



Safeguarding Policy

Version 7 - September 2025

Document Control

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Version Control

Version 4	Effective Date: August 2022
Version 5	Effective Date: April 2023
Version 6	Effective Date: October 2024

Review Dates

Policy will be reviewed on an annual basis.

Linked Policies

Safer Recruitment Policy – Aug 2023
Equal Ops Policy – October 2023
Health & Safety Policy – Jan 2024
Disciplinary Policy – Oct 2023

Person Responsible for the Policy

Managing Director

Name

Tony Higgins

Signature

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1. Policy Statement

Purpose and scope

All providers of adult, community and work-based learning in England are required by the *Safeguarding Vulnerable Groups Act 2006 (as revised)* to secure the safety of children, young people and vulnerable adults who are their learners. As a provider of education, System People are committed to ensure all learners are kept safe so that they can learn and thrive. The drive for 'Inclusive Learning' has succeeded in bringing into the system learners with a wide range of needs, including many who can now be deemed 'vulnerable'.

The term vulnerable is defined as a person 'who is or may be in need of community care services by reason of mental or other disability, age or illness: and who is or may be unable to care for him or herself, or unable to protect him or herself against significant harm or exploitation' (Department of Health 2000).

Section 42, Care Act 2014

- (a) has needs for care and support (whether or not the authority is meeting any of those needs),
- (b) is experiencing, or is at risk of, abuse or neglect, and
- (c) as a result of those needs is unable to protect himself or herself against the abuse or neglect or the risk of it.

The six key principles that underpin all adult safeguarding are:

- Empowerment
- Prevention
- Proportionality
- Protection
- Partnership
- Accountability

The term vulnerable may also apply to people at increased risk of abuse or mistreatment due to some of the following factors:

- They may be unaware of their rights
- They may be socially isolated
- They may not know how to complain or who to complain to
- They may have communication difficulties in making decisions
- They may have low self esteem
- They may be discriminated against linked to the nine protected characteristics
- They may not have access to healthcare
- They may be dependent on others for their basic health care needs

At System People, this may apply to a colleague or a learner you work with.

A child is defined as anyone who has not yet reached their 18th birthday, 'Children' therefore means 'children and young people' The fact that a child has reached 16 years of age, is living independently or is in further education does not change his or her status or entitlement to services or protection under the Children's Act 1989 (As revised)

Essential Annex documentation for safeguarding policy:

- Annex A Safeguarding Children/Vulnerable Adult Incident Record – to be completed in accordance with the Policy where there is a cause for concern.
- Annex B Safeguarding Children & Vulnerable Adults Flowchart – guidance on next steps when a cause for concern has been raised.
- Annex C Safeguarding information for all staff – summary of the Keeping Children Safe in Education Part One legislation.

The essential appendices documentation is relevant to safeguarding policy covering children, young people and vulnerable adults and should be read in conjunction with this policy.

What is Safeguarding?

The term '*Safeguarding*' describes the broader preventative and precautionary approach to planning and procedures that are necessary to be in place to protect children, young people and vulnerable adults from any potential harm or damage including, abuse, neglect and exploitation.

Safeguarding is more than having background check policies and procedures in place. It means having a culture of vigilance where all staff know their responsibilities and act accordingly and all learners are aware of what they can expect and what to do if they have concerns. It is about providing a deep commitment to place the learner at the centre of our concerns and to build policies, practices, and procedures around the learner for them to succeed.

Safeguarding must be the informed responsibility of all staff, senior management, volunteers, and board members to ensure the learning environment is safe and secure for all. In order to do so they will need to consider and act on the 5 R's:

Recognition

The ability to recognise behaviour that may indicate abuse, neglect and exploitation is of fundamental importance. Whether the abuse, neglect or exploitation may occur on or outside of System People premises, in or outside of the home, online or in any other setting in which the learner may find themselves, all those playing a role in meeting learners' needs should be aware and informed so that possible abuse can be recognised, investigated, and acted upon effectively. This includes where children have witnessed the ill-treatment of others and is particularly relevant when children see, hear or experience domestic abuse and its effects. Signs and symptoms of abuse, neglect or exploitation of young people and/or vulnerable adults may include direct disclosure. All staff should be trained to understand signs of possible abuse neglect or exploitation and know how, where and to whom to report concerns. Staff will be able to recognise signs of abuse, will know how to respond to students, how to use appropriate questioning and how to record information accurately. They will be aware of the Designated Person Flowchart and how to follow this procedure.

Response

Appropriate response by our staff is vital. No report of or concern about possible abuse should ever be ignored. Staff are trained how to determine the most appropriate response and to clarify precise details. They are aware of the correct protocol, i.e.:

- Do not lead or probe with questions
- Remain calm, listen and ensure your body language and facial expressions remain neutral.
- Do not agree confidentiality, this may restrict you from taking any action later
- Reassure that they have done the correct thing in reporting their concerns and that everything possible will be done to help
- Record any disclosures accurately with no opinion or personal beliefs
- Keep copies of any notes taken and please sign and date them accordingly
- It is essential to remember that children and young people may not feel ready or know how to tell someone that they are being abused, they may begin to disclose information only to stop and withdraw. You must not question or 'push' for information but report and wait for them to feel ready to make the approach again.

Report

Report your concern or allegation within 24 hours to the company Safeguarding Officer or member of staff with specific designated responsibility for dealing with issues relating to safeguarding, using this link:

<https://www.sptraininguk.com/safeguarding/>

The link will take you to a form embedded within the SP Training website, please complete, and click on 'Send' at the bottom of the page. The information will then go directly to the safeguarding inbox and no data will be stored within the website.

The Designated Safeguarding Officer may contact you for further information if required and will investigate from this point. The information must not under any circumstances be discussed with anyone apart from the designated Safeguarding Officer.

Recording

Staff are trained to ensure allegations are recorded precisely using the link above.

Please use the words of the complainant and include accurate quotation. This can include observations about the physical and emotional state of the individual sharing their concerns. Information is recorded and stored securely, confidentially, and only accessible to those who need to access it as part of the action taken to resolve the complaint or allegation.

Referral

The decision to refer a complaint or allegation lies with the Designated Safeguarding Officers, having gathered and examined all relevant information. No one else will investigate such a situation. Investigation will involve questioning colleagues, learners, carers, parents, assessors and the complainant. Designated Safeguarding Officers will have access to organisations and websites in order to seek guidance and help for learners.

2. Safeguarding Strategy

The safeguarding strategy sets out the strategic approach to strengthening our arrangements for safeguarding across the company.

System People are committed to maintaining the highest possible standards to meet its social, moral and legal responsibilities to safeguard the welfare of every child/young person or vulnerable adult (hereinafter referred to as learners).

The emphasis of our safeguarding strategy and action plan is to focus on all the people who use our services. This will be a further demonstration of our organisational values & culture base. In order to meet the company culture and values to treat people well and keep people safe we need to demonstrate our effectiveness in safeguarding adults and children from abuse neglect and exploitation or maltreatment of any kind to enable people and children to feel safe.

The Aims of the Safeguarding Strategy

Our aims are:

- To ensure that all staff understand safeguarding is everyone's business
- To keep children, young people and vulnerable adults safe
- To raise and maintain awareness regarding Safeguarding, Health & Safety, and Equality and Diversity across the company
- To ensure that we work in partnership and contribute to the safeguarding work with the relevant Stakeholders and Boards
- To learn the lessons and good practice from serious case reviews, local and national enquires
- To ensure LGBTQ+ children, young people and adults have a safe space for them to speak or share concerns with members of staff
- To provide help and support to meet the needs of children as soon as problems emerge
- To protect children from maltreatment, inside or outside the home, including online
- Offer appropriate signposting to outside agencies offering specialised services e.g. 'Shore Space'

We shall achieve our objectives by carrying out the following strategic activities:

Strategic Planning

- By ensuring that safeguarding is embedded within our strategic and operational planning processes
- By reviewing annually this strategy and associated policies

Filtering and Monitoring

- Learners only have access to company software in order to sit examinations, at no point are learners left unattended throughout this process and are only able to access the exam content that they are scheduled to complete.
- Outside safeguarding influences are addressed through hot topics
- All platforms that learners need to access in order to complete planned learning are secure and password protected with content reviewed by the DSL

Cyber Security

- To safeguard issues due to sensitive personal data being compromised
- To prevent a significant data breach
- To prevent reputational damage
- By gaining Cyber Essentials certification on an annual basis

Leadership and Management

- By implementing an annual Business Development Plan to address our areas for improvement and build on our strengths so that our safeguarding arrangements continue to improve
- By ensuring all personal data will be processed in accordance with the requirements of the Data Protection Act 2018 and General Data Protection Regulation (GDPR).
- By highlighting in job descriptions, staffs' responsibilities in relation to safeguarding.
- By giving staff opportunities to propose ideas and to share best practice through regular staff meetings, as minimum, annual training and awareness sessions and through staff surveys.
- By continuing to work with employers to benchmark their current safeguarding practice and work collaboratively to support improvement

- By monitoring the development of all learning materials and establishing standardized best practice.

Safer Recruitment

- By implementing a rigorous staff recruitment and selection process (including risk assessment) to ensure their suitability to work with learners.
- By informing shortlisted candidates that online searches may be done as pre-recruitment checks

Induction

- By providing a thorough induction to both staff and learners to raise awareness and understanding of System People safeguarding arrangements, the standards expected and their responsibilities in relation to these.

Continuous Personal Development (CPD)

- All relevant staff will complete Safeguarding training annually.
- All staff will complete Equality and Diversity bi-annually
- All Designated Safeguarding persons will complete Safeguarding training at Level 3.

Child Protection

- By undertaking thorough risk assessments to ensure that all relevant staff and service providers are subjected to the relevant DBS check
- By educating and empowering learners to take responsibility for their own safety and wellbeing and that of others.

3. Radicalisation and Extremism

Since 2010, when the Government published the Prevent Strategy, there has been an awareness of the specific need to safeguard young people and families from violent extremism. There have been several occasions in which extreme groups have attempted to radicalise vulnerable young people to hold extreme views including views justifying political, religious, sexist or racist violence, or to steer them into a rigid and narrow ideology that is intolerant of diversity and leaves them vulnerable to future radicalisation.

When any member of staff has concerns that a learner or member of staff may be at risk of radicalisation or involvement with terrorism, they should speak with one of the companies designated safeguarding officers. Most young people do not become involved in extremism, for this reason, the appropriate interventions in any particular case may not have any specific connection to the threat of radicalisation, for example, they may address mental health, relationship or drug/alcohol issues.

As part of the wider safeguarding responsibilities, staff at System People will be alert to use of extremist or 'hate' terms to exclude others or incite violence.

Risk Assessment

- By undertaking thorough risk assessments of learning processes that we deliver ourselves
- By working closely with employers and other partners to ensure appropriate risk assessments have been completed.

Communication

- By facilitating effective internal and external communications that promote clear

understanding of strategic aims and objectives, policies, operating procedures and guidance notes.

Quality Improvement

- By observing teaching, learning and assessment
- By benchmarking our performance through analysis of Inspection Reports published by Ofsted and other good practice materials
- By the publication of an annual self-assessment report (SAR) that evaluates the effectiveness of our safeguarding arrangements against the Common Inspection Framework
- By improving safeguarding arrangements via the Business Improvement Plan
- By listening carefully to what our learners and employers think of the experience they receive through formal and informal feedback opportunities, including questionnaires, regular formal reviews, monitoring visits, meetings, presentations and the complaints and compliments log
- By ensuring observations of key learning processes take into account safeguarding arrangements and support continuous improvement
- By sharing our best practice across contracts and the regions so that all learners benefit from consistently high standards.

In summary, the key processes required to be in place are:

- Business and development planning
- Policy and strategy review
- Staff recruitment and selection
- Risk assessment of the different 'Learner Journeys'
- Review of employers' safeguarding arrangements
- Self-assessment and quality improvement planning.

These key processes are dependent on:

- Communications within System People
- Communications with learners, employers and other stakeholders
- Learner, employer and staff feedback
- Feedback from the senior management team
- Monitoring and evaluation of activities and internal audit
- Benchmarking of performance against comparable organisations.

CTP Prevent Team Contact Details:

If you require further assistance or advice on any non-urgent Prevent or CT related matter, please contact your local Prevent team:

Cheshire - 01606 362 147 , Cumbria - 0300 124 0113 , Greater Manchester - 0161 856 6345
Lancashire - 01282 472 320 , Merseyside - 0151 777 8506, London - 020 7601 2442 ,
North East - 0800 789 321,

This is a website dedicated to counter terrorism

[ACT Early | Prevent radicalisation](#)

The following link contains help & advice around counter terrorism

<https://www.gov.uk/government/organisations/national-counter-terrorism-security-office>

4. Roles and responsibilities

- Overall responsibility for implementing this strategy and monitoring the Business improvement plan lies with the Management Team
- The Managing Director is responsible for the development and maintenance of the policies, strategies and operating procedures
- The Safeguarding Lead is responsible for acting as a source of advice and support in relation to safeguarding and protecting learners, promoting good practice and for co-ordinating action within the company on receipt of any concerns or referrals
- The Quality and Compliance team undertakes review of all the documentation and ensures the processes are followed across the business
- Delivery staff (with support from the Safeguarding Lead) are responsible for promoting and ensuring that the safeguarding standards set by System People are applied to their provision
- All operational staff job descriptions will include general responsibilities relating to safeguarding.

Communication of the Safeguarding Agenda

There are a wide range of meetings which address the implementation of this Safeguarding Strategy including, senior management team meetings, quality team meetings, and operational team meetings. Staff development sessions also enhance communication of the safeguarding agenda and focus on improving practice.

5. Reporting Procedure

No one other than the Safeguarding Lead or Deputy should mount an investigation into complaints, allegations, or suspicions of abuse. If actions are carried out by someone other than the Safeguarding Lead or Deputy, it could be seen as unjustified interference which could jeopardize an investigation and any possible subsequent court case.

Designated Safeguarding Leads – Sarah Taylor, Liza Ewing and Jayne Lillington (reporting to Tony Higgins)

All allegations against people who work with children and that meet the specific criteria below should be reported by the employer within one working day to Local Authority Designated Officer (LADO).

- Staff who have behaved in a way that has harmed a child or may have harmed a child
- Staff who have possibly committed a criminal offence related to a child
- Staff who have behaved towards a child or children in a way that indicates that he/she is unsuitable to work with children.

If you need to contact your **Local Authority Designated Officer (LADO)**, please consult your Local Children Safeguarding Partnership (CSCP for Cumbria) or Local Authority Children Safeguarding Partnership in all other areas:

CSAB – Cumbria Safeguarding Adults Board

All reports of adult disclosures or concerns must be reported to the Safeguarding Team. Referral to the Local Adult Safeguarding Board will be made as necessary. The local authority has a statutory responsibility to cooperate with relevant partners to protect adults experiencing abuse or neglect.

Your local Adult Safeguarding Board can be found here

<https://www.anncrafttrust.org/resources/find-your-nearest-safeguarding-adults-board/>

System People have a dedicated email address for safeguarding issues which is as follows: safeguarding@sptraininguk.com and there is a designated safeguarding mobile phone to contact which is 07555792632.

6. Key guidance and legislation

The key guidance and legislation for the safeguarding of children responsibilities for System People are contained within:

- The Children Act 1989
- The Victoria Climbié Inquiry Report by Lord Laming; 2003
- Every Child Matters Green Paper 2003
- Every Child Matters 'Change for Children' 2004
- National Service Framework for Children, Young People and Maternity Services 2004
- The Children Act 2004(revised 2014)
- Working Together to Safeguard Children 2006 (2025 now Statutory Guidance)
- Safeguarding Vulnerable Adults Act 2006
- Safeguarding Children and Safer Recruitment in Education 2007
- Vetting and Barring Scheme 2009
- Rehabilitation of Offenders Act 1974
- Equality Act 1998
- Children and Social Work Act 2017
- GDPR 2018
- Keeping Children Safe in Education 2021
- The Care Act 2014

7. Forms of Abuse

Physical Abuse – may involve hitting, shaking, poisoning, burning, or scalding, drowning, suffocating or otherwise causing physical harm to a child. Factitious Disorder is also classed as physical abuse. Physical harm may also be caused when a parent or carer feigns the symptoms of, or deliberately causes ill health to a child whom they are looking after. The situation is commonly described using terms such as Factitious illness by proxy or Factitious Disorder.

Emotional Abuse – is the persistent emotional ill treatment of a child that causes severe and persistent side effects on the child's emotional development. It may involve conveying to the children that they are worthless or unloved, inadequate, or valued only in so far as they meet the needs of another person. It may feature age or developmentally inappropriate expectations being imposed on children. These may include interactions that are beyond the child's

development capability as well as overprotection and limitation of exploration and learning or preventing the child participating in normal social interaction. It may involve seeing or hearing the ill treatment of another. It may involve serious bullying causing children to feel frightened or in danger, or the exploitation or corruption of children. Some level of emotional abuse is present in all types of ill treatment of a child, though it can still occur alone.

Sexual Abuse – involves forcing or enticing a child or young person to take part in sexual activities including prostitution, whether or not the child is aware of what is happening. The activities may involve physical contact, including penetrative (e.g. rape or buggery) or nonpenetrative acts. They may involve non-contact activities such as involving children in looking at, or in the production of sexual online images, pornographic material, or watching sexual activities, or encouraging children to act in sexually inappropriate ways. On 21st June 2018 the law changed to include 'Upskirting' as a criminal offence.

Neglect - is the persistent failure to meet a child's or vulnerable adult's basic physical and/or psychological needs, likely to result in the serious impairment of the child's health or development. Neglect may occur during pregnancy as a result of maternal substance misuse. Once a child is born it may involve a parent or carer failing to provide adequate food, shelter or clothing, failing to protect the child or vulnerable adult from physical harm or danger, or failure to ensure access to medical care or treatment. It may also be neglect of or unresponsiveness to the child's emotional needs.

Financial Abuse – This is illegal or unauthorised use of a person's property, money or other valuables. This may be limiting access to money or other resources, or by forcing all financial responsibility onto their victim while limiting their ability to provide this. Financial abuse may include: Taking money from them. Not allowing them access to shared money.

Homelessness - The homeless Reduction Act 2017 places a new legal duty on English councils so that everyone who is homeless or at-risk of homelessness will have access to meaningful help, an assessment of their needs and circumstances, development of a personalised housing plan or work to help them retain their accommodation or find a new place to live.

Staff who identify a learner either at risk of homelessness or are homeless should raise this with the company Safeguarding lead or deputy

'Honour Based' Violence (HBV) - HBV encompasses crime or incidents that have been committed to defend or honour of a family and or community. This may include forced marriage or female genital mutilation. All forms of HBV are abuse regardless of the motivation.

Female Genital Mutilation (FMG) - FMG comprises all procedures involving partial or total removal of the external female genitalia or other injury to the female genital organs. FMG is illegal in the UK and a form of child abuse with long lasting harmful consequences.

Forced marriage - Forcing a person into a marriage is a crime in England and Wales. A forced marriage is one entered into without the full and free consent of one or both parties and where violence, threats or any other form of coercion is used to cause a person to enter into a marriage. Threats can be physical or emotional and psychological. A lack of full and free consent can be where a person does not consent or where they cannot consent (if they have learning disabilities, for example). Nevertheless, some communities use religion and culture as a way to coerce a person into marriage. Schools and colleges can play an important role in safeguarding children from forced marriage.

Child Criminal Exploitation (CCE) and child sexual exploitation (CSE) - Criminal exploitation of children is a geographically widespread form of harm that is a typical feature of county lines criminal activity: drug networks or gangs groom and exploit children and young people to carry drugs and money from urban areas to suburban and rural areas, market and seaside towns. Key to identifying potential involvement in county lines are missing episodes, when the victim may have been trafficked for the purpose of transporting drugs and a referral to the National Referral Mechanism should be considered. Both CCE and CSE are forms of abuse that occur where an individual or group takes advantage of an imbalance in power to coerce, manipulate or deceive a child into taking part in criminal or sexual activity. It may involve an exchange for something the victim needs or wants, and/or for the financial advantage or increased status of the perpetrator or facilitator and/or through violence or the threat of violence. CCE and CSE can affect children, both male and female and can include children who have been moved (commonly referred to as trafficking) for the purpose of exploitation. Like other forms of abuse and exploitation, county lines exploitation CCE and CSE:

- can affect any child or young person (male or female) under the age of 18 years;
- can affect any vulnerable adult over the age of 18 years;
- can still be exploitation even if the activity appears consensual;
- can involve force and/or enticement-based methods of compliance and is often accompanied by violence or threats of violence;
- can be perpetrated by individuals or groups, males or females, and young people or adults; and
- is typified by some form of power imbalance in favour of those perpetrating the exploitation. Whilst age may be the most obvious, this power imbalance can also be due to a range of other factors including gender, cognitive ability, physical strength, status, and access to economic or other resources.

Domestic Abuse- Domestic abuse can impact children in a variety of ways including psychological, physical, sexual, financial or emotional. This can be through seeing, hearing or experiencing the effects of domestic abuse in the home between others or within their own intimate relationships.

Children Missing from Education –

It is essential to remember that being absent, as well as missing, from education can be a warning sign of a range of safeguarding concerns, including sexual abuse, sexual exploitation or child criminal exploitation. Children and vulnerable adults that are absent or missing from education are reported immediately and calls are made to the learner, employer and if deemed appropriate the parent. If this raises a safeguarding concern a referral is made and passed to the DSL following policy

Child on child abuse - Children can abuse other children. This used to be referred to as peer-on-peer abuse and can take many forms. This can include (but is not limited to) bullying (including cyberbullying); sexual violence and sexual harassment; physical abuse such as hitting, kicking, shaking, biting, hair pulling, or otherwise causing physical harm; sexting and initiating/hazing type violence and rituals.

Key points in legislation include –

- the importance of explaining to children that the law is in place to protect rather than criminalise them
- the importance of understanding intra-familial harms, and any necessary support for siblings following incidents

- the need for schools and colleges to be part of discussions with statutory safeguarding partners.

Other forms of abuse can include, but are not limited to, and may pose a risk to children, learners and vulnerable adults; serious violent crime, risks linked to using technology and social media, substance misuse, issues that may be specific to local area or population e.g. gang activity and knife crime. It must be remembered that all forms of abuse will have a negative impact on mental health.

All concerns should be reported to the company Safeguarding lead or deputy

8. Staff Responsibilities and Training

Learners

All Learners will be introduced to their rights and responsibilities with regards to Safeguarding through their induction and initial assessment. Learners will go through a thorough sign-up procedure with a member of staff, where any additional needs will be determined, logged and appropriately dealt with. All Learners in work-based learning will have their place of work vetted by a trained member of staff for Health and Safety purposes. Learners who work in places deemed medium or high risk will be revisited at regular intervals. Reviews with learners include specific safeguarding questions, covering areas including Health & Safety, Equality and Diversity, Safeguarding and British values; these reviews are carried out 12 weekly as a minimum.

Training

All new employees will be introduced to their rights and responsibilities with regards to Safeguarding at their initial induction. The relevant policies are available to all employees.

All staff in contact with learners who are under 18 or vulnerable adults will receive appropriate safeguarding training annually and regular safeguarding updates. Effective training is the key to carrying out our responsibilities of promoting and safeguarding children and young people. Staff will need to be trained on how to identify a learner in need, and what subsequent action to take. Training will take place on a variety of levels and will depend upon the needs of the staff concerned. All staff will have a basic induction which will include how to report safeguarding concerns.

The Designated Safeguarding Lead will undertake regular inter-agency training and refresher training annually.

ICT Training facilities

Cyber bullying is the act of communicating harmful, violent and/or malicious words and or pictures through the means of technology.

Cyber bullying is the term used to refer to bullying and harassment by use of electronic devices through means of e-mail, instant messaging, text messages, blogs, mobile phones, pagers and websites. No longer does bullying transpire only on school grounds. The cyber world has allowed for children and vulnerable adults to be vulnerable to bullying in the safe haven of their home. This new ability to socially network in the cyber world is rapidly expanding the harmful effects children suffer from being bullied. System People play an active role in protecting their learners from this rising trend by barring them from sites and all social networking sites. All our computers are audited regularly by qualified IT staff.

9. Recording, Sharing of Information and Consent Issues

Important statutory duties in relation to vulnerable adults and children in need cannot be met without effective and appropriate sharing of information. For agencies to work together to the benefit of children, they must be able to share relevant information.

This includes a referral to Children's Social Care but could simply be sharing information between supporting agencies regarding a young person, for example, before a referral is made. However, sharing of information should take place according to the principles of good practice and on a need-to-know basis. When a request for information is made, we need to be clear about why the information is needed and the way it is going to be used. Prior to information being shared with other agencies, or a referral being made, consent should normally be sought from the young person and/or from one parent/carer with agreed parental responsibility. However, there are certain important circumstances where consent should not be sought.

These are:

- If this would put the child or young person at greater risk of significant harm.
- Interfere with criminal enquiries
- Raise concerns about the safety of staff.

10. Online Training Delivery

When delivering remote sessions online the following rules apply:

- Consent from parents and carers regarding any recording of young people and vulnerable adults.
- Delivery of classes via a suitably secure platform and teaching/learning software; consideration of filter and security settings.
- Wearing of suitable clothing.
- Lessons taking place in appropriate areas, for example, not in bedrooms; and where possible, against a neutral background.
- Professional and appropriate language, including from any family members in the background.
- Use of appropriate language in chat functions.
- Keeping lessons to a reasonable length of time so as not to prevent others in the household getting on with their day.
- Protocols for contact outside of normal operating times.
- Screen fatigue –the health and safety implications of sitting in online learning sessions all day.

11. Safeguarding Guidance

Good practice ideas:

- It is best practice to work in an open environment avoiding private or unobserved situations and encouraging open communication
- Treating all learners equally with respect and dignity always putting the welfare of each child first
- Maintaining a safe and appropriate distance with learners
- Being an excellent role model, be aware of the effect that your words and actions may have
- Assessments should be scheduled to be within the normal working day of the institution
- Ensure training and work experience providers are fully briefed on Safeguarding issues and that they agree to a Safeguarding policy or appropriate control measures.

Practices to be avoided:

- Spending excessive amounts of time alone with learners away from others
- Saying anything that might make the learner feel uncomfortable or debased.
- Saying anything that could be interpreted as aggressive, hostile or impatient.
- Being drawn into personal conversations or introducing personal subjects.
Sitting or standing too close to the learner
- Standing over the learner or otherwise making the learner feel pressured.
- Meeting other than at the pre-arranged venue
- Exchanging personal contact details.

12. Other Relevant Policies

Please refer to the following policies for further guidance:

- Safe Recruitment
- Equality and Diversity
- Health and Safety
- Whistle blowing Policy
- Disciplinary procedures
- Transgender and Transition Policy

13. Monitoring

Our procedures for safeguarding learners will be in line with Government legislation and the Education & Skills Funding Agency guidelines. When this is changed our policy will be amended to reflect the changes. The implementation of this policy will be monitored by the Senior Management Team each year.

14. Review Date

By when: August 2026

By Whom: Managing Director and Designated Safeguarding Lead

Signed:



Date: 11/09/2025

Safeguarding Children/Vulnerable Adult Incident Record

Appendix A

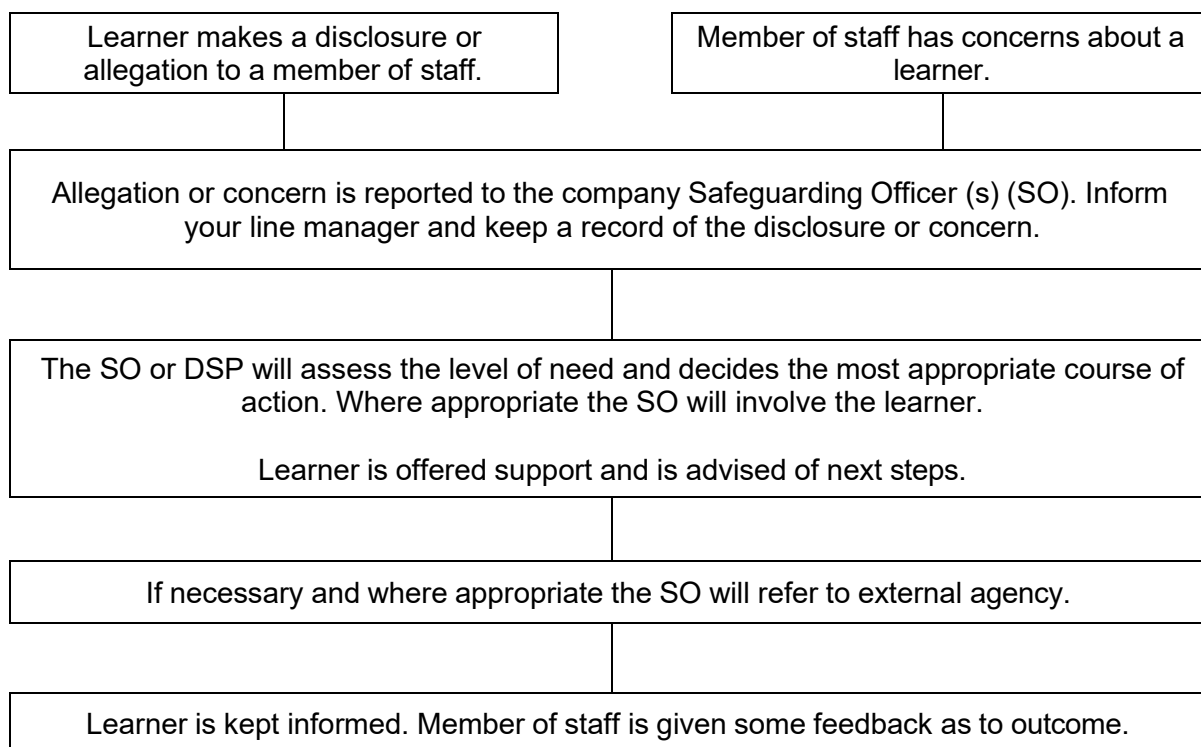
Your name:	
Your position:	
Child's/vulnerable adult's name:	
Child's/vulnerable adult's date of birth:	
Child's/vulnerable adult's address:	
Parents and or carers names and address:	
Date and time of any/alleged incident:	
Exactly what the child/vulnerable adult said and what you said (use separate sheet if necessary – remember, do not lead the child/vulnerable adult, record actual details)	
Action taken so far (use separate sheet if necessary):	

Details of any witnesses to incident/conversation including names:		
Your observations (e.g. signs of physical abuse):		
External agencies contacted (date and time)		
Police Yes/No (Circle)	If yes – which:	
	Name and contact number:	
	Details of advice received:	
Social Services Yes/No (Circle)	If yes – which?	
	Name and contact number:	
Local Authority Yes/No (Circle)	If yes – which?	
	Name and contact number:	
Other (e.g. NSPCC)	If yes – which?	
	Name and contact number:	

Print Name:	Signature:	Date:

Safeguarding Children & Vulnerable Adults Flowchart

Appendix B



If a learner makes a disclosure or staff member has concerns

You should

Listen, do not ask questions

Take the matter seriously

Act without delay – if you are unsure whether the matter needs reporting consult the DSP.

Note down the details and pass all records to the DSP.

You should not

Promise confidentiality – say ‘you can keep it a secret’ as you may have to pass the information on.

Make promises you cannot keep.

Please complete a Safeguarding Children/Vulnerable adult incident record form and deliver to the companies Safeguarding Officer Sarah Taylor - System People, Airport Business Park, Carlisle CA6 4NW.

Part one: Safeguarding information for all staff

Appendix C

Information within Appendix C relates directly to the Keeping Children Safe in Education Part One Government document, which sets out the legal duties which must be followed to safeguard & promote the welfare of children & young people under the age of 18 in schools & colleges.

As a company, we also have a duty to safeguard & promote the welfare of all vulnerable adults, where the document states child, this also includes vulnerable adults.

What schools, or training provider staff should know and do:

A child centred and coordinated approach to safeguarding

1. Schools, colleges and Training Providers staff are an important part of the wider safeguarding system for children. This system is described in statutory guidance Working Together to Safeguard Children.
2. Safeguarding and promoting the welfare of children is everyone's responsibility. Everyone who comes into contact with children and their families has a role to play. In order to fulfil this responsibility effectively, all practitioners should make sure their approach is child centred. This means that they should consider, at all times, what is in the best interests of the child.
3. No single practitioner can have a full picture of a child's needs and circumstances. If children and families are to receive the right help at the right time, everyone who comes into contact with them has a role to play in identifying concerns, sharing information and taking prompt action.
4. Safeguarding and promoting the welfare of children is defined for the purposes of this guidance as:
 - protecting children from maltreatment
 - preventing impairment of children's health or development
 - ensuring that children grow up in circumstances consistent with the provision of safe and effective care
 - taking action to enable all children to have the best outcomes
5. Children includes everyone under the age of 18.

The role of training provider staff

6. School, and training provider staff are particularly important as they are in a position to identify concerns early, provide help for children, and prevent concerns from escalating.
7. All staff have a responsibility to provide a safe environment in which children can learn and all staff should be prepared to identify children who may benefit from early help means providing support as soon as a problem emerges at any point in a child's life, from the foundation years through to the teenage years.
8. Any staff member who has a concern about a child's welfare should follow the referral processes. Staff should expect to support social workers and other agencies following any referral.
9. Every school, college and training provider should have a designated safeguarding lead who will provide support to staff to carry out their safeguarding duties and who will liaise closely with other services such as children's social care.
10. The designated safeguarding lead (and any deputies) are most likely to have a complete safeguarding picture and be the most appropriate person to advise on the response to safeguarding concerns.

11. The Teachers' Standards 2012 state that teachers (which includes headteachers) should safeguard children's wellbeing and maintain public trust in the teaching profession as part of their professional duties.

Online Safety – The Four Cs of Online Risk

Appendix D

As part of our safeguarding duty, we recognise that children and young people can be exposed to a wide range of online risks. In line with *Keeping Children Safe in Education (KCSIE) 2025*, we adopt the **‘Four Cs’ framework** to ensure awareness, prevention, and response strategies are in place.

1. Content – What learners encounter online

Children may be exposed to harmful or inappropriate material, including:

- Sexual, violent, or extremist content.
- Misinformation, disinformation, conspiracy theories, and “fake news”.
- Biased, hateful, or discriminatory material.
- Age-inappropriate games, films, or media.

Our response:

- Curriculum teaching (e.g., RSHE) helps learners develop critical thinking and resilience against misinformation.
 - Staff provide guidance to help learners differentiate between reliable and unreliable online sources.
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2. Contact – Who learners may interact with online

Risks include:

- Grooming for sexual exploitation, criminal exploitation, or radicalisation.
- Coercive or manipulative relationships developed via messaging, gaming, or social media.
- Unwanted contact from strangers.

Our response:

- Learners are taught safe online communication practices.
 - Staff are trained to recognise and respond to concerns about grooming or unsafe contact.
 - Clear reporting routes are in place for learners who feel unsafe online.
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3. Conduct – How learners behave online

Risks include:

- Cyberbullying, trolling, and harassment.
- Sexting or sharing of inappropriate images.

- Oversharing of personal data.
- Involvement in online hate, extremism, or discriminatory behaviours.

Our response:

- Behaviour and anti-bullying policies extend to online activity.
 - Learners are taught about digital footprints and the long-term impact of online actions.
 - Support is provided for victims of cyberbullying, with proportionate sanctions for perpetrators.
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4. Commerce – Financial risks online

Risks include:

- Online scams, fraud, and phishing attempts.
- Exploitative practices in online gaming (loot boxes, in-app purchases).
- Advertising and marketing targeting young people.

Our response:

- Learners are educated about online scams and responsible financial behaviour.
 - Filtering and monitoring systems flag attempts to access known fraudulent sites.
 - Parents and carers are signposted to resources on safe financial activity online.
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Policy Implementation

- The DSL (Designated Safeguarding Lead) will oversee the implementation and review of online safety measures.
- Online safety is embedded across the curriculum, with age-appropriate teaching and resources.
- Staff receive annual training on online safety, including the 'Four Cs', to ensure awareness of current risks.