



Safeguarding and The Prevent Duty

Policy and Procedures
V5 2024



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Safeguarding and The Prevent Duty Policy and Procedures

1 Policy Statement

Umbrella Training is fully committed to safeguarding the welfare of all stakeholders by taking all reasonable steps to protect them from harm and accepts its corporate responsibility for the well-being and safety for all learners including children and adults at risk.

The company recognises its responsibility and acknowledges that it is the duty of Umbrella Training's workforce in its entirety to uphold The Prevent Duty (including British Values) and to safeguard the welfare of all stakeholders by creating an environment that protects them from harm and reduces any potential risks of being exposed to violence, extremism, exploitation or victimisation.

Therefore, employees, volunteers, delivery partners and contractors will at all times show respect and understanding for the rights, safety and welfare of all parties and conduct themselves in a way that reflects the principles, values and culture of our organisation and be aware and follow current legislation regarding the safeguarding of all stakeholders. Our policy sets out, in detail, the roles and responsibilities of all parties in providing a safe working and learning environment whereby everyone is protected from abuse of any kind.

We will promote this Safeguarding and Prevent Duty Policy within the organisation during new starter inductions as part of their training plan, meetings and business updates. Additionally, we will promote the policy externally through discussions with our employer partners, onboarding of learners and apprentices, as part of the curriculum and in updates to stakeholders. We will drive policy commitment and engagement by making it relevant to the sectors we work with, keeping it current by responding to national and local news items and ensuring staff training and refresher training is varied and meets the needs of different role holders.

It is Umbrella Training's intention to:

- ensure that all stakeholders, including apprentices are protected from abuse regardless of sex, race, disability, age, sexual orientation, religion or belief, gender reassignment, maternity or because someone is married or in a civil partnership
- ensure that staff are appropriately trained in The Prevent Duty and understand the risk of radicalisation, their role in implementing the Prevent Duty, and the impact this has on their job role and how to refer an individual who they feel is at risk
- ensure staff are appropriately trained in Safeguarding and know what signs to look for, what their role is and how to report allegations
- ensure that appropriate supervision is given where required
- take the necessary steps to inform all stakeholders of relevant policies and procedures and Code of Conduct
- Carry out an annual review and monitor Umbrella Training's policies and procedures to ensure

our legal, moral and social responsibilities are met

- take all suspicions and allegations of abuse and risks of radicalisation extremely seriously and to respond to concerns with due speed and consideration
- work in partnership with and in accordance with organisations' procedures where required, including Designated Person in the local authority, safeguarding children partnership, safeguarding adult partnership and the Channel multi-agency panel.
- to comply with and maintain knowledge of all relevant legislation, codes of practice and appropriate guidance to any amendments to such
- have a Designated Safeguarding Lead (DSL) and Designated Safeguarding Officers (DSO's) in place to advise on and manage any concerns and referrals made
- ensure that relevant employment and security checks are undertaken, as required (including DBS)
- all personal data will be processed in accordance with the requirements of the Data Protection Act 1998 and meet GDPR requirements
- personal information is confidential and should only be shared with the permission of the individual concerned (and or those with parental responsibility) unless the disclosure of confidential information is necessary in order to protect a child or vulnerable adult from serious harm or promote their welfare. In all circumstances, information must be confined to those people directly involved in the professional work of each individual child or adult at risk and on a strict "need to know" basis.

The following policies demonstrate and support Umbrella Training's shared commitment to safeguarding and promoting the welfare of its stakeholders:

- Bullying and Harassment
- Public Interest Disclosure (Whistleblowing)
- Safeguarding Children and Adults at Risk
- Criminal Records
- Equality and Diversity
- Health & Safety
- Recruitment and Selection
- Complaints Procedure
- Code of Conduct
- Data Protection
- Disciplinary
- Grievance
- Internet Policy
- Lone Working
- Probation

Umbrella Training Designated Safeguarding Lead (DSL):			
Name	Role	Location	Contact Details
Angela Marder	Curriculum Manager	Remote	07534 499729
angela.marder@umbrellatraining.co.uk			

Umbrella Training Designated Safeguarding Officers (DSO):			
Name	Role	Location	Contact Details
Jenni Clarke	Commercial Director	Remote	07947 905602
jenni.clarke@umbrellatraining.co.uk			

Contact Information:	
Service	Contact Information
Childline	0800 1111
Child Exploitation and Online Protection Centre (CEOP)	http://www.there4u.info/index.html Follow links
Child and Family Consultation Service	http://www.there4u.info/index.html
NSPCC Helpline	https://www.nspcc.org.uk/ 0808 800 5000
NSPCC Whistleblowing helpline	help@nspcc.org.uk 0800 028 0285
Internet Watch Foundation	https://www.iwf.org.uk/
Social Care link for Safeguarding Concerns	https://www.gov.uk/report-child-abuse-to-local-council

Note: If you suspect child trafficking is taking place the DSL must be informed immediately and they will contact Modern Slavery Helpline on Call **0800 012 1700** or fill in their [online form](#) to

implement urgent steps to protect the child/ren in question.

The need to refer allegations or concerns about the possible risk posed by staff, volunteers, delivery partners or contractors to the Designated Local Authority Person (formerly LADO) is a requirement as detailed in the government guidance Working Together to Safeguard Children (2018).

2 Introduction

Umbrella Training believes that it is always unacceptable for a child or adult at risk to experience abuse or discrimination of any kind and recognises its responsibility to safeguard the welfare of all children and vulnerable adults by a commitment to practice that protects them.

Umbrella Training has a commitment that no child or adult at risk will be treated less favourably than others in being able to access services that meet their specific individual needs and this is linked to our Equality and Diversity Policy and social inclusion strategies.

This policy has been developed to describe the responsibilities of Employees, Volunteers, Delivery Partners and Contractors for the recognition and prevention of abuse and to clarify the actions to take when abuse is suspected or identified. Therefore, the aim of this Policy is to ensure that Umbrella Training fulfils its responsibilities towards the protection, welfare and safety of children and adults at risk.

Abuse is the violation of an individual's human rights. It can be a single act or repeated acts. It can be physical, sexual which can include a child or human trafficking or emotional or psychological, domestic, discriminatory or financial. It also includes acts of neglect or an omission to act. Abuse can take many forms and is not acceptable in any way. Umbrella Training will endeavor to safeguard children and adults at risk by:

- Valuing, listening to and respecting them
- Adopting policies, guidelines and a Code of Conduct and Behaviour for Employees, Volunteers Delivery Partners and Contractors
- Sharing information about concerns with agencies that need to know, and involving parents and children appropriately
- Ensuring that the DBS, in accordance with their guidelines, checks all staff, volunteers and delivery partners with responsibilities for children are up to date at all times
- Recruiting staff and volunteers safely, ensuring all necessary checks are made, including taking up references and DBS checks
- Making all new staff, volunteers, delivery partners and contractors aware of our Safeguarding and Prevent Duty policy and procedures
- Providing all staff, volunteers and delivery partners with Safeguarding and Prevent Duty training
- Ensuring that all adults at risk, children, their parents, and carers are aware of our Safeguarding and Prevent Duty policy and procedures

Umbrella Training is committed to reviewing its policies and good practice annually unless there is a change to legislation or guidance with immediate effect or there has been a significant change within the organisation. The DSL is responsible for carrying the annual review and updating the policy and procedures with support from the strategic management team.

Umbrella Training operates a culture of openness and transparency and embeds the principles of The 4R's across all our services and ensure all staff, volunteers, delivery partners and contractors understand their responsibilities regarding Safeguarding.

The 4 Rs:

- **Recognise** – the Signs and Indications of Abuse
- **Respond** – As Soon As Possible
- **Record** – Everything You Have Heard, was Said or any Actions Seen
- **Refer** – To the Designated Person

3 Definition

For the purpose of this policy and procedures, children are any persons up to the age of 18 years.

Safeguarding

“Safeguarding is not just about protecting learners from deliberate harm. It includes a wide range of issues relating to learner’s welfare, health, and safety.”

Safeguarding is defined as:

- Protecting children and venerable people form maltreatment.
- Preventing impairment of children’s and vulnerable learner’s health or development.
- Ensuring that children and vulnerable learners are growing up in circumstances consistent with the provision of safe and effective care.
- Acting to enable all children and vulnerable learners to have the best life-chances.

The Prevent Duty in Further Education

Section 26(1) of the Counter-Terrorism and Security Act 2015 (“the Act”) imposes a duty on “specified authorities”, when exercising their functions, to have due regard to the need to prevent people from being drawn into terrorism. There is an important role for independent training providers, in helping prevent people being drawn into terrorism, which includes not just violent extremism but also non-violent extremism, which can create an atmosphere conducive to terrorism and can popularise views which terrorists exploit.

4 Adults at Risk

An adult at risk is 'any person who is aged 18 years or over and at risk of abuse or neglect because of their needs for care and support' (The Care Act 2014 [England]). An adult at risk may be a person who:

- has a physical or sensory disability
- is physically frail or has a chronic illness
- has mental health needs including dementia or personality disorder
- Has a long-term illness or condition
- has a mental illness or dementia
- has a learning difficulty
- misuses drugs and or alcohol
- has social and or emotional issues
- exhibits challenging behaviours
- is a young adult, over the age of 18, who has care and support needs (such as an EHCP or looked after status) and is transitioning from children's to adult services
- is a carer (looking after another person with care and support needs).

Statutory guidance and legislation differ in relation to working with these two groups e.g., children and adults at risk. Practitioners are familiar with the differences if they are working across the age groups and take advice from the DSL when appropriate.

5 Legislation & Guidance

- Education and Training (Welfare of Children) Act 2021 - [Education and Training \(Welfare of Children\) Act 2021 \(legislation.gov.uk\)](#)
- Keeping Children Safe in Education (*DfE statutory guidance for schools and colleges*) 2023 - [Keeping children safe in education 2023 \(publishing.service.gov.uk\)](#)
- Working together to safeguard children: A guide to inter-agency working to safeguard and promote the welfare of children (*HM Government*) July 2018 - [Working Together to Safeguard Children 2018 \(publishing.service.gov.uk\)](#)
- What to do if you're worried about a child being abused (*HM Government*) March 2015 - [Stat guidance template \(publishing.service.gov.uk\)](#)
- Sexual violence and sexual harassment between children in schools and colleges (DfE Advice for governing bodies, proprietors, headteachers, principals, senior leadership teams and designated safeguarding leads September 2021 - [Sexual violence and sexual harassment between children in schools and colleges \(publishing.service.gov.uk\)](#)
- Prevent duty guidance for education institutions in England and Wales September 2023.

<https://www.gov.uk/government/publications/prevent-duty-guidance>

- Security Act 2015 section 29 Counter-Terrorism and Security Act 2015
- Ofsted – Inspecting safeguarding in early years, education and skills settings, Education Inspection Framework 2019
- Safeguarding Children: Working Together Under the Children Act 2004.
- Disqualification under the Children Act 2006 (2018).
- Sexual violence and sexual harassment between children in schools and colleges (DfE Advice for governing bodies, proprietors, headteachers, principals, senior leadership teams and designated safeguarding leads September 2021 - [Sexual violence and sexual harassment between children in schools and colleges \(publishing.service.gov.uk\)](https://publishing.service.gov.uk))
- The Children Act 1989 and 2004
- UN Convention on the Rights of the Child 1991
- Data Protection Act 1998
- Protection of Freedoms Act 2012
- The Care Act 2014
- The Mental Capacity Act 2005
- Equality Act 2010
- Domestic Abuse Act 2021

6 Definitions and Indication of Abuse

Abuse, including neglect, is a form of maltreatment of a child or vulnerable adult at risk (often called avulnerable adult). In relation to adults the terminology ‘serious harm’ is frequently used within the guidance rather than ‘significant harm’ which is a term from the Children Act 1989. Someone may abuse a child or adult at risk by inflicting harm, or by failing to act to prevent harm. Children and adults at risk may be abused in a family or an institutional or community setting, by those known to them or, more rarely, by a stranger for example via the internet. They may also be abused by an adult or adults, or by another child or children.

Working Together to Safeguard Children 2018 defines four types of abuse: physical, emotional, sexual and neglect. Adults at risk may also be subjected to these forms of abuse therefore the wording from Working Together to Safeguard Children 2018 has been slightly altered to reflect this fact. Adults may be subjected to; financial, discriminatory and institutional abuse and staff should be familiar with indicators for all forms of abuse.

Physical Abuse

Physical Abuse: this may involve	Signs: this may include
<ul style="list-style-type: none"> • Hitting • Shaking • Throwing • Poisoning • Burning or Scalding • Drowning • Suffocating or otherwise causing Physical Harm 	<ul style="list-style-type: none"> • Unexplained bruises, marks or injuries on any part of the body • Frequent visits to the GP or A&E • An injury inconsistent with the explanation offered • Fear of parents or carers being approached for an explanation • Aggressive behaviour or severe temper outbursts • Flinching when approached • Reluctance to get changed or wearing long sleeves in hot weather • Depression • Withdrawal behaviour or other behaviour change • Running away from home/residential care • Distrust of adults, particularly those with whom a close relationship would normally be expected
<p>Physical harm may also be caused when a parent or carer fabricates the symptoms of or deliberately indicates illness in a child, young person or adult at risk</p>	

Emotional Abuse or Psychological Abuse

Emotional abuse is the persistent maltreatment of a child or adult at risk such as to cause severe and persistent adverse effects on the child or adult at risk's emotional development.

Emotional Abuse: this may involve	Signs: this may include
<ul style="list-style-type: none"> • conveying to the child or adult at risk that they are worthless and unloved, • that they are inadequate or valued only insofar as they meet the needs of another person • not giving the child or adult at risk opportunities to express their views • making fun of what they say or how they communicate • age or developmentally inappropriate • expectations being imposed on the child or adult at risk • interactions that are beyond their developmental capability • preventing the child or adult at risk participating in normal social interaction or enforced social isolation • seeing or hearing the ill-treatment of another child or adult at risk • serious bullying (including cyberbullying) • causing children or adults at risk frequently to feel frightened or in danger • exploitation or corruption of children or adults at risk • Intimidation, coercion, harassment, use of threats, humiliation, bullying, swearing or verbal abuse • Addressing a person in a patronising or infantilising way • Threats of harm or abandonment 	<ul style="list-style-type: none"> • A failure to thrive or grow • Sudden speech disorders • Developmental delay, either in terms of physical or emotional progress • Behavioural change • Being unable to play or socialise with others • Fear of making mistakes • Self-harm • Fear of parent or carer being approached regarding their behaviour • Confusion • Use of inappropriate language, possession of violent, extremist literature, behavioral changes, the expression of extremist views, advocating violent actions and means, association with known extremists, seeking to recruit others
<p>Some level of emotional abuse is involved in all types of maltreatment of a child or adult at risk though it may occur alone.</p>	

Sexual Abuse

Sexual abuse includes sexual violence, sexual harassment and Criminal Sexual Exploitation (CSE). All safeguarding referrals and investigations relating to sexual abuse must be report the ESFA using the Contact Form: <https://www.gov.uk/government/organisations/education-and-skillsfunding-agency>

Sexual Abuse: this may involve	Signs: this may include
<ul style="list-style-type: none"> • forcing or enticing a child/ren or adult/s at risk to take part in sexual activities not necessarily involving a high level of violence, whether or not the child or adult at risk is aware of what is happening • physical contact including assault by penetration (for example rape or oral sex) • non-penetrative acts such as masturbation • Kissing • Rubbing and Touching outside of clothing • They may also include non-contact activities, such as involving children or adults at risk in looking at, or in the production of, pornographic material or watching sexual activities • encouraging children to behave in sexually inappropriate ways • grooming a child in preparation for abuse (including via the internet) 	<ul style="list-style-type: none"> • Pain or itching in the genital/anal areas • Bruising or bleeding near genital/anal areas • Sexually transmitted diseases • Vaginal discharge or infection • stomach pains • Discomfort when walking or sitting down • Pregnancy • Sudden or unexplained changes in behaviour e.g., becoming aggressive or withdrawn • Fear of being left with a specific person or group of people • Nightmares • Leaving home • Sexual knowledge which is beyond their age or developmental age • Sexual drawings or language • Bedwetting • Saying they have secrets they cannot tell anyone about • Self-harm or mutilation, sometimes leading to suicide attempts
<p>Sexual abuse is not solely perpetrated by adult males. Women can also commit acts of sexual abuse, as can other children (peer on peer abuse).</p>	<ul style="list-style-type: none"> • Eating problems such as overeating or anorexia

Neglect Abuse *including Self Neglect*

This is the persistent failure to meet a child's or vulnerable adults basic physical and or psychological needs, likely to result in the serious impairment of the child's or adult at risk's health or development.

Neglect Abuse: this may involve	Signs: this may include
<ul style="list-style-type: none"> • Neglect may occur during pregnancy as a result of material substance abuse • A parent or carer failing to provide adequate food, clothing and shelter • Exclusion from home or abandonment • Failure to protect a child or adult at risk from physical harm or danger • Failure to ensure adequate supervision • Failure to use adequate care takers • Failure to ensure access to appropriate medical care or treatment • Neglect of, or unresponsiveness to a child's or adult at risk's basic emotional needs • Refusal of access to visitors • Not taking into account the individual's cultural, religious, or ethnic needs. • Ignoring or isolating the person • Failure to ensure privacy and dignity • Lack of self-care to an extent it threatens personal health and safety • Neglect for one's personal hygiene, health or surroundings • Failure to seek help or access services to meet health and social care needs 	<ul style="list-style-type: none"> • Loss of weight, or being constantly underweight • Inappropriate dress for the weather • Complaining of being tired all the time • Not requesting medical assistance and or failing to attend appointments • Having few friends • Worsening health conditions • Pressure sores • Mentioning their being left alone or unsupervised • Sore or extreme nappy rash • Skin infections • Lack of response to stimuli or contact • Poor skin condition(s) • Frozen watchfulness • Anxiety • Distressed • The child moves away from a parent under stress • Inappropriate emotional responses • Language delay • Little or no distress when separated from the primary carer

Financial Abuse

Financial Abuse: this may involve	Signs: this may include
<ul style="list-style-type: none"> • Being overcharged for services • Being tricked into receiving goods or services that they do not want or need • Inappropriate use, exploitation, or misappropriation of property and or utilities • Theft • Deception • Fraud • Explanation or pressure in connection with wills 	<ul style="list-style-type: none"> • Lack of basic requirements e.g., food, clothes, or shelter • Inability to pay bills • Unexplained withdrawals from accounts • Inconsistency between the standard of living and income • Reluctance to take up assistance which is needed • Unusual interest by family or other people in the persons' assets • Recent changes in deeds • Power of Attorney is obtained when a person lacks the capacity to make the decision

Institutional Abuse

Institutional Abuse: this may involve	Signs: this may include
<ul style="list-style-type: none"> • Service users are required to fit in excessively to the routine of the service • More than one individual is being neglected • Everyone is treated in the same way • Other forms of abuse on an institutional scale 	<ul style="list-style-type: none"> • Inflexible daily routines e.g., set bedtimes and or deliberate waking • Dirty clothing and bed linen • Lack of personal clothing and possessions • Inappropriate use of nursing and medical procedures • Lack of individualised care plans and failure to comply with care plans • Inappropriate use of power, control, restriction and confinement • Failure to access health care, dental services, etc. • Inappropriate use of medication • Misuse of residents' finances or communal finances • Dangerous moving or handling practices • Failure to record incidents or concerns

Modern-Day Slavery

Modern Day Slavery: this may involve	Signs: this may include
<ul style="list-style-type: none"> • Human trafficking • Forced labour • Domestic servitude • Sexual exploitation, such as escort work, prostitution and pornography • Debt bondage – being forced to work to pay off debts that realistically they never will be able to 	<ul style="list-style-type: none"> • Signs of physical or emotional abuse • Appearing to be malnourished, unkempt or withdrawn • Isolation from the community, seeming under the control or influence of others • Living in dirty, cramped or overcrowded accommodation and or living and working at the same address • Lack of personal effects or identification documents • Always wearing the same clothes • Avoidance of eye contact, appearing frightened or hesitant to talk to strangers • Fear of law enforcers

Discriminatory Abuse

Discriminatory Abuse: this may involve	Signs: this may include
<ul style="list-style-type: none"> • Unequal treatment based on age, disability, gender reassignment, marriage and civil partnership, pregnancy and maternity, race, religion and belief, sex or sexual orientation (known as 'protected characteristics' under the Equality Act 2010) • Verbal abuse, derogatory remarks or inappropriate use of language related to a protected characteristic • Denying access to communication aids, not allowing access to an interpreter, signer or lip-reader • Harassment or deliberate exclusion on the grounds of a protected characteristic • Denying basic rights to healthcare, education, employment and criminal justice relating to a protected characteristic • Substandard service provision relating to protected characteristics 	<ul style="list-style-type: none"> • The person appears withdrawn and isolated • Expressions of anger, frustration, fear or anxiety • The support on offer does not take account of the person's individual needs in terms of a protected characteristic

Other Safeguarding issues:

Domestic Violence and Abuse

Domestic violence and abuse are any incident or pattern of incidents of controlling, coercive or threatening behaviour. It can include violence or abuse by family members, teenage relationship abuse and child/ adolescent to parent violence or abuse. This can encompass but is not limited to the following types of abuse; psychological, physical, sexual. Financial and or emotional. The Domestic Abuse Act 2021 recognises that children can be adversely affected by domestic abuse in the context of their home life where domestic violence happens between family members. Exposure to this type of abuse can have a long-lasting emotional and psychological impact on children. Concerns about this type of abuse should be raised to the DSO. Refuge runs the National Domestic Abuse Helpline, which can be called free of charge and in confidence, 24 hours a day on 0808 2000 247. The Refuge website contains advice and support along with mechanisms to book a call at a time that suits.

Identifying Cases of Honor Based Violence including Female Genital Mutilation (FGM), Breast Ironing and Forced Marriage

Honor Based violence encompasses crimes that have been committed to protect or defend the honor of the family or the community. There are many different types of abuse but there are some that staff may be initially less aware of including Female Genital Mutilation, Breast Ironing and Forced Marriage. All of which fall into this category. FGM is the collective name for

procedures involving the removal or partial removal of the external female genitalia for non-medical reasons. It is a criminal offence under the Female Genital Mutilation Act 2003. Breast Ironing is when a young girl's breasts are damaged over time to delay their development. Forced Marriage is when one or both parties do not or cannot consent to marriage and pressure or abuse is used to force them into marriage. Any indications that children or adults at risk may be subjected to FGM or Forced Marriage, or that this may have already taken place, will be dealt with under the procedures outlined in this policy.

Peer on Peer Abuse

All staff should be aware that children can abuse other children (peer on peer abuse). It can happen on-site and online and just because it is not reported does not mean that it is not happening. It can include bullying, relationship abuse, physical abuse, sexual violence, sexual harassment, consensual and non-consensual sharing of images, upskirting and violence or rituals. Staff must report this to the DSO and will advise on the procedure to follow.

Upskirting

Upskirting has been illegal since 2019. This type of abuse typically involved taking a picture under a person's clothing for sexual gratification or to cause distress.

Nudes and Semi-Nudes

Includes consensual and non-consensual sharing of images or pressuring others to send images. The sharing of images of those under 18s is illegal even when it has been shared consensually. Non-consensual sharing is both illegal and abusive.

Serious Violence

All staff must be aware of the indicators that children are at risk of or involved in serious violent crime. Indicators include increased absence, change in friendship groups, a decline in performance, signs of self-harm, signs of assault or unexplained injury or significant changes in well-being. Increased likelihood of being involved include being male, frequent absence or previous school exclusions, previous maltreatment or previous criminal convictions. Guidance can be found in Preventing Youth Violence and Gang Involvement and Criminal Exploitation of Children and Vulnerable Adults: County Lines Guidance. County Lines is the exploitation of young and vulnerable people through:

- **Grooming & recruitment** – vulnerable children are targeted, befriended, given money, made to feel like a family and they belong, they have the things they've always wanted and then they are exploited.
- **Property – Cuckooing** is when a vulnerable person has their property taken over by drug dealers and mules from outside of the county.
- **Drugs** – the primary target is buying cheap drugs in major cities such as London, using vulnerable children and young people to cross several county lines to deal.
- **Weapons** – more recently the movement of weapons has become another commodity.
- **Violence** – the children and young adults can't escape it, they are threatened, they experience violence, and they often go on to be perpetrators of violence.

- **Sex** – whilst sexual exploitation is a risk, authorities' hat those involved in County Lines are at no greater risk than other vulnerable children and young adults.
- **Gangs** – once recruited these vulnerable children are gang members, it's highly likely they will remain in the gang, move up the ranks and become institutionalised gang members and possibly gang leaders of the future.
- **Crime** – most fall into a life of crime, starting with small convictions and sentences, progressing to serious crime and serving time in jail – it's almost impossible for them to break the cycle.

When a young learner goes missing, and we don't know why and after all usual attempts to contact them, including through their parents and/or guardian, we need to consider the risk that they may have got caught up in County Lines and actually living outside of the area and in need of help. Not all people that go missing are involved in County Lines, but it is an ever-increasing problem across the UK.

Child Criminal Exploitation (CCE) And Child Sexual Exploitation (CSE)

Child Criminal Exploitation and Child Sexual exploitation are forms of abuse where an individual or group coerces, manipulates or deceives a child into taking part in sexual or criminal activity in exchange for financial reward or increased status or through the threat of violence. CCE can include County Lines which is the transportation of drugs or money often outside of the local area. They may be forced to carry weapons and become involved in violence making them both a victim and perpetrator of crimes and there may be risks to their family including the use of the family home to sell drugs (cuckooing). Both girls and boys at risk may also be at a higher risk of sexual exploitation. CSE can happen over time and can affect any child including 16- and 17-year-olds who can legally consent to sex. Some children may not realise that they have been exploited and may consider themselves as being in a genuine loving relationship.

Mental Health

Mental Health can be an indicator that someone has suffered or is at risk of suffering from abuse or exploitation. If staff have a concern about a learner's mental health, they should follow their safeguarding policy and speak to the DSO.

IN SUPPORT OF THIS PROVISION UMBRELLA TRAINING WILL DO EVERYTHING THAT IT CAN TO ENSURE THAT:

- The DSL and DSOs are aware of the issues surrounding FGM and Forced Marriage
- Advice and signposts are available for accessing additional support e.g., the NSPCC's helpline. Child Line services, Forced Marriage Unit
- Awareness-raising about FGM and Forced Marriage is incorporated within UmbrellaTraining
- Safeguarding training
- Where there are concerns about FGM or Forced Marriage, a referral must be made as a matter of urgency. It is also extremely important that if a child or adult at risk has disclosed that they are at risk of FGM or Forced Marriage, the case is referred to SocialCare even if it is against that person's wishes. Umbrella Training staff must NOT consult or discuss these concerns with the child or adult at risk's parents or family or others within the community. If there is an imminent



risk e.g., the child or adult at risk of being taken out of the country, police must be informed (999) and the safety of the child or vulnerable adult whilst awaiting the police response must be the prime consideration.

7 The Prevent Duty

The Counter-Terrorism and Security Act 2015 places a duty on certain bodies to have 'due regard to the need to prevent people from being drawn into terrorism'.

The government have defined extremism in the Prevent Strategy as vocal opposition to fundamental British Values including democracy, the rule of law, individual liberty and mutual respect and tolerance of different faiths and beliefs.

The Prevent Team will, in partnership with other professionals including those involved in Safeguarding, investigate further to assess the nature and extent of the risk. The relevant local police prevent teams and regional Prevent coordinators will complete an initial assessment which will be used to inform the decision as to whether an individual should be referred to Channel.

The company carries out an annual Prevent risk assessment, which informs our Prevent action plan. This is led by the DSL, signed off at Board level, monitored as a minimum quarterly with updates present to the Board. The Board must satisfy itself that risk have been accurately identified and are being mitigated and that the action plan is increasing knowledge, awareness and safety.

We ensure apprentices and employees are resilient to extreme narratives, through training, regular updates, use of current local and national news items. We help all those involved, both internally and externally to identify changes in behaviour of apprentices and employees and who to raise concerns.

How Does Channel Work?

The Channel Panel is an early intervention multi-agency process and will develop the most appropriate support package for the individual concerned and review progress.

Channel works similarly to existing safeguarding partnerships aimed at protecting vulnerable people. Channel is designed to work with individuals of any age and is shaped around the circumstance of each individual and can provide support for any form of radicalisation or personal vulnerabilities.

Each Channel Panel is chaired by a local authority and brings together a range of multiagency partners to collectively assess the risk and can decide whether a support package is needed. The group may include statutory and non-statutory partners, as well as lead safeguarding professionals. If the group feels the person would be suitable for Channel, it will look to develop a package of support that is bespoke to the person. The partnership approach ensures those with specific knowledge and expertise around the vulnerabilities of those at risk can work together to provide the best support.

What Does Channel Support Look Like?

Channel interventions are delivered through local partnerships and specialist agencies. The support may focus on a person's vulnerabilities, around health, education, employment or

housing, as well as specialist mentoring or faith guidance and broader diversionary activities such as sport. Each support package is tailored to the person and their particular circumstances.

A person will always be informed first if it's felt that they would benefit from Channel support. The process is voluntary, and their consent would be needed before taking part in the process. The process is managed carefully by the Channel Panel.

Who Can Make a Referral?

Anyone can make a referral. Referrals come from a wide range of partners including education, health, youth offending teams, police and social services.

What Happens with the Referral?

Referrals are first screened for suitability through a preliminary assessment by the Channel Panel Coordinator and the local authority. If suitable, the case is then discussed at a Channel Panel of relevant partners to decide if support is necessary.

Raising a Concern

If you believe that someone is vulnerable to being exploited or radicalised, please use the established safeguarding procedures to escalate your concerns to the DSO, who can raise concerns to Channel if appropriate.

8 Abuse of Position of Trust

Umbrella Training's policy on bullying is set out in a separate policy and acknowledges that to allow or condone bullying may lead to consideration under safeguarding children or adults at risk procedures. All incidents of bullying, including cyber-bullying, racist, homophobic and gender-related bullying, will be dealt with in accordance with our anti-bullying policy.

Umbrella Training recognises that children and adults at risk with special needs and or disabilities are more susceptible to being bullied. Umbrella Training maintains a log of bullying incidents in our contracts. Our policy on bullying is explained during the induction process for new customers and their parents/carers.

9 Online Safety and social media

All staff, volunteers, delivery partners and contractors if relevant are trained in and receive regular updates in e-safety and recognising and reporting concerns. Technology is a significant component in many safeguarding cases, as well as a source of harm relating to radicalisation. Our acceptable use policy recognises that internet safety is a whole team/organisation responsibility which includes customers and their parents and carers.

Children, young people and adults at risk may expose themselves to danger, whether knowingly or unknowingly when using the internet and other technologies. Additionally, some children, young people and adults at risk may find themselves involved in activities that are inappropriate or possibly illegal. Learners are supported to develop their online safety knowledge in four categories:

- Content- exposure to harmful content and radical views including fake news
- Contact- harmful interaction with others online
- Conduct- their online behaviour and the impact of their behaviour online including online bullying
- Commerce- risks such as phishing, financial scams and online gambling. Concerns of this nature can be reported to [APWG | Unifying The Global Response To Cybercrime](#)

Umbrella Training, therefore, recognises our responsibility to educate our customers, teaching them the appropriate behaviours and critical thinking skills to enable them to remain both safe and legal when using the internet and related technologies. These issues are addressed within the learner journey and relevant policies and procedures and with parents and carers as appropriate.

Umbrella training recognises the impact of the pandemic including ensuring the safety of learners during remote sessions, as identified in [Safeguarding and remote education during coronavirus \(COVID-19\) - GOV.UK \(www.gov.uk\)](#). This includes ensuring appropriate backgrounds are in place during live sessions, privacy settings are implemented and staff and learners are aware of the expectations with regards to behaviour and participation. Staff should take care

not to share email addresses with multiple learners and be aware of capturing personal data when cameras are switched on. Any safeguarding concerns during remote lessons should be raised to the DSO following the normal procedures.

Umbrella Training will, wherever possible, to monitor IT usage, ensure filters are in place to prevent access to unsuitable sites and we will monitor the use of the network and internet to ensure that any customer, staff, volunteer, delivery partner or contractor attempting to access inappropriate, abusive or harmful material is appropriately advised and or supported.

If inappropriate, harmful or indecent images are found then the Police will be informed immediately, and Umbrella Training will fully support their investigation. If involving a member of staff/volunteer, immediate suspension in line with the disciplinary process will take effect and the "managing safeguarding allegations" procedure may need to be instigated by the DSL. Umbrella Training will take the police advice when this is involving a customer as to whether the relevant commissioner should be informed.

The welfare and protection of our children and adults at risk are paramount and consideration should always be given to whether the use of photography will place them at risk. Images may be used to harm children or adults at risk for example, as a preliminary to grooming or by displaying them inappropriately on the internet, particularly social networking sites.

For this reason, consent is always sought when photographing customers and additional consideration is given to photographing vulnerable children (particularly looked after children) or adults at risk, such as those known to be fleeing domestic violence. Consent must be sought from those with parental responsibilities (this may include the Local Authority in the case of looked after children).

We are aware of the LSCB escalation procedures for raising concerns in respect of poor practice and recognise our responsibility to utilise these as and when necessary, in the interest of safeguarding and promoting the welfare of children and adults at risk.

Online safety also involves being aware of the risks to young people, our staff/volunteers and vulnerable adults when communicating via the internet, digital and mobile devices and using social media. Social media includes blogs, Wikis, online communities and social networking sites such as Facebook and Twitter.

As an organisation working with young people, it is acknowledged by Umbrella Training the impact and involvement that social networking sites such as Facebook and Twitter have on the lives of young people and their role in the ways in which they interact with each other. These tools are used by Umbrella Training to encourage young people in their projects and involvement with graduate activities. At the same time, we recognise the dangers and potential risks that these sites can pose to both young people and Umbrella Training staff/volunteers and that they have the potential to be abused as a means of interacting with young people.

There is a wide range of ways to communicate with young people and adults at risk and this is a rapidly changing environment as new technologies, applications and social media sites emerge.

Nocode of conduct for e-safety can cover all of these separately, however, there are broad principles that we expect from all staff/volunteers to adhere to in order to safeguard young people, adults at risk and themselves in respect of using all these forms of media, devices, apps and social networkingsites.

Content

When communicating with young people/adults at risk online observe the same rules of behaviour asif speaking with them in person that is by being professional – polite, respectful, not swearing or saying anything (using the written word, images or icons) that could be regarded as sexual, innuendo, bullying or discrimination.

Ask yourself whether the content of the message could be misunderstood or misinterpreted by someone else. Always ensure that the content of any online communication has a clear work purpose.

Don't use any text-speak abbreviations or symbols/emotions even if you ordinarily use these in yourpersonal life.

Never disclose non-public and confidential information about Umbrella Training, its staff/volunteersor the customers you are working with.

Do not say anything or re-tweet any posts that could be deemed offensive, controversial or sociallyinappropriate in any way.

Contact with young people or vulnerable adults online should be a recognised element of your workand done strictly for the business of Umbrella Training only.

Do not send illegal or inappropriate content (written, images or icons) including sexting via mobilephones.

Openness and Scrutiny

Always communicate with young people or vulnerable adults in a way that is open to othersto see if necessary.

Do not use private messaging facilities on social networks or apps rather if it needs to be private then do this by e-mail exchange or phone and note the conversation afterwards.

Ensure there is always a record of such conversations that would be open to others tocheck if necessary.

It should always be clear who the communication is from when Umbrella Training is communicatingwith a young person or an adult at risk.

There should be no use of anonymous apps –that is where the sender remains anonymous.

Recording

Only use social media and apps where there is a permanent record of what's been said and sent thereby being open to scrutiny e.g., the use of "Snapchat" is not appropriate.

Use of Equipment

Umbrella Training IT equipment (including computers, laptops, mobile phones, etc.) must not be used to view, download, create or share (with colleagues or children) illegal content including abusive images of children, young people, or adults at risk.

10 Role of the Designated Safeguarding Lead and Officers

Umbrella Training has appointed a Designated Safeguarding Lead DSL and Designated Safeguarding Officers (DSO) to have overall responsibility for issues related to safeguarding children and adults at risk. The DSL is responsible for acting as a source of advice on child and adults at risk protection matters, for coordinating action within the organisation and for liaising with health, children's services, adult services and other agencies about suspected or actual cases of abuse. The DSL will be assisted by other designated members of staff drawn from senior management and suitably experienced staff. Designated members of staff have a key responsibility for raising awareness, within the staff, of issues relating to the welfare of children and adults at risk and the promotion of a safe environment for children and adults at risk within Umbrella Training.

Designated members of staff receive training in Safeguarding children and adults at risk and inter-agency working as required by the Safeguarding Children's Partnerships (SCP) and Safeguarding Adults Partnerships (SAP) and receive refresher training every two years as required by Umbrella Training. The team are required to keep up-to-date with developments in safeguarding children and adults at risk as required.

The DSL has overall responsibility for Safeguarding and The Prevent Duty across Umbrella Training. The Safeguarding Board Member is responsible for the governance of Safeguarding and The Prevent Duty, reporting to the board at regular intervals and in the event of a serious incident.

The Designated Safeguarding Lead (DSL) will ensure that resources, support and all relevant training are available and in place for staff. All staff receive safeguarding training including online safeguarding as part of their induction. The senior leadership team will support the DSO team in meeting their responsibilities and ensuring that Umbrella Training meets its commitments and takes Safeguarding seriously.

There is a clear and robust job description for the DSL and DSO roles within Umbrella Training which can be accessed via the system.

- The DSL is responsible for reviewing the child and vulnerable adult safeguarding policy annually along with any policies linked to the safeguarding policy and processes and procedures that support the embedding and working practices of this policy
- The DSO is responsible for ensuring the child and adult at risk safeguarding policy is available publicly and to parents and carers and that parents and carers are aware that suspected abuse referrals may be made and Umbrella Training's role in this
- The DSO will alert the DBS where a person has been dismissed or left due to risk to or harm that they presented or may have presented to a child or vulnerable adult
- The DSO will alert the Police – where a crime may have been committed
- DSOs foster strong links with the SCP and SAP and Designated Local Authority Person
- Refer all cases of suspected abuse to the local authority children's social care agency

or in the case of an adult at risk to the local authority adult's social care agency

- Liaise with senior management to inform them of issues especially ongoing enquiries and police investigations
- DSOs will maintain a proper record of any safeguarding referral, complaint or concern – even where that concern does not lead to a referral
- DSOs act as a source of advice, support and expertise to staff on matters of safety and safeguarding
- Liaise with relevant agencies following a referral to ensure it has been dealt with and nothing has slipped through the net and whether or not a resolution has been achieved
- DSOs ensure that Umbrella Training works with employers and other training organisations that provide apprenticeships and or work placements for children or adults at risk from Umbrella Training to ensure that appropriate safeguards are in place
- H.R. with support from the senior leadership team ensures that all staff, volunteers and delivery partners receive training in safeguarding children and adults at risk, are aware of Umbrella Training's procedures for protecting children and adults at risk and that refresher training takes place every two years
- DSL provides information quarterly to the SMT setting out how Umbrella Training has discharged its duties. The DSL is also responsible for reporting deficiencies in procedure or policy identified by the SCP or SAP at the earliest opportunity
- The DSO will ensure staff are aware of changes to legislation and current concerns

Under no circumstances should a member of staff, volunteer or contractor undertake any investigative activities of alleged or actual abuse, nor should they contact any of the external agencies that will deal with a referral. It is the responsibility of the DSOs with support from the senior management team to decide whether a referral should be made and to which agency or agencies. It is the role of the relevant safeguarding and Police Services agencies to decide if abuse has taken place.

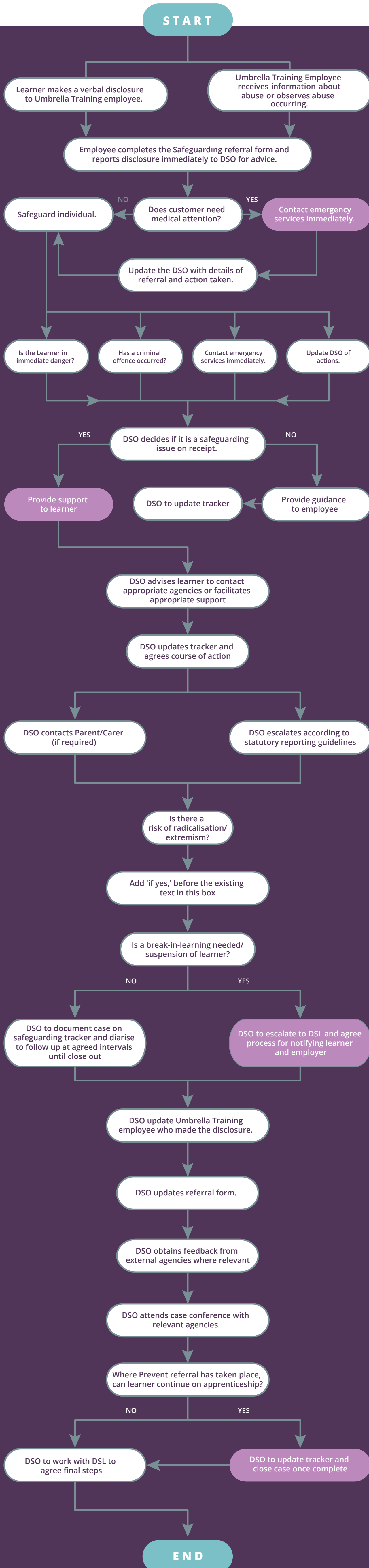
When working on external sites, Umbrella Training's staff would need to be aware of the safeguarding process that the external site-specific site/company has in place. If there was a concern about an Umbrella Training's customer or staff member then the Umbrella Training DSO would deal with this but may, depending upon the circumstances, need to inform the DSO on the external site.

Responding to concerns

Umbrella Training ensure and emphasise that everyone in the organisation understands and knows how to share any concerns immediately with the lead or deputy lead for safeguarding and The Prevent Duty the additional DSO's.

The process for responding is set out over the next page.

Safeguarding Reporting Procedure



When an allegation of abuse is made to a member of staff, the member of staff who receives it should:

- reassure the individual (child or adult at risk) making the allegation that they have done the right thing
- listen and not interrupt
- do not promise that the matter will be kept confidential. Explain to him/her that you must report the matter to a member of Umbrella Training's designated safeguarding team as part of your legal duty, if you are in doubt as to whether the matter is a safeguarding issue, check with one of the designated safeguarding team members
- Let the individual finish speaking and then only ask questions if you are still unsure whether
- this is a safeguarding issue
- note, this is not an investigation, simply establish the key facts. Remember TED – Tell, Explain, Describe.
- only ask simple, open, non-leading questions, e.g., if a child or adult at risk tells you they have been hurt ask "Can you describe how that happened" rather than "did someone hit you"
- accept what the individual is saying and do not offer an alternative interpretation of the alleged events
- raise the concern with a DSO, do not ask any more questions
- write down what has been said immediately afterwards, to the best of your memory, in the words used by the individual and ensure you make clear what is fact and what is opinion or hearsay in any given piece of information
- do not ask the individual to sign anything at this stage
- note anything about the individual which may be connected e.g., any visible injuries including the position and description
- report the matter to a DSO immediately, within the same working day
- complete the relevant documentation (the DSO Referral Form located in the system) and submit it to the designated safeguarding team
- ensure you tell the individual what will happen next

Remember, if a child or adult at risk tells you about abuse that happened a long time ago or some time has lapsed since it last occurred, this doesn't make it any less real and distressing for the child or adult at risk. Abuse can be historic and relate to incidents that happened a long time ago. They must still be referred to the DSO as per this procedure.

Staff should be mindful that an allegation may involve another child/children/young person(s) and if a child had been involved, the Lead DSO should be contacted immediately as equally the welfare of the child being accused is paramount at this time.

The DSO will ensure that the member of staff reporting the incident/concern is reassured that their concerns are being appropriately addressed and that they have access to staff support if needed.

If a child or vulnerable adult chooses to disclose, you should never:

- take photographs of injuries
- examine marks or injuries solely to assess whether they may have been caused by abuse (there may be a need to give appropriate first aid)
- investigate or probe, aiming to prove or disprove possible abuse
- make promises to the individual about confidentiality or keeping secrets
- assume that someone else will take the necessary action
- jump to conclusions or react in any way to what the individual is disclosing
- speculate or accuse anybody
- confront another person (adult or child) allegedly involved
- offer opinions about what is being said or about the persons allegedly involved
- forget to record what you have been told – what may seem insignificant to you could be extremely important in supporting external agencies to decide whether abuse has occurred or is indeed likely to occur.
- Remember: **IF ANY STEP IN THE PROCESS IS NOT RECORDED THEN IT COULD BE ASSUMED THAT IT DID NOT HAPPEN**
- fail to pass the information on to the designated safeguarding team
- ask the individual to sign a written copy of the disclosure or a statement

Where a child or vulnerable adult has communication difficulties or uses alternative/augmented communication systems, you may need to take extra care to ensure that signs of abuse and neglect are identified and interpreted correctly, but concerns should be reported in exactly the same manner as for other children or vulnerable adults.

If a young person or adult has personal needs their requirements would be discussed prior to commencement of their programme and an additional support plan implemented. Umbrella Training will respect personal privacy and dignity, ensuring that young people and adults at risk are supported in meeting their own physical care needs wherever possible.

For example, there may be a number of transgender customers where sharing facilities is not appropriate and therefore in this situation, Umbrella Training would secure alternative arrangements so that they are not excluded from the activity.

If it is determined by the DSO that the concern is not a safeguarding one but rather the child or adult at risk is in need of support services, then this should be discussed with the child and their parents. A referral for a child in need of services to the local authority requires parental consent.

The DSO is responsible for following up on any referrals made to social care to ensure action has been taken. This should be done within 3 working days of having made the referral. If social care has not been back to the DSO to confirm their actions. A record of actions being taken must be

made by the DSO.

If there are concerns that the action is not sufficient to safeguard the child or vulnerable adult, then the DSO must discuss with the Lead DSO and escalate if necessary, with Social Care. The local safeguarding children partnership will have procedures to follow in this instance.

Talking to Parents/Carers:

In most cases, it is good practice to be open and honest at the outset with parents/carers about concerns and any action that Umbrella Training intends to take. Where a referral is to be made the Umbrella Training Lead DSO will make all reasonable efforts to ensure parents/carers are informed. However, an inability to inform parents/carers should not prevent a referral from being made.

Consideration will be given to not informing them when a child or adult at risk expresses a wish that their parent/carer are not informed at this stage.

There are cases where it would not be good practice for the lead DSO to discuss concerns with parents/carers before referral.

In these cases, arrangements for discussing concerns with the parents/carers should be agreed upon in advance with Social Care and or the Police.

Concerns must not usually be discussed with parents/carers before referral where:

- discussion would put a child or adult at risk of significant harm
- discussion would impede a police investigation or social work enquiry
- sexual abuse is suspected
- organised or multiple abuse is suspected
- the fabrication of an illness is suspected
- to contact parents/carers would place you or others at risk
- it is not possible to contact parents/carers without causing undue delay in making the referral

In each case, the lead DSO must make a reasoned judgement. Where further guidance is needed, contact should be made with the Designated Local Authority Person or relevant social care department or Police.

Abuse Requiring Immediate Response

If medical attention or police emergency action is required, then:

- The emergency services should be contacted on 999 immediately. The UmbrellaTraining DSO team should be informed without delay
- The DSO team will contact the relevant Social Care and or police services (contact numbers annex 1)
- The DSO must consider if it is safe for the child or vulnerable adult to return home to a potentially abusive situation, seeking advice from Social Care or Police as required
- Managers in the Police or Social Care agencies will then advise about how to proceed to ensure the immediate wellbeing of the child or adult at risk
- If the child or adult at risk is in immediate danger or in need of medical attention they should remain with Umbrella Training staff, volunteers, delivery partner or contractor.

Where there is any doubt about the safety of the child or adult at risk if they were to return home to a potentially abusive situation, the lead DSO must inform the relevant Social Care agency and or the Police of their concerns. Managers in the Police or Social Care agencies will then advise about how to proceed to ensure the immediate well-being of the child or adult at risk.

If after 48 hours no action has been taken the Lead DSL or DSO Team member should escalate the utilisation of the escalation process with the SC/AP. Staff must also be aware that if they feel the referral has not been dealt with, no action has been taken or that the Umbrella Training is trying to disregard the referral they should follow the procedures as set out in the Whistleblowing Policy.

Allegations Against Staff, Volunteers, Delivery Partners or Contractors:

All allegations of abuse made against a member or members of staff, volunteers, delivery partners or contractors will be managed in line with Umbrella Training's safeguarding and employment policies and procedures.

These procedures apply to a wide range of allegations, including those that indicate a person may be unsuitable to work with children or adults at risk in their present position or in any capacity.

It is essential that any concerns for the welfare of a child or adult at risk arising from abuse or harassment by a member of staff, volunteer, delivery partner or contractor should be reported immediately to the DSL who will contact the Designated Local Authority Person (formerly known as LADO).

The procedures are, therefore, to be followed in respect of allegations that a member of staff, volunteer, delivery partner or contractor has:

- Behaved in a way that has harmed, or may harm a child or adult at risk
- Possibly committed a criminal offence against, or related to, a child or adult at risk

- Behaved towards a child, children or adult at risk in a way that indicates they are unsuitable to work with children or adults at risk

Where you have concerns about a colleague, volunteer, delivery partner or contractor, you should report these concerns to the DSO Team immediately, detailing your concerns on the Umbrella Training safeguarding referral form, who will manage the allegations in line with agreed policy.

The DSL or their deputy will discuss allegations against staff, volunteers, delivery partners or contractors with the Designated Local Authority Person. The purpose of this discussion is to consider the nature, content and context of the allegation and to agree what further action, if any, is necessary, notifying the parents/carers, the person the allegation has been made against will be suspended partly to protect them during any investigation, risks to other children, communication with relevant organisations/bodies, supporting the person the allegation has been made against and ensure they are treated fairly and with impartiality, as detailed in Umbrella Training's disciplinary policy and procedures and will include any support from the other agencies involved and managing possible media interest.

Disciplinary or Capability procedures will not be initiated until the investigation by police or social care has been conducted. Umbrella Training will take the lead from these bodies at all stages of the process and involve the relevant DSO. Senior Managers and H.R. personnel.

This may include:

- Child Protection or Adult at risk safeguarding Investigation – this will assess whether the child/adult is in need of protection or in need of services – led by Social Care
- Criminal Investigation – led by the relevant Police Agency immediate danger or in need of medical
- A Disciplinary Investigation – in line with Umbrella Training's disciplinary procedures. In the first two instances, Social Care and or the Police will lead on investigations Umbrella Training's H.R. will notify the Data Barring Services (DBS) where –
- Umbrella Training have permanently removed a member of staff, volunteer, delivery partner or contractor from regulated activity due to a safeguarding concern
- Umbrella Training thinks that the person has either
- Engaged in relevant conduct, or
- Satisfied the harm test, or
- Received a caution for, or been convicted of, a relevant offence

For most cases, the DBS only has the power to bar a person who is, has been or might in future engage in regulated activity. Resignation will not prevent a referral to DBS.

Umbrella training acknowledges that concerns may be raised against staff that do not meet the threshold for referral (Low-level concerns). All low levels of concern should be raised to the DSL who will keep a secure record of concerns whilst the member of staff is employed by the company. Low-level concerns include but are not limited to:

- Being over-friendly with learners
- Preferential treatment of a learner
- Contacting learners using personal devices
- Inappropriate language
- Contact with learners in secluded areas.

Umbrella Training's CEO, Adele Oxberry handles allegations of abuse made against a member of staff, volunteer, delivery partner or contractor in line with current Umbrella Training's policy. The DSL will be consulted in all such cases. The CEO will inform the ESFA of allegations against staff, volunteers, delivery partners or contractors.

Where the allegation is found to be of a malicious nature, unfounded and with no further action to be taken the individual the allegation was made against will be supported back into work and their team environment by the H.R. Director with an agreed support plan put in place.

Allegations Against Learners:

Learners can be harmed by other learners. This type of harm is referred to in KCSIE 2023 as Peer-on-Peer abuse. Bullying will be treated as a safeguarding concern where it is recognised that the learner is at risk of suffering harm or significant harm. Staff should be aware that a lack of reports does not mean that this type of abuse is not happening. If the police are involved in abuse allegations, all learners will be supported whilst this is investigated and in the case of children, parents will be informed. Allegations of peer-on-peer abuse will be recorded, investigated and dealt with in line with other forms of abuse. Consideration will be made of the safety of all parties. This type of abuse can be physical or sexual including the sharing of nudes/ semi-nude images. Peer on peer abuse should never be passed as being banter and all cases must be reported to the DSO. Staff should also be aware of local risks such as initiation into groups and risks to learners in the local context to support them in recognising the signs of peer-on-peer abuse. Peer on peer abuse can happen both in person and online and staff should be aware of vulnerable groups such as females, learners with a SEND and LGBT learners.

Support for the Referrer:

Umbrella Training will fully support and protect staff, volunteers, delivery partners, contractors and learners who, in good faith (without malicious intent), make a referral about a colleague who may be abusing a child or adult at risk and reports his or her concern about a colleague's practice.

This support may take the form of counselling, moving the person reporting the abuse/potential abuse to another workplace temporarily whilst the incident is investigated. Umbrella Training's Whistleblowing procedures can be followed if they feel their concerns are not being acted upon appropriately. However, all staff, volunteers, delivery partners and contractors have a duty to safeguard and promote the welfare of children and adults at risk. However, in order to investigate concerns robustly, it may not be possible to maintain complete anonymity, but the interests of the referrer will be protected when concerns are raised.

Following a referral, staff, volunteers, delivery partners and contractors may be involved in the assessment and management process led by the relevant Social Care Team and may be invited to take part in any strategy meeting or attend an initial Case Conference. Where there is a criminal investigation they may be required to co-operate with the Police. In all these circumstances they will be offered sufficient time to prepare and attend meetings with the support of their line manager and Umbrella Training's DSO Team.

They will also receive appropriate senior management support and the DSL will continue to provide support and guidance as required/appropriate.

Records will be kept of every concern raised, including low-level concerns, and they will be detailed as what actions have been taken, whether an external agency has been involved and is leading on any investigation and what the outcome has been so that the file can be closed and then stored for legal purposes on the secure system.

Record Keeping and Information Security

Well-kept records are essential in situations where it is suspected or believed that a child or adult at risk may be at risk from harm.

Records should state who was present, time, date and place. Be factual, state exactly what was said, observed or alleged, be written in ink and signed by the recorder.

Records must also be stored, retrieved and destroyed within current Data Protection laws and Umbrella Training's Data and Information Security requirements.

The use of a standard Safeguarding Referral Form for all staff irrespective of their role or which delivery contract they currently work with and an aide mémoire to assist in its completion is available on the system.

Staff, volunteers, delivery partners and contractors are guided in recording, to be mindful of the possibility that this may be shared with others at some stage and in exceptional circumstances, the possibility that they may become evidence in court proceedings.

Equally staff, volunteers, delivery partners and contractors must be aware that documents regarding an individual that Umbrella Training hold may be subject to a Freedom of Information request under the Freedom of Information Act.

Under the Act individuals have the right to access their own records unless the situation is covered by the following exemptions:

- Information that would be likely to prejudice the prevention and detection of a crime, or the capture or prosecution of an offender
- Information held for the purposes of social work where disclosure would be likely to prejudice the work, by causing serious harm to the physical or mental health or condition of the data subject or another person

Records are kept for the time required legally (as long as required) and or contractually by the various government Commissioners and there is robust storage, retrieval and disposal process and system in place. Low-level concerns against staff will be kept whilst until employment ceases.

Details of allegations that are found to be malicious will be removed from personnel files. However, for all other allegations, it is important that a clear and comprehensive summary of the allegations, detail how the allegation was followed up and resolution to the allegation and a note of action/s taken and any decisions reached is kept on the confidential personnel file of the accused and a copy provided to the person concerned.

The purpose of the record is to enable information to be given in response to any future request for a reference, where appropriate. It will provide clarification in cases where future DBS checks reveal

information from the police about an allegation that did not result in a criminal conviction and it will help to prevent unnecessary re-investigation if an allegation resurfaces at a later date. In respect of safeguarding allegations against an adult the record should be retained at least until the accused has reached normal pension age or for a period of 10 years from the date of the allegation if that is longer. Records in respect of a safeguarding concern about a child should be kept for 7 years unless a minimum time is specified by specific contracts held by Umbrella Training.

Where a request for information sharing is made the Lead DSO, DSO Team and senior management would decide as to whether they can share the information and if necessary, would seek relevant legal advice and advice from other bodies such as the NSPCC and Childline. Once the decision has been made regardless of whether it is to be shared or not this is still recorded identifying the reasons for the decision. If the request has come from the SC/AP, they will provide Umbrella Training with a clear rationale as to why the information is needed and the request should be proportionate to the reason. Umbrella Training follow the 7 Golden Rules to Information Sharing as per the guidance document "Information Sharing: Advice for Practitioners Providing Safeguarding Services to Children, Young People, Parents and Carers".

All customers undergo standard induction. Part of this process includes the consent forms required. This is recorded on our system and documents are stored securely on the electronic system.

Customer's and their parents/carers are made aware of the need for Umbrella Training and or delivery partners to hold information relating to them, what will be held, how it will be held, how long it might be held, who might have access to it and how it will be used.

The safeguarding form is sent to the Umbrella Training DSL via e-mail and this is then uploaded by a member of the DSO Team to the system within 24 hours and can only be accessed by the DSO Team. Once a copy has been uploaded to the system then all local records will be destroyed. All concerns and incidents are reported on at the senior management level and lessons learnt in how these were dealt with are discussed and where appropriate procedures are revised.

Separate confidential folders are required to store the concern of each individual child or adult at risk.

Awareness sessions regarding data and information security are delivered to staff at all levels in the organisation with regular reminders through Intranet news items. All information covering data protection and security are held on our system which all staff, volunteers, delivery partners and where applicable contractors are made aware of through the awareness and induction sessions. The system is available on the Umbrella Training intranet, Umbrella Training's definition of its staff's roles and responsibilities to data security and protection are detailed in a number of documents on our system.

Safer Recruitment and Training for Staff

When recruiting new members of staff Umbrella Training follows the government guidance "Safeguarding Children: Safer Recruitment in Education and Safer Recruitment Principles" and has

due regard to the Safeguarding Vulnerable Groups Act 2006 and the Protection of Freedoms Act 2012. Umbrella Training uses the DBS checking service to assess all applicants' suitability for positions of trust, the organisation complies fully with the code of practice and undertakes to treat all applicants for positions fairly. DBS checks are undertaken in line with government guidance and current legislation, alongside appropriate references being obtained and ensuring qualifications are verified. Safer recruitment training has been undertaken by senior members of staff who conduct recruitment activities in accordance with statutory guidance. Applicants will also have to complete a Declaration Form in line with Umbrella Training's recruitment policy.

Newly appointed staff have a job role induction in line with Umbrella Training's probationary terms. A robust induction into the child protection procedures will also be provided when they join the organisation. Probation is a period of both professional development and review. It provides a fair opportunity for an employee to understand the organisation, the standard of performance required and to be given the guidance and support to be effective in his or her new role.

Probation allows the manager of the newly appointed employee to assess objectively whether the new recruit is suitable for the role, taking into account the individual's overall capability, skills, performance, and general conduct in relation to the job in question.

Umbrella Training shall ensure that all employees are made aware of the standards expected of them and will put in place the appropriate support, training and feedback to achieve these standards.

For the organisation, probation allows the assessment of the employee's contribution, potential and suitability for the role to which they have been appointed.

Furthermore, probation aims to identify the essential development required to undertake the job role, identify any areas for development following initial interventions, and provide support in these areas through a structured plan.

They will be made aware procedures of the relevant Safeguarding procedures as part of their induction programme and be given a copy of Umbrella Training's Safeguarding Children and Adults Policy.

Training Interventions

Name	Training	Frequency
Umbrella Colleague Academy (UCA)	Internal 3-day programme with a focus on how to practically deal with safeguarding situations	Onboarding & Yearly Refresher
Safeguarding in FE	Specific focus on safeguarding of vulnerable adults aimed at practitioners	Yearly
WRAP	HM Government resource with a specific focus on CHANNEL	Yearly
Prevent for Practitioners	Comprehensive resources package aimed to provide a further understanding	Yearly
ETF Radicalisation Resource	Basic understanding of Onboarding situational factors that lead to radicalisation and extremism	Onboarding

11 Umbrella Training Safeguarding Code of Conduct

All employees are required to abide with the Umbrella Training Code of Conduct (Annex 2) alongside the Safeguarding Code of Conduct below, which applies to the behaviour of all staff, volunteers, and contractors/stakeholders in direct contact with young people or adults at risk and online. This Safeguarding Code of Conduct also details how individuals can also protect themselves against allegations of abuse.

12 How to Protect Yourself Against Allegations of Abuse

Avoid personal and social contact with children or adults at risk and seek to minimize the risk of any situation arising in which misunderstandings can occur.

You Should NOT:

- Engage in flirting, innuendo or make suggestive terms or gestures, or indicate favouritism for a child or adult at risk
- Issue or threaten any form of physical punishment
- Initiate or engage in sexually provocative games, conversations or activities involving or observed by young people or adults at risk, whether based on talking or touching
- Allow the use of inappropriate language to go unchallenged
- Do things of a personal nature for children or adults at risk that they can do for themselves
- Dismiss an allegation of any sort relating to a customer's welfare or delay the reporting of an allegation
- Discourage anyone from reporting concerns
- Make promises to keep secrets, keep any disclosure confidential or overreact or be judgemental should they disclose abuse
- Spend excessive amounts of time alone with children or adults at risk, away from others
- Make unnecessary physical contact with children or adults at risk, however, there may be occasions where physical contact is unavoidable, such as providing comfort at times of distress or physical support in contact sports or similar. In all cases, contact should only take place with the consent of the child or adult at risk
- Do not arrange to meet a child or adult at risk or their families with whom you work outside of working hours unless it is with the consent of the parents/carer and person in charge of the activity
- Make sexually suggestive remarks or discriminatory comments to or in front of a young person or adult at risk or discuss staff's own sexual relationships in front of them
- Engage in any sort of sexual relationship with a young person or adult at risk even where the person is aged 16yrs or over and therefore legally able to consent

- Use any type of physical punishment in order to discipline. Shouting at young people or adults at risk should be avoided whenever possible and only if alternative forms of discipline have failed
- Photograph or film young people or adults at risk for which no prior consent has been sought and recorded
- Broadcast or view any audio and or visual material (CD, DVD, video, computer, or games, etc.) that has inappropriate content to young people or adults at risk
- Invite, or allow a young person or adult at risk who you have met through your work to your home, or another location where the purpose is one of friendship or an intimate relationship
- Engage in or tolerate, any inappropriate physical activity involving young people or adults at risk

You Should:

- Work in a room where you can be visibly seen, leave the door open and make sure other adults visit the room regularly whilst respecting children and adults' rights to privacy. Encourage children and adults to feel comfortable enough to report attitudes and behaviours they do not like
- Plan activities that involve more than one person being present, or at least within sight and hearing of others. If it is unavoidable always ensure your line manager knows where you are, with whom and why
- All staff, volunteers, delivery partners and contractors at organised activities will be expected to act with discretion with regard to their personal relationships. This should ensure their personal relationships do not affect their leadership role within the organisation. All pre-existing relationships between staff, volunteers, delivery partners, contractors and or participants of the organised activities must be declared
- Avoid working in isolation with children and adults at risk, follow the recommended adult to-young people ratios for meetings and activities and ensure there is a separate sleeping accommodation for young people, adults and Young Leaders
- Never give out a personal mobile number or private e-mail address and ensure working hours of contactability are stated
- Everyone should be aware of the procedures for reporting concerns or incidents and be familiar with the contact details of the DSL and DSOs
- Treat all young people and adults equally and listen to them, avoid favouritism and gossiping
- Never befriend or chat with children or vulnerable adults on social network sites.
- Always use professional language when writing, phoning, emailing or using social media to communicate with young people or vulnerable adults
- Be aware that young people can develop heterosexual and homosexual infatuations (crushes) towards adults working with them. If this is happening, tell your line manager and then respond to the situation in a way that maintains the dignity of all concerned
- Ensure all allegations or disclosures by a young person or another adult are taken seriously and reported, including any made against you. Follow the procedures for reporting concerns
- If staff, volunteers, delivery partners and contractors have concerns relating to the welfare of a child or vulnerable adult in their care, be it concerns about actions/behaviours of another colleague or concerns based on any conversation with the child or vulnerable adult, particularly where they make an allegation, they should report this immediately
- Act as a role model
- Set and monitor appropriate boundaries and relationships when working with children and vulnerable adults based on openness, honesty and respect for the child
- or vulnerable adult. Ensure that the focus of your relationship with a young person or adult at risk that you have met through any programmes remains professional at all times. The aim should never be to develop the relationship into a friendship or intimate relationship
- Respect a young person/adult's right to personal privacy but never agree to keep any information relating to the harm of a young person/adult confidential. Provide support to a child, young person or adult at risk of making a complaint

- Remain calm and ensure that no one is in immediate danger if they suspect abuse. Report any concerns to the DSOs without delay and record all the facts
- Ensure that if a young person or vulnerable adult who has become distressed needs comfort that this is done in a way that is both age-appropriate and respectful of their personal space. Never act in a way that may be perceived as threatening or intrusive. Always ask a young person or adult at risk before you act. Hugging should be limited and never initiated by staff/volunteers. Any hugging should be done by the side of the young person with an arm placed around the shoulders side by side
- Ensure that if any kind of physical support is required during any activities, it is provided only when necessary in relation to the activity and that this is done in a way that other colleagues can observe you

Upon induction to the programme the young person or adult at risk will be given a copy of the Code of Conduct and the Umbrella Training staff will go through this document with them to ensure they understand their responsibilities. If a young person or vulnerable adult feels that there has been a breach of the Code of Conduct, they should report this breach by utilising the Umbrella Training complaints process (*Annex 3*)

The complaint will be fully investigated as per the policy/process and actions are taken to ensure the individual making the complaint is fully supported. If the complaint is in regard to another young person or adult at risk, there may be a need for immediate actions to be implemented to ensure the safety of both the individual making the complaint and the person the complaint has been made against. The breach of the code of conduct may need the intervention of the DSO Team and the Umbrella Training complaints manager.

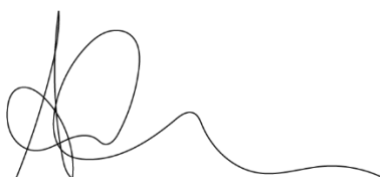
Staff, volunteers and other stakeholders who breach this code of behaviour may be subject to Umbrella Training's disciplinary procedures whilst volunteers who do so may not be able to continue in their volunteering role. Serious breaches may result in a referral being made to a statutory authority.

All young people and adults at risk should be treated with respect and the Code of Conduct has been written with respect, dignity and safety for every individual in mind, however, staff understand that young people and adults at risk are capable of abusing their peers. Peer abuse can take forms such as sexting, bullying, physical and or emotional abuse and inappropriate banter.

13 Document Control

Document Reference	
Document Title	Safeguarding and Prevent Policy and Procedures
Version	5
Original Author	Adele Oxberry and Dan Grant
Authors Title	CEO
Policy Owner	Head of Quality and Operations
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Annual Review Date	September 2024
Author of Revision	Karen Palfreyman
Date of Revision	6 th February 2024
Revision Number	5
Reason for Revision	Legislation updates and changes to DSL
Amendments	Legislation updates and changes to DSL
Annual Review Date	September 2024

Signed



Printed Name Adele Oxberry
 Job Title CEO
 Date 6th February 2024

Annexes

- **Annex 1:** List of relevant Agencies and Contact Details
- **Annex 2:** Umbrella Training Code of Conduct
- **Annex 3:** Umbrella Training Complaints Procedure and Form
- **Annex 4:** Umbrella Training Designated Safeguarding Referral Form

Annex 1:

Safeguarding Local Authority Contact for Prevent Teams Version 1.2 | Revision Date: January 2021

Westminster

<https://www.westminster.gov.uk/leisure-libraries-and-community/crime-and-community-safety/prevent/safeguarding-vulnerable-individuals>

Mark Chalmers

mchalmers@westminster.gov.uk
or please call directly: 0781 705 4759

Camden

<https://www.camden.gov.uk/safeguarding-adults-and-children>
Please call [020 7974 4000](tel:02079744000) and select option 1, or
email adultsocialcare@camden.gov.uk.

Kensington and Chelsea

<https://www.rbkc.gov.uk/health-and-social-care/adult-social-care/safeguarding-adults>

Safeguarding helpline 020 7361 3013 (office hours) / 020 7361 3013 (out-of-hours)

Email: socialservices@rbkc.gov.uk

Kent and Medway

Email: KMSAB@kent.gov.uk

<https://www.kmsab.org.uk/p/worried-about-an-adult/report-abuse>

Hampshire

Hampshire Adult Services: 0300 555 1386 or out of hours: 0300 555 1373

<https://www.hants.gov.uk/socialcareandhealth/adultsocialcare/safeguarding>

Bath and NE Somerset

<https://beta.bathnes.gov.uk/tell-us-about-adult-being-abused-or-neglected>

Call: [0300 247 0201](tel:03002470201) and select option 3 (our phone lines are open Monday to Thursday, 8.30am to 5pm, and Fridays, 8.30am to 4.30pm), or call Emergency Duty Social Work team on [01454 61 51 65](tel:01454615165) (evenings, weekends and bank holidays).

West Berkshire

<https://www.westberks.gov.uk/article/38898/Concerned-About-an-Adult-Being-Abused-or-Neglected>

Tel :[01635 519056](tel:01635519056)

Windsor and Maidenhead

<https://rbwmsafeguardingpartnership.org.uk/p/safeguarding-adults/safeguarding-adults>

During working hours contact the First Contact and Duty Team on 01628 683744

Outside of working hours contact the Emergency Duty Service on 01344 351999

Dorset

<https://www.dorsetcouncil.gov.uk/care-and-support-for-adults/dorset-safeguarding-adults-board/reporting-a-concern>

Tel: 01305 221 016 during office hours

Tel: 01305 858 250 for the [Out of Hours Service](#)

Leeds

<https://leedssafeguardingadults.org.uk/contact-us>

Tel: 0113 222 4401

Nottingham

<https://www.nottinghamshire.gov.uk/care/safeguarding/reporting-abuse>

Tel: 0300 500 80 80 to discuss your concerns. In an emergency outside of these hours, contact the Emergency Duty Team on 0300 456 4546.

Devon and Torbay

<https://www.devonsafeguardingadultspartnership.org.uk/reporting-a-concern/>

Devon

Tel: Care Direct on [0345 1551 007](tel:03451551007) (Monday to Friday 8.00 am to 8.00 pm and Saturday 9.00 am to 1.00 pm)

Tel: Emergency Duty Service on [0345 6000 388](tel:03456000388) (outside of the hours above or on bank holidays)

Email: csc.caredirect@devon.gov.uk

Torbay

Tel: Torbay Safeguarding Adults Single Point of Contact Team on [01803 219700](tel:01803219700)(Monday to Friday, 9.00 am to 5.00 pm)

Tel: Emergency Duty Service on [0300 4564 876](tel:03004564876) (outside of the above hours, weekends and bank holidays)

Email: safeguarding.alertstct@nhs.net

Luton

https://m.luton.gov.uk/Page/Show/Health_and_social_care/safeguarding/safeguarding_adults/Pages/default.aspx

Tel: 01582 547730

Email: adultsafeguarding@luton.gov.uk

Lewis and Eastbourne

<https://www.lewes-eastbourne.gov.uk/about-the-councils/safeguarding/>

Tel: 0345 60 80 191

Oxfordshire

<https://www.oxfordshire.gov.uk/residents/social-and-health-care/keeping-safe/raising-safeguarding-concern>

Tel: 0345 050 7666 during office hours or the Emergency Duty Service number (0800 833 408) outside of those hours.

Annex 2:

Code of Conduct

Umbrella Training employees are required, under the Code of Conduct, to behave at all times in a way that upholds the Umbrella Training Values. The Code: The Code of Conduct requires that when working on behalf of Umbrella Training, Employees must:

- Behave honestly and with integrity
- Act with care and diligence
- Treat everyone equally with respect and courtesy
- Comply with all UK laws
- Maintain appropriate confidentiality, at all times working within the requirements of the
- Data Protection Act
- Disclose, and take reasonable steps to avoid any conflict of interests (real or apparent)
- Use resources appropriately
- Not provide false or misleading information
- Not make improper use of:
 - Business information, or
 - Status, power or authority in order to gain, or seek to gain, a benefit or advantage for their own self or for any other person
- At all times behave in a way that upholds the Values, Integrity and Good Reputation of Umbrella Training
- At all times follow the Policies and Procedures set out by the organisation
- Maintain a professional standard of conduct as is embedded in Umbrella Training's Values, Policies and Procedures which supports the development of professional relationships between employees and customers
- Adhere to the following principles which apply in respect of personal relationships with customers:
 - Any employee who is involved in a close personal relationship with a customer must not allow that relationship to influence his/her conduct while at work
 - If the employee's role places them in a position of trust and they begin a close personal relationship with a customer, the relationship must be declared to the employee's manager. In these circumstances, the Company reserves the right to transfer the employee following appropriate consultation or will apply alternative measures for example, reallocation of caseloads and such like
 - Employees, temporary workers and volunteers are expected to make informed judgements about their own conduct and behaviour in order to advocate the best interests, wellbeing and safety of all customers within their care, taking accountability and responsibility for such actions
 - Employees are to be mindful in the disclosure of any personal information

Annex 3:

Complaints Procedure

Please refer to our complaints and procedure policy via our website or contact our head office on:
0333 577 2557

Annex 4:

Umbrella Training National Safeguarding Referral Form

Page 1				
Name of Child/Vulnerable Adult				
Please state which programme and location they are allocated to:				
Programme:		Location:		
Gender:		Ethnicity:		
DOB:		Language:		
		Interpreter Needed?		
Address:				
Postcode:		Phone:		
Service/Organisation:				
Date started at Service/Organisation:				
Main Carer/s:				
Relationship:	Name:	DOB:	Address:	Phone:
Is the main carer aware of the referral?:		Yes:	No:	
If No, state reason:				
Does the individual concerned know a referral is being made?:			Yes:	No:
If No, state reason:				

Page 2

Other relevant information: (GP, Health Visitor Name)

Reason for concern: (State briefly)

State briefly what the individual concerned said or what you observed that caused concern. Include date, time and event. Please use an additional sheet if necessary

Category of concern:

Physical:

Neglect:

Emotional:

Sexual:

Financial:

Extremism:

Child Trafficking:

Human Trafficking:

Who have you spoken to and what was said?

Page 3

State what action you have taken, and when:

--

Signed:

--

Print Name:

--

Date:

--

Position:

--

It is important that you complete all sections of the form. Once completed, please forward the form for the attention of the Lead Designated Safeguarding Officer via email and your form will be dealt with accordingly.

Please note that the DSO will acknowledge receipt of your concern and will keep you informed of actions being taken wherever possible.