White Horse Training Ltd
Child Protection and Safeguarding Vulnerable Adults (Adults at Risk) 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 sign to say they have read <u>and</u> understood its contents.

<u>Key Contacts</u>

	Name	Contact information
Designated Safeguarding Lead (DSL)	Yvonne Meek	Yvonne.meek@whitehorseltd.co.uk 07787422628
Deputy Designated Safeguarding Lead	Marylee Wollaston	Marylee.wollaston@whitehorseltd.co.uk 01225 460167
Managing Director	Marylee Wollaston	Marylee.wollaston@whitehorseltd.co.uk 01225 460167
Chair of White Horse Training Ltd	Ian Sumbler	Ian.sumbler@morrisowen.com 01793 603900

Date written: August, 2021
Date of last update: September, 2020
Date agreed and ratified by Managing Director: August, 2021
Date of next full review: August, 2022

This policy will be reviewed at least annually and/or following any updates to national and local guidance and procedures.

Contents

What to do if you have a welfare concern at White Horse Training Ltd

Why are you concerned?

For example
- Something a child/young person has said – e.g. allegation of harm
- Child/young person's appearance – may include unexplained marks as well as dress
- Behaviour change
- Witnessed concerning behaviour

↓

Act immediately and record your concerns. If urgent, speak to the DSL first.

Follow the procedure
- Reassure the child/student
- Clarify concerns, using open questions if necessary (**TED**: **T**ell, **E**xplain, **D**escribe)
- Use child/young person's own words, record facts **not** opinions.
- Sign and date your records
- Seek support for yourself if required from DSL (Yvonne Meek)

↓

Inform the Designated Safeguarding Lead (Yvonne Meek 07787422628)

Designated Safeguarding Lead

- Consider whether the child/young person/vulnerable is at immediate risk of harm e.g. unsafe to go home
- Access the appropriate Safeguarding Support Level Guidance document and procedures: https://www.proceduresonline.com/swcpp/#
- Refer to other agencies as appropriate e.g. Internal or community services, early help open access, LADO, Police or Request for Support for integrated children's services
- If unsure then consult with the appropriate Area Education Safeguarding Advisor or Local Authority Social Worker.

If you are unhappy with the response

Staff:
- Follow local escalation procedures and contact the Managing Director.
- Follow whistleblowing procedures

Learners (and Parents):
- Follow White Horse Training's complaints procedures and contact the Managing Director.

↓

Record decision making and action taken in the learner's safeguarding file

↓

Monitor

Be clear about:
- What you are monitoring e.g. behaviour trends, appearance etc.
- How long you will monitor
- Where, how and to whom you will feedback and how you will record

↓

Review and request further support if necessary

At all stages, the child/young person/vulnerable adult's circumstances will be kept under review. The DSL/Staff will request further support if required to ensure the **child/young person's safety** is **paramount**

3

1. Child Focused Approach to Safeguarding

1.1 Introduction

- White Horse Training is a small independent training provider delivering specialist accountancy training, apprenticeships and CPD courses to students and qualified accountants. Our learners come from a wide geographical area across the South West and are predominantly over 18 with the majority in the 18-24 age group. However we do occasionally have learners who are 16-18 and as such understand that we have specific responsibilities for these learners.

- White Horse Training recognise our statutory responsibility to safeguard and promote the welfare of all children, young people and vulnerable adults/adults at risk. Safeguarding is everybody's responsibility and all those directly connected (staff, volunteers, board directors, parents, carers, families, and learners) are an important part of the wider safeguarding system for children, young people and vulnerable adults and have an essential role to play in making this community safe and secure.

- White Horse Training believe that the best interests of children and 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.

- Staff working with children and young people at White Horse Training will maintain an attitude of 'it could happen here' where safeguarding is concerned. When concerned about the welfare of a child or young person, staff will always act in the best interests of the child or young person and if any member of our community has a safeguarding concern about any child or adult, they should act and act immediately.

- White Horse Training recognises the importance of providing an ethos and environment that will help children and young people to be safe and to feel safe. At White Horse Training children and young people are respected and are encouraged to talk openly. We will ensure children and young people's wishes and feelings are taken into account when determining what safeguarding action to take and what services to provide.

- Whilst we recognise that adults (defined as those over the age of 18) may require a different approach to safeguarding and have specific guidance relating to consent to any action and intervention, we will use the principles and procedures set out in this policy to inform our approach to safeguarding for vulnerable adults and adults at risk, where applicable.

- Our primary concern is to safeguard all of our learners, whether adults or children, and support them to raise concerns about their own safety or the safety of others and we will follow the appropriate legislative requirement to do this.

- Our core safeguarding principles are:
    - **Prevention**
        - positive, supportive, safe culture, curriculum and pastoral opportunities for children, young people and adults, safer recruitment procedures.
    - **Protection**
        - following the agreed procedures, ensuring all staff are trained and supported to recognise and respond appropriately and sensitively to safeguarding concerns.
    - **Support**
        - for all learners, parents and staff, and where appropriate specific interventions are required for those who may be at risk of harm.

- o **Working with parents and other agencies**
  - to ensure timely, appropriate communications and actions are undertaken when safeguarding concerns arise.

- Our six key principles specifically relating to adults are:
  - o **Empowerment**
    - the person being safeguarded should have as much say as possible in the decisions being made about them
  - o **Prevention**
    - always better than dealing with the consequences afterwards
  - o **Proportionality**
    - stops protections going too far; any interventions should be as unobtrusive as possible
  - o **Protection**
    - allows for those in greatest need to be looked after and supported adequately
  - o **Partnership**
    - encourages local solutions to be found across agencies; rarely will there be a solution that needs only one sector to implement
  - o **Accountability**
    - ensures that decisions are made transparently, without secrets and with clear reasoning.

- The procedures contained in this policy apply to all staff, including directors, temporary or third-party agency staff and volunteers, and are consistent with those outlined within KCSIE 2021.

1.2   Policy Context

- This policy is implemented in accordance with our compliance with the statutory guidance from the Department for Education, 'Keeping Children Safe in Education' 2021 (KCSIE) which requires individual schools and colleges to have an effective child protection policy.

- This policy has been developed in accordance with the principles established by the Children Acts 1989 and 2004 and related guidance. This includes but is not limited to:
  - o Keeping Children Safe in Education 2021 (KCSIE)
  - o Working Together to Safeguard Children 2018 (WTSC)
  - o Ofsted: Education Inspection Framework 2021
  - o Framework for the Assessment of Children in Need and their Families 2000
  - o The Education Act 2002

- For Adults the relevant policy guidance includes but is not limited to:
  - o The Care Act 2014
  - o The Safeguarding Vulnerable Groups Act 2016
  - o Health and Social Care Act 2012
  - o Mental Capacity Act 2005
  - o Equality Act 2010
  - o No Secrets 2000, Government White Paper

- 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.

- White Horse Training is currently operating in response to coronavirus (Covid-19), however, our safeguarding principles, remain the same. We will continue to follow government guidance and will amend this policy and our approaches, as necessary.
  - As a result of the Covid-19 pandemic some members of our community may have been exposed to a range of adversity and trauma including bereavement, anxiety and in some cases increased welfare and safeguarding risks. We will work with local services, such as health and the local authority, to ensure necessary support is in place.

1.3   Definition of Safeguarding

- In line with KCSIE 2021, safeguarding and promoting the welfare of children is defined for the purposes of this policy as:
  - protecting children from maltreatment
  - 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.

- As learners at White Horse Training are over 16 with the majority being over 18 the principles of safeguarding are applied to all of our learners, as appropriate to the individual and the context.

- White Horse Training acknowledges that safeguarding includes a wide range of specific issues including (but not limited to):
  - Abuse and neglect
  - Bullying, including cyberbullying
  - Children with family members in prison
  - Children Missing Education (CME)
  - Child missing from home or care
  - Child Sexual Exploitation (CSE)
  - Child Criminal Exploitation (CCE)
  - Contextual safeguarding (risks outside the family home)
  - County lines and gangs
  - Domestic abuse
  - Drugs and alcohol misuse
  - Fabricated or induced illness
  - Faith abuse
  - Gender based abuse and violence against women and girls
  - Hate
  - Homelessness
  - Human trafficking and modern slavery
  - Mental health
  - Nude or semi-nude image sharing, aka youth produced/involved sexual imagery or "Sexting"
  - Online safety
  - Peer on peer abuse
  - Preventing radicalisation and extremism
  - Private fostering
  - Relationship abuse
  - Serious violence
  - Sexual violence and sexual harassment
  - So-called 'honour-based' abuse, including Female Genital Mutilation (FGM) and forced marriage
  - Upskirting

(Also see Part One and Annex B within 'Keeping Children Safe in Education' 2021)

1.4 Related Safeguarding Policies

- This policy is one of a series in the White Horse Training integrated safeguarding portfolio and should be read and actioned in conjunction with the policies as listed below:
  - o Learner Charter
  - o IT Security
  - o Online safety
  - o Social media
  - o Mobile and smart technology
  - o Equal Opportunities
  - o Data protection and Confidentiality
  - o Drugs and Alcohol
  - o Learner Absence
  - o Health and safety, including plans for reopening
  - o Risk assessments
  - o Health and Safety
  - o Managing allegations against staff
  - o Complaints
  - o Safer recruitment
  - o Whistleblowing

For further information about Safeguarding Adults please refer to the Safeguarding and Prevent Policy.

1.5 Policy Compliance, Monitoring and Review

- White Horse Training will review this policy at least annually (as a minimum) and will update it as needed, so that it is kept up to date with safeguarding issues as they emerge and evolve, including lessons learnt. The policy will also be revised following any national or local updates, significant local or national safeguarding events and/or learning, and/or any changes to our own procedures.

- All staff (including temporary staff and volunteers) will be provided with a copy of this policy and Part One and/or Annex A of KCSIE 2021 as appropriate. Copies of these can be found on the shared drive or obtained from the Designated Safeguarding Lead and a paper copy is in the Safeguarding folder in the office. Annex A will be provided to staff who do not have direct contact with children/students.

- Parents/carers can obtain a copy of the White Horse Training Child Protection and Safeguarding Vulnerable Adults Policy and other related policies on request. Additionally, our policies can be viewed via the White Horse Training Ltd website: https://whitehorsetraining.co.uk/our-policies/ .

- The policy forms part of our development plan and will be reviewed annually by the Managing Director who has responsibility for oversight of safeguarding and child protection systems.

- The Designated Safeguarding Lead will ensure regular reporting on safeguarding activity and systems to the Managing Director and Board of Directors. The Board of Directors will not receive details of individual learner situations or identifying features of families as part of their oversight responsibility.

2.   Key Responsibilities

2.1   Governance and Leadership

- The Managing Director and Board of Directors have a strategic responsibility for our safeguarding arrangements and will comply with their duties under legislation.

- The Managing Director and Board of Directors have regard to the KCSIE 2021 guidance and relevant Adult Safeguarding guidance and will ensure our policies, procedures and training is effective and complies with the law at all times.

- White Horse Training has a nominated board member for safeguarding. The nominated person will support the DSL and have oversight in ensuring that White Horse Training 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.

- The Managing Director and Board of Directors will ensure that the DSL is supported in their role and is provided with sufficient time so they can provide appropriate support to staff and children regarding any safeguarding and welfare concerns.

- The Managing Director will ensure that our child protection and safeguarding policies and procedures adopted by the Board of Directors, are understood, and followed by all staff.

2.2   Designated Safeguarding Lead (DSL)

- White Horse Training has appointed Yvonne Meek, Training Manager, a member of the senior leadership team as the Designated Safeguarding Lead (DSL).

- The DSL has overall responsibility for the day-to-day oversight of safeguarding and child protection systems (including online safety) in White Horse Training. Whilst the activities of the DSL may be delegated to the deputies, the ultimate lead responsibility for safeguarding and child protection remains with the DSL and this responsibility will not be delegated.

- White Horse Training has also appointed a Deputy DSL who will have delegated responsibilities and act in the DSL's absence.
    - Marylee Wollaston, Managing Director.

- It is the role of the DSL to carry out their functions as identified in Annex C of KCISE 2021. This includes but is not limited to:
    - Acting as the central contact point for all staff to discuss any safeguarding concerns
    - Maintaining a confidential recording system for safeguarding and child protection concerns
    - Coordinating safeguarding action for individual children/learners
    - Liaising with other agencies and professionals in line with KCSIE 2021 and WTSC 2018
    - Ensuring that locally established procedures as put in place by relevant Multi-Agency Partnerships, including referrals, are followed, as necessary.
    - Representing, or ensure White Horse Training is appropriately represented at multi-agency safeguarding meetings (including child protection conferences)
    - Managing and monitoring White Horse Training's role in any multi-agency plan for a child/young person or a vulnerable adult or adult at risk.
    - Being available during working hours for staff in White Horse Training to discuss any safeguarding concerns.

- o Helping promote educational outcomes by sharing the information about the welfare, safeguarding and child protection issues that children, including children/young people with a social worker, are experiencing, or have experienced, with teachers and White Horse leadership staff.
  - o Ensuring adequate and appropriate DSL cover arrangements in response to any closures and out of hours activities.
  - o Ensuring all staff access appropriate safeguarding training and relevant updates in line with the recommendations within KCSIE.
  - o Informing the Managing Director of any significant safeguarding issues.

- The DSL will undergo appropriate and specific training to provide them with the knowledge and skills required to carry out their role. Deputy DSLs will be trained to the same standard as the DSL. The DSLs training will be updated formally at least every two years, but their knowledge and skills will be updated through a variety of methods at regular intervals and at least annually.

2.3   Members of Staff

- All members of staff have a responsibility to:
  - o Provide a safe environment in which children, young people and vulnerable adults can learn.
  - o Be aware of the indicators of abuse and neglect so that they can identify cases of children, young people or adults who may need help or protection.
  - o Know what to do if a child, young person or vulnerable adult 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 or vulnerable adult.
  - o Be able to identify and act upon indicators that children or young people are, or at risk of developing mental health issues.
  - o Be prepared to identify children or young people who may benefit from early help.
  - o Understand the early help process and their role in it.
  - o Understand White Horse Training's safeguarding policies and systems.
  - o Undertake regular and appropriate training which is regularly updated.
  - o Be aware of the local process of making referrals to children's social care and statutory assessment under the Children Act 1989.
  - o Know how to maintain an appropriate level of confidentiality.
  - o Reassure children, young people or vulnerable adult who report concerns that they are being taken seriously and that they will be supported and kept safe.

2.4   Children, Young People and Vulnerable Adults

- Children, young people and vulnerable adults have a right to:
  - o Feel safe, be listened to, and have their wishes and feelings taken into account.
  - o Confidently report abuse, knowing their concerns will be treated seriously, and knowing they can safely express their views and give feedback.
  - o Contribute to the development of White Horse Training's safeguarding policies.
  - o Receive help from a trusted adult.
  - o Learn how to keep themselves safe, including online.

2.5   Parents and Carers

- Parents/carers, of children under 18, have a responsibility to:
  - o Understand and adhere the relevant White Horse Training's policies and procedures.
  - o Talk to their children about safeguarding issues and support White Horse Training in their safeguarding approaches.
  - o Identify behaviours which could indicate that their child is at risk of harm including online.

o   Seek help and support from White Horse Training or other agencies.

3.   Child Protection Procedures

3.1   Recognising Indicators of Abuse and Neglect

- All staff are made aware of the definitions and indicators of abuse and neglect as identified by Working Together to Safeguard Children (2018) and Keeping Children Safe in Education 2021.

- White Horse Training recognises that when assessing whether a child/young person may be suffering actual or potential harm there are four categories of abuse:
    - Physical abuse
    - Sexual abuse
    - Emotional abuse
    - Neglect
        - For further information see Appendix 1.

- For vulnerable adults/adults at risk there are 10 categories:
    - Physical abuse
    - Domestic violence or abuse
    - Sexual abuse
    - Psychological or emotional abuse
    - Financial or material abuse
    - Modern slavery
    - Discriminatory abuse
    - Organisational or institutional abuse
    - Neglect or acts of omission
    - Self-neglect

- White Horse Training recognises 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/young people 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 is being abused however all concerns should be taken seriously and will be explored by the DSL on a case-by-case basis.

- White Horse Training recognises abuse, neglect, and safeguarding issues are rarely standalone events and cannot always be covered by one definition or one label alone. In many cases, multiple issues will overlap with one another, therefore staff will always be vigilant and always raise concerns with a DSL.

- Children/young people and vulnerable adults may report abuse happening to themselves, their peers or their family members. All reports made by children/young people and vulnerable adults to White Horse staff will be taken seriously and will be responded to in line with this policy.

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

- Technology can be a significant component in many safeguarding and wellbeing issues. Children/young people and vulnerable adults are at risk of abuse online as well as face to face and in many cases, abuse will take place concurrently via online channels and in daily life. Children/young people and vulnerable adults can also abuse their peers online.

- By understanding the indicators of abuse and neglect, we can respond to problems as early as possible and provide the right support and services for the child/young person/vulnerable adult and their family.

- All members of staff are expected to be aware of and follow this approach if they are concerned about a child/young person:
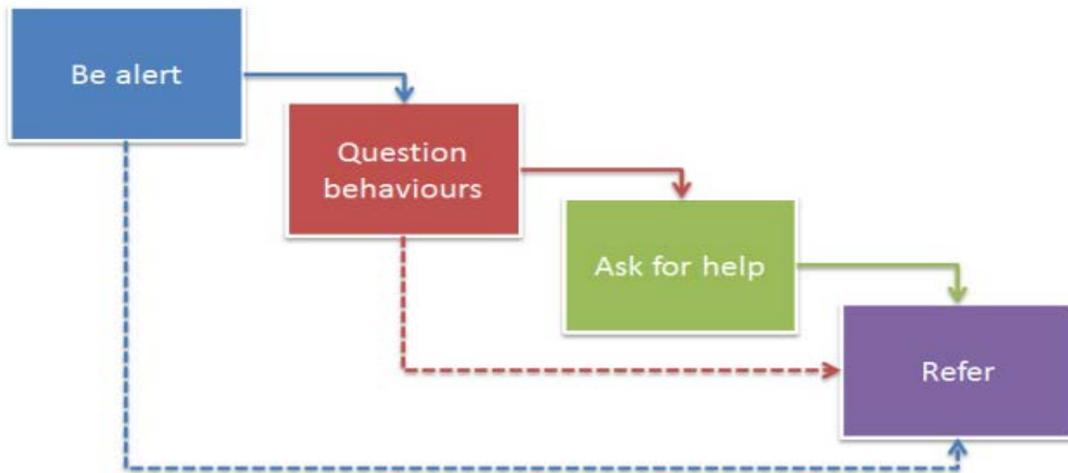
'What to do if you are worried a child is being abused' 2015

- In all cases, if staff are unsure, they will always speak to the DSL (or deputy).

- White Horse Training recognises that some children/young people have additional or complex needs and may require access to intensive or specialist services to support them.

3.2   Responding to Child Protection Concerns

- If staff are made aware of a child protection concern, they are expected to:
  - listen carefully to the concern and be non-judgmental.
  - only use open questions to clarify information where necessary, e.g. who, what, where, when or Tell, Explain, Describe (TED).
  - not promise confidentiality as concerns will have to be shared further, for example, with the DSL and potentially Integrated Children's Services.
  - be clear about boundaries and how the report will be progressed.
  - record the concern in line with White Horse Training's record keeping requirements.
  - inform the DSL (or deputy), as soon as practically possible.

- The DSL or a deputy should always be available to discuss safeguarding concerns. If in exceptional circumstances, a DSL is not available, this should not delay appropriate action being taken. Staff should speak to the Managing Director and/or take advice from the appropriate local authority safeguarding team. In these circumstances, any action taken will be shared with a DSL as soon as is practically possible.

- White Horse Training will respond to concerns in line with the relevant local authority Safeguarding Children Multi-Agency Partnership procedures.
  - o Further information about local authority procedures and additional guidance relating to reporting concerns and specific safeguarding issues can be found on individual websites which can be accessed through: https://www.proceduresonline.com/swcpp/#

- Where a child/young person is suffering, or is likely to suffer from harm, or is in immediate danger, a 'request for support' will be made immediately to the appropriate services and/or the police, in line with local authority procedures.
  - o White Horse Training recognise that in situations where there are immediate child protection concerns for a child/young person as identified in line with Support Level Guidance, it is NOT to investigate as a single agency, but to act in line with local authority guidance which may involve multi-agency decision making**.**
  - o The DSL may seek advice or guidance before deciding next steps.

- In the event of a request for support parents/carers will be informed and consent to this will be sought by the DSL in line with local authority guidance. Parents/carers will be informed of this, unless there is a valid reason not to do so, for example, if to do so would put a child/young person at risk of harm or would undermine a criminal investigation.

- Where is it is identified a child may benefit from Early Help support, the DSL (or deputy) will generally lead as appropriate and make a request for support via the appropriate service.
  - o The DSL will keep all early help cases under constant review and consideration will be given to escalating concerns or seeking advice if the situation does not appear to be improving or is getting worse.

  - If, after a request for support or any other planned external intervention, a child's situation does not appear to be improving or there is a concern regarding decisions made, the DSL will consider following local authority escalation procedures to ensure their concerns have been addressed and, most importantly, that the child's situation improves.

3.3   Recording Concerns

- All safeguarding concerns, discussions and decisions, and reasons for those decisions, will be recorded in writing on the White Horse Training safeguarding incident/concern form and passed without delay to the DSL. Currently this is paper based but is moving to an electronic system in the near future.

- Incident/Welfare concern forms are kept on the shared drive in the Safeguarding folder.

- Records will be completed as soon as possible after the incident/event, using the child/young person/vulnerable adult's words and will be signed and dated by the member of staff. Child protection records will record facts and not personal opinions. A body map will be completed if injuries have been observed.

- If there is an immediate safeguarding concern the member of staff will consult with the DSL before completing the form as reporting urgent concerns takes priority.

- If members of staff are in any doubt about recording requirements, they will discuss their concerns with the DSL.

- Child protection and safeguarding records will include a clear and comprehensive summary of the concern, details of how the concern was followed up and resolved and details regarding any action taken, decisions reached and the outcome.

- Child protection and safeguarding records will be kept confidential and stored securely. Child protection and safeguarding records will be kept for individual children/young people/vulnerable adult and will be maintained separately from all other records relating to the child in White Horse Training. Child protection and safeguarding records are kept in accordance with data protection legislation and are retained centrally and securely by the DSL.

- All child protection and safeguarding records will be transferred in accordance with data protection legislation to the child's subsequent training provider, under confidential and separate cover as soon as possible. Child Protection and safeguarding files will be transferred securely to the new DSL, separately to the child's main file, and a confirmation of receipt will be obtained.

- In addition to the child protection file, the DSL will also consider if it would be appropriate to share any information with the DSL at the new training provider in advance of a child/young person leaving, for example, information that would allow the new training provider to continue to provide support.

- Where White Horse Training receives child protection files, the DSL will ensure key staff will be made aware of relevant information as required.

3.4   Multi-Agency Working

- White Horse Training recognises and is committed to its responsibility to work within local authority 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.

- White Horse Training 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 authority processes as required, such as, participation in relevant safeguarding multi-agency plans and meetings, including Child Protection Conferences, Core Groups, Strategy Meetings, Child in Need meetings or other early help multi-agency meetings. For adults this may include Adult Safeguarding Boards and other relevant agencies.

3.5   Confidentiality and Information Sharing

- White Horse Training recognises our duty and powers to hold, use and share relevant information with appropriate agencies in matters relating to child protection at the earliest opportunity as per statutory guidance outlined within KCSIE 2021.

- White Horse Training has an appropriately trained Data Protection Officer (DPO) as required by the General Data Protection Regulations (GDPR) to ensure that we are complaint with all matters relating to confidentiality and information sharing requirements. The Data Protection Officer is Marylee Wollaston, Managing Director.

- 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 2021). DfE ''Information sharing advice for safeguarding practitioners'' (2018) provides further detail. This can be found on the shared drive and a paper copy is in the Safeguarding folder in the office.

- The Managing Director and DSL will disclose relevant safeguarding information about a learner with staff on a 'need to know' basis.

- All members of staff must be aware that whilst they have duties to keep information confidential, in line with our confidentiality policy, they also have a professional responsibility to be proactive in sharing information as early as possible to help identify, assess, and respond to risks or concerns about the safety and welfare of children/young people; this may include sharing information with the DSL and with other agencies as appropriate. All staff are aware they cannot promise confidentiality in situations which might compromise a child or young person's safety or wellbeing.

- For Adults consent to share information should be obtained as adults have a general right to independence, choice and self-determination including control over information about themselves. However in the context of adult safeguarding these rights can be overridden in certain circumstances:
  - Emergency or life-threatening situations may warrant the sharing of relevant information with the relevant emergency services without consent.
  - The law does not prevent the sharing of sensitive, personal information between organisations where the public interest served outweighs the public interest served by protecting confidentiality – for example, where a serious crime may be prevented.
  - Information can be shared lawfully within the parameters of the Data Protection Act 2018 and the General Data Protection Regulation (GDPR).

3.6   Complaints

- All members of staff should feel able to raise or report any concerns about children or young people's safety or potential failures in our safeguarding regime. White Horse Training has a complaints procedure available to learners and members of staff and visitors who wish to report concerns or complaints. This can be found on the shared drive, in the office and on our website.

- Whilst we encourage members of our community to report concerns and complaints directly to us, we recognise this may not always be possible. Children, young people, and adults who have experienced abuse whilst in an education setting can contact the NSPCC 'Report Abuse in Education' helpline on 0800 136 663 or via email: help@nspcc.org.uk

- Staff can also access the NSPCC whistleblowing helpline if they do not feel able to raise concerns regarding child protection failures internally.
  - Staff can call 0800 028 0285 (8:00 AM to 8:00 PM Monday to Friday) or email help@nspcc.org.uk.

- The leadership team at White Horse Training will take all concerns reported to us seriously and all complaints will be considered and responded to in line with the relevant and appropriate process.
  - Anything that constitutes an allegation against a member of staff or volunteer will be dealt with in line with section 8 of this policy.

4.   Specific Safeguarding Issues

- White Horse Training is aware of a range of specific safeguarding issues and situations that can put children and young people at greater risk of harm. In addition to Part One, DSLs, White Horse Training leaders and staff who work directly with children or young people will read annex B of KCSIE 2021 which contains important additional information about specific forms of abuse and safeguarding issues.

- Where staff are unsure how to respond to specific safeguarding issues, they should follow the processes as identified in part 3 of this policy and speak with the DSL or their deputy.

4.1   Peer on Peer Abuse

- All members of staff at White Horse Training recognise that children and young people are capable of abusing their peers, and that it can happen both inside and outside of White Horse and online.

- White Horse Training recognises that peer on peer abuse can take many forms, including but not limited to:
  - o   Bullying, including cyberbullying, prejudice-based and discriminatory bullying
  - o   abuse in intimate personal relationships between peers
  - o   physical abuse which can include hitting, kicking, shaking, biting, hair pulling, or otherwise causing physical harm
  - o   sexual violence and sexual harassment
  - o   consensual and non-consensual sharing of nudes and semi-nude images and/or videos (also known as sexting or youth produced sexual imagery)
  - o   causing someone to engage in sexual activity without consent, such as forcing someone to strip, touch themselves sexually, or to engage in sexual activity with a third party
  - o   upskirting (which is a criminal offence), which typically involves taking a picture under a person's clothing without their permission, with the intention of viewing their genitals or buttocks to obtain sexual gratification, or cause the victim humiliation, distress or alarm
  - o   initiation/hazing type violence and rituals

- White Horse Training believes that abuse is abuse and it will never be tolerated or dismissed as "banter", "just having a laugh", "part of growing up" or "boys being boys" as this can lead to a culture of unacceptable behaviours and an unsafe environment for children and young people.

- White Horse Training recognises that even if there are no reported cases of peer on peer abuse, such abuse is still likely to be taking place.

- All staff have a role to play in challenging inappropriate behaviours between peers. Staff recognise that some peer on peer abuse issues may be affected by gender, age, ability and culture of those involved, i.e. for gender based abuse, girls are more likely to be victims and boys more likely to be perpetrators.

- Concerns about learner's behaviour, including peer on peer abuse taking place offsite will be responded to as part of a partnership approach with learners and parents/carers where appropriate. Offsite behaviour concerns will be recorded and responded to in line with existing appropriate policies, for example the learner charter and child protection policies.

- White Horse Training want children and young people to feel able to confidently report abuse and know their concerns will be treated seriously. All allegations of peer on peer abuse will be reported to the DSL and will be recorded, investigated, and dealt with in line with associated White Horse Training policies, including the learner charter. Learners who experience abuse will be offered appropriate support, regardless of where the abuse takes place.

- Alleged victims, perpetrators and any other child/young person affected by peer on peer abuse will be supported through a range of methods including but not exclusively:
  - o   listening carefully
  - o   avoiding victim blaming
  - o   providing appropriate pastoral support

o   where necessary and appropriate, informing the police or following local authority procedures.

4.2   Child on Child Sexual Violence or Harassment

- When responding to concerns relating to child on child sexual violence or harassment, White Horse Training will follow the guidance outlined in Part Five of KCSIE 2021 and the DfE 'Sexual Violence and Sexual Harassment Between Children in Schools and Colleges' guidance.

- White Horse Training recognises sexual violence and sexual harassment can occur between two children/young people of any age and sex. It can occur through a group of children/young people sexually assaulting or sexually harassing a single child/young person or group of children/young people and can occur online and face to face (both physically and verbally). Sexual violence and sexual harassment is never acceptable.

- All victims of sexual violence or sexual harassment will be reassured that they are being taken seriously and that they will be supported and kept safe. A victim will never be given the impression that they are creating a problem by reporting sexual violence or sexual harassment or be made to feel ashamed for making a report.

- When there has been a report of sexual violence or harassment, the DSL will make an immediate risk and needs assessment which will be considered on a case-by-case basis which explores how best to support and protect the victim and the alleged perpetrator (and any other children/young people involved/impacted).
  o   The risk and needs assessment will be recorded and kept under review and will consider the victim (especially their protection and support), the alleged perpetrator, and all other students and staff and any actions that are required to protect them.

- Reports will initially be managed internally by White Horse Training and where necessary will be referred to appropriate services and/or the Police.
  o   The decision making and required action taken will vary on a case by case basis, but will be informed by the wishes of the victim, the nature of the alleged incident (including whether a crime may have been committed), the ages and developmental stages of the children/young people involved, any power imbalance, if the alleged incident is a one-off or a sustained pattern of abuse, if there are any ongoing risks to the victim, other students or White Horse staff, and, any other related issues or wider context.

- If at any stage the DSL is unsure how to proceed, advice will be sought from an appropriate safeguarding partner.

4.3   Nude and/or Semi-Nude Image Sharing by Children

- White Horse Training recognises that consensual and non-consensual sharing of nudes and semi-nude images and/or videos (also known as youth produced/involved sexual imagery or "sexting") can be a safeguarding issue; all concerns will be reported to and dealt with by the DSL (or deputy).

- When made aware of concerns involving consensual and non-consensual sharing of nudes and semi-nude images and/or videos by children/young people, staff are advised to:
  o   Report any concerns to the DSL immediately.
  o   Never view, copy, print, share, store or save the imagery, or ask a child/young person to share or download it – this may be illegal. If staff have already viewed the imagery by accident, this will be immediately reported to the DSL.
  o   Not delete the imagery or ask the child/young person to delete it.
  o   Not say or do anything to blame or shame any children/young people involved.

- o Explain to child(ren)/young persons involved that they will report the issue to the DSL and reassure them that they will receive appropriate support and help.
- o Not ask the children/young persons involved in the incident to disclose information regarding the imagery and not share information about the incident with other members of staff, the child(ren) involved or their, or other, parents and/or carers. This is the responsibility of the DSL.

- DSLs will respond to concerns as set out in the non-statutory UKCIS guidance: Sharing nudes and semi-nudes: advice for education settings working with children and young people' and the local authority guidance. When made aware of a concern involving consensual and non-consensual sharing of nudes and semi-nude images and/or videos:
  - o the DSL will hold an initial review meeting to explore the context and ensure appropriate and proportionate safeguarding action is taken in the best interests of any child/young person involved. This may mean speaking with relevant staff and the children/young persons involved as appropriate.
  - o parents and carers will be informed at an early stage and be involved in the process to best support children/young people, unless there is good reason to believe that involving them would put a child/young person at risk of harm.
  - o All decisions and action taken will be recorded in line with our child protection and safeguarding procedures.
  - o a referral will be made to ICS and/or the police immediately if:
    - the incident involves an adult (over 18).
    - there is reason to believe that a child/young person has been coerced, blackmailed, or groomed, or there are concerns about their capacity to consent, for example, age of the child or they have special educational needs.
    - the image/videos involve sexual acts and a child under the age of 13, depict sexual acts which are unusual for the child's developmental stage, or are violent.
    - a child/young person is at immediate risk of harm owing to the sharing of nudes and semi-nudes.
  - o The DSL may choose to involve other agencies at any time if further information/concerns are disclosed at a later date.
  - o If DSLs are unsure how to proceed, advice will be sought from an appropriate safeguarding partner

4.4   Child Sexual Exploitation (CSE) and Child Criminal Exploitation (CCE)

- White Horse Training recognises that CSE and CCE 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/young person into taking part in sexual or criminal activity, in 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. CSE and CCE 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.

- If staff are concerned that a child/young person may be at risk of CSE or CCE, immediate action should be taken by speaking to the DSL or a deputy.

4.5   Serious Violence

- All staff are made aware of the indicators which may signal children/young people are at risk from or are involved with serious violent crime. These may include unexplained gifts or new possessions, increased absence from school, a change in friendships or relationships with older individuals or

groups, a significant decline in performance, signs of self-harm or a significant change in wellbeing, or signs of assault or unexplained injuries.

- Any concerns regarding serious violence will be reported and responded to in line with other child protection concerns.
  - o The initial response to child victims is important and staff will take any allegations seriously and work in ways that support children/young people and keep them safe.

4.6   So-called honour based abuse

- So-called 'honour'-based abuse (HBA) encompasses incidents or crimes which have been committed to protect or defend the honour of the family and/or the community, including female genital mutilation (FGM), forced marriage, and practices such as breast ironing.

- All forms of HBA are abuse (regardless of the motivation) and concerns should be responded to in line with section 3 of this policy. Staff will report any concerns about HBA to the DSL (or a deputy).

- Whilst all staff will speak to the DSL (or deputy) with regard to any concerns about female genital mutilation (FGM), there is a specific legal duty on teachers.
  - o If a teacher, in the course of their work in the profession, discovers that an act of FGM appears to have been carried out on a girl under the age of 18, the teacher must report this to the police.

4.7   Preventing radicalisation

- White Horse Training is aware of our duty under section 26 of the Counter-Terrorism and Security Act 2015 (the CTSA 2015), to have "due regard to the need to prevent people from being drawn into terrorism", also known as the Prevent duty and the specific obligations placed upon us as an education provider regarding risk assessments, working in partnership, staff training, and IT policies.

- White Horse Training recognises that children and young people are vulnerable to extremist ideology and radicalisation and staff will be alert to changes in children/young people's behaviour which could indicate that they may be in need of help or protection.

- Staff will report any concerns to the DSL (or a deputy), who is aware of the local procedures to follow.

4.8   Cybercrime

- White Horse Training recognises that children/young people/vulnerable adults with particular skill and interest in computing and technology may inadvertently or deliberately stray into 'cyber-enabled' (crimes that can happen offline but are enabled at scale and at speed online) or 'cyber dependent' (crimes that can be committed only by using a computer/internet enabled device) cybercrime.

- If staff are concerned that a child/young person may be at risk of becoming involved in cyber-dependent cybercrime, the DSL will be informed, and consideration will be given to accessing local support and/or referring into the Cyber Choices programme, which aims to intervene when young people are at risk of committing, or being drawn into, low level cyber-dependent offences and divert them to a more positive use of their skills and interests.

- Where there are concerns about 'cyber-enabled' crime such as fraud, purchasing of illegal drugs online, child sexual abuse and exploitation, or other areas of concern such as online bullying or general online safety, they will be responded to in line with this and other appropriate policies.

18

5. Supporting Children and Vulnerables Adults Potentially at Greater Risk of Harm

- Whilst all children/young people should be protected, some groups of children/young people are potentially at greater risk of harm.

5.1 Safeguarding Children or Adults with Special Educational Needs or Disabilities (SEND)

- White Horse Training acknowledges that children/young people/adults with special educational needs or disabilities (SEND) or certain health conditions can face additional safeguarding challenges and barriers for recognising abuse and neglect.

- White Horse Training recognises that children/young people/adults with SEND may also face additional communication barriers and experience difficulties in managing or reporting abuse or challenges. As such children/young people/adults with SEND will be appropriately supported to communicate and ensure that their voice is heard and acted upon.

- All members of staff will be encouraged to appropriately explore possible indicators of abuse such as behaviour, mood changes or injuries and not to assume that they are related to the child/young person's disability. Staff will be mindful that children/young people/adult with SEND or certain medical conditions may be disproportionally impacted by behaviours such as bullying, without outwardly showing any signs.

- Members of staff are encouraged to be aware that children/young people/adults with SEND can be disproportionally impacted by safeguarding concerns, such as exploitation, peer group isolation or bullying including prejudice-based bullying.

5.2 Children Requiring Mental Health Support

- All staff will be made aware that mental health problems can, in some cases, be an indicator that a child/young person/adult has suffered or is at risk of suffering abuse, neglect or exploitation.

- Staff are aware that children/young person/adult's experiences, for example where they have suffered abuse and neglect, or other potentially traumatic adverse childhood experiences, can impact on their mental health, behaviour and education.

- If staff have a mental health concern about a child/young person/adult that is also a safeguarding concern, immediate action should be taken by speaking to the DSL or a deputy.

5.3 Children Missing from Education

- Children/young people missing from education, particularly persistently, can act as a vital warning sign to a range of safeguarding issues including neglect, sexual abuse, and child sexual and criminal exploitation.

- Where we have concerns that a child is missing from education, we will respond in line with our statutory duties and local policies.

5.4   Children who need a Social Worker

- The DSL will hold details of social workers working with children/young people in White Horse Training so that decisions can be made in the best interests of the child/young person's safety, welfare, and educational outcomes.

- Where children/young people have a social worker, this will inform White Horse Training's decisions about their safety and promoting their welfare, for example, responding to unauthorised absence and provision of pastoral and/or academic support.

5.5   Looked after children, previously looked after children and care leavers

- White Horse Training recognises the common reason for children becoming looked after is as a result of abuse and/or neglect and a previously looked after child also potentially remains vulnerable.

- Where a child is leaving care, the DSL will hold details of the local authority Personal Advisor appointed to guide and support them and will liaise with them as necessary regarding any issues of concern.

6.   Online Safety

- It is essential that children/young people/vulnerable adults are safeguarded from potentially harmful and inappropriate material or behaviours online. White Horse Training will adopt an approach to online safety which will empower, protect, and educate our learners and staff in their use of technology, and establish mechanisms to identify, intervene in, and escalate any concerns where appropriate.

- White Horse Training will ensure online safety is safety is reflected as required in all relevant policies.

- White Horse Training identifies that the breadth of issues classified within online safety is considerable, but can be categorised into four areas of risk:
    - Content: being exposed to illegal, inappropriate or harmful content. For example pornography, fake news, racism, misogyny, self-harm, suicide, anti-Semitism, radicalisation and extremism.
    - Contact: being subjected to harmful online interaction with other users. For example peer to peer pressure, commercial advertising and adults posing as children or young adults with the intention to groom or exploit them for sexual, criminal, financial or other purposes.
    - Conduct: personal online behaviour that increases the likelihood of, or causes, harm. For example, making, sending and receiving explicit images (e.g. consensual and non-consensual sharing of nudes and semi-nudes and/or pornography), sharing other explicit images and online bullying.
    - Commerce: risks such as online gambling, inappropriate advertising, phishing and or financial scams.

- White Horse Training recognises that technology, and the risks and harms related to it, evolve and change rapidly. We will carry out an annual review of our approaches to online safety, supported by a risk assessment which is reviewed regularly and considers and reflects the risks our learners face.

- The Managing Director will be informed of online safety concerns by the DSL, as appropriate and any incidents will be reported to the Board of Directors as necessary.

6.1   Policies and Procedures

- The Managing Director has overall responsibility for online safety but will liaise with the DSL, other members of staff and IT support services as necessary.

- The Managing Director will respond to online safety concerns reported in line with our policies.
  - o   Internal sanctions and/or support will be implemented as appropriate.
  - o   Where necessary, concerns will be escalated and reported to relevant partner agencies in line with local policies and procedures.

- White Horse Training uses a range of technology. This includes computers, laptops, tablets and other digital devices, the internet, our learning platforms, intranet and email systems.
  - o   All White Horse Training owned devices and systems will be used in accordance with our IT security and data protection policies

- White Horse Training recognises the specific risks that can be posed by mobile and smart technology, including mobile/smart phones, cameras and wearable technology. In accordance with KCSIE 2021 White Horse Training has a policy in place regarding appropriate mobile and smart technology and image use. These policies can be found on the shared drive.

6.2   Appropriate Filtering and Monitoring

- White Horse Training will do all we reasonably can to limit children/young people/vulnerable adult's exposure to online risks through our provided IT systems and will ensure that appropriate filtering and monitoring systems are in place.
  - o   The entire system at White Horse Training is protected through the use of Sophos anti-virus and firewall which continually updates.
  - o   We also use the web security and control functions within our Sophos software to block "Adult and potentially inappropriate categories". A list of all the different categories that can be blocked is provided here: https://www.sophos.com/en-us/labs/web-control.aspx and is kept under constant review.
  - o   If learners or staff discover unsuitable sites or material, they are required to: turn off the monitor/screen, report the concern immediately to a member of staff and the DSL who will then report the URL of the site.
  - o   All users will be informed that use of our systems can be monitored, and that monitoring will be in line with data protection, human rights, and privacy legislation.
  - o   Filtering breaches or concerns identified through our monitoring approaches will be recorded and reported to the DSL who will respond as appropriate.
  - o   Any access to material believed to be illegal will be reported immediately to the appropriate agencies, such as the Internet Watch Foundation and the police.
  - o   When implementing appropriate filtering and monitoring, White Horse Training will ensure that "over blocking" does not lead to unreasonable restrictions as to what children/young people can be taught with regards to online teaching and safeguarding.

- White Horse Training acknowledges that whilst filtering and monitoring is an important part of our online safety responsibilities, it is only one part of our approach to online safety.
  - o   Learner's internet use will be supervised by staff according to their age and ability.
  - o   Learners will be directed to use appropriate online resources and tools by staff.

6.3　Information Security and Access Management

- White Horse Training is responsible for ensuring an appropriate level of security protection procedures are in place, in order to safeguard our systems as well as staff and learners. Further information can be found in our IT security policy.

- White Horse Training will review the effectiveness of these procedures periodically to keep up with evolving cyber-crime technologies.

6.4　Staff Training

- White Horse Training will ensure that all staff receive online safety training as part of induction and that updates for all staff will be integrated, aligned and considered as part of our overarching safeguarding approach.

6.5　Educating Learners

- White Horse Training will ensure that information is available to all learners to learn about and manage online risks effectively.

6.6　Remote Learning

- White Horse Training will ensure any remote sharing of information, communication and use of online learning tools and systems will be in line with privacy and data protection requirements.

- All communication with learners and parents/carers, where appropriate, will take place using approved communication channels; for example, White Horse Training email accounts and phone numbers and/or agreed systems e.g. Moodle, Onefile, Zoom or equivalent.
  - o Any pre-existing relationships or situations which mean this cannot be complied with will be discussed with the DSL.

- Staff and learners will engage with remote teaching and learning in line with existing behaviour principles as set out in our Learner Charter.

- 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.

- When delivering remote learning, staff will follow our Acceptable Use Policy (AUP)

- Where appropriate parents/carers will be made aware of what their children are being asked to do online, including the sites they will be asked to access.

- Where appropriate parents/carers will be encouraged to ensure children are appropriately supervised online and that appropriate parent controls are implemented at home.

7.   Staff Engagement and Expectations

7.1   Awareness, Induction and Training

- All members of staff have been provided with a copy of part one or annex A of 'Keeping Children Safe in Education' 2021 which covers safeguarding information for staff.
  - White Horse Training leaders, including the DSL will read KCSIE in its entirety.
  - White Horse Training leaders and all members of staff who work directly with children will read Part one and annex B.
  - All members of staff who do not work directly with children will read Annex A
  - All members of staff have signed to confirm that they have read and understood the national guidance shared with them. This is recorded in the safeguarding folder in the office.

- The DSL will ensure that all new staff and volunteers (including agency and third-party staff) receive safeguarding and child protection training (including online safety), including information to ensure they are aware of the our internal safeguarding processes, as part of their induction.

- Safeguarding training for staff, including online safety training, will be integrated, aligned and considered as part of our whole safeguarding approach and wider staff training and curriculum planning.

- In addition to specific child protection training, all staff will receive regular safeguarding and child protection updates, at least annually, to provide them with relevant skills and knowledge to safeguard children, young people and vulnerable adults effectively. This will be via email, e-bulletins, and staff meetings.

- Staff will be encouraged to contribute to and shape our safeguarding arrangements and child protection and safeguarding policies by inviting input at staff meetings.

- The DSL will maintain an up to date register detailing safeguarding training undertaken by all staff and will report this to the Managing Director who will inform the Boards of Directors

7.2   Safer Working Practice

- All members of staff are required to work within our clear guidelines on safer working practice.

- The DSL will ensure that all staff and volunteers (including agency and third-party staff) have read the child protection policy and are aware of our expectations regarding safe and professional practice.

- Staff will manage behaviour effectively to ensure a good and safe educational environment and will have a clear understanding of the needs of all children/young people and vulnerable adults.

- 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 IT Security.

7.3   Supervision and Support

- 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/young person's safety or welfare.

- White Horse Training 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/young people
    - All staff are supported by the DSL in their safeguarding role.

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

8.   Safer Recruitment and Allegations

8.1   Safer Recruitment and Safeguarding Checks

- White Horse Training is committed to ensure that we develop a safe culture and that all steps are taken to recruit staff and volunteers who are safe to work with our learners and staff.
    - White Horse Training will follow relevant guidance in Keeping Children Safe in Education 2021 (Part Three, 'Safer Recruitment') and from The Disclosure and Barring Service (DBS)
    - The Managing Director is responsible for ensuring that White Horse Training follows safe recruitment processes as outlined within guidance.
    - The Managing Director will ensure that at least one of the people who conducts an interview has completed safer recruitment training.

- White Horse Training maintains an accurate Single Central Record (SCR) in line with statutory guidance.

- White Horse Training are committed to supporting the statutory guidance from the Department for Education on the application of the Childcare (Disqualification) Regulations 2009 and related obligations under the Childcare Act 2006 in schools.

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

- Where White Horse Training places a learner with an alternative provision provider, we will continue to be responsible for the safeguarding of that child/young person.
    - White Horse Training will undertake appropriate checks to ensure the provider meets the needs of the learner, including written confirmation that appropriate safeguarding checks have been carried out on individuals working at the establishment.

8.2   Allegations/concerns raised in relation to teachers, including supply teachers, other staff, volunteers and contractors

- White Horse Training will respond to allegations in line with the appropriate local authority arrangements and Part Four of KCSIE 2021.

- Any concerns or allegations about staff, including those which do not meet the allegation/harm threshold (8.2.1) will be recorded and dealt with appropriately in line with national and local guidance. Ensuring concerns are dealt with effectively will protect those working in or on behalf of the White Horse Training from potential false allegations or misunderstandings.

- Where the Managing Director is unsure how to respond, for example if White Horse Training is unsure if a concern meet the harm 'thresholds', advice will be sought via the appropriate Local Authority Designated Officer (LADO).

8.2.1 Concerns that meet the 'harm threshold'

- White Horse Training recognises that it is possible for any member of staff, including volunteers, directors, contractors, agency and third-party staff (including supply teachers) and visitors to behave in a way that indicates a person would pose a risk of harm if they continue to work in their present position, or in any capacity with children/young person in a school or college. This includes when someone has
    - o behaved in a way that has harmed a child, or may have harmed a child and/or
    - o possibly committed a criminal offence against or related to a child and/or;
    - o behaved towards a child or children in a way that indicates he or she may pose a risk of harm to children; and/or
    - o behaved or may have behaved in a way that indicates they may not be suitable to work with children.

- Allegations against staff which meet this threshold will be referred immediately to the Managing Director who will contact the appropriate Local Authority Designated Officer to agree further action to be taken in respect of the child and staff member. In the event of allegations of abuse being made against the Managing Director, staff are advised that allegations should be reported to the Chair of White Horse Training who will contact the LADO.

8.2.2 Concerns that do not meet the 'harm threshold'

- White Horse Training may also need to take action in response to 'low-level' concerns about staff, which typically would be behaviours which are inconsistent with our staff code of conduct, including inappropriate conduct outside of work and concerns that do not meet the allegations threshold.

- Where low-level concerns are reported to White Horse Training, the Managing Director will liaise with the appropriate LADO.

- Low-level concerns will be recorded in writing and reviewed so potential patterns of concerning, problematic or inappropriate behaviour can be identified. Where a pattern is identified, White Horse Training will implement appropriate action, for example consulting with the Local Authority Designated Officer and following our disciplinary procedures.

8.2.3 Safe Culture

- As part of our approach to safeguarding, White Horse Training has created and embedded a culture of openness, trust and transparency in which our values and expected behaviour are constantly lived, monitored and reinforced by all staff (including supply teachers, volunteers and contractors) and where all concerns are dealt with promptly and appropriately.

- All staff and volunteers should feel able to raise any concerns about poor or unsafe practice and potential failures in the White Horse Training safeguarding regime. The leadership team at White Horse Training takes all concerns or allegations received seriously.

- All members of staff are made aware of our Whistleblowing 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. Staff can call 0800 028 0285 (8:00 AM to 8:00 PM Monday to Friday) or email help@nspcc.org.uk.

- White Horse Training 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.
  - o If these circumstances arise in relation to a member of staff at White Horse Training, a referral will be made as soon as possible after the resignation or removal of the individual in accordance with advice from the appropriate Local Authority Designated Officer and/or the Managing Director.

9. Opportunities to teach safeguarding

- White Horse Training will ensure that children/young people/adults are given appropriate information about safeguarding, including online safety, as part of our curriculum.

- We recognise that we play an essential role in helping children/young people/adults to understand and identify the parameters of what is appropriate child and adult behaviour, what is 'safe', to recognise when they and others close to them are not safe, and how to seek advice and support when they are concerned. Our curriculum provides opportunities for increasing self-awareness, self-esteem, social and emotional understanding, assertiveness and decision making so that learners are supported in their own development.

- White Horse Training recognise that a one size fits all approach may not be appropriate for all children/young people, and a more personalised or contextualised approach for more vulnerable children/adults, victims of abuse and some SEND children/adults might be needed.

- We support children/young people/adults to talk to a range of staff. Children/young people/adults will be listened to and heard, and their concerns will be taken seriously and acted upon as appropriate.

10. Physical Safety

10.1 Site 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.

- Visitors to White Horse Training are required to use the entry buzzer to inform staff that they have arrived. Staff will check the visitor is expected and allow access. All visitors are met at the door and are escorted out when they leave.

- Staff and visitors will be expected to adhere to any safety arrangements implemented because of Covid-19 restrictions.

- Any individual who is not known or identifiable on site should be challenged for clarification and reassurance. Learners are expected to inform a member of White Horse staff immediately.

- White Horse Training will not accept the behaviour of any individual that threatens our security or leads others 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 our site.

11.   Local Support

- Given the wide geographical area that our learners come from the DSL has the contact detail for local authorities.

- There is a central hub to access relevant local authorities: https://www.proceduresonline.com/swcpp/#.

Signed: *M. Wallash.*

Position: Managing Director

Date: 01/09/2021

Review Date: 01/09/2022

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: Support Organisations

NSPCC 'Report Abuse in Education' Helpline
- 0800 136 663 or help@nspcc.org.uk

National Organisations
- NSPCC: www.nspcc.org.uk
- Barnardo's: www.barnardos.org.uk
- Action for Children: www.actionforchildren.org.uk
- Children's Society: www.childrenssociety.org.uk

Support for Staff
- Education Support Partnership: www.educationsupportpartnership.org.uk
- Professional Online Safety Helpline: www.saferinternet.org.uk/helpline

Support for Learners
- ChildLine: www.childline.org.uk
- Papyrus: www.papyrus-uk.org
- The Mix: www.themix.org.uk
- Shout: www.giveusashout.org
- Fearless: www.fearless.org
- Victim Support: www.victimsupport.org.uk

Support for Adults
- Family Lives: www.familylives.org.uk
- Crime Stoppers: www.crimestoppers-uk.org
- Victim Support: www.victimsupport.org.uk
- The Samaritans: www.samaritans.org
- NAPAC (National Association for People Abused in Childhood): www.napac.org.uk
- MOSAC: www.mosac.org.uk
- Action Fraud: www.actionfraud.police.uk
- Shout: www.giveusashout.org
- Advice now: www.advicenow.org.uk

Support for Learning Disabilities
- Respond: www.respond.org.uk
- Mencap: www.mencap.org.uk
- Council for Disabled Children: https://councilfordisabledchildren.org.uk

Contextual Safeguarding Network
- https://contextualsafeguarding.org.uk/

Kent Resilience Hub
- https://kentresiliencehub.org.uk/

Substance Misuse
- We are with you (formerly Addaction): www.wearewithyou.org.uk/services/kent-for-young-people/
- Talk to Frank: www.talktofrank.com

Domestic Abuse
- Domestic abuse services: www.domesticabuseservices.org.uk

- Refuge: www.refuge.org.uk
- Women's Aid: www.womensaid.org.uk
- Men's Advice Line: www.mensadviceline.org.uk
- Mankind: www.mankindcounselling.org.uk
- National Domestic Abuse Helpline: www.nationaldahelpline.org.uk
- Respect Phoneline: https://respectphoneline.org.uk

Criminal and Sexual Exploitation
- National Crime Agency: www.nationalcrimeagency.gov.uk/who-we-are
- It's not okay: www.itsnotokay.co.uk
- NWG Network: www.nwgnetwork.org

Honour Based Abuse
- Forced Marriage Unit: www.gov.uk/guidance/forced-marriage
- FGM Factsheet: https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/496415/6_1639_HO_SP_FGM_mandatory_reporting_Fact_sheet_Web.pdf
- Mandatory reporting of female genital mutilation: procedural information: www.gov.uk/government/publications/mandatory-reporting-of-female-genital-mutilation-procedural-information

Peer on Peer abuse, including bullying, sexual violence and harassment
- Rape Crisis: https://rapecrisis.org.uk
- Brook: www.brook.org.uk
- Disrespect Nobody: www.disrespectnobody.co.uk
- Upskirting – know your rights: www.gov.uk/government/news/upskirting-know-your-rights
- Lucy Faithfull Foundation: www.lucyfaithfull.org.uk
- Stop it Now! www.stopitnow.org.uk
- Parents Protect: www.parentsprotect.co.uk
- Anti-Bullying Alliance: www.anti-bullyingalliance.org.uk
- Diana Award: www.antibullyingpro.com/
- Bullying UK: www.bullying.co.uk
- Kidscape: www.kidscape.org.uk

Online Safety
- CEOP: www.ceop.police.uk
- Internet Watch Foundation (IWF): www.iwf.org.uk
- Think U Know: www.thinkuknow.co.uk
- Childnet: www.childnet.com
- UK Safer Internet Centre: www.saferinternet.org.uk
- Report Harmful Content: https://reportharmfulcontent.com
- Marie Collins Foundation: www.mariecollinsfoundation.org.uk
- Internet Matters: www.internetmatters.org
- NSPCC: www.nspcc.org.uk/onlinesafety and www.net-aware.org.uk
- Get Safe Online: www.getsafeonline.org
- Parents Protect: www.parentsprotect.co.uk
- Cyber Choices: https://nationalcrimeagency.gov.uk/what-we-do/crime-threats/cyber-crime/cyberchoices
- National Cyber Security Centre (NCSC): www.ncsc.gov.uk

Mental Health
- Mind: www.mind.org.uk
- Moodspark: https://moodspark.org.uk
- Young Minds: www.youngminds.org.uk
- We are with you (formerly Addaction): www.wearewithyou.org.uk/services/kent-for-young-people/
- Anna Freud: www.annafreud.org/schools-and-colleges/

Radicalisation and hate
- Educate against Hate: www.educateagainsthate.com
- Counter Terrorism Internet Referral Unit: www.gov.uk/report-terrorism
- True Vision: www.report-it.org.uk

Children with Family Members in Prison
- National information Centre on Children of Offenders (NICCO): https://www.nicco.org.uk/