

TDR PO – 119

Safeguarding Policy

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Approved by	TDR Training Ltd (TDR) Directors
Signed	
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1. Purpose

TDR has both a moral and statutory duty to ensure that we operate with a focus on the safeguarding and wellbeing of those who receive training and assessment from us. The purpose of this policy is to outline the approach TDR adopts to ensure that they meet the statutory requirements and is mandatory for all employees and learners. TDR will ensure that this policy will be promoted to all relevant parties.

2. Scope

Safeguarding practices are most commonly applied to children and young people under the age of 18 (eighteen). Throughout various pieces of legislation and guidance, the two terms are sometimes differentiated, where 'children' refers to those under the age of eighteen who are still in full-time education, and 'young people' refers to those under the age of eighteen who have left full-time education. For the purpose of clarity, throughout this policy and related procedures documents, TDR uses the term 'young people' or 'young person'.

TDR also recognise that some adults are also vulnerable to abuse, in instances of this nature the policy and associated procedures may be applied (with appropriate adaptations) to allegations of abuse and the protection of adults at risk. An adult at risk as defined by the Care Act 2014 may be defined as someone who:

- (a) has needs to care and support
- (b) is experiencing, or is at risk of , abuse and neglect, and
- (c) as a result of those needs is unable to protect himself or herself against the abuse or neglect or the risk of it

3. Background

TDR is committed to providing a safe and secure environment for all learners, employees and visitors who access its facilities and services.

TDR recognises its particular responsibility to safeguard the wellbeing of young people and vulnerable adults engaged in TDR's activities by ensuring that there are appropriate arrangements in place to enable it to discharge its duty to provide a safe and secure environment and to deal with issues concerned with suspected or reported abuse of young people and vulnerable adults.

TDR seeks to ensure that its policy and procedures comply with statutory duties, reflects guidance and good practice in safeguarding children and vulnerable adults, and that safeguarding arrangements are proportionate and based upon common sense.

TDR recognises that it has a duty to help staff members and learners recognise their responsibilities (through guidance, support and training), minimise risk and avoid situations (where possible) where abuse or neglect might be alleged. It is not intended that staff members should be restricted from normal ways or working, but they are advised to consider how an action may be misperceived.

4. Safeguarding Approach and consideration

All staff members working with learners need to consider how to avoid putting themselves in positions where abuse might be alleged and also know what to do if they should suspect an individual is being abused. All employees should be aware of the dangers inherent in:

- Working alone with a child/vulnerable adult.
- Physical interventions.

- Cultural and gender stereotyping.
- Dealing with sensitive information.
- Contacting learners through private telephones (including texting), e-mail, MSN (Microsoft Network) or social networking websites.
- Disclosing inappropriate personal details.
- Meeting learners outside of duties/business.

In order to ensure that learners are protected whilst participating in any of our programmes TDR will ensure that our staff members:

- Are carefully selected, screened and supervised.
- Are DBS checked as appropriate.
- Receive basic information in line with the Local Safeguarding Children's and Adult Board guidelines, Care Act 2014, Working Together to Safeguard Children 2023 and Keeping Children Safe in Education 2024.
- Receive necessary training that will enable them to fulfil their responsibilities in respect of safeguarding children, young people and vulnerable adults.

We recognise that statistically, children/young people with disabilities and/or behavioural difficulties are more vulnerable to harm/abuse. TDR staff who deal with children/young people with disabilities, sensory impairments and/or emotional and behavioural problems recognise that these children can face additional safeguarding challenges such as:

- assumptions that indicators of abuse such as behaviours, mood and injury automatically relate to a child's disability without further exploration;

- being more prone to child group isolation or bullying (including prejudiced based bullying) than other children;
- that children with SEN and disabilities can be disproportionately impacted by things like bullying – without outwardly showing any signs; and
- communication barriers and difficulties in overcoming these barriers.

Within the workplace a mentor will be appointed for each learner and the relevant TDR employee will work closely with this named person (i) to ensure learners receive the necessary support in order to complete all outcomes identified within their Commitment Statement and (ii) to have due regard for the learner's welfare.

For learners with additional vulnerabilities such as SEN, staff members will be made aware at time of onboarding and the necessary support and care package will be put in place for the learner to recognise and respond to signs of abuse or neglect. Resources will be made available for the staff members and learners.

Any suspicion with regard to a learner's welfare should be brought to the attention of TDR as soon as identified.

If an allegation is made that someone may have:

- Committed an offence against a learner.
- Placed a learner at risk of significant harm.
- Behaved in a way that calls into question their suitability to work with learners.

Any allegation will be handled as a matter of urgency and be brought immediately to the attention of the Designated Person for safeguarding who will gather information about the allegation and report this without delay to the

relevant party. Any steps required to remove the learner from harm will be agreed with all interested parties and implemented with immediate effect.

TDR works closely with its partner agencies, to ensure information is shared and referrals are made as appropriate. All TDR employees working with learners will receive training adequate to familiarise them with Safeguarding issues and responsibilities and TDR procedures and policies, with refresher training at regularly defined intervals. The Chief Executive Officer of TDR will have ultimate responsibility for Safeguarding issues and they will be assisted by other members of staff with the responsibility of Safeguarding.

5. Key Definitions and Concepts

Keeping Children Safe in Education 2024 sets out definitions of the four broad categories of abuse which are used for the purpose of making a child subject to a Child Protection Plan. These broad categories are a useful guide for employees who have responsibility for young people and vulnerable adults and should be considered at all times.

a. Physical Abuse – may involve hitting, shaking, throwing, poisoning, burning or scalding, drowning, suffocating, or otherwise causing physical harm to a child or young person. Physical harm may also be caused when a parent or carer fabricates the symptoms of, or deliberately induces, illness in young person.

b. Emotional Abuse – is the persistent emotional maltreatment of a young person such as to cause severe and persistent adverse effects on the young person's emotional development. It may involve conveying to young people 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 young person 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 young people. These may include interactions that are beyond the young person's developmental capability, as well as overprotection and limitation of exploration and learning, or preventing the young person participating in normal social interaction. It may involve seeing or hearing the ill-treatment of another. It may involve serious bullying (including cyber bullying), causing young people frequently to feel frightened or in danger, or the exploitation or corruption of young people. Some level of emotional abuse is involved in all types of maltreatment of a young person, though it may occur alone.

c. Sexual Abuse – involves forcing or enticing a young person to take part in sexual activities, not necessarily involving a high level of violence, whether or not the young person 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 young people in looking at, or in the production of, sexual images, watching sexual activities, encouraging young people to behave in sexually inappropriate ways, or grooming a young person 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 young people.

d. Neglect – is the persistent failure to meet a young person’s basic physical and/or psychological needs, likely to result in the serious impairment of the young person’s health or development.

It may also include neglect of, or unresponsiveness to, a young person’s basic emotional needs.

e. Specific Issues and Further Information – There are 16 areas which require specific mention and further guidance should be sought for the following:

- Child Sexual Exploitation
- Bullying including cyberbullying
- Domestic Violence
- Drugs
- Fabricated or Induced Illness
- Faith Abuse
- Female Genital Mutilation (FGM)
- Forced Marriage
- Gangs and youth violence
- Gender based violence/violence against women and girls (VAWG)
- Mental Health
- Private Fostering
- Radicalisation
- Sexting
- Teenage Relationship Abuse
- Trafficking

f. Abuse of Trust – under the Sexual Offences Act 2003 it is an offense for a person over 18 to have a sexual relationship with a young person under 18 where that person is in a position of trust in respect of that young person, even if the relationship is consensual. This includes teaching and a range of support staff within educational establishments.

Any concerns regarding Abuse of Trust will be investigated under PO-106 Staff Disciplinary Policy and if appropriate will be reported to the Police.

In addition, the Care Act 2014 sets out a number of alternative definitions of abuse as follows, that must also be considered by TDR employees:

Physical

This includes assault, hitting, slapping, pushing, giving the wrong (or no) medication, restraining someone or only letting them do certain things at certain times.

Domestic

This includes psychological, physical, sexual, financial or emotional abuse. It also covers so-called 'honour' based violence.

Sexual

This includes rape, indecent exposure, sexual harassment, inappropriate looking or touching, sexual teasing or innuendo, taking sexual photographs, making someone look at pornography or watch sexual acts, sexual assault or sexual acts the adult didn't consent to or was pressured into consenting.

Psychological

This includes emotional abuse, threats of harm or abandonment, depriving someone of contact with someone else, humiliation, blaming, controlling,

intimidation, putting pressure on someone to do something, harassment, verbal abuse, cyber bullying, isolation or unreasonable and unjustified withdrawal of services or support networks.

Financial or material

This includes theft, fraud, internet scamming, putting pressure on someone about their financial arrangements (including wills, property, inheritance or financial transactions) or the misuse or stealing of property, possessions or benefits.

Modern slavery

This covers slavery (including domestic slavery), human trafficking and forced labour. Traffickers and slave masters use whatever they can to pressurise, deceive and force individuals into a life of abuse and inhumane treatment.

Discriminatory

This includes types of harassment or insults because of someone's race, gender or gender identity, age, disability, sexual orientation or religion.

Organisational

This includes neglect and poor care in an institution or care setting such as a hospital or care home, or if an organisation provides care in someone's home. The abuse can be a one-off incident or repeated, on-going ill treatment. The abuse can be through neglect or poor professional practice, which might be because of structure, policies, processes and practices within an organisation.

Neglect and acts of omission

This includes ignoring medical, emotional or physical care needs, failure to provide access to educational services, or not giving someone what they need to help them live, such as medication, enough nutrition and heating.

Self-neglect

This covers a wide range of behaviour which shows that someone isn't caring for their own personal hygiene, health or surroundings. It includes behaviour such as hoarding.

6. Staff with responsibility for safeguarding

TDR has in place a clear organisational structure for safeguarding young people and vulnerable adults across the organisation with a specific Safeguarding team in place.

Role of the Chief Executive Officer

The Chief Executive Officer has overall accountability for safeguarding young people and vulnerable adults at TDR and is informed of all safeguarding concerns raised.

Role of the Safeguarding Team

The Team coordinates and provides support for young people and vulnerable adults who disclose concerns that they may have or they have been, are being abused or are the victim of other inappropriate behaviour.

Role of the Safeguarding Officers

The Safeguarding Officers understand the safeguarding policies, procedures and can assist members of staff who report any concerns or safeguarding risks.

Identifying abuse, neglect or harm can assist vulnerable individuals in taking

their own decisions on safeguarding. They also maintain a proper reporting and recording system to support the designated persons in their roles.

Role of the Designated Safeguarding Lead (DSL) and Deputy Designated Safeguarding Lead (DDSL)

In those areas where staff members and learners work with young people and vulnerable adults as part of their roles, the Deputy Designated Safeguarding Lead is nominated to have responsibility for safeguarding in their area of responsibility. The Deputy Designated Safeguarding Lead will be the focal point for all safeguarding issues within that area but also other areas when needed for cover in the business. The core role and responsibilities of a DSL and DDSL are –

- The safeguarding lead should always be available to discuss any safeguarding issues.
- Informing the young person's safeguarding issues to the right agencies. Also, gathering more information if needed.
- Making sure the staff members are well-trained in safeguarding. And they have the ability to raise concerns.
- Taking regular training and ensuring their knowledge is up-to-date with the guidelines.
- Establishing adequate report and recording systems for the safeguarding procedures.
- Checking if the safeguarding policies are coordinated with the most recent statutory guidelines. Also, ensuring that everyone responsible for safeguarding is aware of the updates.

- Abiding by the Local Safeguarding Children Partnership (LSCP) requirements.
- Ensuring that there is adequate safeguarding procedure in the organisation
- Identifying young people who have particular vulnerabilities and need some specific safeguarding procedures.
- The Designated Safeguarding Lead will chair the Safeguarding meetings held throughout the year.

Role of the HR Department

Where an allegation of abuse or inappropriate behaviour is made against a TDR employee and relates to their actions as a member of TDR, the HR department will advise and guide the line manager of the employee against whom allegations have been made in relation to employment issues.

Where an allegation of abuse or inappropriate behaviour is made against a learner and relates to their actions as a stakeholder of TDR, HR department will contact the relevant TDR Manager/Lead (or learner employer where appropriate) in relation to learner discipline issues.

Role of Employee

TDR staff members working in direct contact with young people and vulnerable adults on a day-to-day basis (i.e. staff members involved in teaching and providing pastoral guidance to learners) may come across signs of harm and/or abuse. Staff members need to ensure that significant concerns for the wellbeing of a young person or vulnerable adult are reported to the safeguarding team within 24 hours using the TDR 82 Record of Concern Form. They must note the

details of the concern on the form and forward to a member of the safeguarding team who will categorise the concern and investigate further if needed, invoking the appropriate procedures to protect the young person or vulnerable adult.

TDR's Safeguarding Team:

Li Xue (DSL)	lixue@tdrtraining.co.uk
Reece Shotton (DDSL)	reeceshotton@tdrtraining.co.uk
Ivy Mead (DDSL)	ivymead@tdrtraining.co.uk
Iain Heppell (Safeguarding Officer)	iainheppell@tdrtraining.co.uk
Louise Cook (Safeguarding Officer)	louisecook@tdrtraining.co.uk

Employers and subcontracted providers TDR partner with should have a nominated safeguarding lead. Subcontractors TDR work with are contracted to follow TDR Safeguarding Policy in dealing with TDR learners.

Role of the Police

Under the Children and Families Act 2014, the police, working with other agencies (such as the Local Authority children's social care services, health and education services), are responsible for making enquiries to safeguard the welfare of any child within their area who is suffering (or likely to suffer) significant harm. The police also have a duty to refer to the Local Authority those children 'in need' whom they come into contact with in the course of their work.

Local Safeguarding Children / Adult boards

Local Safeguarding Children/ Adults Boards are multi-agency bodies set up in every local authority. They lead and co-ordinate the effectiveness of the safeguarding work of their members and partner agencies to protect children and adults at risk. In England these are set up under the Children and Families

Act 2014 and the Care Act 2014; and in Wales under the Social Services and Well-being (Wales) Act 2014.

Local Authority Designated Officer (LADO)

Each Local authority have their own safeguarding team and reporting procedures for the TDR DSL or DDSL to report to. They can also be contacted out of hours if learners are unable to reach a member of staff or the safeguarding team at TDR.

Newcastle Safeguarding Team:

Phone 0191 278 8377 (Monday to Friday, 8am-5pm)

Phone 0191 278 7878 (Evenings and Weekends)

Text/SMS 07968474891 (Monday to Friday, 8am-5pm)

Email: scadmin@newcastle.gov.uk

North Tyneside:

The LADO for North Tyneside Council is:

Quadrant

Silverlink North

Cobalt Business Park

North Tyneside

NE27 OBY

Telephone: 0345 2000 109 (within office hours)

Emergency Duty Team: 0330 333 7475 (out of hours)

If contacting by E-mail: childrenandadultscontactcentre@northtyneside.gov.uk

Please note this mailbox is checked daily Monday – Friday 9:00 – 16:30.

Front Door Service at North Tyneside

Quadrant East

Silverlink North

Cobalt Business Park

North Tyneside

NE27 0BY

0345 2000 109

0191 200 6800 (out of hours)

0191 643 2413

childrenandadultscontactcentre@northtyneside.gov.uk

Northumberland Safeguarding Team:

Children's Services:

24/7 Onecall telephone: 01670 536400 to speak to a member of staff.

Gateshead: The Safeguarding Business Unit

First Floor

Civic Centre

Regent Street

Gateshead

NE8 1HH

07395 361 053

Safeguarding Children's Business Manager

AnnaharrisonCWL@gateshead.gov.uk

Safeguarding Adults Business Manager

catherinehardman@gateshead.gov.uk

South Tyneside: Safeguarding Team

Phone 0191 424 5010 (Monday to Thursday 08:30am-5pm, Friday 08:30am-4:30pm).

Phone 0191 456 2093 (out of hours).

Sunderland:

Together for Children

Phone 0191 5205560 (available 8.30am to 5.00pm Monday - Thursday, 8.30am to 4.30pm Friday);

Out of Hours Team 0191 520 5552 (also available 24 hours Saturday and Sunday).

MASH Professional Helpline 0191 643 5555

Adult Social Care Gateway Team 0191 6432777

Police Emergency 999 Non-emergency number 101

Prevent Duty Dedicated DFE (Department for Education) Prevent line 020 7340 7264

NSPCC Help Lines: National Whistleblowing helpline 0800 028 0285

help@nspcc.org.uk

Report Abuse in Education helpline 0800 136 663 help@nspcc.org.uk

7. Guidelines for Working with Young People and Vulnerable Adults

The following guidelines should be referred to and considered prior to any engagement with young people or vulnerable adults:

- TDR staff members should conduct meetings with young people or vulnerable adults either with another staff member present or in an open environment (e.g. leave office door open and do not hold meetings when lone working i.e. when others are out of eyesight/earshot).

- TDR staff members should not meet with learners outside of the work environment.
- If physical contact is necessary e.g. for demonstration purpose, ensure it takes place only with the full consent of the young person or vulnerable adult and that its purpose is clear.
- TDR staff members should not use touch as a form of communication, even to comfort a distressed young person or vulnerable adult.
- TDR staff members should never (even in fun)
 1. Initiate or engage in sexually provocative conversations or activities.
 2. Allow the use of inappropriate language to go unchallenged.
 3. Trivialise or exaggerate learner abuse issues.
- TDR staff members must respect a learners' right to privacy and encourage learners to feel comfortable enough to report attitudes or behaviour they do not like.
- All pre-existing relationships between TDR staff members and learners must be declared to a member of the management team.
- Consider implications transporting young people or vulnerable adults in your own vehicle, TDR's policy is not to allow a learner in a staff members vehicle, if transport is required then other arrangements are to be organised with the company i.e. travelling with peers or a taxi.
- TDR staff members should not show favouritism to any one learner, nor should they issue or threaten any form of physical punishment.
- TDR staff members should never allow any allegation made by a learner to go without being reported and addressed.

- TDR staff members should never make any promises to keep any disclosure confidential from relevant authorities.
- If a TDR staff member finds themselves the subject of inappropriate affection or attention from a learner they should make others aware of this issue.

8. Responding to an Observation or Disclosure

In the event of an observation or disclosure being raised the following guidelines should be referred to and considered:

- Do not promise confidentiality.
- Do not offer guidance or advise, this can only be done by trained professionals.
- Listen to what is being said, without displaying shock or disbelief.
- Accept what is said.
- Reassure the learner but do not make promises that you may not be able to keep.
- Questions should be kept to the minimum necessary to understand what is being alleged.
- Do not interrogate the learner; it is not your responsibility to investigate.
- Do not ask leading questions.
- Do not ask the learner to repeat the information for another employee.
- Explain what will happen next and who will be consulted.
- Take notes if possible, to be written or transferred onto the TDR 82

Record of Concern but ensure confidentiality is maintained.

9. Safeguarding concerns or allegations made about staff, including supply teachers, volunteers and contractors

If staff have a safeguarding concern or an allegation of harming or posing a risk of harm to children and young adults is made about another member of staff (including supply staff, volunteers, and contractors), then:

- this should be referred to the departmental Manager;
- where there is a concern/allegation about the departmental Manager, this should be referred to the CEO;
- in the event of a concern/allegation about the CEO, this should be referred to the TDR Trust Board.

The following two sections cover different levels of concerns and allegations:

a. Concerns/allegations that may meet the harm threshold

The following list includes behaviour that may have happened outside of school or training establishments, which might make an individual unsuitable for working with children. This is known as transferable risk:

- behaved in a way that has harmed a child or may have harmed a child
- and/or
- possibly committed a criminal offence against or related to a child,
- and/or
- behaved towards a child or children in a way that indicates he or she
- may pose a risk of harm to children and/or
- behaved or may have behaved in a way that indicates they may not be
- suitable to work with children.

Where appropriate, an assessment of transferable risk to children with whom

the person works should be undertaken. If in doubt, the company will seek advice from the local authority designated officer (LADO).

When TDR identifies that a child and young adult has been harmed, that there may be an immediate risk of harm to a child or if the situation is an emergency, the Safeguarding team will contact local authority children's social care and as appropriate the police immediately.

There are two aspects to consider when an allegation is made:

- Looking after the child and young adult's welfare – the designated safeguarding lead (or a deputy) is responsible for ensuring that the child is not at risk and referring cases of suspected abuse to the local authority children's social care.
- Investigating and supporting the person subject to the allegation – the case manager should discuss with the LADO, the nature, content and context of the allegation, and agree on a course of action.

When dealing with allegations, TDR will:

- apply common sense and judgement
- deal with allegations quickly, fairly and consistently, and
- provide effective protection for the child and support the person subject to the allegation.

b. Concerns or allegations that do not meet the harm threshold

It is important that TDR manage "low-level" concerns appropriately, record any such concerns, and take appropriate action to safeguard children and young adults.

TDR promote an open and transparent culture in which all concerns about all adults working in or on behalf of TDR's safeguarding concerns are dealt with promptly and appropriately.

A low-level concern is any concern – no matter how small, and even if no more than causing a sense of unease or a 'nagging doubt' - that an adult working in or on behalf of TDR may have acted in a way that:

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

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

- being over-friendly with children or young adults;
- having favourites;
- taking photographs of children or young adults on their mobile phones, contrary to the company policy;
- engaging with a child or young adult on a one-to-one basis in a secluded area or behind a closed door, or;
- humiliating children or young adults.

Such behaviour can exist on a wide spectrum, from the inadvertent or thoughtless, or behaviour that may look to be inappropriate but might not be in specific circumstances, through to that which is ultimately intended to enable abuse.

Low-level concerns may arise in several ways and from a number of

sources. For example: suspicion, complaint, or disclosure made by a learner, parent or other adult within or outside of the organisation or as a result of vetting checks undertaken.

It is crucial that all low-level concerns are shared responsibly with the right person and recorded and dealt with appropriately. Ensuring they are dealt with effectively should also protect those working in or on behalf of TDR from becoming the subject of potential false low-level concerns or misunderstandings.

TDR encourages learners and staff to raise low-level concerns in order to:

- Ensuring staff are clear about what appropriate behaviour is, and are confident in distinguishing expected and appropriate behaviour from inappropriate, problematic or concerning behaviour, in themselves and others;
- empowering staff to share any low-level safeguarding concerns;
- addressing unprofessional behaviour and supporting the individual to correct it at an early stage;
- handling and responding to such concerns sensitively and proportionately when they are raised and;
- helping identify any weakness in TDR's safeguarding system.

All low-level concerns must be shared with the Safeguarding team and recorded in writing. The record should include details of the concern, the context in which the concern arose, and the action taken. The name of the individual sharing their concerns should also be noted. If the individual wishes to remain anonymous, that should be respected as reasonably possible.

Records will be reviewed to identify potential inappropriate, problematic or concerning behaviour patterns. Where a pattern of such behaviour is identified, the DSL will decide on a course of action, either through its disciplinary procedures or where a pattern of behaviour moves from a low-level concern to meeting the harm threshold, in which case it should be referred to the LADO. Consideration should also be given to whether there are wider cultural issues within TDR that enabled the behaviour to occur and where appropriate policies could be revised, or extra training should be delivered to minimise the risk of it happening again.

10. Child-on-child sexual violence and sexual harassment

TDR is committed to responding to all signs, reports and concerns of child-on-child sexual violence and sexual harassment, including those that have happened outside of the company premises and/or online. All staff working with children are advised to maintain an attitude of 'it could happen here', and this is especially important when considering child-on-child abuse.

There is a zero-tolerance approach in TDR to sexual violence and sexual harassment that it is never acceptable, and it will not be tolerated. It should never be passed off as "banter", "just having a laugh", "a part of growing up", or "boys being boys". Failure to do so can lead to a culture of unacceptable behaviour, an unsafe environment and, in worst-case scenarios, a culture that normalises abuse, leading to children accepting it as normal and not coming forward to report it.

Children who are victims of sexual violence and sexual harassment, wherever it happens, may find the experience stressful and distressing. This will, in all likelihood, adversely affect their educational attainment and will be exacerbated if the alleged perpetrator(s) attends the same education establishment.

Whilst any report of sexual violence or sexual harassment should be taken seriously, staff should be aware it is more likely girls will be the victims of sexual violence and sexual harassment, and more likely, it will be perpetrated by boys. Children with disabilities are also three times more likely to be abused than their peers.

Ultimately, all victims must be reassured that they are being taken seriously and that they will be supported and kept safe.

When concerns are raised regarding child-on-child sexual violence and sexual harassment, all staff should act in the best interests of the child and young adult. In all cases, staff should follow the general safeguarding reporting procedure as set out in this policy. Immediate consideration should be given as to how best to support and protect the victim and the alleged perpetrator(s) (and any other children involved/impacted).

11. Record Keeping

All concerns, discussions and decisions made, and the reasons for those decisions, will be recorded in writing. Response to any complaints about the way TDR has handled a case will also be recorded in line with the company's complaint policy.

Records should include:

- a clear and comprehensive summary of the concern

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

Documents relating to an investigation/incident are stored electronically in a secure location by the HR function.

12. Recruitment and Selection

TDR has in place an established recruitment and selection procedure and HR process that seeks to identify individuals who are unsuitable to work with young people and vulnerable adults. TDR will undertake appropriate recruitment and vetting checks on individuals who are being considered for employment working with young people and vulnerable adults. The approach adopted by TDR ensure compliance with guidance issued by the Department of Education, Ofsted and UK Employment Legislation.

13. Information Technology (IT) Safety

TDR put in place appropriate measures to ensure its IT resources are not used as a platform for inappropriate or explicit content. Any IT equipment available to learners has enabled filtering solutions that limit access to terrorist and extremist material. The following measures have been implemented in the company:

- All computers/laptops/printers/routers are locked down and need usernames and passwords to access, ensuring no one unauthorised can access our IT provision
- All internet history is naturally recorded and the laptops/computers are checked regularly for maintenance and safeguarding.

- As part of the induction, learners are educated on expectations regarding the IT provision and informed of the consequences of misuse.
- As part of the lessons “Prevent & British Values”, topics are regularly discussed to help learners understand the risks and reinforce those values.
- Learners are always supervised when using digital resources.

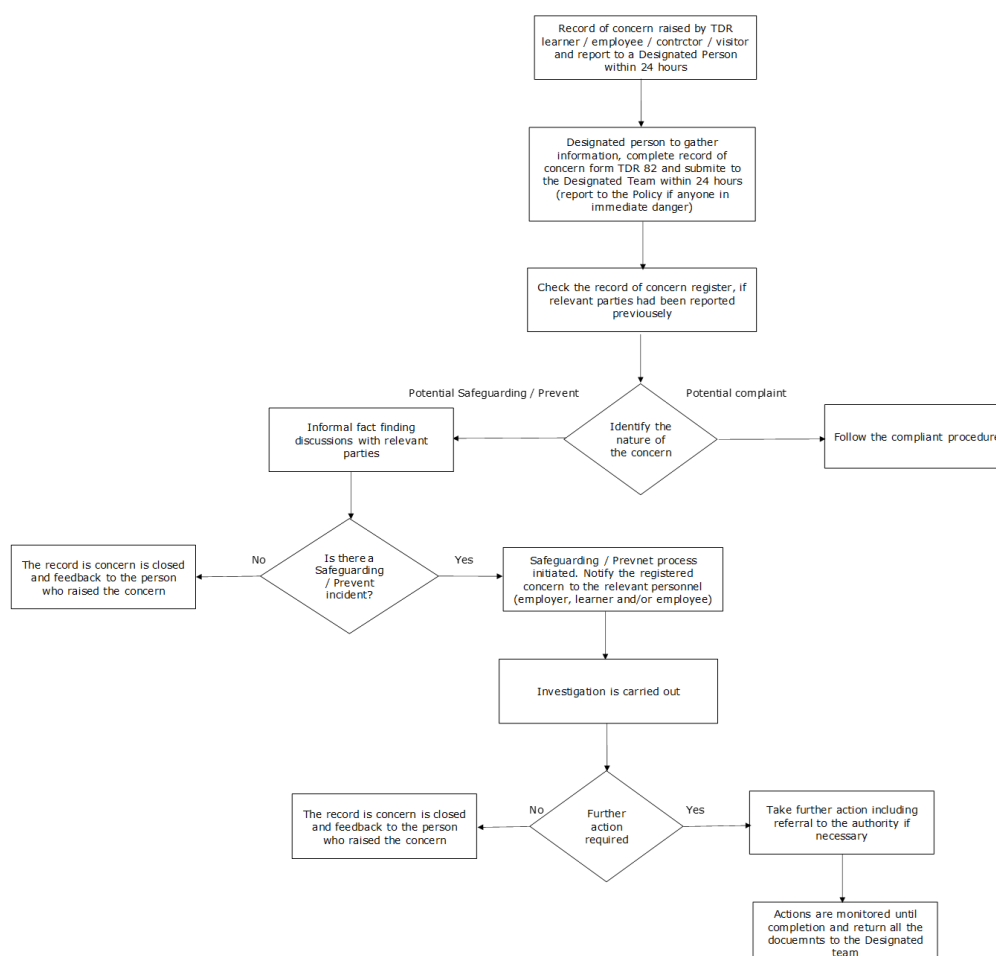
14. Sharing Information

Sharing of information between staff members and organisations is essential for effective identification, assessment, risk management and service provision. Early sharing of information is the key to providing effective early help where there are emerging problems. The GDPR and Data Protection Act 2018 do not prevent, or limit, the sharing of information for the purposes of keeping children and young people safe. Fears about sharing information cannot be allowed to stand in the way of the need to promote the welfare and protect the safety of children, young people and adults.

15. TDR Safeguarding / Prevent Procedure

We understand our responsibility in line with the Prevent Duty (2015) and can identify children who may be vulnerable to radicalisation and know what to do when they are identified. TDR also builds learners’ resilience to radicalisation by promoting fundamental British values and enabling them challenge extremist views. Learners are encouraged to debate controversial issues and provide a safe space in which learners and staff can understand the risks associated with terrorism and develop the knowledge and skills to be able to challenge extremist arguments.

DSLs and their deputies should access training to raise awareness of the Prevent agenda and issues of extremism and radicalisation.



16. Whistleblowing Policy

We have in place an effective Whistle Blowing Policy that staff have access to, understand, know its location, are clear on how it relates to their role in school and how it relates to the Safeguarding and Prevent policy and operating practices which are in place in TDR.

A copy of this policy is on the TDR's intranet where staff can access it, is reviewed at least annually by the Management and updated/re-briefed to all staff as part of our annual CPD/Staff training programme. Reference to the Whistleblowing Policy is also included in our staff code of conduct, alongside references to low-level concerns, allegations against staff, and acceptable use of technologies (including the use of mobile devices), staff/ learner relationships and communications including the use of social media.

ALL are made aware that we have a Whistleblowing Policy and as part of their induction are aware of how to raise concerns about poor or unsafe practice and potential failures in TDR and that Management team will seriously take these.

17. Annex 1 – Records of Review

<u>Date</u>	<u>Review Overview</u>
17/02/2020	Updated due to change in designated persons
08/02/2021	Section 6 – Designated persons list updated
08/03/2021	Section 12 - TDR Safeguarding / Prevent Procedure added
23/07/2021	Updated in line with internal structure changes
16/11/2022	Updated in line with internal structure changes
04/09/2023	Removed ESF logo.Updated to include safeguarding team structure, roles and LADO details.
14/02/2024	Updated legislations changes, Safeguarding and Prevent, Vulnerable learner information. Whistle Blowing Policy.
14/02/2025	Added information on safeguarding concerns or allegations made about staff, including supply teachers, volunteers and contractors and child-on-child sexual violence and sexual harassment.

18. Annex 2 – If required