

## **Safeguarding Policy**

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

### **Key Contacts**

#### **Designated Safeguarding Lead (DSL)**

- Jennifer Johnson

#### **Designated Safeguarding Officer (DSO)**

- Melanie Eastwood
- Carly Barnes
- Jonathan Barrett

#### **Designated Governor for Safeguarding**

- Kim Cook

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## 1. Scope

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

## 2. Introduction and Ethos

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

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

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

This policy is implemented in accordance with our compliance with the statutory guidance from the Department for Education, 'Keeping Children Safe in Education' [KCSIE 2025](#). Schools and colleges in England must have regard to it when carrying out their duties to safeguard and promote the welfare of children.

The procedures contained in this policy apply to all staff, including governors, temporary or third-party agency staff and volunteers and are consistent with those outlined within KCSIE 2025

## 3. Policy Context

This policy has been developed in accordance with the principles established by the Children Acts 1989 and 2004 and related guidance. This includes: DfE KCSIE 2025, Working Together to Safeguard Children 2023 (WTSC) and Ofsted: Education Inspection Framework (as amended).

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

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

- Counter Terrorism and Security Act 2015(as amended)
- Data Protection Act 2018 & GDPR
- Keeping Children Safe in Education 2025
- Mental Capacity Act 2005
- Prevent Duty Guidance 2015 (as amended)
- Safeguarding Disabled Children: Practice Guide 2009
- The Children's Act 1989 & 2004
- The Education and Skills Act 2008
- The Equality Act 2010
- Voyeurism (Offences) Act 2019
- Working Together to Safeguard Children 2024
- UK Council for Internet Safety (UKCIS 2020)
- Apprenticeships, Skills, Children and Learning Act 2009 (as amended)
- The Human Rights Act 1998

## 4. Definitions

In line with KCSIE 2025, safeguarding and promoting the welfare of children is defined for the purposes of this policy as:

- providing help and support to meet the needs of children as soon as problems emerge
- protecting children from maltreatment, whether that is within or outside the home, including online
- preventing impairment of children's mental and physical health or development;
- ensuring that children grow up in circumstances consistent with the provision of safe and effective care; and
- taking action to enable all children to have the best outcomes.

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

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

## 5. Safeguarding Adults

An **adult at risk** of harm (Care Act 2014), is an individual aged 18 years and over who:

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

When a Local Authority has reason to believe there is an adult at risk, they have a responsibility to find out more about the situation and decide what actions need to be taken to support the adult. The actions that need to be taken might be by the Local Authority and/or by other agencies, for example the Police and Health organisations. TDM may need to take action as part of safeguarding an adult, for example, to use the disciplinary procedures in relation to a member of staff or member who has been reported to be harming a participant.

## 6. Child and adult abuse:

Children and adults may be vulnerable to neglect and abuse or exploitation from within their family and from individuals they come across in their daily lives. There are **4 main categories of abuse for children under the age of 18, which are:**

- **Physical**
- **Emotional**
- **Neglect**
- **Sexual**

However, there are 10 categories of abuse for adults. This includes.

- Financial
- Sexual
- Discriminatory
- Physical
- Modern slavery
- Domestic
- Self-harm
- Organisational
- Acts of Omission
- Psychological

within these categories, there are other types of abuse such as the following:

- Child criminal exploitation
- Child sexual exploitation
- Child-on-child abuse
- Domestic abuse
- Female genital mutilation
- Grooming
- Serious violence

Further clarifications:

- **Child Sexual Exploitation** – a type of sexual abuse in which children are sexually exploited for money, power or status
- **Child trafficking** – a type of abuse where children are recruited, moved or transported, and then exploited, forced to work or sold
- **Domestic abuse** – witnessing domestic abuse is child abuse, and teenagers can suffer domestic abuse in their relationships
- **Emotional abuse** – children/adults at risk who are emotionally abused suffer emotional maltreatment or neglect. It's sometimes called psychological abuse and can cause learner's serious harm
- **Female Genital Mutilation** – the partial or total removal of external female genitalia for non-medical reasons
- **Forced marriage** -A forced marriage is where one or both people do not or cannot consent to the marriage, and pressure or abuse is used to force them into marriage.
- **Grooming** – children and young people can be groomed online or in the real world, by a stranger or by someone they know – for example a family member, friend or professional
- **Harmful sexual behaviour** – children and young people who develop harmful sexual behaviour, harm themselves and others.
- **Neglect** – an ongoing failure to meet the basic needs of a child/adult at risk of harm
- **Child-on-child** – children can abuse other children, both inside & outside of training, face to face and online. Can include, bullying, physical abuse, sexual violence/harassment, Upskirting, consensual and non-consensual sharing of nude and semi-nude images and/or videos.
- **Physical abuse** – deliberately hurting a child/adult at risk causing injuries such as bruises, broken bones, burns or cuts
- **Sexual abuse** – a child is sexually abused when they are forced or persuaded to take part in sexual activities. This doesn't have to be physical contact, and it can happen online
- **Upskirting** – Upskirting is a highly intrusive practice, which typically involves someone taking a picture under another person's clothing without their knowledge, with the intention of viewing their genitals or buttocks (with or without underwear). It is now a specific criminal offence in England and Wales.

**For further information see Appendix 1.**

All staff working with children are advised to maintain an attitude of 'it could happen here', and this is especially important when considering child-on-child abuse. Members of staff should recognise that concerns may arise in many different contexts and can vary greatly in terms of their nature and seriousness. The indicators of child abuse and neglect can vary from child to child. Children develop and mature at different rates, so what appears to be worrying behaviour for a younger child might be normal for an older child.

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

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

## 7. Prevent Duty

To help prevent the risk of people becoming terrorists or supporting terrorism. This includes safeguarding learners from extremist ideologies and radicalisation.

TDM follows the statutory guidance in relation to the Prevent Duty. We are aware that there have been occasions, both locally and nationally, in which extremist groups have attempted to radicalise children

and young people to hold extreme views including those justifying political, religious, sexist, or racist violence, or to steer them into a rigid and narrow ideology that is intolerant of diversity and leaves them vulnerable to future radicalisation. The Prevent strategy aims to stop people from becoming terrorists or supporting extreme ideologies. TDM takes the view that early intervention is always preferable and includes this in its procedures as it does for all safeguarding concerns.

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

TDM is committed to working with the local authority and other local partners, families, and communities to play a key role in ensuring young people and our communities are safe from the threat of terrorism. The DSL will keep up to date with all local policies and procedures relating to Prevent. The DSL/DSOs will engage with the Regional Prevent lead to ensure local intelligence and support TDM Staff who are looking out for concerning changes in behaviour of their learners.

### **Potential signs of radicalisation and extremism**

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

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

## **8. Related policies**

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

- Anti-Bullying and harassment policy
- Attendance policy
- Behaviour policy
- Complaints policy
- Data protection and Information security policies
- Disciplinary & Grievance policies
- Equality and Diversity policy
- Health and safety including fire safety, first aid and accidents
- Acceptable Use Policy
- Prevent Duty, British Values and Critical Incident policy
- Risk assessments
- Safer recruitment policy
- Whistleblowing policy
- Sexual Harassment Policy

## **9. Policy Compliance, Monitoring and Review**

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

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

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

## 10. Key Responsibilities:

### Designated Safeguarding Lead (DSL)

Jennifer Johnson is TDM's Designated Safeguarding Lead (DSL).

Jennifer Johnson (DSL)  
[jenny.johnson@tdm.co.uk](mailto:jenny.johnson@tdm.co.uk)  
Direct Line: 0333 101 00 40

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

The DSL will undergo appropriate and specific training to provide them with the knowledge and skills required to carry out their role. The DSL will be updated formally every year, but their knowledge and skills will be updated through a variety of methods at regular intervals and at least annually.

The governor for safeguarding will be kept informed of any significant issues by the DSL.

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

It is the role of the DSL to:

- Act as the central contact point for all staff to discuss any safeguarding concerns.
- The DSL may delegate the day-to-day responsibility to the DSOs.
- Maintain a confidential recording system for safeguarding and child protection concerns. This may be done in conjunction with the DSOs who support the DSL.
- Liaise with other agencies and professionals in line with KCSIE 2025 and WTSC 2018.
- Ensure that locally established procedures, including referrals, are followed, as necessary.
- Represent, or ensure the TDM is appropriately represented at multi-agency safeguarding meetings (including Child Protection conferences).
- Manage and monitor the TDM role in any multi-agency plan for a child.
- Be available during TDM hours for staff to discuss any safeguarding or Prevent concerns.
- Ensure adequate and appropriate DSL cover arrangements in response to any closures and out of hours activities plus annual leave arrangements.
- Promote the safeguarding policy to all staff and stakeholders
- Ensure all staff access appropriate safeguarding training and relevant updates in line with the recommendations within KCSIE (2025)

### TDM's nominated governors for safeguarding are:

- Kim Cook (Nominated Governor for Safeguarding)

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

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

Senior leaders will ensure that the DSL and the DSOs are supported in their role and that everyone is committed to this policy and its related policies and procedures.

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

### Members of Staff

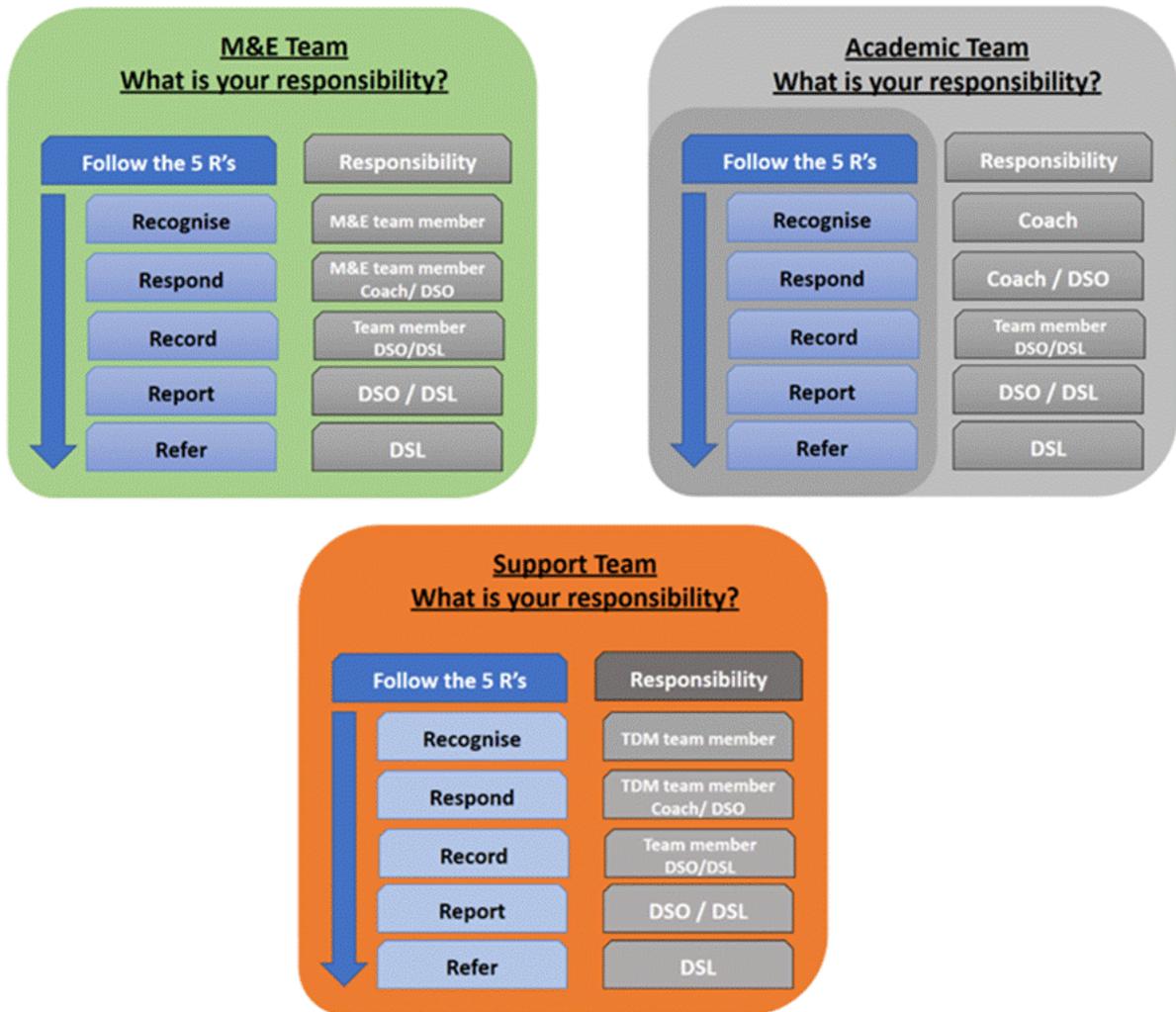
**All members of staff have a responsibility to:**

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

See flowcharts below

**Member of Staff Responsibilities**

**The 5R’s - Flowchart**



**Children and Young People**

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

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

## 11. Child Protection Procedures

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

If a child is in immediate danger or is at risk of harm, a request for support should be made immediately to the police. The DSL may also seek advice or guidance from the **Local Authority Designated Officer (LADO)** before deciding next steps. TDM has a DSL and highly trained DSOs to ensure that support is always available for staff to seek advice. If the DSL and senior DSO are not available then the Governor for Safeguarding should be contacted.

## 12. Record Keeping

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

All staff members are accountable for promptly recording the events where they were involved to deal with the young person or vulnerable adult and passing this to the DSL. Correct and appropriate recording of the incidents allows for the learner case file to be up to date and can be given to referral agencies promptly if this is deemed necessary. Failure to complete accurate and professional records will be dealt with as a disciplinary matter.

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

## 13. Multi-Agency Working

TDM recognises and is committed to its responsibility to work within local multi-agency safeguarding arrangements. The leadership team and DSL will work to establish strong and co-operative local relationships with professionals in other agencies in line with statutory guidance. TDM recognises the importance of multi-agency working and is committed to working alongside partner agencies to provide a coordinated response to promote children's welfare and protect them from harm. This includes contributing to local safeguarding processes as required.

## 14. Confidentiality and Information Sharing

TDM recognises its duty to share relevant information with appropriate agencies in matters relating to child protection at the earliest opportunity as per statutory guidance outlined within KCSIE 2025 Staff must be aware that they cannot promise confidentiality in situations which might compromise a child's safety or wellbeing. The governor for safeguarding or DSL will disclose information about a learner on a 'need to know' basis. All members of staff must be aware that whilst they have duties to keep any information confidential, they also have a professional responsibility to share information with other agencies to safeguard children.

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

TDM's Data Protection Lead is: Jonathan Barrett

The Data Protection Act 2018 and GDPR do not prevent the sharing of information for the purposes of keeping children safe. Fears about sharing information must not be allowed to stand in the way of the need to safeguard and promote the welfare and protect the safety of children (KCSIE 2025). DfE Guidance on Information Sharing (July 2018) provides further detail.

## **15. Complaints**

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

## **16. Staff Induction, Awareness and Training**

All members of staff have been provided with a copy of part one of 'Keeping Children Safe in Education' (2025) which covers safeguarding information for all staff. All staff including the DSL are required to read the entire document and must complete required activities to confirm that they have read and understood KCSIE.

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

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

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

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

## **17. Safer Working Practice**

All members of staff are required to work within our clear guidelines on safer working practice as outlined in the TDM code of practice. All staff will be made aware of the professional risks associated with the use of social media and electronic communication (such as email, mobile phones, texting, social networking). Staff will adhere to relevant policies including staff behaviour, acceptable use and social media policies.

## **18. Staff Supervision and Support**

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

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

- All staff are competent to carry out their responsibilities for safeguarding and promoting the welfare of children
- All staff are supported by the DSL in their safeguarding role.

- All members of staff have regular reviews of their own practice to ensure they improve over time.

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

## 19. Safer Recruitment

TDM is committed to ensure that everyone develops a safe culture and that all steps are taken to recruit staff and volunteers who are safe to work with our learners and staff. As a minimum, TDM will follow relevant guidance in Keeping Children Safe in Education 2025 (Part three: Safer Recruitment) and from The Disclosure and Barring Service (DBS).

The TDM leadership team is responsible for ensuring that the company adheres to safe recruitment processes outlined within guidance. This includes the following:

- Maintaining an accurate Single Central Record (SCR) in line with statutory guidance.
- Ensuring that at least one of the persons who conducts an interview has completed safer recruitment training.
- Obtaining two references
- Carrying out an online search as part of the due diligence on the shortlisted candidates

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

TDM will ensure that all staff and volunteers have read the relevant policies/code of conduct and understand that their behaviour and practice must comply with them.

## 20. Allegations Against Members of Staff and Volunteers

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

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

Any allegation of abuse made against a member of staff (including supply trainers, coaches, support staff and volunteers) in relation to a young person must immediately be brought to the attention of the Governor for Safeguarding and, where appropriate, the DSL. The Governor for Safeguarding will act in a coordinating role. Should the Governor for Safeguarding be the subject of the allegation, the DSL will immediately report to an alternative Governor to establish "the nature, content and context of the allegation" and agree the appropriate course of action. In some cases, allegations may be so serious that they will require immediate intervention by the police and/or the LADO.

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

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

For other allegations, the Governor for Safeguarding and DSL will decide if further enquiries are required prior to referral to the LADO. Where the Governor for Safeguarding considers that a referral may be warranted under Child Protection Procedures and an allegation appears to meet the criteria, the Governor for Safeguarding will inform the LADO.

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

In the event of allegations of abuse being made against the Governor for Safeguarding or DSL; staff are advised that allegations should be reported to an alternative governor who will contact the LADO.

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

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

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

## 21. Low Level Concerns

'The term 'low-level' concern does not mean that it is insignificant. A low-level concern is any concern – no matter how small, and even if no more than causing a sense of unease or a 'nagging doubt' – that an adult working with children may have acted in a way that:

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

Examples could include incidents such as:

- A staff member having favourite learner(s) that they're building an inappropriately close relationship to
- A staff member 'picking on' on a particular learner(s)

Further information about low-level concerns and examples of what they can include can be found [here](#).

Low level concerns about any member of staff, including volunteers, governors, contractors, agency and third party staff must be reported to HR and the DSL. HR and the DSL will investigate the concern and work together to agree the appropriate course of action, keeping a record of all low-level concerns (and action(s) taken from each) in a central low-level concerns folder (within the safeguarding folder) to ensure a full picture is available of any concerns raised about a particular staff member.

## 22. Staff and Learner Relationships

It is TDM policy is that no member of staff, including volunteers, governors, contractors, agency and third party staff may commence a romantic relationship with any TDM learner (of any age) whilst they are on programme due to TDM's continued duty of care and the power dynamic between staff members and learners, regardless of learner age.

Should a staff member start a relationship with a learner, the disciplinary process will be implemented, which could lead to dismissal. If the learner is aged under 18 years old the relevant authorities will also be alerted as per the safeguarding procedures laid out in this policy.

## 23. DBS referrals

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

soon as possible after the resignation or removal of the individual in accordance with advice from the LADO or other statutory agency.

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

## **24. Safeguarding learners with Special Educational Needs and Disabilities**

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

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

## **25. Child-on-child Abuse**

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

- bullying (including cyberbullying)
- abusive intimate personal relationships between peers
- physical abuse causing physical harm
- initiation/hazing type violence and rituals
- Sexual violence and sexual harassment
- 'upskirting', which typically involves taking a picture under a person's clothing without them knowing
- consensual and non-consensual sharing of nude and semi-nude images and/or videos (also known as sexting or youth produced sexual imagery). Sharing nudes and semi-nudes - (UKCIS, 2020), this is defined as the sending or posting of nude or semi-nude images, videos or live streams online by young people under the age of 18. This is a form of child sexual abuse and must be referred to the police as a matter of urgency.

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

## **26. Gangs, County Lines, Serious Violence, Crime and Exploitation**

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

- Unexplained gifts/new possessions – these can indicate children have been approached by/involved with individuals associated with criminal networks/gangs
- Children who go missing for periods of time or regularly come home late

- Children who regularly miss training or do not take part in education
- Change in friendships/relationships with others/groups
- Children who associate with other young people involved in exploitation
- Children who suffer from changes in emotional well-being
- Significant decline in performance
- Signs of self-harm/significant change in wellbeing
- Signs of assault/unexplained injuries

## 27. Online Safety

TDM recognises that the use of technology presents challenges and risks to children and adults both inside and outside of TDM. TDM will therefore empower, protect and educate learners in their use of information technology and ensure that the mechanisms to identify, intervene in, and escalate any incident are in place. TDM will ensure that the use of IT is monitored when learners are in the training centre and that staff work with learners and employers to ensure the use of IT in the workplace or remotely is safe and secure and that they know how to and when to report any concerns.

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

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

The DSL has overall responsibility for online safeguarding within the learning environment but will liaise as necessary with other members of staff, particularly with the IT team, who ensure that TDM are cyber essentials certified every year.

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

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

All users will be informed that use of our systems is monitored, and that monitoring will be in line with data protection, human rights and privacy legislation. Filtering breaches or concerns identified through our monitoring approaches will be recorded and reported to the DSL and technical staff, as appropriate. Any access to material believed to be illegal or promoting terrorism or extremism should be reported immediately to the police using <https://www.gov.uk/report-terrorism>. TDM will ensure that online safety training for all staff is integrated, aligned and considered as part of our overarching safeguarding approach.

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

### Learning & Coaching online

TDM ensures that all remote sharing of information, communication and use of online learning tools and systems are in line with privacy and data protection requirements and are monitored in line with Cyber Essentials.

All communication with learners and employers/mentors take place using TDM provided or approved communication channels. Any pre-existing relationships or situations which mean this cannot be complied with will be discussed with the DSL. Staff and learners engage with remote teaching and

learning in line with existing behaviour principles as set out in the TDM code of practice and Acceptable Use Policies. Staff and learners will be encouraged to report issues experienced at home and concerns will be responded to in line with our child protection and other relevant policies.

## **28. Procedures for Learners on Apprenticeships**

- Learners' employers will be furnished at the outset with a 'Sign-up Safeguarding' agreement which outlines TDM's responsibility to report any incidents of inappropriate practice or safeguarding issues and the employer's responsibility to commit to keeping apprentices safe, including in relation to the Worker Protection Act 2023, which introduced a new duty on employers to take reasonable steps to prevent the sexual harassment of employees.
- Learners should report safeguarding concerns to their coach or any other member of TDM management team.
- Staff members will notify a DSO.
- Staff should be clear on reporting a safeguarding or welfare issue as illustrated in Appendix 3.
- The DSL/DSO must notify the employer and together they will decide on next steps, taking advice where necessary if the information is such that the matter should be referred immediately the police or LADO.
- The DSL/DSO or coach will provide the learner with advice and/or support and, if necessary, signpost them to external support services where appropriate.

When a learner is concerned that the above procedures have not been carried out appropriately or adequately, the following should apply:

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

### **See Appendix 4 for infographic on process**

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

## **29. Off-The-Job Training**

Off-the-job training in relation to safeguarding (either as part of an apprentice's off the job training hours, or a skills bootcamp learner's guided learning hours) will be promoted to all learners as follows:

- During onboarding - learners will be introduced to Safeguarding and Prevent and how to recognise and report a concern at orientation
- During training sessions - safeguarding will be embedded in the curriculum as appropriate
- During progress reviews and coaching sessions - learners' understanding about safeguarding and Prevent will be checked and reinforced.

## **30. Security**

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

Appropriate checks will be undertaken in respect of visitors and volunteers coming onto TDM premises as outlined within guidance. Visitors will be expected to sign in and out via the office visitors log and

to display a visitor's badge whilst on site. Any individual who is not known or identifiable on site should be challenged for clarification and reassurance.

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

#### Contact details for the LADO

Telephone:

- Birmingham: 0121 675 1669 or [ladoteam@birminghamchildrenstrust.co.uk](mailto:ladoteam@birminghamchildrenstrust.co.uk)
- Worcestershire: 01905 846221 or [LADO@worschildrenfirst.org.uk](mailto:LADO@worschildrenfirst.org.uk)
- Herefordshire: 01432 261739 [LADO@Herefordshire.gcsx.gov.uk](mailto:LADO@Herefordshire.gcsx.gov.uk)

#### Local Police

101 or 999 if there is an immediate risk of harm

**For national support organisations and TDM contact details see appendix 2**

### Document Management

Document Name and Reference	Safeguarding Policy -TDMPP002
Classification	External
Policy Ownership	Jennifer Johnson (DSL) This policy must be understood and followed by all staff at TDM
Policy lead originator and point of contact in relation to its content:	Elizabeth Hoyos-Operations Director Jennifer Johnson-Designated Safeguarding Lead
TDM policy and procedure approval	Elizabeth Hoyos-Operations Director
Signature	
Date	28 <sup>th</sup> April 2024

Version Control					
Issue Date	Revision Number*	Revision Date*	Revision Changes*	Initials	Next revision Date
21/02/09	01		Issued	DK, EH	Feb 2020
21/02/09	18	03/03/20	Reviewed and updated as per new guidance, legislation	EH,JJ	March 2021
10/05/21	19	10/05/21	New Issue as per Leaders in Safeguarding (LIS) audit recommendations	EH,SO, JJ	Jan 2022
10/05/21	20	10/01/22	Reviewed, addition of document control,	JJ,EH	Aug 2022
10/05/21	21	16/02/22	Update of phone numbers and DSO details, correct links to resources which did not work.	SOR,JJ	Aug 2022
10/05/21	22	02/03/22	Corrected error point 20- Kim Cook is the governor for safeguarding.	EH	March 2024
10/05/21	23	05/05/22	Remove Derrin from Safeguarding governor	SOR, JJ	May 2024
10/05/21	24	23/05/22	Governor KC contact details added	SOR	May 2024

10/05/21	25	23/02/24	Updated with Keeping children Safe in education 2022 changes Correct Reference number to TDMPP003. Removed Stuart O'Rourke as DSL Added Alex Royle	JJ	Sept 2024
10/05/21	26	28/05/24	Updated section 2 with appropriate policies updates, including Ofsted. Section 10-1 DSL and one senior DSO. Update to section 12. Failure to keep prompt of accurate records - disciplinary. Section 27 added "during coaching sessions" Appendixes -Updated the flow charts for currency. Appendix 5 amended to add Alex Royle - Carly Barnes (as senior DSO).	EHK	Sept 2024
10/05/21	27	15/09/24	Updated with Keeping children Safe in Education 2024 Updated contact details for DSO Added in Appendix 2 the NSPCC website site for report abuse Updated role title (Data Protection Officer to Data Protection Lead, who is now Jonathan Barrett)	JJ	Sept 2024
10/05/21	28	04/12/24	Updated TDM safeguarding telephone number	JJ	Sept 2024
10/05/21	28	06/12/24	Removed Tabi as DSO	AR	Sept 2024
10/05/21	28	15/05/24	Removed Alex Royle as DSO Added Jonathan Barrett as DSO	AR	Sept 2024
10/05/21	29	21/08/24	Updated to KCSIE 2025 throughout. Updated definition of Safeguarding inline with the updated WTSC 2023 Added in Section 19 - online search of shortlisted candidates Added to Section 25 - online reporting of promoting terrorism or extremism Removed Gloucestershire LADO contact details and added Herefordshire Appendix 6 Updated the Reporting concerns procedure Appendix 2 - Updated website links	JJ	Sept 2025
10/05/21	29	19/11/24	Updated Appendix 4: Safeguarding Disclosure Process with updated DSO names	AR	Sept 2025
10/05/21	29	25/02/25	Updated Section 8 to include the Sexual Harassment Policy. Updated Section 26 - added that the employer has responsibility to commit to keeping apprentices safe, including in relation to the Worker Protection Act 2023, which introduced a new duty on employers to take reasonable steps to prevent the sexual harassment of employees. Updated Section 27 to encompass all learners.	AR	Sept 2025
10/05/21	29	05/06/25	Added in sections 21 and 22 (low level concerns and staff and learner relationships)	AR	Sept 2025
10/05/21	30	22/10/25	Updated to include KCSIE 2025 Added a new line in the definition of safeguarding page 4 Tested and updated hyperlinks	JJ	Sept 2026

\*Significant changes or reviewed

## Appendix 1: Categories of Abuse

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

**Abuse:** a form of maltreatment of a child. Somebody may abuse or neglect a child by inflicting harm, or by failing to act to prevent harm. They may be abused by an adult or adults or another child or children. It should be noted that abuse can be carried out both on and offline and be perpetrated by men, women and children.

**Sexual abuse:** involves forcing or enticing a child or young person to take part in sexual activities, not necessarily involving a high level of violence, whether or not the child is aware of what is happening. The activities may involve physical contact, including assault by penetration (for example rape or oral sex) or non-penetrative acts such as masturbation, kissing, rubbing and touching outside of clothing. They may also include non-contact activities, such as involving children in looking at, or in the production of, sexual images, watching sexual activities, encouraging children to behave in sexually inappropriate ways, or grooming a child in preparation for abuse (including via the internet). Sexual abuse is not solely perpetrated by adult males. Women can also commit acts of sexual abuse, as can other children.

#### **Signs that MAY INDICATE Sexual Abuse**

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

**Physical abuse:** a form of abuse which may involve hitting, shaking, throwing, poisoning, burning or scalding, drowning, suffocating or otherwise causing physical harm to a child. Physical harm may also be caused when a parent or carer fabricates the symptoms of, or deliberately induces, illness in a child.

#### **Signs that MAY INDICATE physical abuse:**

- Bruises and abrasions around the face
- Damage or injury around the mouth
- Bi-lateral injuries such as two bruised eyes
- Bruising to soft area of the face such as the cheeks
- Fingertip bruising to the front or back of torso
- Bite marks
- Burns or scalds (unusual patterns and spread of injuries)
- Deep contact burns such as cigarette burns
- Injuries suggesting beatings (strap marks, welts)
- Covering arms and legs even when hot
- Aggressive behaviour or severe temper outbursts.
- Injuries need to be accounted for. Inadequate, inconsistent or excessively plausible explanations or a delay in seeking treatment should signal concern.

**Emotional abuse:** the persistent emotional maltreatment of a child such as to cause severe and adverse effects on the child's emotional development. It may involve conveying to a child that they are worthless or unloved, inadequate, or valued only insofar as they meet the needs of another person. It may include not giving the child opportunities to express their views, deliberately silencing them or 'making fun' of what they say or how they communicate. It may feature age or developmentally inappropriate expectations being imposed on children. These may include interactions that are beyond a child's developmental capability as well as overprotection and limitation of exploration and learning, or preventing the child participating in normal social interaction. It may involve seeing or hearing the ill-treatment of another. It may involve serious bullying (including cyberbullying), causing children frequently to feel frightened or in danger, or the exploitation or corruption of children. Some level of emotional abuse is involved in all types of maltreatment of a child, although it may occur alone.

### Signs that MAY INDICATE emotional abuse:

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

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

### Signs that MAY INDICATE neglect:

- Constant hunger
- Poor personal hygiene
- Constant tiredness
- Inadequate clothing
- Frequent lateness or non-attendance
- Untreated medical problems
- Poor relationship with peers
- Compulsive stealing and scavenging
- Rocking, hair twisting and thumb sucking
- Running away
- Loss of weight or being constantly underweight
- Low self esteem

## Appendix 2: National Support Organisations

The following links may help the DSL & DSOs provide further advice and support to their learners, staff and parents/carers. Additional links can be found in KCSIE 2025 <https://www.gov.uk/government/publications/keeping-children-safe-in-education--2> in Annex B.

NSPCC – Reporting abuse <https://www.nspcc.org.uk/keeping-children-safe/reporting-abuse/report/>

#### Support for staff

Education Support Partnership: <https://www.educationsupport.org.uk/>

Professional Online Safety Helpline: <https://swgfl.org.uk/training/online-safety-training/>

Safeguarding children (DfE); <https://www.gov.uk/topic/schools-colleges-childrens-services/safeguarding-children>

#### Support for Learners

ChildLine: <https://www.childline.org.uk/>

Papyrus: <https://www.papyrus-uk.org/>

The Mix: <https://www.themix.org.uk/>

Shout: <https://giveusashout.org/>

Fearless: <https://www.fearless.org/>

#### Support for Adults

Family Lives: <https://www.familylives.org.uk/>

Crime Stoppers: <https://crimestoppers-uk.org/>

Victim Support: <https://www.victimsupport.org.uk/>  
The Samaritans: <https://www.samaritans.org/>  
NAPAC (National Association for People Abused in Childhood): <https://napac.org.uk/>  
Action Fraud: <https://www.actionfraud.police.uk/>  
Shout: <https://giveusashout.org/>

### **Support for Learning Disabilities**

Respond: <https://respond.org.uk/>  
Mencap: <https://www.mencap.org.uk/>

### **Domestic Abuse**

National Domestic Abuse Helpline: <https://www.nationaldahelpline.org.uk/>  
Refuge: <https://www.refuge.org.uk/>  
Women's Aid: <https://www.womensaid.org.uk/>  
Men's Advice Line: <https://mensadvice.org.uk/>  
Mankind: <https://www.mankind.org.uk/>  
Respect Phoneline: <https://respectphoneline.org.uk/>

### **Honour Based Abuse**

Forced Marriage Unit: <https://www.gov.uk/guidance/forced-marriage>  
Factsheet:  
[https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\\_data/file/322304/FM\\_MPs\\_factsheet\\_web2.pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/322304/FM_MPs_factsheet_web2.pdf)  
Mandatory reporting of female genital mutilation: procedural information:  
<https://www.gov.uk/government/publications/mandatory-reporting-of-female-genital-mutilation-procedural-information>

### **Contextual Safeguarding:**

Contextual Safeguarding Network: <https://contextualsafeguarding.org.uk/>  
National Crime Agency: <https://www.nationalcrimeagency.gov.uk/>  
Rape Crisis: <https://rapecrisis.org.uk/get-help/>  
Lucy Faithfull Foundation: <https://www.lucyfaithfull.org.uk/>  
Brook: <https://www.brook.org.uk/>  
Victim Support: <https://www.victimsupport.org.uk/>  
Anti-Bullying Alliance: <https://anti-bullyingalliance.org.uk/>  
Upskirting – know your rights <https://www.police.uk/>

### **Substance Misuse**

We are with you (formerly Addaction): <https://www.wearewithyou.org.uk/>  
Talk to Frank: <https://www.talktofrank.com/>

### **Mental Health**

Mind: <https://www.mind.org.uk/information-support/guides-to-support-and-services/>  
Moodspark: <https://moodspark.org.uk/>  
Young Minds: <https://www.youngminds.org.uk/>

### **Online Safety**

CEOP: <https://www.ceop.police.uk/Safety-Centre/>  
Internet Watch Foundation (IWF): <https://www.iwf.org.uk/>  
Education from the NCA: <https://www.ceopeducation.co.uk/>  
UK Safer Internet Centre: <https://saferinternet.org.uk/>  
Report Harmful Content: <https://reportharmfulcontent.com/>  
Parents Info: <https://parentzone.org.uk/home>  
Marie Collins Foundation: <https://www.mariecollinsfoundation.org.uk/>  
NSPCC: <https://www.nspcc.org.uk/keeping-children-safe/online-safety/>  
Get safe Online: <https://www.getsafeonline.org/>  
Stop it Now!: <https://www.stopitnow.org.uk/>

### **Radicalisation and Hate**

Educate against Hate: <https://www.educateagainsthate.com/>

Counter Terrorism Internet Referral Unit: <https://www.gov.uk/report-terrorism>  
True Vision: <https://www.report-it.org.uk/>

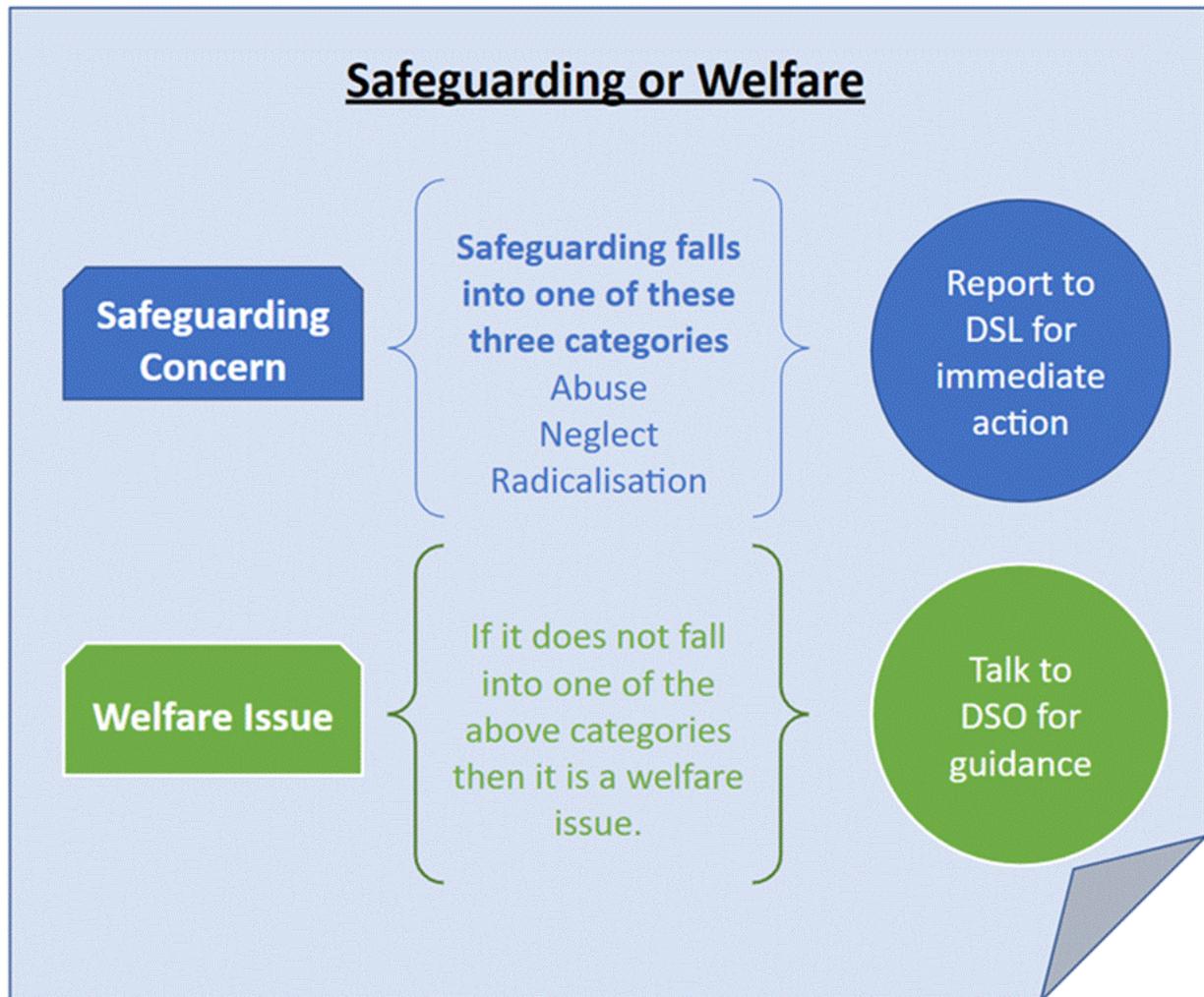
### Appendix 3: Safeguarding vs Welfare

Staff and especially those working directly with learners should be clear on what they are reporting and understand if this is a safeguarding concern or a welfare issue.

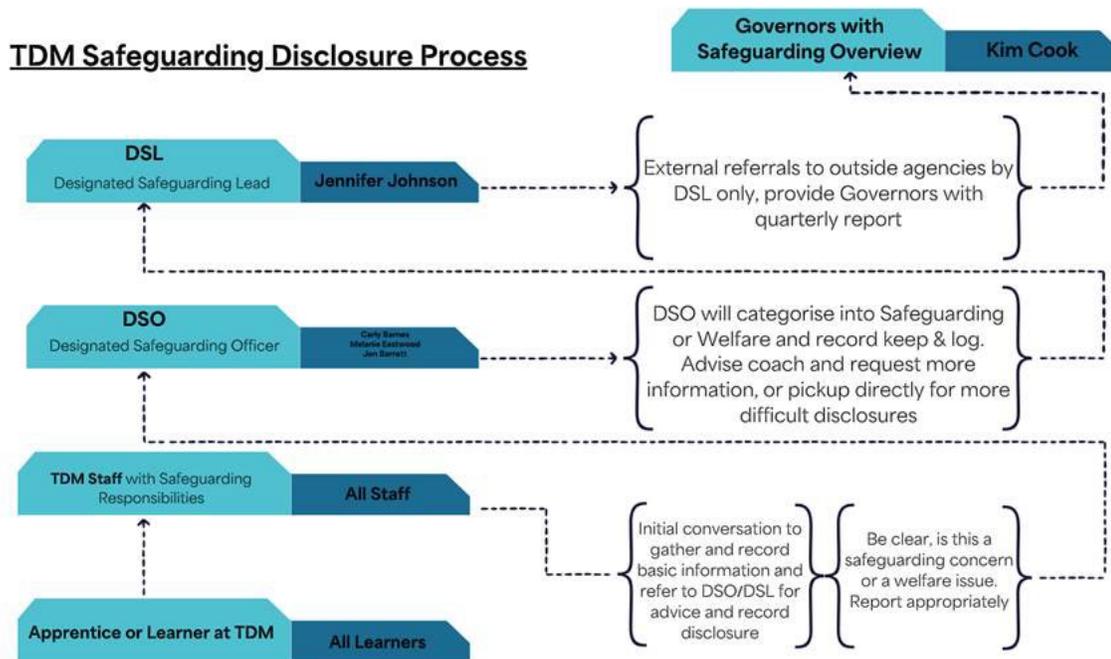
Appropriate reporting is essential, and the DSL will make the final decision on whether a concern raised is a safeguarding issue or a welfare issue.

The DSL will ensure any welfare issues are discussed and dealt with to prevent risk of safeguarding concern.

If it's a safeguarding concern the DSL will follow the right procedure for documenting and reporting the concerns.



### Appendix 4: Safeguarding Disclosure Process



### Designated Safeguarding Officers (DSO):

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

- Carly Barnes (senior DSO)
- Melanie Eastwood
- Jonathan Barrett

## Appendix 5: TDM Safeguarding Staff Contact Details

Name	Role	Email	Phone
Jennifer Johnson	Designated Safeguarding Lead	<a href="mailto:jenny.johnson@tdm.co.uk">jenny.johnson@tdm.co.uk</a>	0333 101 0040 07572 790367
Carly Barnes	Designated Safeguarding Officer	<a href="mailto:Carly.Barnes@tdm.co.uk">Carly.Barnes@tdm.co.uk</a>	07961 603723
Melanie Eastwood	Designated Safeguarding Officer	<a href="mailto:mel@tdm.co.uk">mel@tdm.co.uk</a>	07432 632269
Jonathan Barrett	Designated Safeguarding Officer	<a href="mailto:jon.barrett@tdm.co.uk">jon.barrett@tdm.co.uk</a>	07572 790350
Kim Cook	Governor for Safeguarding	<a href="mailto:kim@hwstpa.co.uk">kim@hwstpa.co.uk</a>	07917 631342

## Appendix 6: Safeguarding Children and Vulnerable Adults Process, casefile procedure and form

### Procedure

1. When a learner discloses a safeguarding or welfare concern, TDM staff member, DSL and DSO must follow this procedure and **formally** document the journey from a concern raised to action plan through to the closing of the case.
2. The DSL/DSO is accountable for filling in this form and any other safeguarding referral forms /logs to ensure governors and potential referral agencies (where applicable) can see a full picture of the situation on time every time.  
This is so that if there is need to support the learner in any circumstance, the case reference can be looked at quickly and appropriate actions can be taken if necessary.

3. The DSL/DSO is responsible for filling in this form and gathering the evidence in the learner case file in the safeguarding folder in the secure drive area.  
The DSL may use the support of the deputy DSL, however, the overall accountability resides with the DSL to ensure that the learner case file is accurate, valid, professionally recorded and organised.
4. Closing of a case must be done by the DSL.  
The process to achieve this is to ensure the governor for safeguarding has access to the file and after reading it they are satisfied the case can be closed. The file then will be moved to the correct area in the secure drive.
5. Filling in the form “ **Safeguarding /Welfare Report Form (Private and Confidential)**”  
It is the responsibility of the DSL/DSO to fill in this form  
The events must be recorded in chronological order stating the **date first** (yyyy.mm.dd) then **LearnerInitials**, then **Evidence number**, then **name of the event/meeting**, For example:  
*2022.03.18-JB-EVID-001-Meeting-Record*  
*2022.03.21-JB-EVID-002-EmailfromEmployer*  
This forms a **code** to signpost to evidence. The evidence must also be named in the same format so it is easy to locate in the learner case file.
6. Record keeping must be robust to ensure cases can be looked at promptly in the event of an emergency so that learners needing support are attended to quickly.
7. DSL must ensure a learner case folder is created as soon as a safeguarding concern or welfare concern is raised and that this is updated every time an update is given on the learner case.
8. The Safeguarding log will only be used as a quick easy reference to the case files
9. Every quarter case files are revised and reported to governors.

- **Remember, if you are concerned that there is an immediate risk of harm to a child, please contact the emergency services without delay 999 or 101**

**Safeguarding /Welfare Report Form (Private and Confidential)**

<b>Name of staff reporting initial concern:</b>	
<b>Responsible DSO for case</b>	
<b>Responsible DSL listed on SCR</b>	
<b>Date of initial concern reported</b>	
<b>State if this is a safeguarding concern or a welfare concern</b>	
<b>Case reference number</b>	

<b>Learner Full Name</b>		
<b>Age bracket at the time of reporting</b>	16 to 18	19+
<b>If an adult learner- Is this a vulnerable adult?</b>		
<b>Employer (If applicable)</b>		
<b>Programme Name</b>		
<b>SKC and PDC</b>		

<b>Details of concern, please describe the issue fully including dates, names, reported allegations, observations of behaviour, injuries, etc.</b> <i>Follow the Naming Convention stated in the procedure to signpost to evidence</i>

<b>Initial Action Taken:</b>
<b>Discussed with the DSO/Coach? Yes/No</b>
<b>Action that is planned for the future in response to the incident/concern</b>
<b>Discussed with the learner's line manager (if applicable)?</b>
<b>DSL Follow up</b> Record in a date order an update on learner welfare/safety following a sequential order. <i>Follow naming convention as in procedure</i>
<b>Date incident deemed closed in agreement with governors</b>
<b>Name of DSL completing the final part and signature:</b>

<b>Records in learner case folder</b>		
Name of record -in chronological order	DSL Confirm in case folder	Evidence Author
<i>e.g.</i>		e.g
<i>2022.03.18-JB-EVID-001-Meeting-Record</i>	Y	Mel Eastwood
<i>2022.03.21-JB-EVID-002-EmailfromEmployer</i>	Y	Betty Bops - Broadband Employers