

P63 Safeguarding & Child Protection Policy

This should be read in conjunction with the following other policies: P75 Prevent, P42 Whistleblowing, P37 Recruitment with Safer Recruitment and P18 Special educational needs and disabilities (SEND).

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1 KEY CONTACT DETAILS

1.1 Internal – Key Contacts for Safeguarding

E-mail: safeguarding@tchc.net

Phone: **07732 684738**

Below are the key points of contact for each centre or office in relation to Safeguarding. Where a site is without a Deputy Designated Safeguarding Lead, the Safeguarding Manager will support the Centre/Office Manager to act as Safeguarding point of contact.

The Safeguarding Team is comprised of the Designated Safeguarding Lead and Deputies.

The Safeguarding Team are available Monday to Friday from 8.30am to 5.30pm throughout the year, excluding bank holidays.

If support is required outside of these hours, please see section 1.3 External Contacts for Local Authority Out of Hours phone numbers. Please note that these are not available in every Local Authority.

If a person/s is at immediate risk of harm or there is a threat to life, Emergency Services should be contacted on 999 immediately.

Role	Name	Contact	Area(s) covered
CEO	Courtney Grinham (currently on Maternity leave)	07813 348258	All

Managing Director	Yuen-man Yau	07720 090207	All
Education & Training Director/ Deputy Designated Safeguarding Lead	Wayne Taylor	07738 771769	GAPs Centres
Safeguarding Manager	Sabah-Rose Morgan	07732 684738	All (Learners related)
HR Manager	Cinzia Ricci	01923698477	All (Staff-related)
Restart Performance Manager	Barry Grehan	07522 329916 01296 255011	Aylesbury
SEN CSL/Centre Deputy Designated Safeguarding Lead	Lynn Jackson	01923 698443	Dunstable
Centre Coordinator/Centre Deputy Designated Safeguarding Lead	Hannah Castell	07597 565626	Ipswich
Functional Skills English Tutor/Centre Deputy Designated Safeguarding Lead	Ashleigh Stimson	07568 136564	Thurrock
Learning Support Assistant/Centre Deputy Designated Safeguarding Lead	Lucy Gray	01268 203844	Basildon – Bowlers Croft
Centre Manager/Centre Deputy Designated Safeguarding Lead	Harriet Brown	01268 203841	Basildon - Southgate
Education & Training Director/ Deputy Designated Safeguarding Lead	Wayne Taylor	07738 771769	Fengate
Centre Manager/Centre Deputy Designated Safeguarding Lead	Sara Sheriff	01923 698 447	Watford
Centre Deputy Designated Safeguarding Lead	Jade Lewington	07710 691017	Kent
Centre Deputy Designated Safeguarding Lead	Pritha Paul	07701 311549	Ealing

1.2 Contacting the safeguarding team

If staff have a concern or need safeguarding support, they should speak to their Centre Deputy Designated Safeguarding Lead, where possible or contact the Safeguarding Manager.

When contacting the Safeguarding Manager, if staff have an urgent concern and require immediate support, this must be by phone call. **If the call goes to voicemail, staff should end the call and immediately call the next Safeguarding Manager on the list, again to signal the need for urgent support.**

Urgent concerns should always be shared via phone call. Emails / Text Messages / CPOMS Alerts should not be used where an immediate response is required, as the receiving person may not be able to see these.

1.3 External Contacts – Local Authority Key Contacts

TCHC have 11 sites across the Southeast of England, within 11 Local Authorities, and contact information for their safeguarding teams is below.

It is the home address of the individual requiring support that dictates which Local Authority has responsibility for safeguarding them, not the centre location. To find the correct Local Authority, use the [Find a Local Council](#) page on gov.uk or enter the individual's home address followed by 'Local Authority' into a search engine, such as [Google](#).

If the Local Authority required is not listed below, enter the name of the Local Authority followed by the team you require (Child Safeguarding/Adult Safeguarding/LADO) into a search engine, such as [Google](#).

If a person/s is at immediate risk of harm or there is a threat to life, Emergency Services should be contacted on 999 immediately.

Local Authority	Agency/Organisation	Contact Number & Web Link
Buckinghamshire	MASH / First Response Children's Social Care	01296 383962 Out of Hours – 0800 999 7677 Web link
	Prevent Team	Michael.Bellamy@thamesvalley.uk Emily.Wilcock@thamesvalley.uk
	Safeguarding Adults Board	0800 137 915 Out of Hours – 0800 999 7677 Web Link
	Local Authority Designated Officer	01296 382 070 Web Link
Cambridgeshire	MASH / First Response Children's Social Care	0345 045 5203 Web link
	Prevent Team	Prevent@cambspnn.police.uk
	Safeguarding Adults Partnership	0345 045 5202 Out of Hours - 01733 234 724 Web Link
	Local Authority Designated Officer	01223 727967

		Out of Hours - 0345 0455203 Web Link
Central Bedfordshire	MASH / First Response Children's Social Care	0300 300 8585 Web Link
	Prevent Team	Prevent@beds.police.uk
	Safeguarding Adults Partnership	0300 300 8122 Web Link
	Local Authority Designated Officer	0300 300 8142 Web Link
Essex	MASH / First Response Children's Social Care	0345 603 7627 Web Link
	Prevent Team	Prevent@essex.police.uk
	Safeguarding Adults Partnership	0345 603 7630 Web Link
	Local Authority Designated Officer	lado@essex.gov.uk Web Link
Hertfordshire	MASH / First Response Children's Social Care	0300 123 4043 Web Link
	Prevent Team	Prevent@hertfordshire.gov.uk

	Safeguarding Adults Partnership	0300 123 4042 Web Link
	Local Authority Designated Officer	0300 123 4043 Web Link
London Borough of Bexley	MASH / First Response Children's Social Care	020 3045 5440 Web link
	Prevent Team	Community.safety@bexley.gov.uk
	Safeguarding Adults Partnership	0208 303 7777 Web link
	Local Authority Designated Officer	0203 045 3436 Web Link
Kent	MASH / First Response Children's Social Care	03000 41 11 11 Web Link
	Prevent Team	Jess.harman@kent.gov.uk Prevent@kent.gov.uk
	Safeguarding Adults Partnership	03000 41 61 61 Web Link
	Local Authority Designated Officer	03000 410 888 Web Link

Peterborough	MASH / First Response Children's Social Care	01733 864170 Out of Hours - 01733 234724 Web Link
	Prevent Team	Pccmash@peterborough.gov.uk
	Safeguarding Adults Partnership	01733 747474 Out of Hours - 01733 234724 Web Link
	Local Authority Designated Officer	01733 864038 Out of Hours - 01733 864180 Web Link
Suffolk	MASH / First Response Children's Social Care	0345 606 1499 Web Link
	Prevent Team	Prevent@norfolk.police.uk
	Safeguarding Adults Partnership	0345 606 1499 Web Link
	Local Authority Designated Officer	0300 123 2044 Web Link
Thurrock	MASH / First Response Children's Social Care	01375 652 802 Out of Hours - 01375 372468 Web Link

	Prevent Team	Thurrockmash@thurrock.gov.uk - children Prevent@essex.police.uk - adults
	Safeguarding Adults Partnership	01375 511000 Web Link
	Local Authority Designated Officer	01375 652921 07738821584 Web Link
Ealing	MASH / First Response Children's Social Care	0208 825 8000 Ealing Children's Integrated Response Service Ealing Children's Integrated Response Service Ealing Council
	Prevent Team	prevent@ealing.gov.uk
	Safeguarding Adults Partnership	<u>020 8825 8000</u> sscallcentre@ealing.gov.uk
	Local Authority Designated Officer	Emmanuel Adofo asv@ealing.gov.uk 020 8825 8930

The details above are checked for validity by members of the Safeguarding team periodically. Should the details require any updates or amendments, please email these to safeguarding@tchc.net.

1.4 External Contacts – Support Agencies

There are many different Support Agencies available, ranging from local providers within specific localities through to national organisations, with professionals trained in specialised areas of need. Information on a range of Agencies can be found on the [Safeguarding page](#) of the TCHC website.

Essex County Council have compiled an extensive [Directory of Services](#), accessible to everyone in the UK, providing information on national services for children, young people and their families.

The Safeguarding Team can support with identifying available Support Agencies, making initial contact and submitting referrals where needed.

2 POLICY STATEMENT

This policy, applicable to TCHC Group Ltd, accessible on the company website, is updated in line with statutory guidance and legislation changes or annually as a minimum. We prioritise safeguarding and the well-being of children, young people, and adults at risk, supporting them to thrive and achieve their best outcomes, whilst protecting them from abuse or harm. This commitment is embedded throughout our company culture, and we maintain a vigilant "it could happen here" approach.

Safeguarding is everyone's responsibility, regardless of job role, hours, or department.

All individuals are legally obligated to take any neglect or abuse concerns seriously and follow the procedures outlined in this policy. Learners with concerns about their peers or others' behaviour can use this policy for support. We are duty-bound to report concerns to the appropriate authorities for investigation and necessary action.

Employees must promptly inform their Line Manager if they or any adult in their household faces allegations related to safeguarding or abuse against a child or vulnerable adult. When in doubt, consult with the Designated Safeguarding Lead (DSL) as a first step.

The objectives of this policy are as follows:

- Ensure the safety of our learners through effective safeguarding measures
- Shield learners from harm and proactively prevent abuse
- Educate staff, volunteers, and associates about the protocol for reporting safeguarding concerns in accordance with this policy
- Embed with staff, volunteers, and associates their duty and obligation to educate learners and participants about Safeguarding, including online safety, healthy relationships and Prevent.

3 DEFINING SAFEGUARDING

3.1 Safeguarding Children

Safeguarding and promoting the welfare of children is defined for the purposes of this policy as:

- Providing help and support to meet the needs of children as soon as problems emerge
- Protecting children from maltreatment, whether that is within or outside the home, including online
- Preventing the 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
- Taking action to enable all children to have the best outcomes.

This is as defined within statutory guidance [Working Together to Safeguard Children \(2023\)](#) and [Keeping Children Safe in Education \(2025\)](#).

3.2 Safeguarding Adults

"Adult safeguarding" is working with adults with care and support needs to keep them safe from abuse or neglect. TCHC have a duty to ensure that the welfare of all adults is ensured. Safeguarding duties apply to an adult who:

- Has needs for care and support and;
- Is experiencing, or is at risk of, abuse or neglect; and;

- As a result of those care and support needs is unable to protect themselves from either the risk of, or the experience of, abuse or neglect.

Adults with care and support needs are referred to as 'Adults at risk of harm' or 'Adults at risk' under The Care Act (2014). Adults at risk were previously referred to 'Vulnerable Adults', however, this could be seen as disempowering, which is at odds with the core principles of safeguarding.

The six core principles of safeguarding are

Empowerment	Prevention	Proportionality	Protection	Partnership	Accountability
Supporting individuals to make informed decisions and providing them with the necessary resources and tools to do so	Taking action to prevent harm before it occurs, being proactive rather than reactive	The response to any potential risk should be appropriate and proportionate to the level of risk presented	To support and represent children and adults at risk of harm	Local Services working in collaboration is crucial in detecting, preventing and reporting abuse and neglect	Establish clear lines of responsibility for all those involved in working with children and adults at risk

TCHC provide services to both children and adults. Whilst most of this policy refers to 'children', it still provides information and guidance applicable to adults.

If there is a concern that someone is experiencing, or is at risk of experiencing, abuse, neglect or other form of harm, this must be reported to the safeguarding team, regardless of age.

3.3 Wellbeing

The definition of well-being is wide and can encompass looking out for someone's personal dignity, physical health, mental health and emotional well-being. Well-being is the state of being happy, healthy and comfortable. [The Care Act \(2014\)](#) outlines that an individual's well-being can be related to the following areas:

- personal dignity (including treatment of the individual with respect).
- physical and mental health and emotional well-being.
- protection from abuse and neglect.
- control by the individual over day-to-day life (including over care and support, or support, provided to the individual and the way in which it is provided).
- participation in work, education, training or recreation.
- social and economic well-being.
- domestic, family and personal relationships.
- suitability of living accommodation.
- the individual's contribution to society.

TCHC promotes the well-being of all learners, and any concerns should be shared with the Safeguarding Team and documented on safeguarding records. Learners are informed how to raise safeguarding or wellbeing concerns during their induction and through signage around centres. Centre D-DSLs are on site to provide support and guidance, with the Safeguarding Manager visiting the Centres as often as possible, popping into classrooms to engage with learners and lead classroom discussions on safeguarding topics where required.

4 REPORTING SAFEGUARDING CONCERNS

Safeguarding is everyone's responsibility.

Learners and Staff should have an awareness of signs that may indicate someone needs support and know how to contact the Safeguarding Team to share a concern should they have one.

All staff have a legal duty to promote the welfare of people and to protect them from harm, and they must report all safeguarding concerns related to learners to the Safeguarding Team and those related to staff to HR without delay.

Learners' reported concerns are stored on a person's Safeguarding Records, within a single system, CPOMS, which members of the Safeguarding Team have full oversight of.

Staff's reported concerns are stored on a person's HR Records, within a single system, Employment Hero, which HR have full oversight of.

Safeguarding is like a jigsaw puzzle. You may have a small or 'low-level concern for someone's welfare, one piece of the jigsaw, which may not seem relevant to anything on its own. By reporting your concern and sharing your jigsaw piece with the Safeguarding Team/HR, who place it onto an individual's safeguarding record, along with any other concerns reported, and collecting all the jigsaw pieces together to enable them to build a full safeguarding picture for a person.

Not reporting concerns can lead to personal and organisational consequences, including disciplinary action. Remember, if you're called to an inquest or child safeguarding review, both your decision-making and TCHC's reputation may be scrutinised.

While reporting concerns might be worrisome, failing to act could have more severe consequences. Always respond appropriately to any concerns, no matter how they come to your attention.

Remember, you are never alone in safeguarding. If you are concerned or worried about something, you should reach out to a member of the Safeguarding Team/HR. You can also call the Safeguarding Manager for learners' concerns or the HR Manager for Staff's concerns.

If you require urgent advice and the call goes to voicemail, simply end the call and immediately call back from the same number.

Section 1 of this policy provides contact information for members of the Safeguarding Team, the HR and the External Support Agencies.

Note: Should you feel a learner, colleague, yourself, or any members of the public are in danger and at immediate risk of harm, you should call 999 to report this to the emergency services immediately and then contact a member of the Safeguarding team.

4.1 Concerns about a learner

Reporting process for learners

If you have seen or experienced something that you don't think is right and is concerning you, it is important that this is shared. Support is available and can be accessed in several ways:

In Person – Please speak to the DDSL or Centre Manager at your Centre

Phone/Email/Text/WhatsApp – Please see the contact details for the Safeguarding Team

Online Reporting - CPOMS is our electronic safeguarding system, essential for reporting concerns and managing cases.

We cannot promise confidentiality as there are certain instances where we cannot guarantee this, such as where there is a threat to life or a person is at serious risk of harm. Where this is the case, we will take

appropriate steps to support that individual, which may involve sharing information externally. Wherever possible, this will be discussed with you initially.

Reporting Process for Staff

Staff should contact the HR Manager if they have a concern relating to another member of staff. This should ideally be reported within two hours of the incident/concern via email to hr@tchc.net, outlining their concern with a full and factual account of the incident.

Any concern will be logged in the HR record (Employment Hero). Where staff require urgent support, this must be done via a phone call. Reporting an incident via email will not always be seen immediately, so it should not be relied on for an urgent response.

4.2 Concerns about staff

Safeguarding is everyone's responsibility, and anyone could require safeguarding support/intervention at any time in their life, which includes members of staff. There are two different types of staff concern:

- Concerns relating to a staff member's safety & welfare
- Concerns relating to a staff member's conduct

4.2.1 Reporting Process for Learners

If you have a safeguarding concern about a member of staff, you should speak to the Centre Manager or the Safeguarding Manager. You can do this in the same way that you would report a concern about a learner:

In Person – Please speak to the DDSL or Centre Manager at your Centre

Phone/Email/Text/WhatsApp – Please see the contact details for the Safeguarding Team

4.2.2 Reporting Process for Staff

If you have a safeguarding concern about a member of staff, you should contact the HR Manager on 01923 698477. In the event that the concern pertains to the HR Manager, the concern should be reported to the Managing Director. This should ideally be reported within two hours of the incident/concern.

Safeguarding concerns about staff members should be shared with the HR Manager directly and must not be discussed with the Centre DDSLs, as this could put them in a conflict of interest. Confidentiality for the member of staff that the concern relates to is paramount, and they should be asked for their consent before sharing information with any other staff, other than the Safeguarding Manager and HR Manager.

Note: should you feel a learner, colleague, yourself, or any members of the public are in immediate danger, report to the police immediately and then contact the internal Safeguarding team.

4.3 Allegations against a member of staff

Note: Allegations against staff members should not be reported to the Centre DDSLs, as this could place them in a conflict of interest, which may impact an investigation into an allegation. This should be reported to the HR Manager, who has the responsibility to support staff members, whilst overseeing the investigation into the allegation.

Where there is suspicion or an allegation that a staff member is the perpetrator of abuse, this should be referred to the HR Manager or Managing Director. Allegations may be made by learners, staff members or other third parties, who should be encouraged to report to the HR Manager directly, to maintain confidentiality,

unless doing so would be at the detriment to the individual and prevent them from making a disclosure. The HR Manager, in discussion with the Safeguarding Manager, will assess the situation and decide whether the allegation **may** meet the harm threshold or not.

4.3.1 Allegations that may meet the harm threshold

Where an allegation may meet the harm threshold, this will be discussed with the Local Authority Designated Officer (LADO), and appropriate actions will be agreed upon. Where an allegation is made that a staff member has/may have acted criminally, this should be reported to the Police, prior to any actions or investigation being taken to prevent any impact on a police investigation, should one be necessary. It may be appropriate to contact other agencies, such as other schools or colleges or emergency services, with information being shared in line with Data Protection and safeguarding confidentiality rules. Depending upon the allegation, it may be necessary to suspend the member of staff whilst an investigation is conducted. The decision to suspend a member of staff must be agreed by the HR Manager.

TCHC have a Duty of Care to support all learners and staff. An individual's welfare is paramount, and this will be the primary concern when investigating an allegation against a staff member. It is likely to cause considerable stress to the staff member subject to the investigation as well, so they will be provided with welfare support by either the Safeguarding or HR Manager throughout the process. Employee Assistance Program (EAP) is available for all employees to support.

Allegations against staff are kept strictly confidential and will not be shared with any individuals who are not directly involved in the investigation. To respect confidentiality, the number of people involved in the investigation will be kept as low as possible, whilst being sufficient to gather as much information as possible to be able to conduct a fair and thorough investigation.

Investigations will result in one of the following outcomes:

- Substantiated – there is sufficient evidence to prove the allegation
- Malicious – there is sufficient evidence to disprove the allegation, **and** there has been a deliberate act to deceive or cause harm to the subject of the allegation
- False – there is sufficient evidence to disprove the allegation
- Unsubstantiated – there is insufficient evidence to prove or disprove the allegation, so this does not imply guilt or innocence
- Unfounded – there is no evidence which supports the allegation being made

An investigation could result in disciplinary action against the subject of the allegation, depending on the outcome. A substantiated allegation may result in the subject's contract of employment being terminated and a referral made to the Disclosure & Barring Service (DBS).

4.3.2 Allegations that do not meet the harm threshold (Low-Level Concerns)

Allegations that do not meet the harm threshold (also known as low-level concerns) will be managed internally, following TCHC policies and procedures as outlined in the Company Handbook. Low-level concerns still have significance and will be dealt with as promptly as any other concern. A low-level concern is any concern, no matter how small, such as a nagging doubt or a feeling of unease that a staff member is conducting themselves inappropriately or behaving in a way that goes against the Staff Code of Conduct, whilst at work **and** outside of work.

Examples of low-level concerns include, but are not limited to:

- Being over-friendly with learners, staff and others who deal with TCHC
- Having favourites
- Having nicknames for learners
- Engaging in 1-2-1 contact with children in a secluded space or in a concealed room

Allegations against staff must not be reported to the DDSLs, as their role is to support learners. The DSL will support staff members whilst overseeing the investigation into the allegation.

5 DATA PROTECTION & CONFIDENTIALITY

TCHC is ISO 27001 and Cyber Essentials Plus certified, with strong data protection measures in place. Share safeguarding information using authorised systems or encrypted emails to ensure security.

Please review [Information sharing advice for safeguarding practitioners](#) guidance where you have any reservations in sharing information.

Ensuring the safety and well-being of children and adults at risk is paramount. Staff, volunteers, and associates often access confidential information to fulfil their roles. Some information can be highly sensitive. They must never misuse this information for personal gain or to harm a learner.

- All staff, volunteers, and associates must be aware that they can never promise a child/young person or adult at risk confidentiality, which might compromise the safety or well-being of the learner, or that of another.
- The DSL / DDSL will disclose confidential safeguarding information about a learner to staff, volunteers, and associates where it directly affects them or their everyday work. The DSL / DDSL will make a judgment for each case about who needs and has a right to access information.
- All staff, volunteers, and associates must be aware that they have a professional responsibility to share information with other agencies to safeguard children/young people and adults at risk, in consultation with a member of the Safeguarding Team/HR.
- Safeguarding records is subject to the Freedom of Information Act and the Data Protection Act. If there is any doubt as to the rights of any party to access information, TCHC may seek legal advice prior to releasing any information.
- Any written request to access Safeguarding records must be passed to the DSL to authorise and action.

6 Monitoring and Filtering Systems

The company uses Smoothwall filtering and monitoring software on all devices, including laptops and mobile phones, for software management and addressing related cases.

Smoothwall Filter effectively blocks harmful and inappropriate content without undue disruption to teaching and learning. This aligns with the company's monitoring strategy, specifically its Filtering and monitoring standards, to fulfil our safeguarding requirements.

Smoothwall Monitor tracks what is typed on device, monitoring for trigger words and/or phrases, including acronyms and abbreviations. When Smoothwall Monitor is triggered, a screenshot is taken, and the Safeguarding, IT Teams and Directors are alerted, who will take appropriate action.

Filtering and monitoring systems – responsibility list		
Name	Role	Responsibility
Alex Irvine	Head of IT	Manage the IT functionality
Sabah-Rose Morgan	Safeguarding Manager	Manage the usage, review cases and act
Courtney Grinham	CEO (currently on Maternity leave)	Manage the usage, review cases and act

Wayne Taylor	Education & Training Director	Manage the usage, review cases and act
Yuen-Man Yau	Managing Director	Manage the usage, review cases and act. Review filtering and monitoring provision at least annually

7 THE ROLE OF THE DESIGNATED SAFEGUARDING LEAD (DSL)

- **Overall Safeguarding Leadership:** The DSL has overall responsibility for safeguarding policies, procedures and ensuring all safeguarding concerns within the organisation are handled appropriately.
- **Policy Development:** They contribute to the development and implementation of safeguarding policies and procedures.
- **Training and Awareness:** Ensure that staff, volunteers, and associates are trained in safeguarding procedures and are aware of their responsibilities.
- **Information Management:** Manage and maintain safeguarding records, ensuring confidentiality and secure storage.
- **Reporting:** Report safeguarding concerns to appropriate authorities when necessary and follow up on cases as required.
- **Coordination:** Collaborate with external agencies and professionals involved in safeguarding cases.
- **Support and Guidance:** Provide guidance and support to staff, volunteers, and associates regarding safeguarding concerns and procedures.
- **Monitoring and Compliance:** Regularly review and update safeguarding practices to ensure compliance with legal requirements.
- **Communication:** Ensure effective communication with all stakeholders, including parents, regarding safeguarding issues.
- **Continual Improvement:** Continuously assess and improve safeguarding practices to enhance the safety and well-being of children and adults at risk.

8 DEFINITIONS

8.1 Safeguarding

Safeguarding and promoting the welfare of children is defined for the purposes of this policy as:

- Providing help and support to meet the needs of children as soon as problems emerge
- Protecting children from maltreatment, whether that is within or outside the home, including online
- Preventing the 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
- Taking action to enable all children to have the best outcomes.

8.2 Child and Adult

A child is defined as anyone who has not yet reached their 18th birthday, including unborn children.

An adult is defined as anyone who is aged 18 and above.

8.3 Adults at risk of harm

An adult at risk of harm is defined by the Care Act (2014) as 'someone over 18 years old who:

- has care and support needs and;
- is experiencing, or is at risk of, abuse or neglect and;

- because of their care and support needs, is unable to protect themselves against abuse or neglect or the risk of it.'

8.4 Looked After Child (LAC)

A child who has been in the care of their local authority for more than 24 hours is known as a looked-after child.

Looked-after children are also often referred to as children in care, a term which many children and young people prefer.

Each UK nation has a slightly different definition of a looked-after child and follows its own legislation, policy and guidance. But in general, looked-after children are:

living with foster parents/carers
living with friends or relatives, through kinship foster care
living in a residential children's home
living in residential settings like schools, secure units or semi-independent living accommodation
in some cases, living with their parents.

8.4 Child in Need (CIN)

A child in need is defined under the Children Act as 'A child who is unlikely to achieve or maintain a reasonable level of health or development, or whose health and development is likely to be significantly or further impaired, without the provision of services; or a child who is disabled'.

The child's needs are high-level or complex needs, longer term intervention from services is highly likely. Examples include families where the care of a child is felt to be inadequate or children with mental health issues.

Teaching staff must promptly inform their DSL or DDSL of any children classified as a child in need or on child protection plans. The DSL or DDSL should always be involved in these meetings.

8.5 Low-level needs

Low-level needs are where the needs of the child are relatively minor and where services may be able to take swift action to prevent the problem from escalating. Examples include regularly missing class, poor behaviour, and the family needs help accessing services.

An Early Help Assessment (EHA) may be requested by social care, carried out by a lead professional who already provides support to the child and family, such as a GP, support worker, teacher or health visitor, to help identify what the child's needs are and to learn which services are required, which is usually triggered by concerns. It also needs to be undertaken in agreement with the child and their parents or carers and must involve the child, family, and other professionals. emerging needs.

8.6 Emerging Needs

Emerging needs are where a child requires a range of services to respond to their needs, such as education, health, housing, or police services. For example, misusing substances, inadequately clothed.

8.7 Complex needs

Complex or serious needs are where a child could be at risk of serious harm, or their development damaged, if help and services are not provided. Where a child has complex needs, it is likely that the problems will need to be resolved urgently. Multiple agencies should be involved to help, which will require coordination from social care.

8.8 Child Protection Concerns

Child protection concerns arise when there is reason to suspect a child is suffering, or likely to suffer, significant harm because of abuse or neglect. The need to help the child is immediate. If any child protection concern is reported to a DSL, it must then be referred to the local social care team.

Examples include unexplained injuries, suffering from neglect, having contact with someone who has been identified as a risk to children, or being at risk of sexual abuse.

8.9 Significant harm

The highest level of the safeguarding structure, this includes children requiring urgent or emergency protection.

In cases where the risk is severe, the child may be removed from home either by court order, police protection powers or by an agreement reached with the parents.

DSLs should work with the professional who has the concern to telephone social care without delay, following the LSP procedures. The referral then must be followed up in writing. The police should then be contacted if the concern involves a criminal act.

8.10 Consent

Consent is when a person voluntarily gives verbal permission to another for something to happen or agrees to do something. Consent can be withdrawn.

Consent is not given if:

- The person asked isn't saying anything
- The person asked is not sober
- The person asked didn't say no
- The person asked said yes earlier, is in a relationship, and they didn't say no

[Watch this short video on consent!](#)

8.11 Special Educational Needs & Disabilities (SEND)

Please refer to our P18 Special educational needs and disabilities (SEND) Policy.

9 FORMS OF ABUSE

Staff should refer to the Government non-statutory guidance document [What to do if you're worried a child is being abused](#), which provides detailed information relating to different forms of abuse, including signs and symptoms.

Physical Abuse

Physical abuse includes hitting, slapping, pushing, kicking, restraining, the misuse of medication or forcing someone to take drugs. It might also involve improper use of sanctions, particularly those that involve physical restraint or failure to prevent an incident of physical harm to a child.

Instances of physical abuse can be isolated incidents. Or they could be ongoing. Both cases are serious and require action.

Emotional abuse

Emotional abuse, also known as Psychological Abuse, is any type of abuse that involves the continual emotional mistreatment of a child. Emotional abuse can involve deliberately trying to scare, humiliate, isolate or ignore a child.

When a child is experiencing another form of abuse, they are also experiencing emotional abuse as a result.

Emotional Abuse will occur as part of other types of abuse, but it can also happen on its own. This can make it hard to identify without a direct disclosure.

Emotional abuse can have a severe, long-term impact on a child's mental health, triggering depression, self-harm and suicide ideation.

Sexual Abuse

Sexual abuse is any form of sexual activity with an individual, which includes both contact and non-contact activities. Non-contact activities include producing sexual images of a child, forcing them to view pornography, encouraging inappropriate sexual behaviours, having inappropriate sexualised conversations with a child or grooming.

Contact activities are where there has been any form of physical contact and include non-penetrative acts or assault by penetration. Non-penetrative acts include touching (either on top or underneath clothing), stroking or rubbing and can be done to the victim or the victim can be forced to do these to others. Assault by penetration includes digital penetration (fingering), oral sex and rape.

Children and young people who are experiencing sexual abuse often do not recognise this themselves and may not understand what is happening to them or that it is wrong.

Historically, it was often thought that adult males were the perpetrators of sexual abuse, which is not true. Anyone can be a perpetrator of sexual abuse, including women and children.

Neglect

Neglect is the ongoing failure to meet a child's or adult's care and support needs, basic needs, such as food, shelter, warmth, clothing, bathing, care or affection. Further, it can include failure to provide access to public services, such as education, health and social care, ignoring or dismissing medical needs, including mental ill health or lack of attention to physical care needs, such as adequate nutrition and exercise.

Neglect can occur when the parent/main carer is unable to meet basic needs due to:

- being unaware of the basic need
- lack of understanding of the need or how to meet it.
- believing they are meeting the need, usually due to a lack of understanding
- financial hardship
- physical disability or medical condition
- mental ill health
- special educational needs

In these instances, there are causal factors for the neglect; the parent/main carer isn't choosing to neglect basic needs.

Where a parent/main carer is fully aware of the need and how to meet it, with the ability and resources to do so, but is choosing not to meet the need, they are guilty of wilful neglect, which is the more severe form.

Parents/Main Carers with a drug or alcohol dependency may have an impaired ability to keep a child safe, or they may prioritise money for drugs or alcohol rather than providing for their child. Neglect can occur to unborn children during pregnancy because of maternal drug or alcohol misuse.

Financial Abuse

- Including theft, fraud, exploitation, making them beg for money, forcing people to commit crimes for money, pressure in connection with wills, property or inheritance of financial transactions, or the misuse or misappropriation of property, possessions, or benefits.

Verbal abuse

- Name-calling, teasing, threats and intimidation, taunting, mimicking, sarcasm, being generally 'unfriendly', making someone look silly and making things up to get someone in trouble
- Ridiculing particular customs, music, accents or the dress of anyone from a different culture
- Offensive, racist graffiti, making silent or abusive phone calls and unkind practical jokes.

Silent bullying

- Ignoring someone/leaving them out, preventing someone from joining in, the spreading of rumours, threatening gestures and following someone around.

Racist bullying

- Racial taunts, graffiti, gestures
- Refusal to work with others because they are from a different culture.

Stalking

- Continued unwanted attention through personal contact (directly with you through your friends and family), telephone calls, letters, emails, text messages and internet chat rooms.

Cyber bullying

- All areas of the internet, such as email, social media and internet chat rooms, misuse, e.g. posting insulting notices about someone
- Sending abusive text messages or emails
- Misuse of associated technology – e.g. camera and video facilities
- Happy slapping – the practice whereby a group of people assault a stranger at random while filming the incident on a mobile device, to circulate the images or post them online.

Banter

- All staff must be aware of the importance of challenging inappropriate behaviours, and these must never be downplayed or minimised to 'just banter.'
- Banter should never be used to excuse or defend a person's behaviour, as this can lead to a culture of unacceptable behaviours becoming normalised, creating unsafe environments
- What is banter to one person is bullying to another. The intention of banter by the perpetrator is irrelevant where a person feels victimised.

Mate crime

- Mate crime is defined as the exploitation, abuse, or theft from any vulnerable person by those they consider to be their friends
- Those who commit such abuse or theft are often referred to as 'fake friends'.

Child criminal exploitation

Common in county lines and occurs where a person or group of people take advantage of a child or young person under the age of 18 by abusing their power, using threats or coercion.

Child sexual exploitation

Like child criminal exploitation, child sexual exploitation differs in that it involves acts of a sexual nature which include grooming, youth involved sexual imagery and sexual harassment/violence.

Mental health

Be aware that mental health problems are, in some cases, indicators of abuse.

Upskirting

Upskirting is an intrusive and invasive practice, which involves a person taking a picture under another person's clothing without their knowledge, with the intention of viewing their genitals or buttocks (with or without underwear).

Upskirting is where a person takes a picture under a person's clothing without their permission. It is now a specific criminal offence in England and Wales.

Upskirting is a criminal offence.

Child on Child Abuse

Child-on-Child abuse is any form of physical, sexual, emotional, and financial abuse, and forced control, between children, and within children's relationships (both intimate and nonintimate), friendships and wider peer associations.

Child-on-Child abuse can take various forms, including (but not limited to): serious bullying (including cyberbullying), relationship abuse, domestic violence and abuse, child sexual exploitation, youth and serious youth violence, harmful sexual behaviour, and/or prejudice-based violence, including, but not limited to, gender-based violence.

Examples of online Child-on-Child abuse would include sexting, online abuse, Child-on-Child grooming, the distribution of youth-involved sexualised content, and harassment.

Children with Special Educational Needs and/or Disabilities (SEND) are three times more likely to be abused than their peers without SEND, and additional barriers can sometimes exist when recognising abuse in children with SEND. These can include: – assumptions that indicators of possible abuse, such as behaviour, mood and injury, relate to a child's disability without further exploration, – the potential for children with SEND to be disproportionately impacted by behaviours such as bullying and harassment, without outwardly showing any signs, – communication barriers and difficulties, and – overcoming these barriers.

Online Abuse

Online abuse is any type of abuse that happens on the internet. It could happen on any device that is connected to the internet. For example, computer, laptop, mobile phone, tablet and smart watch, etc. Anyone who uses the internet is at risk of online abuse.

Types of online abuse can be cyberbullying, emotional abuse, grooming, sexting, sexual abuse or sexual exploitation, etc.

Signs include:

- People may spend a lot more or a lot less time than usual online.
- They could seem distant, upset or angry.
- They may be secretive about who they are talking to or what they are doing.
- They may have lots of new phone numbers and text messages on their device.

10 Harmful Sexual Behaviours

Harmful Sexual Behaviour is an umbrella term covering a wide spectrum of behaviour.

Sexual behaviours are any behaviours which have some form of sexualised link to them, ranging from healthy to harmful. There are many sexual behaviours, many of which are healthy and perfectly 'normal', provided that these behaviours are within an appropriate environment and that they are not causing harm to the individual or to others.

Sexual development begins during childhood and is shaped by several different factors, including: the environment, beliefs, culture, education and experiences. The chronological age of an individual is one factor to consider when assessing whether a sexual behaviour is healthy or harmful.

Everyone is different and may become interested in relationships, sex and sexuality at different stages of life. As people get older, the way they express their sexual feelings changes. An individual's mental capacity needs to be taken into consideration when assessing whether a sexual behaviour is healthy or harmful.

10.1 Sexual Harassment

Harassment is defined by the Metropolitan Police as *'when an individual repeatedly behaves in a way that causes you to feel scared, distressed or threatened. If this behaviour happens two times or more, it may constitute harassment.* If the individual's behaviour is of a sexual nature, this would be deemed Sexual Harassment.

Sexual Harassment can occur in person, virtually, for example, through phone calls, messages or social media. Behaviours can be direct from the perpetrator to the victim or indirect, such as spreading gossip.

10.2 Sexual Violence

Sexual violence is any kind of sexual activity or act that is unwanted and involves one or more of the following:

- Pressure
- Manipulation
- Bullying
- Intimidation
- Threats
- Deception
- Force

- Sexual Violence has many different forms, including sexual harassment, sexual abuse, and child sexual exploitation. Acts of sexual violence occur without the consent of the victim.

10.3 Sexual Assault

Sexual Assault refers to any unwanted sexual act which involves physical contact without consent. This can be the perpetrator touching the victim or the victim being forced to touch another person in a sexual manner against their will.

Sexual Assault includes penetrative and non-penetrative sexual acts.

Examples of non-penetrative acts are stroking, petting, kissing, hugging, and groping. Other lesser-known forms of sexual abuse include pinching a bra strap, giving a wedgie or pulling down trousers or underwear.

Examples of penetrative acts include digital penetration (fingering), oral sex and rape.

10.4 Handling Disclosures and Allegations of Harmful Sexual Behaviours

Cases of Harmful Sexual Behaviours are extremely delicate and must be handled sensitively with support and guidance from the Safeguarding Manager, prior to any actions being taken. The impact of a Harmful Sexual Behaviour Case can be wide-ranging and spread quickly, affecting family, friends and staff. Confidentiality is paramount for all parties involved. Care must be taken around language and terminology used, as this can have a severe and detrimental impact when used incorrectly.

Staff should speak to a member of the Safeguarding Team immediately in relation to any incident of Harmful Sexual Behaviour.

10.5 Victim Shaming / Victim Blaming

Victim Blaming or Victim Shaming is any response that states or implies that the victim was responsible for the abuse that they have suffered. Victims of any form of abuse can experience victim shaming, causing severe harm, increased feelings of guilt or shame, with a detrimental impact on mental health.

Victim shaming often revolves around actions that the victim could have taken, or not taken, to avoid experiencing abuse, when the reality is that the violence will happen regardless of the victim's choices. The perpetrator of victim-blaming may do this unintentionally without realising the impact on the victim.

Examples of Victim Blaming include:

- *"What did you think was going to happen, going out dressed like that?"*
- *"You'll think twice about drinking now, won't you?"*
- *"You should have ended the relationship years ago"*
- *"I told you not to walk home on your own last night, but you didn't listen"*

Victim blaming is never ok. Victims are not responsible for the abuse they have experienced. Perpetrators of abuse are solely responsible.

10.6 Appropriate language – 'Alleged'

The role of TCHC is to educate learners and participants and to support. It is the role of the Police to investigate a crime and the courts to judge whether someone is guilty of it. Where a learner or participant has been accused of a crime which is still under investigation, they are the 'alleged perpetrator'.

11 ONLINE SAFETY AND DIGITAL EDUCATION

Technology has become a very real and dangerous component of many safeguarding issues. For example, child sexual exploitation, radicalisation, and sexual predation. With online tools being used more and more for educational as well as social uses, it is important that we ensure learner, staff, volunteer, and associate safety is a priority when working online.

The three main areas are:

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

All staff, volunteers, and associates are responsible for staying safe online and encouraging others to do the same. Teaching staff must embed this within their lessons and draw attention to the TCHC poster with top tips on how people can Stay Safe Online.

Remember to remove any personal items from the camera view, that may be people and encourage learners to use the blurred background on Teams so that their background is safe and free from falling into the wrong hands.

Set ground rules with learners that include online safety, which is embedded into their learning. Include YouTube clips of sexting as an example. Hold discussions around online safety and include the dos and don'ts of online. Scenarios can be ideal for this, as learners will need to think about what they would do in the same situations.

Make sure learners are aware of who they can report to, both when in the centre or appointments with you, but also share what they can do when they are at home, and things happen. Check local resources and support groups or ask the Safeguarding Team for suggestions. For example, encourage learners to get creative and devise internet safety posters and/or leaflets to display in centres or workplaces if employers agree.

Any child under the age of 18 years old must have a parent, guardian, or carer present BEFORE any audio or visual footage of them is recorded by teaching staff, unless consent has been provided by them beforehand. No learner should be audio- or video-recorded without prior written consent; one consent form per learner will be sufficient for all lessons thereafter. Written consent should be gained at the start of their programme.

Please refer to TCHC's 'Protocol for Online Meetings' document for further information available on the Employment Hero platform/SWAG app.

12 SAFER RECRUITMENT

Please see P37 Recruitment with Safer Recruitment Policy for full information.

TCHC carries out safer recruitment checks on everyone who works for us, as outlined in Keeping Children Safe in Education, and we carry out our pre-employment checks on all staff, associates and volunteers.

- verifying identity and any academic or vocational qualifications
- obtaining professional and character references
- checking previous employment history

- ensuring that a candidate has the health and physical capacity for the job
- undertaking an interview
- undertaking any mandatory vetting and barring checks, including where appropriate DBS and prohibition checks, every three years of employment

TCHC use an organisation called APCS to obtain DBS Checks.

Disclosure and Barring Service (DBS) enhanced checks are requested by HR, ensuring the correct workforce is selected for the role. Child and/or Adult Barred List checks are requested where staff will be engaging in regulated activity with children or adults.

All interviewees need to show an understanding of safeguarding that is relevant to the role that they are applying for, the interview panel are responsible for ensuring they cover safeguarding during any interviews.

Line Managers must ensure that staff, associates and volunteers complete safeguarding training before beginning any role at TCHC.

At least one member of staff on the interview panel must have completed Safer Recruitment in Education training within the last two years.

12.1 Training

Induction and training are in line with advice from Multi-Agency Safeguarding Hubs, Education and Training Foundation, DFE guidelines for Further Education, and Local Authority Safeguarding Teams.

All new staff, including temporary and contracted staff, will be provided with induction training that includes:

- the safeguarding policy (including the policy and procedures to deal with child-on-child abuse).
- the role and identity of the DSL(s)
- the behaviour policy.
- the staff code of conduct, including the Company's whistleblowing procedure and the associated IT policies, staff/learner relationships and communications, including the use of social media
- the safeguarding response to children who go missing from education.
- a copy of Part One of KCSIE at least

All staff, volunteers, and associates must be supervised with learners unless the following tasks have been completed, and they have a valid enhanced DBS check.

- Meet with the DSL/DDSL
- Training completed according to their role
- The Safeguarding and Prevent Policies have been marked as read on Employment Hero
- Keeping Children Safe in Education (2025) - Part Three has been confirmed as read on Employment Hero

All staff members undergo refresher training on safeguarding and child protection throughout their employment with TCHC, at least annually, to keep them up to date with current knowledge to safeguard children (for example, via e-learning and training).

Where there is a concern relating to a staff member's level of knowledge, they may be requested to complete some or all their mandatory training again outside of the standard refresh training time period or complete other additional training, provided by the Safeguarding Manager.

Staff must complete the courses outlined on the HR Platform (Employment Hero) for their mandatory training. Certificates from previous employment will only be accepted if they are for the same course and

the completion date is within the previous 6 months. This should be discussed with the Safeguarding Manager, who may complete a knowledge check with the staff member before authorisation. Courses from other providers will not be accepted.

12.2 Single Central Record (Employment Hero)

TCHC use Employment Hero for the Single Central Record, to record and monitor the following for each member of staff:

- Identity Check
- Enhanced DBS Check
- Child and/or Adult Barred Check
- Prohibition from Teaching Check (*dependent on role*)
- Management 128 Check (*dependent on role*)
- Additional checks completed where staff have lived or worked abroad
- Right to live and work check
- Two satisfactory references from the current and previous employer
- Qualifications (*where required*)

HR to ensure that the Single Central Record is maintained, and all documentation is correct and complete. Visitors will be given a Visitor Safeguarding Leaflet upon arrival.

HR is responsible for the administration of the SCR and is aware of the requirement to maintain the SCR to support in any absence. If there is an administrative error, such as an incorrect date or spelling mistake, this must be rectified as soon as possible.

HR is responsible for spot-checking the single central record throughout the year to ensure that statutory requirements are met.

No staff, volunteers, or associates without an enhanced Disclosure and Barring Service (DBS) check should be left unsupervised.

12.3 Recruitment of Prison Leavers

- As an organisation using the Disclosure and Barring Services (DBS) and/or Disclosure Scotland to assist in assessing applicants' suitability for positions of trust, TCHC complies fully with the Disclosure and Barring Service/Disclosure Scotland Code of Practice (a copy of which is available on request) and undertakes to treat all applicants for all posts fairly. TCHC will not discriminate unfairly against any subject of a disclosure because of a conviction or other information revealed.
- We actively promote equality of opportunity for all, and we select all candidates for interview because of their talent, skills, qualifications and experience. We welcome applications from a wide range of candidates, including those with criminal records.
- A disclosure is only requested where it is legally required or after a thorough risk assessment has indicated that one is both proportionate and relevant to the position concerned. Where a disclosure will be required from a successful candidate, all applicants will be made aware of this at all stages of the recruitment process.
- Where disclosure is to form part of the recruitment process, we encourage all applicants called for an interview to provide details of their criminal record at an early stage in the application process.
- Unless the nature of the position allows the company to ask questions about a candidate's entire criminal record, we only ask about "unspent" convictions as defined in the Rehabilitation of Offenders Act 1974.
- We will ensure that all those in the company who are involved in the recruitment process have been suitably trained to identify and assess the relevance and circumstances of offences. We will also

ensure that they have received appropriate guidance and training in the relevant legislation relating to the employment of prison leavers.

- At an interview or in a separate discussion, we ensure that an open and measured discussion takes place about any offences or other matters that may be relevant to the position. Failure to reveal information that is relevant to the position sought could lead to withdrawal of an offer or termination of employment.
- We undertake to discuss any matter revealed in a disclosure with the person seeking the position before withdrawing a conditional offer or terminating employment.
- Having a criminal record will not necessarily bar an applicant from working for us. This will depend on the nature of the position and the circumstances, and the background of the offences.
- The HR Manager, MD, and CEO may discuss the suitability of the candidate when confirming employment to ensure the safety of staff and learners.

13 TCHC PREMISES ACCESS & LANYARDS

13.1 Premises

Access to TCHC Centres and Offices is restricted, with door entry systems fitted where possible, so that entry to the premises must be granted by a member of staff. All staff have a responsibility to be vigilant about who is in the premises.

External visitors to our centres and offices need to sign into the centre on arrival, wear a red visitor lanyard to identify themselves and must always be accompanied by a member of staff, who provides them with information on safeguarding and contact details for members of the team.

Where Learners are required to invite members of the public to the premises for the purposes of their education, the names of the individuals being invited to the Centre must be provided to the Centre Manager 48 hours prior to the event. An example of this situation is Nail & Beauty Learners inviting friends and family in for practical assessments.

13.2 Lanyards

Lanyards are used to identify individuals and signify that they are authorised to be on site. Apart from Participants at our Aylesbury Office, anyone without a lanyard should be treated with caution and escorted to the reception to ensure they are signed in and issued with a visitor lanyard.

Staff and learners are permitted to decorate their lanyards with badges/pins, provided it is still possible to identify the lanyard's colour and type.

If a learner or staff member wishes to wear their own personal lanyard with their TCHC lanyard, this must be approved by the Centre/Office manager. Centre/Office managers should seek advice on suitability from the Safeguarding Team if they are in any doubt.

For remote staff who travel across multiple sites, the use of a personal lanyard must be approved by the MD or CEO, taking into consideration the beliefs and opinions of all individuals across the group.

Should a personal lanyard cause any offence or upset to an individual, it must be removed immediately and without question.

Personal lanyards must have a quick release clip and not form a continuous loop around the neck to comply with health and safety.

Lanyards should be worn when moving around the premises, ideally around the neck. However, where this is not comfortable for an individual, lanyards may be worn in other ways, such as hanging out of a pocket. Lanyards may be taken off when in a lesson or a meeting.

Lanyards **MUST** be removed when a person is in an area where there would be a risk to health and safety, such as a workshop or a food preparation lesson. Lanyards **MUST** be removed when operating machinery or completing physical activities.

Lanyards should be removed when driving.

All staff are provided with a **BLUE TCHC STAFF** lanyard when they join the organisation, and this should always be worn when on site.

Members of the Safeguarding Team wear **YELLOW TCHC SAFEGUARDING** lanyards to make themselves identifiable to learners.

Learners are provided with **BLACK STUDENT** lanyards with an ID badge when they enrol. Learners should always have their lanyard on them, ideally worn around the neck, or be able to produce it if requested.

Visitors are provided with **RED VISITOR** lanyards when they sign in to the premises and should be returned when they sign out.

14 RISK ASSESSMENTS

It is important when working with children, young people, and vulnerable adults that you are in possession of a case history and as much background information as you can collect about them. This information will provide you with evidence of whether a formal Risk Assessment is carried out before engaging with that person.

When a Risk Assessment is carried out, it must be recorded on the TCHC template, which can be obtained from safeguarding@tchc.net.

Any external activities must be signed off by the Line Manager at least one week before the activity is due to take place, so appropriate measures can be put in place with the safeguarding team. The organiser is responsible for ensuring this process is adhered to, including that the activity is timetabled, a risk assessment has been completed in advance, and an off-site register has been completed.

Any formal education trips outside of the classroom must be approved by the Education & Training Director prior to being formally arranged.

15 OUT OF HOURS TEACHING

At times, there may be a need for teaching to take place outside of normal business hours (Monday to Friday, 08:30 am – 5:30 pm).

Where this is the case, the Centre DDSL, or Safeguarding Manager, where this is not available, must be informed, and a calendar invite should be sent to safeguarding@tchc.net outlining the reason, date and time and any agreed measures taken by their Line Manager. A member of the safeguarding team must be available during the out-of-hours session.

Learners must always sign in when visiting an office or centre when they enter the building for security and safety reasons.

16 PERSONAL AND PROFESSIONAL CONDUCT

16.1 Personal relationships

We recognise that, from time to time, close personal relationships may develop between members of staff, volunteers, and associates. To ensure that potential conflicts of interest are avoided, employees are required to inform their line manager/HR department) of any relationship which may affect their work or compromise the business in any way.

No personal relationships are allowed with service users. If you have a prior personal relationship with a service user, before they became a service user, you must report this to your line manager/HR department.

Any such information will be treated in the strictest confidence. We fully acknowledge the right of employees to privacy in their personal affairs. However, experience has shown that the effect of such relationships can cause a blurring of judgment whereby conflicts of interest arise.

16.2 Learner contact & Social Media

Staff, volunteers, and associates are not permitted to see or contact learners outside of the teaching/workplace environment.

Staff, volunteers, and associates are not permitted to add learners as friends on social media platforms such as Facebook or TikTok. Staff and associates are not permitted to accept friend requests from learners.

16.3 Transporting Learners

No member of staff, volunteers, or associates is allowed to invite or accompany any learners in a private car. There may be extreme circumstances where staff may need to accompany children, young people or adults at risk to another location, e.g., home address or hospital. In this case, they must contact the Safeguarding Team to seek approval, or if this is not possible in an emergency, please seek approval from the Manager. If the Manager is not available, please contact Courtney, Yuen or Wayne. Preservation of life comes first; please ensure the emergency services are called if needed. Two staff members should escort learners. Where it is not possible for two staff members to escort a GAPS learner, the Education & Training Director must have provided approval for a staff member to go alone, and a risk assessment must have been completed.

Staff and associates must liaise with the local authority where transport is provided for young people with EHCPs, and the Safeguarding Team should be involved.

Staff, volunteers, and associates should not be accompanying learners on public transport such as trains, buses, and taxis etc. If this is necessary, then the Safeguarding Manager must be consulted.

16.4 Physical Contact

All staff, volunteers, and associates must follow personal and professional conduct, which includes no unnecessary physical contact with learners and vice versa. If you see something and feel safe to do so, please address it immediately.

Physical contact with learners should be used to prevent harm or protect life, such as in first aid incidents.

Examples of unacceptable physical contact include, but are not limited to:

- Tickling
- Stroking
- Playing with or styling hair

- Removing clothing
- Touching learners' skin in a suggestive way
- Invading personal space
- Or any other sexual conduct

Examples of acceptable physical contact include, but are not limited to:

- 'No contact'
- Carrying out first aid

16.5 POSITIVE HANDLING & PHYSICAL RESTRAINT

The safety and well-being of all individuals are paramount. All efforts will be made to prevent situations that may require physical contact, restraint, or the use of force. We prioritise proactive and non-physical approaches to manage challenging behaviour, ensuring that interventions are both respectful and ethical.

TCHC complies with all relevant laws, regulations, and guidelines governing the use of physical contact, restraint, or force.

Physical restraint should only ever be used for the purposes of preventing harm and preserving life.

Physical contact will only be initiated when it is necessary to protect the person's safety or the safety of others.

The use of physical contact, restraint, or force should be an absolute last resort, and it will be administered with the utmost care and professionalism. Only trained staff members should engage in these actions.

Staff will receive training in de-escalation techniques, crisis management, and positive handling. This training will be to ensure that staff members are well-prepared to manage challenging situations effectively.

Any use of physical contact, restraint, or force will be documented thoroughly, and staff will be required to report such incidents promptly on CPOMS.

All serious instances involving physical contact, restraint, or force will be reported to the appropriate authorities, and an internal review will be conducted post-event with a focus on lessons learned.

17 BOOKING EXTERNAL SPEAKERS

TCHC believe that external speakers can enrich learners' formal education and other areas of the business by adding depth and breadth on a wide range of subjects.

This form is to be used when booking external speakers [CLICK HERE](#).

Please ensure that you have familiarised yourself with our Safeguarding Policy and Prevent Policy prior to completing this form.

If you are unsure of anything when completing this form, please contact your line manager or the DSL for support.

It is the responsibility of the person inviting a speaker to ensure that all checks have been completed prior to the event taking place. The person inviting a speaker must check all resources thoroughly (look through every slide of a presentation, watch any videos from start to finish, etc.) and should contact the Safeguarding Manager if they have any concerns relating to the material.

All guest speakers should:

- Have been authorised by a TCHC Leader or Manager
- Where presentations are used, these must have been checked by TCHC staff before they are presented
- Follow the same signing-in procedures as other visitors
- Always wear a VISITOR identification badge or label
- Never be left unsupervised
- Have their views challenged, should they have any extreme views, whether political or religious

18 MODERN SLAVERY

The Modern slavery awareness booklet from the Home Office, published 17 October 2017, states, 'Modern Slavery is a serious and often hidden crime in which people are exploited for criminal gain. The impact can be devastating for the victims. Modern slavery comprises slavery, servitude, forced and compulsory labour and human trafficking.' The UK has legislation, which is designed to tackle slavery and human trafficking, the **Modern Slavery Act 2015**.

Types of modern slavery

- Sexual exploitation
- Domestic servitude
- Criminal exploitation
- Labour exploitation

Victims of modern slavery can be men, women, or children. They can be of any nationality; the most common nationalities are from:

- Albania
- Vietnam
- UK
- Nigeria
- China
- Romania
- Poland
- Eritrea
- India
- Afghanistan

Indicators of a potential victim may include:

- Distrustful of authorities
- Expression of fear or anxiety
- The person acts as if instructed by another
- Injuries apparently a result of assault or controlling measures
- Perception of being bonded by debt

- Passport or documents held by someone else
- Restriction of movement and confinement to the workplace or to a limited area
- Person forced, intimidated, or coerced into providing services
- Substance misuse
- Money is deducted from salary for food or accommodation
- Being placed in a dependency situation
- Inappropriate sexual behaviour
- Limited/sporadic school attendance (under 18s)
- No or limited access to bathroom or hygiene facilities

Please click this link to access information about modern slavery:

<https://www.gov.uk/government/collections/modern-slavery>

19 INFORMATION SHARING

The police hold important information about children who may be suffering, or likely to suffer, significant harm, as well as those who cause such harm. They should always share this information with other organisations and agencies where this is necessary to protect children. Similarly, they can expect other organisations and agencies to share information to enable the police to carry out their duties. All police forces should have officers trained in child abuse investigation.

Effective sharing of information between TCHC staff, associates, and local organisations and agencies is essential for early identification of need, assessment, and service provision to keep children safe. Serious case reviews have highlighted that missed opportunities to record, understand the significance of and share information in a timely manner can have severe consequences for the safety and welfare of children, including death.

TCHC staff and associates should 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. Whether this is when problems are first emerging, or where a child is already known to local authority children's social care (e.g. they are being supported as a child in need or have a child protection plan).

Fears about sharing information must not be allowed to stand in the way of the need to promote the welfare and protect the safety of children, which must always be the paramount concern.

All TCHC staff, volunteers, and associates should aim to gain consent to share information, but should be mindful of situations where to do so would place a child at increased risk of harm. Information may be shared without consent if a practitioner has reason to believe that there is a good reason to do so, and that the sharing of information will enhance the safeguarding of a child in a timely manner. When decisions are made to share information, TCHC staff, volunteers, and associates should record who has been given the information and why.

When receiving a request for information from the Police:

- Act only on the advice from your DSL and the statutory agency
- Never view or share indecent images of any learners
- All requests for information from the Police should be in writing and should be signed by a serving Police Officer
- First check the verification of the Officer who has made the request
- Consult with the Safeguarding Team and let them know exactly what information has been requested, and if any reasons were given for the request
- Log the request for information, including all details such as who has made the request, what has been requested and why

- Check the ID of the officer when they arrive before handing over any information
- Information should be provided in a sealed envelope
- Log when requested information has been provided/picked up

20 LEARNERS MISSING FROM EDUCATION

All staff and associates should be aware that learners and children going missing, particularly repeatedly, can act as a vital warning sign of a range of safeguarding possibilities. This may include abuse and neglect, which may include sexual abuse or exploitation and can also be a sign of child criminal exploitation, including involvement in county lines (which is criminal activity in which drug dealers in major cities establish networks for the supply and sale of drugs to users in towns and rural areas, by using other people to carry, store and sell the drugs). It may indicate mental health problems, risk of substance abuse, risk of travelling to conflict zones, risk of female genital mutilation or risk of forced marriage. Early intervention is necessary to identify the existence of any underlying safeguarding risk and to help prevent the risks of a child going missing in future.

20.1 Unauthorised absence and children missing from education procedure:

Centre staff/associates are responsible for recording learner attendance.

Centre staff, usually the admin, will contact learners and or next of kin, who are not in attendance on the day, to find out the reason and log it on CPOMS.

Leaders and Managers are responsible for checking teaching/training registers regularly and notifying the safeguarding team where learners miss more than four lessons in a row.

Designated Safeguarding Leads (DSLs) are then responsible for providing advice and support to staff, volunteers, and associates, including agreeing actions. The DSL is responsible for following up with the Leader or Manager to ensure the matter has been resolved and the file can be closed. If the matter is ongoing, the DSL or DDSL must put interventions in place to resolve the issue.

If the learner and the next of kin are not contactable and other options have been exhausted, then other agencies may need to be informed, including the local authority contact or responsible person and any vulnerable or looked-after child support agency.

21 Identifying vulnerability

For the purposes of this guidance, a wide definition of vulnerable and disadvantaged learners has been adopted. It includes, but is not limited to, learners who are in one or more of the following groups:

- learners with special educational needs (SEN)
- learners from minority ethnic groups who have English or Welsh as an additional language (EAL/WAL)
- care-experienced children, including looked-after children
- learners educated other than at school (EOTAS)
- children of refugees and asylum seekers
- Gypsy, Roma and Traveller children
- learners eligible for free school meals (eFSM)
- young carers
- children at risk of harm, abuse or neglect
- learners with an EHCP
- learners with disabilities

22 THE EVENT OF THE DEATH OF A LEARNER

The death of a learner can be traumatic for both TCHC staff and other learners. We ask that the person informed about any learner-related death report this to the Safeguarding Team the same day using the normal safeguarding reporting system.

You may notice that lessons become disrupted as learners may be observed becoming restless and unable to concentrate. There may also be an increase in behavioural difficulties.

If any of the children or young people witnessed the death, irrespective of whether the learner died on TCHC premises or not, they may need to be referred for specialist help. Any specialist help for the child or young person will need to be discussed with their family or carers before any referral is made.

We understand that this can be a difficult time for our staff, and we suggest that you contact the Employee Assistance Programme (EAP) for professional support if you want to. The service is free of charge to staff and can include counselling sessions over the telephone and face-to-face.

Telephone: 0800 047 4097

How Can I Help?

- Reassure learners that we are there to listen to them and support them whilst they grieve.
- Talk to our Safeguarding Team or Centre Manager about holding a memorial service for the learner who has died.
- If there are learners who wish to attend the funeral of the learner who has died, discuss this with your DSL or DDSL and ensure that the family and the family of the person who has died agree.

23 CONTEXTUAL SAFEGUARDING

23.1 Sexual behaviours continuum model

When dealing with other alleged behaviour which involves reports of, for example, emotional and/or physical abuse, staff, volunteers, and associates can draw on aspects of Hackett's continuum to assess where the alleged behaviour falls on a spectrum and to decide how to respond.

Hackett's continuum relates exclusively to sexual behaviours and is not exhaustive.

Sexual behaviours continuum model

Normal	Inappropriate	Problematic	Abusive	Violent
<ul style="list-style-type: none"> • Developmentally expected • Socially acceptable • Consensual, mutual, reciprocal • Shared decision making 	<ul style="list-style-type: none"> • Single instances of inappropriate sexual behaviour • Socially acceptable behaviour within peer group • Context for behaviour may be inappropriate • Generally consensual and reciprocal 	<ul style="list-style-type: none"> • Problematic and concerning behaviour • Developmentally unusual and socially unexpected • No overt elements of victimisation • Consent issues may be unclear • May lack reciprocity or equal power • May include levels of compulsivity 	<ul style="list-style-type: none"> • Victimising intent or outcome • Includes misuse of power • Coercion and force to ensure compliance • Intrusive • Informed consent lacking or not able to be freely given • May include elements of expressive violence 	<ul style="list-style-type: none"> • Physically violent sexual abuse • Highly intrusive • Instrumental violence which is psychologically and/or sexually arousing to the child responsible for the behaviour • Sadism

This could include, for example, whether it:

- is socially acceptable,
- involves a single incident or has occurred over a period.
- is socially acceptable within the peer group,
- is problematic and concerning,
- involves any overt elements of victimisation or discrimination, e.g., related to race, gender, sexual orientation, physical, emotional, or intellectual vulnerability,
- involves an element of coercion. pre-planning or involves a misuse of power.
- involves a power imbalance between the child/ children allegedly responsible for the behaviour and the child/children allegedly the subject of that power, and

How can abuse be identified?

- failing to attend centre, disengaging from classes, or struggling to carry out centre-related tasks to the standard ordinarily expected,
- physical injuries,
- experiencing difficulties with mental health and/or emotional wellbeing,
- becoming withdrawn and/or shy; experiencing headaches, stomach aches, anxiety and/or panic attacks; suffering from nightmares or lack of sleep or sleeping too much,
- broader changes in behaviour, including alcohol or substance misuse,
- changes in appearance and/or starting to act in a way that is not appropriate for the child's age, and
- abusive behaviour towards others.

*Abuse affects people very differently. The behaviour that a person presents with will depend on their circumstances.

24 TCHC tackles Child on Child abuse

Training includes case studies, educating people about the nature and prevalence of Child-on-Child abuse, positive, responsible, and safe use of social media, and the unequivocal facts about consent, via Personal, Social, Health and Economic (PSHE) education and the wider curriculum. For example, by addressing gender inequality in a class, or by reviewing written work in an English class which addresses bullying and its effect on mental health.

Learners are frequently told what to do if they witness or experience such abuse. They are regularly informed about TCHC's approach to such issues, including its zero-tolerance policy towards all forms of Child-on-Child abuse.

Any response should:

- include a thorough investigation of the concern(s) or allegation(s), and the wider context in which it/they may have occurred (as appropriate) – depending on the nature and seriousness of the alleged incident(s), it may be appropriate for the police and/or children's social care to carry out this investigation,
- treat all children involved as being at potential risk – while the child allegedly responsible for the abuse may pose a significant risk of harm to other children, s/he may also have considerable unmet needs and be at risk of harm themselves. The Centre should ensure that a safeguarding response is in place for both the child who has allegedly experienced the abuse and the child who has allegedly been responsible for it, and additional sanctioning work may be required for the latter.
- consider: – that the abuse may indicate wider safeguarding concerns for any of the children involved and consider and address the effect of wider sociocultural contexts – such as the child's/ children's peer group (both within and outside the Centre); family; the Centre environment; their experience(s) of crime and victimisation in the local community; and the child/children's online presence. Consider what changes may need to be made to these contexts to address the child/ children's needs and to mitigate risk and consider the potential complexity of Child-on-Child abuse and of children's experiences, and consider the interplay between power, choice, and consent.
- manage the child/children's expectations about information sharing, and keep them and their parents informed of developments, where appropriate and safe to do so. It is particularly important to consider the wishes of any child who has allegedly been abused, and to give that child as much control as is reasonably possible over decisions regarding how any investigation will be progressed and how they will be supported.

Where the DSL or D-DSL considers or suspects that the alleged behaviour in question might be abusive or violent, the DSL or D-DSL should contact children's social care and/or the police immediately and, in any event, within 24 hours. Any report to the Internet Watch Foundation (IWF) will be made in consultation with the police.

25 Youth involved sexual imagery

'Youth involved sexual imagery' best describes the practice because:

- 'youth involved' includes children sharing images that they, or another child, have created of themselves, and
- 'imagery' covers both still photos and moving videos (and this is what is meant by reference to imagery throughout the policy), and
- A judgement of whether something is 'decent' is both a value judgement and dependent on context. The term 'sexual' is clearer than 'indecent', although the DSL will nevertheless always need to use professional judgement when determining whether a photo is 'sexual'.
- **No TCHC staff, volunteers, and associates, including The Safeguarding Team, are permitted to view any suspected sexual imagery to determine any validity; this is a criminal offence.**
- Creating, keeping and/or sharing sexual photos and videos of under-18s is illegal, and is classified as the making, possession, or distribution of indecent images of a minor - under the Protection of Children Act 1978 (making and/or distribution) and the Criminal Justice Act 1988 (possession).

25.1 What types of incidents are covered?

- A child creates and shares sexual imagery of themselves with a peer (also under the age of 18)

- A child shares sexual imagery created by another child with a peer (also under the age of 18) or an adult.
- A child is in possession of sexual imagery created by another child.
- The sharing of sexual imagery of children by adults constitutes child sexual abuse, and centres should always inform the police.
- Children sharing adult pornography or exchanging sexual texts which do not contain imagery.
- Sexual imagery downloaded from the internet by a child.
- Sexual imagery downloaded from the internet by a child and shared with a peer (also under the age of 18) or an adult.
- An adult should never send, share or receive any indecent images with a child
- A child should never send, share or receive any indecent images with an adult

25.2 Incident involving a youth involving sexual imagery recognised by TCHC:

- No staff, volunteers, associates or members of the Safeguarding Team must view any suspected Youth involved sexual imagery to determine any validity of claims; this is a criminal offence as stated above.
- The incident should be referred to the DDSL or DSL as soon as possible
- the DSL will follow the procedures and guidance set out in Sexting in centres and colleges: responding to incidents and safeguarding young people,
- any report to the police should be considered against the severity of the concerns and/or allegations, the impact on any child who has allegedly experienced the abuse, and broader context of the production and distribution of the image (for example: was production consensual or coerced? Was sharing consensual? Was production volunteered or requested? What are the ages of the children involved?), and police guidance is sought for further steps
- There should be subsequent interviews with the children involved,
- parents or carers could be informed at an early stage and involved in the process unless there is a good reason to believe that involving parents would put the child at risk of harm,
- where a child is suffering, or is likely to suffer from harm, it is important that a referral to children's social care (and, if appropriate, the police) is made immediately,
- Depending on the facts of the particular concern or allegation, a report to the police does not necessarily mean that the child will be criminalised. Since January 2016, the police can record an "Outcome 21" against a reported crime, meaning it is not in the public interest to pursue a charge. Most of the youth involved in sexual imagery would fall into this category. However, in the event of coercion, exploitation, further harm, or aggravated behaviours, it is valid for police involvement to result in a criminal charge.

As the law is constantly changing, this policy is subject to review, and TCHC reserves the right to amend this policy without prior notice.

USEFUL LINKS

[Mencap](#)

[Online sexual abuse](#)

[Are You A Victim Of Online Blackmail Or Sextortion?](#)

[Preventing youth violence and gang involvement](#)

[Criminal Exploitation of children and vulnerable adults: County Lines guidance](#)

[Sex and the law | NHS informt](#)

[Mental health and wellbeing](#)

[Anti-bullying information](#)

[Workplace bullying and harassment](#)

[Female Genital Mutilation \(FGM\)](#)

[Forced marriage](#)

[Child sexual exploitation](#)

[Controlling or Coercive behaviour in an intimate or family relationship](#)

[Children missing education](#)

[Preventing bullying](#)

[Drugs: advice for schools](#)

[Safeguarding children in whom illness is fabricated or induced](#)

[Hate](#)

This policy has been developed in accordance with the following guidance and legislation:

Prevent guidance:

[Counter-Terrorism and Security Act 2015](#)

[Channel and Prevent Multi-Agency Panel \(PMAP\) guidance](#)

[Revised Prevent duty guidance: for England and Wales](#)

Sexual violence and harassment guidance:

[How to report rape and sexual assault](#)

[Help after rape and sexual assault](#)

General safeguarding guidance:

[Care and support statutory guidance](#)

[Modern Slavery Act 2015](#)

[Protection of Freedoms Act 2012](#)

[Education and Training \(Welfare of Children\) Act 2021](#)

[Information sharing advice for safeguarding practitioners](#)

Some of the main legislation and guidance for safeguarding children are:

[Keeping children safe in education 2025](#)

[Children Act 2004](#)

[Childcare Act 2006](#)

[Every child matters](#)

[Children Act 1989](#)

[Children and Social Work Act 2017](#)

[What to do if you're worried a child is being abused](#)

[Working Together to Safeguard Children \(2023\)](#)

Some of the main legislation and guidance for safeguarding adults are:

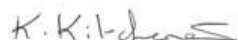
[Care Act 2014](#)

[Equality Act 2010](#)

[Human Rights Act 1998](#)

[Mental Capacity Act 2005](#)

[Safeguarding Vulnerable Groups Act 2006](#)



Kim Kitchener – Head of Quality – TCHC

Document History

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P63	2.9	19/07/2022	Claire Jeens	Unclassified	19/07/2023
P63	3.0	09/08/2022	Claire Jeens	Unclassified	09/08/2023
P63	3.1	07/11/2022	Claire Jeens	Unclassified	07/11/2023
P63	3.2	06/01/2023	Claire Jeens	Unclassified	06/01/2024
P63	3.3	13/06/2023	Claire Jeens	Unclassified	13/06/2024
P63	3.4	12/09/2023	Claire Jeens	Unclassified	12/09/2024
P63	3.5	06/11/2023	Claire Jeens	Unclassified	06/11/2024
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Revision & Amendment Register

Date	Procedure Number	Revision Details	Version Number	Author
03/03/2025	1.1 1.2 4.22 6	Contact details updated Update 'contact the Safeguarding Team procedure' Updated the following to read 'If you have a safeguarding concern about a member of staff, you should contact the Safeguarding Manager, or HR Manager on 01923 698477.' 'Updated Safeguarding Manager' list	3.8	Kim Kitchener/Courtney Grinham
10/02/2026	1.1 1.2 1.3	Key contact details updated Updated information re contacting the Safeguarding team Updated Local Authority contact details Updated useful links	3.9	Sabah-Rose Morgan
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