellbeing, prevent harm and respond effectively if concerns are raised. The policy will provide information to staff, contractors, volunteers, agency workers and associates on their role and responsibilities for safeguarding apprentices and learners.
- 1.2. It provides procedural guidance on actions to take should anyone suspect an apprentice or learner is at risk from harm, abuse, discrimination, or exploitation or if an allegation is made.
- 1.3. This procedure should be read in conjunction with the following policies, procedures, and guidance:
  - ☐ Safeguarding Policy Statement HS-03A
  - ☐ Safeguarding Alert Process Flow Chart HS-03C
  - ☐ Safeguarding Appendix, A Signs and symptom of abuse HS-03D
  - ☐ Safer Recruitment Policy BM-07
  - ☐ Equality & Diversity Policy Statement BM-10A
  - ☐ Equality & Diversity Policy BM-10B
  - ☐ Glossary of terms & guidance notes BM-10C
  - ☐ E-safety and acceptable use of technology policy HS-08
  - ☐ Whistle blowing procedure BM-05
  - ☐ Child Protection Policy HS-14
  - ☐ Missing Children in Education Policy HS-15

## 2. Principles

- 2.1 To ensure compliance with moral, ethical, and legal requirements and best practice guidance namely:
  - ☐ Children Act 1989
  - ☐ Children Act 2004
  - ☐ Safeguarding Vulnerable Groups Act 2006
  - ☐ Education Act 2002
  - ☐ Education Act 2011
  - ☐ Rehabilitation of Offenders Act 1974 ((Exceptions) Order 1975 as amended) (Updated 2014)
  - ☐ Working Together to Safeguard Children 2018

- ☐ “No secrets” guidance DoH 2000
- ☐ Every Child Matters, 2004 (Updated 2018) (<http://www.workingwithkids.co.uk/every-child-matters-policy-explained.htm>)
- ☐ The Equality Act 2010
- ☐ Immigration, Asylum and Nationality Act 2006
- ☐ Immigration Act 2014
- ☐ Human Rights Act 1998
- ☐ Data Protection Act 2018
- ☐ General Data Protection Regulations 2018
- ☐ Safeguarding Children and Safer Recruitment in Education 2010 (DCSF)
- ☐ Local Safeguarding Adults Board Policy
- ☐ Local Safeguarding Children’s Board Policy
- ☐ Safer practice, safer learning: A whole-organisation approach to safeguarding vulnerable adults for the learning and skills sector. NIACE for the Department for Education and Skills 2007
- ☐ Handling Cases of Forced Marriage: Multi-agency practice guidelines. HM Government 2014
- ☐ Care Act 2014
- ☐ Counter- Terrorism and Security Act 2015
- ☐ Counter Terrorism and Border Security Bill 2018
- ☐ Female Genital Mutilation Act 2003
- ☐ The Voyeurism (Offences) Act 2019
- ☐ Keeping Children Safe in Education - Statutory guidance for Schools and Colleges, September 2025
- ☐ Domestic Abuse Act 2021
- ☐ The Education and Training (Welfare of Children) Act 2021

2.2 All staff at Train Ltd have a duty under the above guidance and legislation to identify any apprentice or learners who may be experiencing or at risk of experiencing, abuse or harm in the workplace, at home, through on-line computer networks or in relationships, and take appropriate action to ensure their safety. This policy also includes reporting and dealing with allegations of abuse against members of staff.

2.3 Train Ltd acknowledges that training and education staff have a crucial role to play in helping identify welfare concerns and indicators of possible abuse or neglect at an early stage. All learners may benefit from early help however all staff at TRN should be particularly alert to the potential need for early help for a child who

- ☐ is disabled or has certain health conditions and has specific additional needs
- ☐ has special educational needs (whether they have a statutory Education, Health and Care Plan)
- ☐ has a mental health need
- ☐ is a young carer
- ☐ is showing signs of being drawn in to anti-social or criminal behavior, including gang involvement and association with organised crime groups or county lines
- ☐ is frequently missing/goes missing from care or from home
- ☐ is at risk of modern slavery, trafficking, sexual or criminal exploitation
- ☐ is at risk of being radicalised or exploited

- ☐ has a family member in prison, or is affected by parental offending
- ☐ is in a family circumstance presenting challenges for the child, such as drug and alcohol misuse, adult mental health issues and domestic abuse
- ☐ is misusing drugs or alcohol themselves
- ☐ has returned home to their family from care
- ☐ is at risk of 'honor'-based abuse such as Female Genital Mutilation or Forced Marriage
- ☐ is a privately fostered child; and
- ☐ is persistently absent from education, including persistent absences for part of the school day.

Children potentially at greater risk of harm may include

- ☐ Children who have a social worker (child in need or child protection plan)
- ☐ Children absent/missing from education
- ☐ Children requiring mental health support
- ☐ Looked after children and previously looked after children.
- ☐ Children who are male

2.4 It is not the responsibility of any member of staff at Train Ltd to investigate suspected cases of abuse; rather all cases must be referred to the Designated Safeguarding Officer (DSO) who will decide whether to make a referral to relevant outside agencies. The DSO may make relevant enquiries where appropriate.

2.5 Train Ltd wants all apprentices and learners to feel confident that their concerns will be taken seriously and that disclosure to any member of staff will be treated in a sensitive manner.

2.6 The Policy will be reviewed at least annually as part of the Company's quality assurance framework, the policy will form part of all staff inductions and be communicated to the team when any changes are made.

## 2.7 Looked-After Children & Care Leavers

TRN identifies and tracks the progress, welfare and safety of looked-after children and care leavers. A named senior leader acts as the designated point of contact for this group, ensuring liaison with local authorities, social workers, carers and other relevant professionals.

## 3. Definitions

3.1 The table below provides guidance around the definitions of key terms used in this policy:

Abuse	Is defined as "a violation of an individual's human and civil rights by any other person or persons. (The Care Act 2014)
Children	An apprentice or learner is a <b>CHILD</b> under the legislation until they reach 18 years of age (i.e. their 18 <sup>th</sup> birthday) or 25 if the individual has learning or other disability.

Adult	An apprentice or learner is an adult under the legislation once they reach 18 years of age (i.e. their 18 <sup>th</sup> birthday) or from 25 if the individual has learning or other disability.
Vulnerable Adult	Aged 18 years or over; Who may be in need of community care services by reason of mental or other disability, age or illness; and who is or may be unable to take care of him or herself, or unable to protect him or herself against significant harm or exploitation.
Other apprentices or learners	Learners and apprentices who do not fall into either group but may also experience abuse and need to talk to a member of staff about this. Train Ltd takes seriously its duty of care to safeguard apprentices and learners wherever possible and offer appropriate support and advice
LADO	Local Authority Designated Officer
LDSO	Lead designated safeguarding officer
DSO	Designated safeguarding officer
Safeguarding and promoting the welfare of children	Activities which protect from harm or abuse and provide a safe and effective environment that enables young people to have optimum life chances
Vulnerable Adult Protection	Process of protecting individual Vulnerable Adults identified as suffering serious harm or abuse
Prevent Agenda	Part of the Government counter terrorism strategy
MASH	Multi Agency Safeguarding Hub

#### 4. Forms of abuse

4.1 Children and young people and adults can experience abuse in a variety of settings including in their learning environment; their workplace; within the family home; within a personal relationship; in the community and while using online computer networks and phones.

4.2 Safeguarding action may be needed to protect children, apprentices, and learners from:

- Bullying, including online bullying and prejudice-based bullying
- Racist, disability and homophobic or transphobic abuse
- Gender based violence/violence against women and girls
- Radicalisation and/or extremist behavior
- Child sexual exploitation and trafficking
- Child criminal exploitation
- The impact of new technologies on sexual behavior e.g. sexting/production and sharing of nudes or seminude pictures or videos
- Teenage relationship abuse
- Child on child abuse or harassment
- Domestic abuse
- Substance misuse
- Sexual Harassment

- Issues that may be specific to a local area or population e.g. gang activity and youth violence
- Female genital mutilation
- Forced marriage
- Fabricated or induced illness
- Poor parenting, particularly in relation to babies & young people

4.3 The following categories of abuse are used in Children's legislation and Adult Guidance:

- ❖ Physical abuse
- ❖ Emotional abuse (psychological)
- ❖ Sexual abuse
- ❖ Neglect and acts of omission
- ❖ Self-neglect
- ❖ Discriminatory Abuse
- ❖ Financial or Material Abuse
- ❖ Institutional or organisational abuse
- ❖ Domestic violence
- ❖ Modern slavery
- ❖ Forced marriage
- ❖ Child sexual exploitation
- ❖ Child criminal exploitation

## 5. Responsibilities/Accountability

5.1 The overall responsibility for safeguarding children, young people and adults at risk and the implementation of this policy is that of the Managing Director. The Managing Director is responsible for ensuring that Train Ltd has appropriate policies and procedures in place.

It is the responsibility of the Head of Quality to oversee the application of the Safeguarding and Prevent Policy and related policies and procedures and to review its content on an annual basis as part of the company's self-assessment process. Senior management and quality forum meetings are to be used as a vehicle to review any in-year policy updates that may be required.

5.2 The Lead Designated Safeguarding Officer (LDSO) is Natalie Wheeler ([natalie.wheeler@trainltd.org](mailto:natalie.wheeler@trainltd.org) 07365 526074) who is the lead for Safeguarding, the deputy LDSO is Michelle Burke ([michelle.burke@trainltd.org](mailto:michelle.burke@trainltd.org) 07403 858810). The LDSO responsibilities include:

- Lead responsibility for ensuring that Train Ltd carries out its duties in relation to Safeguarding Children, Young People and Vulnerable Adults.
- Liaising with Social Care, Local Safeguarding Boards, children's social care, Police, prevent team, Forced Marriage Unit, and other relevant agencies.
- Providing advice and support to other staff on issues relating to child and young or vulnerable people's protection.
- Maintaining a proper record of any protection referral, complaint, or concern (even where that concern does not lead to a referral)
- Ensuring that parents of children are aware of Train Ltd safeguarding policy as appropriate.
- Ensuring that staff receive relevant training in protection issues and are aware of the company protection procedures.

- Undertake relevant safeguarding adults training and receive refresher training annually.
- Undertake relevant safeguarding children training to include any “keeping children safe in education” updates and receive refresher training annually.
- Undertake relevant specialist LDSO training every 2 years.
- To ensure that employers have appropriate safeguards in place where they employ a Train Ltd apprentice or learner or have a learner on placement.
- To ensure that all staff and associates receive relevant and ongoing training in Child, Young Person and Vulnerable Adult Protection and are aware of company procedures.
- Ensuring that Train Ltd deals with allegations in accordance with these procedures.

### 5.3 There are several Designated Safeguarding Officer (DSOs):

Natalie Wheeler

Michelle Burke

Teresa Dowd

Andrew Naylor

Edward Clark

(Their details can be found at the end of this article)

### 5.4 It is the responsibility of the DSO to:

- Report to the named LDSO.
- Liaise with Social Care, Local Safeguarding Boards, Children’s social care, Police Prevent team, Forced Marriage Unit and relevant agencies and make referrals as appropriate.
- Provide advice and support to staff on issues relating to Child, Young Person and Vulnerable Adult Protection.
- Have responsibility to be available to listen to apprentices and learners who may be experiencing abuse.
- To maintain an attitude of “it could happen here”
- Respond to individual cases, including attending multi-disciplinary conferences as appropriate.
- Maintain a proper record of any referral, complaint, or concern (even where that concern does not lead to a referral)
- Undertake relevant safeguarding adults training and receive refresher training annually.
- Undertake relevant safeguarding children training to include any “keeping children safe in education” updates and receive refresher training annually.
- Undertake relevant specialist DSO training every 2 years.
- Ensure that the apprentice and learner is central to the process and is kept informed throughout; and their wishes and feelings ascertained, and support offered by the most appropriate staff member(s).
- Give feedback to the member of staff who made the referral taking information sharing and confidentiality issues into account.

### 5.5 TRN’s teacher’s/tutors and Assessors

- Have responsibility to be available to listen to apprentices and learners who may be experiencing abuse.
- To maintain an attitude of “it could happen here”

- Respond and report any concerns or disclosures of abuse or harassment and not assume another professional will report or respond.
- Respond to individual cases, including attending multi-disciplinary conferences as appropriate.
- Maintain a proper record of any referral, complaint, or concern (even where that concern does not lead to a referral)
- Undertake relevant safeguarding adults training and receive refresher training annually.
- Undertake relevant safeguarding children training to include any “keeping children safe in education” updates and receive refresher training annually.
- Ensure that the apprentice and learner is central to the process and is kept informed throughout; and their wishes and feelings ascertained, and support offered by the most appropriate staff member(s).
- Understand signs and symptoms of abuse and recognise that children may not feel ready of know how to tell someone they are being abused.

#### 5.6 The LADO is responsible for:

- Providing advice, information and guidance to employers and voluntary organisations around allegations and concerns regarding paid and unpaid workers.
- Managing and overseeing individual cases from all partner agencies.
- Ensuring the child’s voice is heard and that they are safeguarded.
- Ensuring there is a consistent, fair and thorough process for all adults working with children and young people against whom an allegation is made.
- Monitoring the progress of cases to ensure they are dealt with as quickly as possible.
- Recommending a referral and chairing the strategy meeting in cases where the allegation requires investigation by police and/or social care.

TRN must share all relevant information and work in partnership with any related agencies to ensure that all investigations are completed fully and not purposefully obstructed and are completed without bias. Local authority boards will not always share information about their investigations and are not at liberty to share the outcome.

5.7 The police have a duty and responsibility to investigate all criminal offences. The investigation of crimes against children/and vulnerable adults is as important as the investigation of any other serious crime. Offences committed against children can be particularly sensitive, and often require the police to work with other organisations, such as Children's Social care, in the conduct of any investigation, TRN must share all relevant information and support all criminal investigations without bias.

5.8 Each departmental manager has responsibility for ensuring that all staff they are responsible for are aware of this policy and procedure to take to safeguard individuals and to ensure that staff receive the appropriate level of training.

5.9 It is the responsibility of all staff to comply with this policy and reporting procedures.

## **6. Child, Young Person and Vulnerable Adult Protection Procedure for staff and associates.**

### **6.1 What to do if you are concerned that an individual is at risk of being abused or harmed:**

- All delivery staff are expected to report and record within their learner review process all learners that present a risk of being vulnerable to harm or abuse, the purpose of this is to allow early recognition and intervention.
- A learner can be registered as “at risk” for any duration due to changing circumstances (this could be for the full duration of learning or intermitted periods)
- All delivery staff must disclose to the individual that they have been identified as “at risk” and discuss support options
- All employees that are identified or disclose they are “at risk” should be directly referred to the LDSO or deputy LDSO

### **6.2 What to do if you are concerned that an individual is being abused or harmed:**

- All staff and associates are expected to take seriously the duty to be aware of and respond to concerns regarding an individual who are/or may be experiencing abuse and harm in their workplace, learning environment, home or in any part of their lives and to pass these concerns on to a DSO.
- All staff must understand that children may not be ready or know how to tell someone they are being abused, staff must understand the need to respond and act in these circumstances and understand the importance of quick intervention to support children.
- Where the individual is not a child or Adult at risk; the apprentice or learner will need to agree to this being passed on. The only exception to this is where the member of staff considers the individual to be at risk of serious harm

### **6.3 If an individual informs you that they are experiencing abuse: Please read in conjunction with safeguarding policy Appendix A**

- ✓ Respond calmly and listen carefully to what they are telling you. Try not to appear shocked or show disapproval. It can be very difficult for someone to talk about their own abuse.
- ✓ Gain consent to share information on a need-to-know basis, explaining as early as possible that you cannot keep total confidentiality on such matters and that you may need to speak to the DSO.
- ✓ If they then decide not to continue talking to you, offer them advice and sign post them to confidential help lines and web sites. If possible, find a room where they can make private phone calls.
- ✓ Try to find a quiet area to speak where you will not be interrupted. Do not put them off talking by asking them to meet later.
- ✓ Ask the individual to explain as clearly as possible but do not ask leading questions.
- ✓ Write down notes of what the individual has told you or ask them to write it down themselves if you think this is appropriate for them. This is because they may not want to tell anyone again what they have shared with you. Take down times, locations, and any other relevant facts. Do not include your own opinions or views about the disclosure although you can describe the manner or state of the individual when they present themselves to you. There is a possibility you may be asked to attend a multi-



disciplinary meeting outside work and/or give evidence in court proceedings in relation to this disclosure. Sign and date each page of the notes.

- ✓ Complete a Safeguarding Incident report as soon as possible, but in all cases should be reported within 24 hours of the incident.
- ✓ Assess if the individual is in imminent danger. Ensure that the individual is safe in their learning environment/workplace/home. Try to ascertain how safe they will be if they leave the learning environment/workplace or return home.
- ✓ Respect confidentiality and do not discuss the disclosure with anyone other than one of the DSOs. It may be appropriate to talk to your line manager in some circumstances, but you do not automatically need to do so. Be clear with the individual about who you are speaking to and when. Keep the individual informed of what is happening because of their disclosure and ascertain their wishes and feelings where possible/relevant.
- ✓ Where an individual has made a disclosure of abuse, or a staff member has concerns about abuse, no contact should be made with the individual's parents or carers without consultation with the DSO.
- ✓ You may have concerns that an individual is experiencing abuse because of their behavior or changes in their presentation or that they are missing from their learning environment or workplace. Contact a DSO to discuss your concerns.
- ✓ An individual may disclose information that leads to concerns that another child or young person or Vulnerable Adult is experiencing abuse. You need to inform the individual that you will need to tell a DSO.
- ✓ You may be contacted by a DSO to request information from you about an apprentice or learner. This is because Train Ltd may be asked to contribute information to Children's Social Care for an Assessment or Child Protection investigation. The DSO will ensure that they are adhering to the Government Information Sharing Guidance for Practitioners and Managers and will discuss with you what to inform the apprentice or learner. Where possible Train Ltd will be as open as possible with the individual.
- ✓ If you continue to be concerned about an individual after you have informed a DSO, contact them again to let them know or contact another DSO.
- ✓ Where you continue to be concerned about the individual and do not consider that the DSO has followed this up appropriately you may contact the LISO.

## **7. Support for apprentices, learners, and staff**

7.1 Support for apprentices and learners is essential whilst investigations are being undertaken or services being set up. Counselling, Learning Support, Advice and Guidance and Financial Support can be helpful to some apprentices or learners. Train Ltd can signpost apprentices or learners to external organisations who provide a range of specialist support and advice. Often the member of staff who they have chosen to tell is viewed as an important source of support by the apprentice or learner. There are confidential help lines such as Childline, Forced Marriage Unit and the Domestic Violence Helpline if apprentices or learners do not want to talk to staff.

7.2 Support for staff is also important as this is a sensitive subject. The DSO should be able to give staff some feedback on their referral (subject to issues of confidentiality). Staff may wish to discuss this with them, especially if they are continuing to offer the apprentice or learner support. Staff may wish to seek counselling for themselves and will be supported to do so.

### **7.3 Learner Voice**

Learners are regularly invited to contribute their views on how safe they feel and how safeguarding arrangements are working. Feedback is gathered through surveys, forums, focus groups and course reviews. Themes are analysed and reported to leaders and governance to inform continual improvement.

## **8. Learners and apprentices who may present a risk to other apprentice or learners (Child on Child), including sex offenders and violent offenders.**

8.1 All TRN staff should know the different forms Child on Child abuse can take, such as:

- bullying (including cyberbullying, prejudice-based and discriminatory bullying)
- abuse in intimate personal relationships between Children
- physical abuse which can include hitting, kicking, shaking, biting, hair pulling, or otherwise causing physical harm
- sexual violence and sexual harassment.
- Consensual and non-consensual sharing of nude and semi-nude images and/or videos (also known as sexting or youth produced sexual imagery)
- Up skirting- Up skirting 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).

All allegations of Child-child abuse should be taken seriously, staff need to make clear TRN has a zero-tolerance approach to abuse and harassment inclusive of sexual harassment and it will never be passed off as "banter/just having a laugh"/"I'm just joking"/part of growing up/boys being boys/kids being kids"

8.2 If any member of staff becomes aware or is concerned that an apprentice or learner who is enrolling or has already enrolled on a program of learning; may have been involved in sexual or violent offences; this information needs to be passed immediately to a DSO. The DSO will contact outside agencies to obtain any risk information on a 'need to know' basis and liaise with the LDSO or Managing Director about the action to be taken. Train Ltd accepts it has a role in rehabilitation of offenders but will assess the risks to other apprentices or learners especially when these are children or vulnerable adults.

### **8.3 Child-on-Child Sexual Violence and Harassment**

TRN has a zero-tolerance approach to child-on-child sexual violence and sexual harassment. All disclosures or concerns are taken seriously, recorded, investigated and responded to promptly. Safety planning and risk assessments will be completed immediately, considering the needs of both the victim and the alleged perpetrator. Appropriate curriculum, pastoral and external support will be put in place. Decisions about sharing information with employers, parents/carers or external agencies will be made by the LDSO/DSO in line with statutory guidance.

## **9 Allegations of an apprentice or learner abusing another apprentice or learner (Child on Child abuse).**

9.1 If an apprentice or learner has reported being abused by another apprentice or learner, a DSO should be contacted immediately.

9.2 The apprentice or learner who it is alleged has been abused will be advised to report the incident to the police. In some circumstances the DSO will contact the Police especially if the alleged victim is a child or vulnerable.

9.3 If the apprentice or learner is under 18 years, their parents may be contacted (apprentices or learners wishes will be considered when deciding this).

9.4 Serious consideration of immediate suspension of the apprentice or learner who is alleged to have abused the other apprentice or learner will be given whilst an investigation is undertaken. If the decision is taken not to suspend the apprentice or learner, a risk assessment will be undertaken, and a risk management plan put in place (coordinated by a DSO).

9.5 If an investigation is being conducted by an external agency, it is likely that Train Ltd will need to wait for the outcome of this to undertake its own investigation. The safety of other apprentices or learners must be considered in any disciplinary process. Support needs to be offered to the apprentice or learner alleging abuse and where appropriate the alleged abuser.

## **10 External Speakers and their responsibilities**

10.1 An external speaker, guest speaker or visitor is used to describe any individual or organisation who is not a learner or staff member of TRN and who has been invited to speak to learners and/or staff. This includes any individual who is a learner or staff member from another organisation.

10.2 An event is any event, presentation, visit, activity or initiative organised by a learner group/society, individual or staff member that is being held on TRN premises or where TRN is being represented by a stand on non-TRN premises e.g. at an exhibition, school event or fair. It includes events where external speakers are streamed live into an event or a pre-recorded film is shown. It also includes activity being held on TRN premises but organised by external venue hire clients.

10.3 Should an external speaker be left unsupervised with learners at any time, the person who has arranged for the external speaker to attend an event must have seen the external speakers DBS police check.

10.4 All speakers or visitors should be made aware by the person or group arranging the event that they have a responsibility to abide by the law and TRN policies including that they:

- Must not advocate or incite hatred, violence or call for the breaking of the law, including incitement against British Values
- Are not permitted to encourage, glorify or promote any acts of terrorism including individuals, groups or organisations that support such acts
- Must not spread hatred and intolerance in the community and thus aid in disrupting social and community harmony

- Must be mindful of the risk of causing offence to or seek to avoid insulting other faiths or groups, within a framework of positive debate and challenge
- Are not permitted to raise or gather funds for any external organisation or cause without express permission of TRN (available from Managing Director or Board Director)
- Are not permitted to use presentations or notes unless these have been seen by the person who has arranged for the external speaker to attend prior to the event.

## **11. Information for apprentices, learners, and parents**

11.1 Learners, apprentices and parents (where applicable) will be provided with information regarding Train Ltd's Safeguarding Procedures and also a confidential help line and contact numbers.

11.2 Learners and apprentices can access safeguarding designated contact information on Train Ltd's website where there is information about what to do and who they can tell at Train Ltd if they are experiencing abuse, and with links to other helpful websites. Information about staying safe is given to all apprentices or learners at induction. Posters and other publicity and leaflets are on display and available around training rooms.

## **12. Record Keeping**

12.1 Confidential records will be kept for all concerns relating to abuse. All records should be passed to the LDSO to be stored securely in line with GDPR regulations.

### **12.2 Transfer and Retention of Safeguarding Records**

When a learner under 18 transfers to another provider, TRN will transfer all relevant child protection files securely and without delay. Records are retained and archived in accordance with statutory guidance, local procedures and TRN retention schedules.

### **12.3 Single Central Record**

TRN maintains a Single Central Record (SCR) of all required pre-appointment checks, including identity, right to work, DBS, barred list checks, qualifications and references, in line with KCSIE 2025.

## **13 Reporting and dealing with allegations against members of staff or associates**

13.1 It is essential that any allegation of abuse made against a member of staff or associate is dealt with fairly, as quickly as possible, and consistently, in a way that provides effective protection for the apprentice or learner and at the same time supports the person who is the subject of the allegation.

13.2 Train Ltd recognises that an allegation of abuse made against a member of staff may be made for a variety of reasons and that the facts of the allegation may or may not be true. It is imperative that those dealing with an allegation maintain an open mind and that investigation is thorough and not subject to delay.

13.3 The Children Act 1989 states that the welfare of the child is the paramount concern. It is also recognised that hasty or ill-informed decisions in connection with a member of staff can irreparably damage an individual's reputation, confidence, and career. Therefore, those dealing with such allegations within Train Ltd will do so with sensitivity and will act in a careful, measured way.

13.4 When allegations are made about a member of staff, the LDSO should assess the risk of harm to the learner or other learners if the member of staff remains in post while the investigation is ongoing

13.5 Allegations of abuse will be reported by a DSO to the relevant Local Children's Safeguarding Board (or Adults Safeguarding Board where applicable) and following local council safeguarding procedures. Relevant contact details can be located in section 21 of this policy.

13.6 A member of staff who receives an allegation from an apprentice or learner about another member of staff should follow the guidelines in section 6 of this policy. The same applies if a member of staff witnesses behaviour that they consider to be abusive by another member of staff. They must immediately inform a DSO.

13.7 The DSO will contact the LDSO (unless the LDSO is the person against whom the allegation is about, in which case the report will be made to the Managing Director).

13.8 The DSO will provide the LDSO with written details of the allegation that include information about times, dates, location, and names of potential witnesses. The written details will be signed and dated by the member of staff who received the allegation and countersigned by the DSO.

13.9 The LDSO will make an initial assessment consulting with the relevant agencies where necessary as to:

- whether the alleged behaviour harmed a child or adult at risk, is a possible criminal offence, or indicates that an adult is unsuitable to work with children and/or vulnerable adults.
- whether an allegation to be managed under this procedure requires a Children's Social Care Assessment or Adult Protection Assessment and/or a police criminal investigation, or whether it can be dealt with solely via Train Ltd's procedures.

13.10 If the LDSO and the Local Authority Designated Officer (LADO) agree a referral is appropriate, this will be made by the DSO to the LADO using the relevant referral form within one working day of the incident being reported.

13.11 It is important that the DSO does not investigate the allegation. The initial assessment should be on the basis of the information received and is a decision whether or not the allegation warrants further investigation. Other potential outcomes are:

- The allegation represents inappropriate behaviour or poor practice by the member of staff and is neither potentially a crime nor a cause of significant harm to the child/vulnerable adult. The matter should be addressed in accordance with Train Ltd disciplinary procedures.
- The allegation can be shown to be false because the facts alleged could not possibly be true.

## **Suspension of Staff**

13.12 Suspension of staff will not be automatic. Suspension may be considered at any stage of the investigation. It is a neutral not a disciplinary act and shall be on full pay. The suspension procedure as detailed in the disciplinary policy will be observed.

13.13 The apprentice or learner making the allegation and/or their parents/carers will be informed of the outcome of the investigation and proceedings.

## **Allegations without foundation**

13.14 False allegations may be indicative of problems of abuse elsewhere. A record will be kept, and information passed to the LADO, in order that other agencies may act upon the information.

13.15 In consultation with the LDSO and/or the Managing Director, the DSO shall:

- Inform the member of staff against whom the allegation is made that no further disciplinary or Child/Adult Protection action will be taken.
- Inform the parents/carers of the alleged victim that the allegation has been made and of the outcome (where appropriate with the agreement of the apprentice or learner).
- Where the allegation was made by an apprentice or learner other than the alleged victim, consideration to be given to informing the apprentice or learner and parents/carers if they are under 18.
- Prepare a report that will be kept with safeguarding records, outlining the allegation, and giving reasons for the conclusion that it had no foundation and confirming that the above action had been taken.

## **Low Level Concerns**

13.6 Low-level concerns about adults are behaviours that do not meet the harm threshold but may be inconsistent with TRN's Code of Conduct. All low-level concerns must be reported to the LDSO and recorded. Records will be reviewed to identify any patterns of concerning, problematic or inappropriate behaviour. Staff are encouraged to report low-level concerns openly and in a culture of professional curiosity.

## **14. Enquiries and Investigations**

14.1 Child or adult protection enquiries by Social Care or the police are not to be confused with internal disciplinary enquiries by Train Ltd. Train Ltd may be able to use the outcome of external agency enquiries as part of its own procedures. The Child and Adult Protection agencies, including the police, have no power to direct Train Ltd to act in a particular way in respect of the management of staff. However, Train Ltd is obliged to assist the agencies with their enquiries.

14.2 Train Ltd will hold in abeyance its internal enquiries while the formal Police or Social Care investigations proceed; to do otherwise may prejudice the investigation. Any internal enquiries shall adhere to the existing staff disciplinary procedures. If there is an investigation by an external agency, for example the police, the DSO should normally be involved in, and contribute to, the inter-agency strategy discussions which are facilitated by the LADO.

14.3 The DSO is responsible for ensuring that Train Ltd gives every assistance with the agency's enquiries. S/he will ensure that appropriate confidentiality is maintained in connection with the enquiries, in the interests of the member of staff about whom the allegation is made, and

of the child or young person making the allegation. The DSO shall advise the member of staff that s/he should consult with a representative, for example, a trade union and seek the support of a counselling service.

14.4 Subject to agreement of the LADO and the police or other investigating agency, the DSO shall:

- Inform the apprentice or learner or parent/carer (where appropriate) making the allegation that the investigation is taking place and what the likely process will involve.
- Ensure that the parents/carers of the apprentice or learner making the allegation have been informed that the allegation has been made and what the likely process will involve (where appropriate, and in most cases with the agreement of the apprentice or learner).
- Inform the member of staff against whom the allegation was made of the fact that the investigation is taking place and what the likely process will involve.
- Inform the Managing Director of the allegation and the investigation.

14.5 The DSO shall keep a written record of the action taken in connection with the allegation. On completion of the investigation the LADO will refer a member of staff who has been dismissed from regulated activity to the disclosure and barring services if they have met the requirement

- engaged in relevant conduct in relation to children and/or adults
- satisfied the harm test in relation to children and/or vulnerable adults; or
- been cautioned or convicted of a relevant (automatic barring either with or without the right to make representations) offence.

## **15. Records**

15.1 Records will be retained in a secure place, together with a written record of the outcome.

15.2 The LADO will be informed of the progress and outcomes of management of investigations and disciplinary processes.

15.3 If a potential outcome of an allegation and subsequent investigation is referral to the Independent Safeguarding Authority, this will be discussed with the LADO.

## **16. Monitoring Effectiveness**

16.1 Where an allegation has been made against a member of staff or associate, the DSO will, at the conclusion of the investigation and any disciplinary procedures, consider whether there are any matters arising from it that could lead to the improvement of Train Ltd policies and procedures. Consideration will also be given to the training needs of staff.

## **17. Staff Training and Information.**

17.1 All staff will complete formal training in Safeguarding Adults and Children and Young People within the first 6 months of employment as well as be trained in the company policies and procedures. This will consist of:

- The Education and Training Foundation Safeguarding
- Channel General awareness

- General Prevent awareness training
- Awareness of keeping children safe in education.

#### 17.2 Additionally DSO's will complete:

- The Education and Training Foundation Safeguarding & Safer Recruitment in FE, if responsible for staff recruitment.
- Safer Recruitment
- Awareness of keeping children safe in education
- Other Safeguarding training relevant to their role

### 17. 3 Staff Reading Requirement

All staff, including temporary staff, contractors and volunteers, must read and understand Part 1 (or Annex A, where appropriate) of Keeping Children Safe in Education 2025. TRN maintains a formal record of staff confirmation that they have read and understood the required sections. All staff receive regular safeguarding updates, at least termly, via briefings, newsletters or meetings.

### 18. IT and Social Media usage

IT and Social Media usage by staff, apprentice or learners will be monitored in accordance with policy HS 08 E Safety and Acceptable use of ICT and HS 10 Prevent Duty Risk Assessment.

18.1 Any cyber crime or mis-use of IT equipment will be reported to the police and the DSO. mis use of equipment can be (but is not exclusive to)

- ☐ searching of adult/pornographic sites.
- ☐ Participating in cyber bullying
- ☐ Participating in or sharing of any hate crime materials
- ☐ Searching of or active participation with any radicalization groups
- ☐ Participation of identity/financial fraud

18.2 TRN recognises the benefits of social media and the internet in modern lives and aims to work with employees/learners/parents and carers to reduce the risk access can produce. All staff and learners complete online safety training where the aim is to educate all employees and learners to the risks presented and provide our learners with the support and guidance they need to stay safe on line.

18.3 TRN ensures that all centre IT equipment that learners have access to has filters on through Impero software this is managed by SMART IT contract who is our external IT provider. Andrew Naylor is internally responsible for managing and monitoring this process. Daily reports that indicate all activity logged for blocked sites pertaining to the list in 18.1 are received and analysed daily to allow for investigations to take place if required.

18.4 Imperio software will be reviewed annually to ensure that this remains the most suitable software provision.

### 18.5 Online Safety Oversight

TRN maintains robust filtering and monitoring systems appropriate to the age and needs of our learners. The effectiveness of these systems is reviewed regularly by senior leaders, and the



outcome of these reviews is reported to governance. Leaders consider residual risks and take account of learner feedback and incident data when updating online safety arrangements.

## **19. Failure to comply with the Safeguarding Policy**

Staff who fail to report concerns, suspicions or allegations of abuse will be subject to Company Disciplinary Procedures.

## **20. Learning Lessons**

When there have been any safeguarding incidents at TRN, the staff are committed to reviewing incidents to ensure there is no improvements needed to the way that we support or carry out safeguarding processes within our centres. This will be completed in the monthly safeguarding forum.

## **21. Code of Professional Conduct**

Train Ltd has developed a Code of Professional Conduct to help protect its apprentices, learners, and employees. We recognise that it is not practical to provide definitive instructions that would apply to every situation where staff members come into contact with apprentices or learners, but the following points cover the minimum standards Train Ltd expects from its staff to minimise any risk to themselves and apprentices or learners.

### **Staff should:**

- ✓ Treat everyone with respect & be professional
- ✓ Act as positive role model
- ✓ Avoid physical contact with an apprentice or learner (unless they are in danger of harming themselves or others, or if it is essential to administer first aid to an apprentice or learner)
- ✓ Set and monitor appropriate boundaries and relationships when working with apprentices or learners, based on openness, honesty and respect for the apprentice or learner's personal space.
- ✓ Plan activities that avoid you working in isolation with an apprentice or learner where possible.
- ✓ Create and maintain a safe and supportive environment that enables apprentices or learners to raise concerns about attitudes or behaviour they do not like.
- ✓ Challenge activities which are abusive e.g. initiation ceremonies, bullying, including those from an apprentice or learners and apprentices peers.
- ✓ Challenge inappropriate behaviour from an apprentice or learner such as jokes or language that is discriminatory or offensive
- ✓ Challenge sensitively inappropriate behaviour from an apprentice or learner such as a crush on an Assessor, or attention seeking behaviour. If this is focused on you, inform your supervisor.
- ✓ Support an apprentice or learner to make a complaint.
- ✓ Act if you have concerns about an apprentices or learner's welfare, or if the apprentice or learner has concerns about the behaviour of another person towards them.

**Staff must not:**

- ✓ Treat young people or vulnerable adults or other apprentice or learners as children.
- ✓ Be aggressive or threatening in their manner or tone of voice.
- ✓ Do anything which could be construed as bullying.
- ✓ Never indulge in actions or language that demeans or makes fun of apprentices or learners.
- ✓ Re-enforce negative emotions/behaviours.
- ✓ Spend excessive time with one apprentice or learner more than, or away from, other apprentices or learners or indicate favouritisms for an apprentice or learner.
- ✓ Transport or have young people in their own in a vehicle (except in the case of an emergency).
- ✓ Engage in flirting, innuendo or making sexually suggestive actions or comments to, or within earshot of apprentices or learners even if in fun.
- ✓ Allow or engage in inappropriate touching of any kind.
- ✓ Indulge in or repeat jokes or language that is discriminatory or potentially offensive with or within earshot of apprentices or learners.
- ✓ Dismiss an allegation of any sort of abuse relating to an apprentice or learners' welfare.
- ✓ Delay the reporting of an allegation.
- ✓ Take photographs of apprentices or learners without permission. (Photographing young people and vulnerable adults should only be taken/used if written consent has been obtained from a parent or guardian).

**22 Contact Referral list – useful numbers:**

Safeguarding **Adult** Concerns should be raised with the appropriate Local Authority as follows

**Gateshead**

Contact Adult Social Care Direct on 0191 433 7033, 24 hours a day, 7 days a week

**North Tyneside**

Contact Gateway service- Telephone: (0191) 643 2777 (office hours) or 0330 333 7475 (evenings and weekends)

**Sunderland**

Contact Adult Safeguarding Team on 0191 5618934 or 0191 5618936 (8.30am to 5:15pm Monday - Thursday, 8.30am to 4.45pm Friday).

If you are concerned that immediate action may be needed from the emergency services, you should dial 999.

Safeguarding **Children** Concerns should be raised with the appropriate Local Authority as follows:

**Gateshead**

Contact Gateshead Council's Children's Services on 0191 433 2653, 24 hours a day, 7 days a week.

**North Tyneside**

Contact Local Authority Designated Officer 0345 2000 109

**Sunderland**

Contact Together for Children on 0191 561 7007 (available 8.30am to 5:15pm Monday - Thursday, 8.30am to 4.45pm Friday)

If you are concerned that immediate action may be needed from the emergency services, you should dial 999.

TRN Designated Safeguarding Officers:

Lead Designated Safeguarding Officer – Natalie Wheeler;

[natalie.wheeler@trainltd.org](mailto:natalie.wheeler@trainltd.org) 0736 552 6074 or 0191 4902563

Deputy Lead Designated Safeguarding Officer - Michelle Burke;

[michelle.burke@trainltd.org](mailto:michelle.burke@trainltd.org), 0740 385 8810 or 0191 477 0840

Designated Safeguarding Officer- Andrew Naylor; [andrew.naylor@trainltd.org](mailto:andrew.naylor@trainltd.org), 07450 156215 or 0191 477 0840

Designated Safeguarding Officer - Teresa Dowd; [teresa.dowd@trainltd.org](mailto:teresa.dowd@trainltd.org), 07706352178 or 0191 477 0840

Designated Safeguarding Officer – Edward Clark; [Edward.Clark@trainltd.org](mailto:Edward.Clark@trainltd.org) 0191 477 0840

Concerns can also be raised by email: [safe@trainltd.org](mailto:safe@trainltd.org)

**Other useful contacts:**

For non-emergencies you can contact Police on 101.

Childline on 0800 1111. This is a free 24 hour number offering advice and support.

Parent line Plus: 0808 8002 222

NSPCC: 0808 8005 000