Safeguarding Policy

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Designated Safeguarding Roles

- **Designated Safeguarding Lead (DSL):** Elizabeth Amos-Milburn
- **Deputy Designated Safeguarding Lead:** Alexandra Gager-Liebhart

All safeguarding concerns should be reported to the Designated Safeguarding Lead in the first instance. In the DSL's absence, concerns should be reported to the Deputy.

- Our commitment

All our employees who work with learners and clients have a crucial role to play in shaping their lives. You have a unique opportunity to interact in ways that are both affirming and inspiring. This policy has been produced (and is supported by Information, Advice and Guidance), to help you to establish safe and responsive environments which safeguard all and reduce the risk of you being unjustly accused of improper or unprofessional conduct. We all have a duty of care to safeguard and promote welfare, and to enhance awareness of the broader welfare spectrum, specifically the issues facing young people in society

- Objectives

The policy aims to ensure you are aware of and understand your responsibilities, and those of others, signs there might be a safeguarding concern along with the reporting procedures for all safeguarding issues.

- Scope

This policy covers the safeguarding of Children and Adults at Risk, both our learners and clients and those within subcontracted provision, and those persons in settings in which we practice which fall into the category of child or adult at risk. It includes specific highlighted safeguarding agenda areas – as defined by law, and in the wider context all our students and learners. This policy also aligns our compliance with the Government Prevent strategy.

- Key Contacts

Designated Safeguarding Lead (DSL) – Elizabeth Amos-Milburn

elizabeth@cumbriaskills.org.uk Tel 07809380643

Deputy Designated Safeguarding Lead – Alexandra Gager-Liebhart

lexie@cumbriaskills.org.uk Tel: 07985269318

External safeguarding contacts:

- **Cumberland Local Authority Designated Officer (LADO)** – for allegations against staff, volunteers, contractors or any adult in a position of trust working with children. Email: lado@cumberland.gov.uk. Telephone: 0300 373 2735. Out of hours via the Emergency Duty Team: 0333 240 1727.

- **Cumberland Safeguarding Hub (Children)** – for referrals where a child is at risk of significant harm. Telephone: 0333 240 1727 (24 hours).
- **Cumberland Adult Safeguarding** – for adults at risk. Telephone: 0300 303 3589.
- **Police** – 999 in an emergency; 101 for non-emergency reports.
- **NSPCC Helpline** – 0808 800 5000 (advice for adults concerned about a child).
- **FGM Helpline (NSPCC)** – 0800 028 3550.

This policy aligns with *Keeping Children Safe in Education* (KCSIE, most recent edition) and *Working Together to Safeguard Children* (2023). Where a learner is placed with SCSE by a commissioning school or local authority, primary safeguarding responsibility usually remains with that body. The specific division of safeguarding responsibilities, including who holds the role of Designated Safeguarding Lead for that learner and how information is shared, will be agreed in writing at the start of every placement and recorded in the placement agreement.

- Definitions

Safeguarding is the protection of children and adults at risk from abuse and neglect, promoting health and development, ensuring safety and care, and ensuring optimum life chances. The Safeguarding Agenda includes a wide range of potential risks:

Abuse (physical, emotional, financial, institutional, sexual, and organisational)

- Self-neglect
- Discrimination
- Child sexual exploitation
- Bullying and cyberbullying
- Domestic abuse
- Substance misuse
- Fabricated and induced illness
- Faith abuse
- Forced marriage
- Gang and youth violence
- Private fostering
- Radicalisation
- Sexting
- Female genital mutilation (FGM)
- Gender-based violence
- Teenage relationship abuse
- Trafficking and modern slavery
- Breast ironing
- mental health concerns
- Children Missing in Education

A Child is defined as anyone under the age of 18. An adult at risk (previously vulnerable adult) is

defined as any person over the age of 18 and at risk of abuse or neglect because of their need for

support or personal circumstances. Alongside the Safeguarding Agenda above this could be due to, and not limited to any of the following

- Living in sheltered housing
- Receiving any form of healthcare
- Receiving a welfare service in order to support their need to live independently
- Receiving a service due to their age or disability
- Living in residential accommodation such as a care home

- Receiving domiciliary care in their own home
- Expectant or nursing mother living in residential care
- Person under supervision of probation service

While the definitions of a child and adult at risk give the rationale for legislative intervention, it is

important to note that a person may be deemed at higher risk of a safeguarding issue affecting them due to other factors, examples:

- Poor numeracy and literacy skill, or specific learning need
- Unsupportive home environment
- English not a first language
- Unsupportive employer
- Underrepresented group
- Acting as a carer for another family member
- Background in offending
- Disability or social need
- Our Responsibility

We all have a responsibility to ensure that children, young people and adults at risk are protected from harm, informed about potential risks to their welfare, and understand how to seek help. We ensure all concerns are dealt with timely and appropriately. We also have a responsibility to minimise the risk of allegations against you.

All staff are expected to comply with any DBS check request and to have a good understanding of

what constitutes a safeguarding or welfare concern and how to provide support, guidance in such

instances and the channels for escalating a concern. To assist you in this, on-going training and

awareness, as well as continuous information, advice and guidance will help you to feel confident confident in proactively promoting safeguarding and understanding your individual responsibilities.

The responsibilities of particular individuals are detailed below:

- Our Directors - to ensure we have effective policies
- Our CEO - to ensure policies are policies are implemented and followed, and sufficient time and resources are allocated to employees to carry out their responsibilities
- Designated Safeguarding Lead – to maintain links with Local Safeguarding Children's Boards and Prevent Coordinators, inform and advise all parties on legislation changes and current safeguarding themes, plan and implement training for all employees including CPD, quality assurance and standardisation for the designed safeguarding officer team. Carry out investigations where appropriate into welfare concerns reported and liaise with external bodies such as the safeguarding board where appropriate. Support and coordinate escalation process. Overall management of safeguarding issues and report to the board on any issues that arise. Review procedures and policies on a timely basis. Maintain their own CPD to ensure their role can be fulfilled competently.
- Designated Safeguarding Officers – to deal with employee concerns over learner and client

welfare, signpost and offer guidance. Conduct investigations where appropriate into welfare

concerns reported and liaise with external bodies such as the safeguarding board where

appropriate. Maintain own CPD to ensure their role can be fulfilled competently and seek

guidance where appropriate.

- Support Teams - You must be mindful of indicators that there may be a safeguarding issue

should you come into contact with a learner, potential learner, or client. To carry out training

as directed by the safeguarding team in a timely manner.

- Safer Recruitment

Whamos Training & Development CIC carries out a safe recruitment process and ensures that all

appropriate checks are carried out on new staff that will work or come into contact with children and adults at risk in line with the Disclosure and Barring Service requirements. See Safer Recruitment policy for further details on recruitment procedures.

- Disclosure and Barring Service Checks

The Disclosure and Barring Service (DBS) is an executive agency of the Home Office, and its primary purpose is to help employers make safer recruitment decisions and appointments. By conducting checks and providing details of criminal records and other relevant information, DBS helps to identify applicants who may be unsuitable for certain work and positions, especially those involving contact with children (those less than 18 years old) or adults at risk.

Depending on the type and regularity of contact with children or adults at risk involved in a particular role, employers are entitled to make appropriate types of enquiries about the applicant's criminal record and seek a disclosure through a DBS check. Whamos Training & Development CIC can undertake five types of criminal records checks depending on the role applied for:

Standard DBS check This will be for positions that are included in the Rehabilitation of Offenders Act (ROA) 1974

(Exceptions) Order 1975. This type of check contains details of an individual's convictions, cautions, reprimands, or warnings recorded on police central records and includes both 'spent' and 'unspent' convictions that will be shown on a criminal records check.

Enhanced DBS check

This will be for positions included in both the ROA 1974 Exceptions Order and in the Police Act 1997 regulations. This type of check contains the same details as the standard check plus any information held locally by police forces that it is reasonably considered to be relevant to the post applied for.

Enhanced DBS & barred list check (child)An enhanced check with information from the DBS's children's barred list is only available for those individuals engaged in regulated activity with children and a small number of posts as listed in the Police Act 1997 regulations.

Enhanced DBS & barred list check (adult)

An enhanced check with information from the DBS's adults barred list is only available for those individuals engaged in regulated activity with adults and a small number of posts as listed in the Police Act 1997 regulations.

Enhanced DBS & barred list check (child and adult)

An enhanced check with information from the DBS's children and adults barred list is only available for those individuals engaged in regulated activity with both vulnerable groups including children and a small number of posts as listed in the Police Act regulations.

Scotland - Protecting Vulnerable Groups scheme (PVG)

In Scotland all employees engaging in regulated activity are obliged to have a membership of the

PVG scheme, this is facilitated through our Umbrella partner.

- When and What Type of DBS Check is Appropriate

Whamos Training & Development CIC Designated Person, along with HR personnel are responsible for deciding which level of check is appropriate for a particular role and whether barred list checks are necessary. Even where a post has some contact with children or adults at risk, the definition of regulated activity may not be fully satisfied, but to safeguard our learners and clients any unsupervised contact with learners and clients will result in an enhanced DBS check with child barred list. The Safeguarding Vulnerable Groups Act 2006 (amended by the Protection of Freedoms Act 2012) defines what types of activities involving children and adults at risk are regulated and therefore require barring list checks.

Regulated Activity – is a term that defines activities that an individual engages in. The criteria for

regulated activity differ for adults and children as shown below:

Children

- Regular activity (once per week or 4 times over 1 month)
- Unsupervised activity
- Teaching, training, assessing, and mentoring based activities concerning non-work-related

activities - working intensively and closely with a child

Within a specified setting

Adults

- Health care professionals - giving first aid or receiving first aid
- Receiving or giving personal assistance to those due to age, illness, or disability (going to the toilet/ washing/ nutritional advice)
- Providing social care - being subject to or assessing the need for health/ social care
- Providing assistance in someone's personal affairs or allowing someone else to do so
- Provide assistance with cash, bills and shopping (allowing someone else to or shopping on

someone's behalf)

- Person who transports or is transported because of their illness

Individuals must not engage in regulated activity with either children or adults at risk if they have

been barred from doing so by the Disclosure and Barring Service (DBS). How we meet our

responsibility towards this is explained below. Further advice on types of DBS disclosure and the

circumstances in which regulated activity applies can be obtained from the Designated Safeguarding Lead.

Where Whamos Training & Development CIC is recruiting for a role that qualifies for a DBS

disclosure, the advert and further information will confirm the type of DBS disclosure required. When the most suitable candidate for the position has been identified, the offer of appointment will be made subject to a satisfactory DBS, right to work, references and qualification checks. In the instance that the outcome of a DBS check has not been received from the appropriate authority prior to learner visits being carried out, all visits with learners aged below 18 will be supervised by a person whose DBS outcome has been received and approved. The Area Manager will be responsible for arranging this supervision. Quality assurance of this process will take place on a weekly basis.

As a DBS check forms part of our recruitment process, we encourage all candidates to declare

anything relevant to the type of disclosure required for the role they applied for. Once an offer has

been made, candidates should tell us of any further details of convictions, including those that

normally would be considered as spent, cautions or reprimands.

As part of our safeguarding obligations, we will re-apply for the appropriate types of DBS checks on a 3-year basis during employment with Whamos Training & Development CIC Training.

- Confidentiality

Information provided in a DBS disclosure report must be kept confidential and only on a need-to-know basis. Such information will be handled under Whamos Training & Development CIC's Statement on the Secure Storage, Handling, Use, Retention and Disposal of Disclosures and Disclosure Information'. Any other information regarding offences must be kept securely and under Whamos Training & Development CIC's Data Protection Policy.

We recognise that job applicants and our employees need to feel confident that information about their convictions will not be disclosed to colleagues unless there is a specific reason for doing so. Those involved in recruitment decisions should ensure that when appointing an individual with a conviction, they are advised as to whom within Whamos Training & Development CIC knows of their conviction and the reasons why the information has been disclosed.

If you would like further information on our disclosure process, please see Appendix A.

- Failure to Disclose Information Relevant to the Type of DBS Check Appropriate to Your Role

A criminal record does not necessarily preclude an individual from working at Whamos Training &

Development CIC. The decision as to whether a person with a criminal record should be appointed, or an offer of employment withdrawn, or employment terminated will be taken only after careful and

thorough consideration of the outcome of any DBS check as well as job and offence-related factors as explained in 8.6. Nonetheless, we request all employees to tell us about any information relevant to the type of DBS check appropriate for their role. This could mean, for example, that if your role requires satisfactory Enhanced DBS and barring check, you need to tell us about any convictions, cautions or reprimands or being barred from working with children as soon as any of these have been issued. Failure to disclose information relevant to the type of DBS check appropriate to your role would be seen by Whamos Training & Development CIC as a breach of trust and confidence. Such acts are considered as gross misconduct, and you would be invited to a disciplinary hearing with a potential outcome of instant dismissal.

- Exploring the Relevance of Information Provided in the Disclosure Report

As we explained in the previous section having a criminal record does not necessarily preclude an

individual from working at Whamos Training & Development CIC. The decision as to whether a

candidate with a criminal record should be appointed, or an offer of employment withdrawn, will be

taken only after careful and thorough consideration of the outcome of any DBS check as well as the job and offence-related factors as explained in section 8.6.

Similar to the recruitment process, a disclosure of a criminal record will not necessarily lead to the

termination of your employment with us, and the decision will be taken only after careful and

thorough consideration of the job and offence-related factors. Any decision to terminate employment would follow our Disciplinary Policy (or Probationary Policy if you have not yet passed your probation).

A member of the HR Team alongside the Designated Safeguarding Officer will make an initial

assessment of the content of the disclosure report. If the report provides no evidence of convictions or any other related information, no further action will be taken.

If the report confirms a conviction or any other related information, a member of HR Team alongside the Designated Safeguarding Officer will make an initial assessment of whether the information provided has any potential relevance to the post. If there is clearly no potential relevance, no further action will be taken.

If the report confirms a potentially relevant conviction or any other potentially relevant information

further exploration will be required following the process outlined below.

- Exploring a Conviction and its Relevance

All discussions relating to convictions must take place after the selection process has

been completed and will involve the line manager and a member of the HR Team and, if appropriate, the company Designated Safeguarding Officer. As part of the decision-making process, they will normally meet with the individual to gain more information from the person about the nature and circumstances of any conviction.

The suitability for employment of a person with a criminal record will clearly vary, depending upon

the nature of the job and the details and circumstances of any convictions. The decision will be made on the basis of a risk assessment to enable the applicant's criminal record and circumstances to be assessed in relation to the tasks he or she will be required to perform and the circumstances in which the work is to be carried out. The following job-related factors should be taken into account.

- Does the post involve direct contact with learners or the public?
- What level of supervision will the post-holder receive?
- What level of trust is involved? Will the nature of the job present any opportunities for the

post-holder to reoffend in the place of work?

- Does the post involve any direct responsibility for finance or items of value?
- Does the post involve any contact with children or other vulnerable groups of learners or

employees?

The assessment is also likely to include consideration of the following factors relating to the

individuals’ offence(s)

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- The seriousness of the offence(s) and relevance to the safety of other employees, students, research subjects, the public etc.
- The length of time since the offence(s) occurred.
- Relevant information offered by the person about the circumstances that led to the offence(s) being committed, for example the influence of domestic or financial difficulties.
- The degree of remorse, or otherwise, expressed by the person and their motivation to change.
- Whether the offence was a one-off, or part of a history of offending.
- Whether person's circumstances have changed since the offence(s) was committed, making re-offending less likely.

Whether the offence has since been decriminalised

Following careful and thorough consideration of all these matters and consultation with the HR person and Designated Person, a decision will be made as to whether the individual should be appointed. If appropriate we may seek further information from relevant bodies when reaching this decision. If the decision is not to appoint, a letter will be sent to the individual confirming the reasons for this decision.

The above process will also be followed in the event of a criminal conviction coming to light after the formal offer of employment has been made or during employment. In such cases Whamos Training & Development CIC would reserve the right to withdraw the offer of appointment where appropriate or terminate employment in line with the Whamos Training & Development CIC's Disciplinary Policy (or Probationary Policy if in probationary period).

- Reporting a Concern
- If a learner or client raises a concern/allegation with you: If the learner or client has a concern over their own personal welfare and wellbeing, you are to listen to and record all information given, making no judgement or assumptions. Take any actions required to secure the immediate safety of the child or adult at risk if deemed appropriate, this may involve staying with them until a responsible adult can be located. This will only be recorded if the learner or client agrees and then raised with the manager. If the learner or client gives consent, you must report the issue to a designated officer. If you feel the learner or client's safety and wellbeing are at risk and they do not give consent for the matter to be escalated, you should escalate only when you believe the matter would deteriorate if additional support were not sourced. You should always consider the wishes of the individual, even those aged Under 18. Guidance should be sourced with a safeguarding officer if you are unsure. The designated officer will then decide the appropriate course of action, and if a referral outside the organisation is appropriate.

b) If a Mentor or employee has concerns over a learner or client: This might be through observation, alleged by others of discussion. To follow procedure set out as point (a) If a learner or client raises an issue/allegation with the Mentor.

- If a learner/ parent/ client / has a concern or allegation about a member of Whamos Training & Development CIC or staff: All learners and clients are to be informed that if they have a concern over their own personal welfare and wellbeing that they do not feel comfortable talking to their mentor about, they are to contact Whamos Training & Development CIC's Designated Officer. Contact details for the designated person are available in this policy, the information, advice, and guidance section on Whamos Training & Development CIC's online social learning platform. The safeguarding policy is also available on Whamos Training & Development CIC's external website.
- If a parent of a learner contacts you to report a concern about their child. Ensure you listen and record the details as per a learner reporting a concern to you. Ensure you have contact details for the parent. You must report the issue to the designated officer. The designated officer will then decide the appropriate course of action, and if a referral outside the organisation is appropriate, consult with the parent as appropriate. Be mindful of confidentiality as all learners aged 16 and above and of employed status are deemed to be adults,

and therefore no information should be passed to parents or carers without prior content to do so from the learner.

- If you observe a safeguarding issue taking place within the working practices - example

would be a mentor hitting a child or observing inappropriate restraint techniques. Take action to stop the activity immediately, and inform the individual of your concerns, ask them to remove themselves from the area and advise them you will inform a senior manager. Take any actions to secure the safety of the child or adult at risk, this may involve staying with them until a responsible adult can be located. Inform your designated safeguarding officer. Be mindful of differences between poor practice and a safeguarding issue and apply your action appropriately.

It is important you do not pass any information to other parties or try to investigate the concern

yourself. All concerns should be reported to email address provided in the first instance.

If you require an immediate response, call the Designated Safeguarding Lead immediately

(Telephone: (07809380643).

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Recognising that the designated officers may not be available out of normal working hours, so in

circumstances where the individual is in immediate danger report the incident to the police on 999.

One of the designated officers will endeavour to make initial contact with regards to the concerns

within 72 hours.

The designated officer will assess if the individual is at risk of significant harm and decide upon the

next course of action, this can range from offering signposting to support agencies to referral to the

police and local safeguarding authorities. This may also involve passing information to the DBS.

Important Information

If you feel the safeguarding concern, you have reported is not being dealt with effectively by the

safeguarding team please refer to the Designated safeguarding Lead or follow the whistleblowing

policy.

If you disagree with the outcome of a safeguarding referral outcome, please refer to the Safeguarding lead for guidance or you may also follow the local safeguarding board escalation procedure – found on their local authority website.

External support, contact details and information relating to safeguarding concerns can be found at:

Cumbria Safeguarding Hub | Cumbria County Council

https://www.cumbriasafeguardingchildren.co.uk/about/cumbriasafeguardingchildrenpartnership. asp

- Training and Educating Employees

Our Designated Safeguarding Lead holds a formal L3 safeguarding qualification and undertakes

regular training in order to keep updated with legislation to refresh knowledge.

All employees undertake a Safeguarding Induction and/or completion of a L2 online course

specifically for Safeguarding Young Vulnerable People. The training received is continually reviewed to ensure most appropriate and up to date training is given.

- Keeping Yourself Safe

To maintain yours, learners and client safety, the following are discouraged:

- Befriending learners or clients on personal social media sites
- Distributing personal telephone numbers
- Do not use sarcasm, insults, or belittling comments towards learners or clients
- Personal relationships with learners or clients

It also important to be mindful of the following when conducting yourself:

- Locations of one-to-one meetings with colleagues. These should take place at a neutral

Location.

- You will naturally build a rapport with learners and clients through the mentorship contact,

and the learners and clients may see you as a confidante and support but be sure to maintain professional boundaries whenever carrying out work on Whamos Training & Development CiCs behalf.

- Be respectful of all young and vulnerable people, and appreciate you are in a position of trust. We have the opportunity to listen to their concerns and support them.
- Uphold confidentiality within certain remits when required by the situation but be careful not

to promise to keep secrets or ask others to do so.

- Avoid spending time alone with learners and clients in a closed environment. If this is

unavoidable for example during 1;1 mentorship, ensure a member of staff is aware where you are and monitors this.

- Be careful when giving learners and clients advice – as this is based on your opinion, focus

support on information (facts) and guidance (signposting).

- Be mindful of any learners and clients you acquire that by default creates a conflict of interest i.e. a partner or friend becomes a learner or client. Discuss appropriateness/ alternative mentor arrangements with management.
- If at any point you feel unsafe in a learner or clients company inform a manager, your line

manager, the designated safeguarding officer and leave the premises.

- Keeping Learners Safe

Learners and clients – where applicable - are made aware of all of Whamos Training & Development CIC's relevant policies, who the designated persons are and how to report a concern during their initial mentorship and acceptance to the programme.

Topics in relation to equality and diversity and safeguarding are discussed during each monthly

management meeting.

Where Whamos Training & Development CIC acts as a subcontract to other companies - Whamos

Training & Development CIC mentorship will commit to upholding the policies and procedures of the contractor which holds the funding. Whamos Training & Development CIC will also attend any

relevant training/ updates, adhere to monitoring requirements, be aware of and adhere to funding

regulations as set out by the funding authorities.

- Leadership and Management

A safeguarding Senior Management team, meet quarterly providing greater focus on safeguarding and safety of employees, learners, and clients.

The safeguarding officer team are also subject to Quality Assurance checks carried out by the

Designated Safeguarding Lead.

Child-on-Child Abuse

Whamos Training & Development CIC recognises that children and young people can abuse, harm, or exploit other children or young people. In Alternative Provision (AP) settings, learners may have heightened vulnerabilities and complex histories that increase the likelihood of such behaviours. Consistent with the requirements of Keeping Children Safe in Education (KCSIE, 2024) and AP-specific guidance, we take all forms of child-on-child abuse seriously and will never pass off such behaviour as "banter", "part of growing up", or "normal peer interaction".

Forms of child-on-child abuse include, but are not limited to:

- Bullying (including cyberbullying, prejudice-based and discriminatory bullying)
- Physical abuse, including assault and initiation or hazing rituals

- Sexual violence and sexual harassment, including sharing of unsolicited sexual images or content (upskirting, non-consensual sharing of intimate images)
- Exploitation by peers (including county lines, gang association, or criminal exploitation)
- Coercive control or emotional manipulation between peers

Responsibilities and Response in AP Settings

Where a concern or allegation of child-on-child abuse arises, all staff must follow the reporting procedure set out in this policy. The following principles apply specifically in Alternative Provision settings:

- Both the alleged victim and the alleged perpetrator are treated as children in need of safeguarding and appropriate support must be put in place for both parties.
- Where the commissioning school or local authority holds the safeguarding lead responsibility, the Designated Safeguarding Officer must notify them immediately and coordinate response jointly, maintaining clear records of all communication.
- A risk assessment must be completed to determine whether the two learners can safely continue to access the same provision, and whether any interim protective measures are required.
- Allegations of sexual violence between learners are always referred to the police and children's social care; these are not matters to be managed internally.
- Staff should be mindful that online and digital harm (e.g. sharing intimate images, online harassment) may originate outside the provision but still require a safeguarding response.

Mandatory Reporting Duties

Some safeguarding duties are mandatory by law. Failure to comply may be a criminal offence and will always be treated as a serious matter by SCSE. All staff must be aware of, and act in accordance with, the following:

- **Suspected sexual abuse of a child (mandatory reporting duty).** Where a member of staff has reason to suspect that a child is being or has been the victim of sexual abuse, they must make a report. The duty arises from the Crime and Policing Bill 2024-25 and applies regardless of whether the child has disclosed directly. Reports are made via the Designated Safeguarding Lead to Children's Social Care and, where appropriate, the police. Where the DSL is unavailable or is the subject of the concern, the report must be made directly to Children's Social Care or the police without delay.
- **Female Genital Mutilation (s5B Female Genital Mutilation Act 2003).** Where a regulated professional (which includes teachers, healthcare professionals, and social workers) discovers in the course of their work that an act of FGM appears to have been carried out on a girl under the age of 18 – whether through disclosure by the girl herself or through observation of physical signs – they must report this directly to the police by calling 101. The Designated Safeguarding Lead must also be notified the same day so that wider safeguarding coordination can be put in place. For girls under 18 who appear to be at risk of FGM, a referral is made to Children's Social Care.
- **Prevent duty (Counter-Terrorism and Security Act 2015).** All staff have a duty to have due regard to the need to prevent people from being drawn into terrorism. Concerns are reported to the DSL, who will consider whether a Channel referral is appropriate in coordination with the Local Authority Prevent Coordinator.
- **Reporting accidents and dangerous occurrences (RIDDOR).** Reportable workplace incidents are notified to the HSE in line with the Health and Safety Policy.

Site Security and Access Control

In line with the Department for Education non-school Alternative Provision standards (specifically Standard 1.6), site access is restricted to children receiving provision, the provider's own staff, and supervised visitors only. SCSE operates the following controls:

- A single, monitored point of entry to the building during operational hours; external doors locked outside arrival and departure windows.
- All visitors sign in at reception, are issued with a visitor badge that must be worn visibly throughout the visit, and sign out on departure.
- Visitors are never left unsupervised in learner-facing areas. A named member of SCSE staff is responsible for the visitor for the duration of their time on site.

- The identity of any unknown visitor is verified before access is granted. Photo ID is requested where the visitor has not been pre-arranged.
- Contractors working on site during operational hours are inducted on safeguarding expectations and supervised.
- Where SCSE delivers provision off-site (in a partner venue or in the community), the host venue's access controls are reviewed in advance and any gaps addressed through additional SCSE staffing or alternative arrangements.
- Suspicious approaches to learners by any unknown adult, whether on site or in the immediate vicinity, are reported to the police and recorded in the safeguarding log.

DBS Checks: Levels and Renewal

All staff, volunteers and regular contractors working with learners hold an Enhanced DBS check with the appropriate children's barred list check before commencing work. There is no statutory requirement to renew a DBS certificate; however, in line with best practice for Alternative Provision, SCSE requires every member of staff and every regular volunteer to subscribe to the **DBS Update Service** at the point of their original check. SCSE monitors the Update Service annually with the individual's written consent and acts on any new information disclosed. Where an individual is not subscribed to the Update Service, a fresh Enhanced DBS check is sought every three years.

Adult Behaviour Policy

Whamos Training & Development CIC expects all adults — including staff, mentors, contractors, and visiting adults — to model appropriate professional behaviour at all times. In Alternative Provision settings, where learners may have experienced trauma, exclusion, and instability, adult behaviour carries additional weight in shaping the environment and learner outcomes. All adults working within our provision must adhere to the following standards.

Expected Standards of Adult Behaviour

- Treat all learners, clients, and colleagues with dignity and respect at all times, regardless of circumstance or provocation.
- Never use language, gestures, or actions that are threatening, discriminatory, humiliating, or designed to intimidate.
- Maintain professional boundaries at all times, including appropriate physical boundaries. Physical contact with learners must only be in the context of safety, welfare, or agreed supportive intervention and never be used for punishment or control outside of lawful restraint guidelines.
- Any concerns regarding the behaviour of an adult working within the provision must be reported to the Designated Safeguarding Lead immediately. Where the concern relates to the Designated Safeguarding Lead, it should be escalated to the CEO or the Local Authority Designated Officer (LADO).

Dealing with Violent or Threatening Behaviour

Whamos Training & Development CIC recognises that in AP settings, staff may occasionally encounter violent or threatening behaviour from learners, their families, or other adults. The safety of all individuals is the overriding priority. The following procedures apply when violent or threatening behaviour occurs.

- Immediate safety: Remove yourself and other individuals from immediate danger if it is safe to do so. Do not attempt to physically restrain a person unless trained to do so and only where it is necessary to prevent injury to the individual or others. Call 999 without hesitation where there is an immediate risk to life or safety.
- **De-escalation:** Where the immediate risk allows, staff should use calm, non-confrontational language and body language to de-escalate the situation. Avoid raising voices, pointing, blocking exits, or making sudden movements. Give the individual space and time to self-regulate where possible.
- **Physical restraint:** Only staff who hold a current, recognised physical intervention or restraint qualification (such as Team Teach or an equivalent accredited framework) may use physical restraint, and only as a last resort to prevent serious injury. Any use of restraint must be recorded in full, including the rationale, the technique used, duration, and any injuries sustained. The Designated Safeguarding Lead and the learner's parent or carer must be notified the same day.

- **Reporting after an incident:** All incidents involving violent or threatening behaviour must be recorded using an incident report form as soon as practicable after the event. The report must capture: the date, time, and location; those involved; a factual description of the incident and any triggers identified; any injuries; the response taken; and any safeguarding referrals made. This record must be passed to the Designated Safeguarding Lead within 24 hours.
- **Staff support:** Staff who have been involved in or witnessed a violent incident will be offered a debrief, access to wellbeing support, and, where appropriate, occupational health or counselling referral. No member of staff should be expected to return to the same situation without a risk assessment and appropriate support being in place.
- **Violence by adults (including parents/carers):** Whamos Training & Development CIC has a zero-tolerance approach to violence or threatening behaviour by any adult towards staff, learners, or other adults. Where an adult behaves violently or threateningly, the police will be contacted and the individual may be barred from the premises. This is without prejudice to any parallel safeguarding investigation regarding a child or adult at risk connected to that person.

Where violent or threatening behaviour by a staff member is alleged or witnessed, this constitutes a potential allegation against a person in a position of trust and must be referred immediately to the LADO in addition to internal disciplinary procedures. The individual will be suspended from duties pending investigation in accordance with the Disciplinary Policy.

- Associated Policies
- Equality and Diversity Policy
- Grievance Policy
- Disciplinary Policy
- Social Networking and Media Policy
- Prevent Policy
- Resourcing Policy
- Safer Recruitment Policy
- Child-on-Child Abuse Policy (this document)
- Adult Behaviour and Violent Behaviour Policy (this document)

General Principles

As an organisation using the Disclosure and Barring Service (DBS) to help assess the suitability of

applicants for positions of trust, Whamos Training & Development CIC complies fully with the DBS

Code of Practice regarding the correct handling, use, storage, retention and disposal of disclosures and disclosure information. It also complies fully with its obligations under the Data Protection Act and other relevant legislation pertaining with the safe handling, use, storage, retention and disposal of DBS disclosure information.

Storage and Access

Disclosure information is never kept on an applicant's personnel file and is always kept separately and securely, in lockable, non-portable, storage containers with access strictly controlled and limited to those who are entitled to see it as part of their duties.

Handling

In accordance with section 124 of the Police Act 1997, disclosure information is only passed to those who are authorised to receive it in the course of their duties. The HR Team will be responsible for maintaining a record of all those to whom disclosures or disclosure information has been revealed. It is recognised that it is a criminal offence to pass this information to anyone who is not entitled to receive it.

Usage

Disclosure information is only used for the specific purpose for which it was requested and for which

the applicant's full consent has been given.

Retention

Once a recruitment (or other relevant) decision has been made, Whamos Training & Development

CIC does not keep disclosure information for any longer than is absolutely necessary. This is

generally, for a period of up to six months, to allow for the consideration and resolution of any disputes or complaints. If, in very exceptional circumstances, it is considered necessary to keep disclosure information for longer than six months, Whamos Training & Development CIC will consult the DBS about this before doing so. Throughout this time, the usual conditions regarding safe storage and strictly controlled access will prevail.

Disposal

Once the retention period has elapsed, Whamos Training & Development CIC will ensure that any

disclosure information is immediately destroyed by secure means, i.e. by shredding or confidential

waste disposal. While awaiting destruction, disclosure information will not be kept in any insecure

receptacle (e.g. waste bin or confidential waste sack). Whamos Training & Development CIC will not keep any photocopy or other image of the disclosure or any copy or representation of the contents of a disclosure. However, Whamos Training & Development CIC will keep a record of the date of issue of a disclosure, the name of the subject, the type of disclosure requested, the position for which the disclosure was requested, the unique reference number of the disclosure and the details of the recruitment decision taken.

Appendix A

DBS Disclosure Process

Whamos Training & Development CIC uses Indelible Data which is a registered body responsible for authorising and processing applications for DBS checks.

Successful candidates will be sent a DBS disclosure application form and guidance with the written

offer of employment. The completed disclosure form and associated ID documentation must be

verified in person. This can either be done by bringing the documents to their line manager, who will authenticate and scan the documents and then forward them to the HR Team; or the individual can bring the documents to the HR Team directly. The HR Team is responsible for checking the form is fully completed, confirming which type of disclosure is required and will forward to Indelible Data.

Indelible Data will then process the application and return a disclosure report to the HR responsible

person, with a copy also sent to the individual. The published DBS turnaround time is for 95% of

disclosures to be sent out within 4 weeks.

Wherever possible the DBS disclosure should be obtained before the individual commences

employment, but sometimes this may not be possible. In such cases the individual can commence

employment but only on a supervised basis for those aspects of the job involving contact with

children or adults at risk until a satisfactory disclosure report is received.

In some cases, an applicant may already have received a satisfactory disclosure report for their current or previous position at Whamos Training & Development CIC. It may be appropriate to use the existing report to assess suitability for the post, taking into account the date the report was produced and the similarities between the two positions. A Member of the HR Team should be consulted in such cases.

Disclosure reports for applicants with a substantial record of overseas residence, including current UK residents and British nationals, may not include information on convictions from outside the UK. In most circumstances, however, a disclosure report should still be sought. The DBS can also offer

guidance on the availability of criminal record checks in a variety of foreign countries and the

applicant can be requested to obtain the equivalent checks from the country in question, where

available.

Appendix B

Detailed Procedure for Dealing with Safeguarding Concerns

- Recognition

Signs of abuse can be difficult to spot, as can a learner or client trying to find the right language to tell you about a concern. If you have any concerns over the welfare of the learner or client from what you have seen, heard, or

discussed with the learner or you have noticed changes in their behaviour which cause you safeguarding concerns, you must report it to the designated person. You do not personally have to believe the concerns to raise them, any concerns raised should be taken seriously.

- Response

No report or concerns about possible abuse should be ignored. Your main role here is to listen and

record with no judgements or leading questions; use open questions to gather factual details – when did it take place, who said what, what happened. You must stay calm and not let the learner or client know if you feel panicked or shocked. Do not make any promises about what will happen next, but only that you will pass it on to the designated person within Whamos Training & Development CIC,

and that we will do everything we can to help. It is good practice to show support and reassurance but be mindful to maintain a situation where you do not put yourself at risk. It would also be useful to have information regarding current agency support – i.e. have the police already been informed, is the person receiving local authority or medical support?

- Record

Ensure you record notes of the incident or disclosure as close to the time as possible. The notes should be dated and signed where possible. The notes should detail what you saw/heard or what was discussed with an individual, the names of those involved and the time, location and what action you took. Use the disclosure form where possible, but any form of notes will be acceptable.

- Report

Report the concerns to the designated person, ensuring you have recorded all details as above. This communication can be face-to-face, via email, or by phone call followed up by email. All

communication and documents will remain confidential between the designated person and the

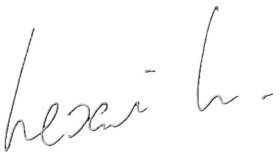
individual who has reported it unless the designated person deems it appropriate to take further action and involve other agencies.

- Referral

The designated person will then decide what course of action should be taken. Only the designated person should decide to make referrals outside of the organisation.

Approval & Review

This policy has been approved on behalf of the Directors:

Elizabeth Amos-Milburn *Co-Director*	**Alexandra Gager-Liebhart** *Co-Director*
	

Date of approval: 18th May 2026

Next review: 18th May 2027

Schedule 1 — Record of Changes

Version	Date	Nature of Change
001	18th May 2026	Initial published version included in the Combined Policies and Procedures 2026 edition.