Coventry & Warwickshire Chamber of Commerce Training

Training | Skills | Growth

Safeguarding Young People & Vulnerable Adults Policy

C&W Chamber Training

"Putting People First"

POLICY STATEMENT

C&W Chamber Training (CWCT) has a statutory and moral duty of care to safeguard and promote the welfare of all adults in particular situations who may be vulnerable and young people. By young people, we mean those under the age of 18, whilst also recognising that some adults are also vulnerable to abuse, those defined in the Safeguarding Vulnerable Groups Act 2006 as receiving support because they have physical or mental health disabilities. This policy will ensure the safety and protection of all adults in particular situations who may be vulnerable and young people in learning with C&W Chamber Training.

CWCT is committed to maintaining a culture of vigilance, inclusion and respect. The organisation promotes an anti-discriminatory approach to safeguarding and will actively challenge racism, faith-based prejudice, misogyny, misandry, homophobia, biphobia, transphobia, sexual harassment and all forms of discriminatory behaviour. Safeguarding is everyone's responsibility and all decisions made by CWCT staff will place the welfare and best interests of children, young people and vulnerable adults at the centre of decision-making.

In simple terms, we need to ensure we work effectively together to protect individuals in particular situations who may be vulnerable and young people involved with C&W Chamber Training - a zero tolerance of abuse and other harmful behaviours. We will ensure that employers taking on young people and adults in particular situations who may be vulnerable understand the safeguards they need to put into place.

We are committed to ensuring that C&W Chamber Training:

- Prevent unsuitable people working with young people and adults in particular situations who may be vulnerable
- Identifying learners who are at risk of and/or are likely to suffer significant harm and take appropriate action to make sure they keep safe at work and at CWCT
- Promote safe practice and challenge poor and unsafe practice
- Make necessary referrals to the Independent Safeguarding Authority
- Provide a safe environment for young people and vulnerable adults to learn in

C&W Chamber Training recognises there are 2 main aspects to safeguarding and promoting welfare of young people and adults in particular situations who may be vulnerable. These are minimising risks and taking all appropriate actions to address concerns and actively promoting the safe learner. We will help young people and adults in particular situations who may be vulnerable to stay safe, enjoy and achieve and make a positive contribution to the world around them.

We will refer concerns that a young person or adults in particular situations who may be vulnerable to appropriate agencies. All staff working with young people and adults in particular situations who may be vulnerable will be made aware of this policy and its contents. Adequate training will take place to familiarise staff with protection issues.

This policy encompasses the following:

1. Recruitment and Selection of staff
2. Staff Training
3. Safe Use of IT
4. Counter Terrorism and Prevent
5. Code of Practice
6. Dealing with Disclosure
7. Guidelines for Reporting and Recording
8. Designated Protection Person and signature
9. Duties of the Designated Protection Person
10. Dealing with Allegations Against Members of Staff
11. Enquiries and Investigations
12. Suspension of Staff
13. Disciplinary Investigation
14. Definitions of Abuse
15. Directory of Agencies who can help

1. INTRODUCTION

1.1 C&W Chamber Training is committed to safeguarding and aims to create a culture of vigilance. We expect everyone who works at C&W Chamber Training to share this commitment. Staff take all welfare concerns seriously and encourage young people and vulnerable adults to talk about anything that worries them. We will always act in their best interest.

1.2 C&W Chamber Training recognises that safeguarding and protection is an essential part of the duty of care to all learners and all staff has a responsibility to provide a safe environment in which learners can learn and thrive. C&W Chamber Training understands that safeguarding, child protection and promoting the welfare of all young people and vulnerable adults is everyone's responsibility and everyone has a role to play in protecting them. C&W Chamber Training recognise it is part of a wider safeguarding system for young people and vulnerable adults and works closely with other agencies to promote their welfare. C&W Chamber Training maintains an attitude of 'it could happen here' and will consider the wishes of, and at all times, what is in the best interests of each young person and vulnerable adult.

1.3 This policy applies to all staff, learners and volunteers who may be working with children (i.e. those aged under 16), young persons (i.e. those aged 16 to 18) and vulnerable adults (i.e. as defined by section 59 of the Safeguarding Vulnerable Groups Act 2006). Through this policy, C&W Chamber Training is seeking to provide assurances to staff, learners, volunteers and visitors that, through its implementation, we will protect children, young people and vulnerable adults and to keep them safe from harm when in contact with C&W Chamber Training.

1.4 The policy takes account of statutory guidance including Keeping Children Safe in Education and Working Together to Safeguard Children. It will be applied and promoted across all service delivery areas via electronic (website, learning platforms), face to face (recruitment information, advice and guidance, teaching, learning and assessment and progression reviews) and in written format available from C&W Chamber Training. Safeguarding will be a cultural cross-cutting theme, ensuring that staff, learners and employers are committed to upholding the highest standards of care.

1.5 Statutory Framework

In order to safeguard and promote the welfare of all, C&W Chamber Training will act in accordance with the following legislation and statutory guidance:

- Keeping Children Safe in Education
- Working Together to Safeguard Children and young people in settings (July 2019)
- What to do if you are worried a child is being abused: Advice for practitioners (2015)
- The Children Act 1989 and 2004
- The Education Act 2002 (section 175)
- The Education (Learner Information) (England) Regulations 2005
- The Care Act 2014
- No Secrets', the Children Act (1989 and 2004)
- Dealing with Allegations of Abuse Against Teachers and Other Staff
- Safeguarding Vulnerable Adults Act 2010
- Procedures set out by the Coventry Safeguarding Children Partnership, and Coventry Safeguarding Adults Board
- Section 26 (1) of the Counter Terrorism and Security Act 2015
- Prevent Duty Guidance for Further Education Institutions 2015
- Mandatory Reporting of Female Genital Mutilation Oct 2015
- Controlling or Coercive Behaviour Statutory Guidance Framework Dec 2015
- Inspecting Safeguarding in Early Years, Education and Skills Settings August 2021

1.6 Safeguarding Definitions

- Safeguarding and promoting the welfare of children and adults in particular situations who may be vulnerable is defined for the purposes of this guidance as:

  - protecting children from maltreatment, inside or outside the home including online
  - preventing impairment of mental and physical health development;
  - taking action to enable all children and vulnerable adults to have the best outcomes.
  - providing help and support the meet the needs of children as soon as problems emerge.

- A child in need is defined under the Children Act 1989 updated 2004 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. Local authorities are required to provide services for children in need for the purposes of safeguarding and promoting their welfare. Children in need may be assessed under section 17 of the Children Act 1989.

- For the purposes of this policy, children are defined as any individual who is under the age of 18.

- Family help means providing support as soon as concerns emerge, ensuring children, young people and families receive the right help at the right time. Family help may involve coordinated support from education, health, social care and other agencies to improve outcomes and prevent concerns escalating.

- C&W Chamber Training recognises that some adults are vulnerable to abuse. The *Care Act 2014* states that safeguarding responsibilities apply to any adult who:

  - has needs for care and support (whether or not the local authority is meeting any of those needs)
  - is experiencing, or at risk of abuse or neglect
  - 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

- Sometimes, a single traumatic event may constitute significant harm, e.g. violent assault, suffocation or poisoning. More often, significant harm is a compilation of significant events, both acute and long-standing, which interrupt, change or damage physical and psychological development.

2. PURPOSE AND SCOPE

2.1 The purpose of this policy is to take all reasonable steps to promote and safeguard the welfare of any child or vulnerable adult undertaking training.

2.2 This policy provides a framework that informs procedures related to C&W Chamber Training statutory obligations to protect children and vulnerable adults who are suffering, or who are at risk of suffering abuse.

2.3 This policy applies to all learners, staff, board members and volunteers.

2.4 This policy also applies to any provision delivered by a sub-contractor or partner of C&W Chamber Training.

3. OBJECTIVES

3.1 To promote and safeguard the welfare of all staff and learners at C&W Chamber Training.

3.2 To provide staff, board members and learners with information on how to contact appropriately qualified and experienced members of staff, who are able to deal with all safeguarding concerns in a timely manner.

3.3 To enable staff and directors to take appropriate action if there is a cause for concern and for C&W Chamber Training to play a full and active part in the multi-agency response to children's and vulnerable adults' protection concerns.

3.4 To ensure that all learners have a safe and stimulating environment in which they can fulfil their potential.

4. IMPLEMENTATION, MONITORING AND EVALUATION

4.1 C&W Chamber Training will:

- Appoint a Designated Safeguarding Lead who will provide support to staff to carry out their safeguarding duties and who will liaise closely with other services such as children's social care.
- C&W Chamber Training will identify learners that may benefit from early help and ensure that the most appropriate support is in place.
- Address any situation where concerns arise regarding the safeguarding of children and vulnerable adults.
- Review this policy annually, and in response to major changes in legislation or significant events.
- Ensure that this policy is displayed on the C&W Chamber Training website and is accessible to all staff, learners, parents and carers, visitors and other stakeholders.
- Provide appropriate training (in accordance with the guidance from Safeguarding Children's Partnership), to all staff annually to ensure that they are aware their role in safeguarding children and adults in particular situations who may be vulnerable and the procedures they should follow should they have concerns.
- Recognise the C&W Chamber Training duty of care and that the child or adult in particular situations who may be vulnerable welfare must be paramount. There will be circumstances, where it may be necessary to breach a person's confidentiality to protect them from harm. Learners must be informed of this position through and reinforced by verbal explanations from staff.

5. LEARNER SUPPORT & PROTECTION

5.1 C&W Chamber Training will have the necessary information to take preventative action working with partner agencies, professionals, relatives and employers to protect apprentices and staff. This will be achieved through:

- Maintaining robust support arrangements for staff and learners
- Ensuring learners have clear communication channels with appropriate support
- Implementing anti-bullying strategies and challenging any discriminatory behaviour
- Focus on supporting groups of individual identified as higher risk

6. POLICY AND PROMOTION

6.1 C&W Chamber Training will promote this policy through visual displays around the training facility; in electronic materials (Guide to Apprenticeships for learners and employers); on its website; in curriculum delivery – teaching, learning and assessment; progress review meetings (scenario discussions) and broadcast announcements on the e-portfolio system.

6.2 Commitment to the policy will be monitored through:

- Annual self-assessment and development planning
- Employer and learner surveys
- Data analysis, including retention, achievement and progression
- Collecting and disseminating examples of good practice
- Investors in People review process and annual management review

7. GENERAL DATA PROTECTION REGULATION (GDPR)

7.1 All policies which are approved by the Executive Director and are in line with our GDPR policies and procedure.

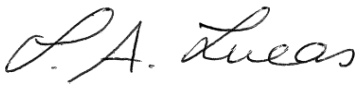
7.2 CWCT will process safeguarding information in accordance with the Data Protection Act 2018, UK General Data Protection Regulation (UK GDPR) and the Data (Use and Access) Act 2025. Fears about sharing information must never prevent staff from taking action to protect a child, young person or vulnerable adult from harm. Information will be shared lawfully, proportionately and in accordance with safeguarding responsibilities

8. LIST OF APPENDICES

Appendix 1: Safeguarding responsibilities
Appendix 2: Recruitment and Selection of Staff
Appendix 3: Safeguarding procedures and guidance for staff
Appendix 4: Staff Training
Appendix 5: Staff Guidance - What to do if you suspect abuse
Appendix 6: Counter terrorism and Prevent
Appendix 7: Reporting and Dealing with Allegations
Appendix 8: Staff Guidance -How to protect yourself from false allegations of abuse
Appendix 9: Directory of Agencies for Additional Support and Guidance

9. **Policy Review**

This policy is subject to annual update as part of C&W Chamber Training's business performance review led by senior management.



Signed:
(Executive Director)

Date: 1st September 2026

APPENDIX 1: SAFEGUARDING RESPONSIBILITIES

1.1 All Staff will:

C&W Chamber Training staff play a particularly important role because they are in a position to identify concerns early in order to provide help for learners. Staff will:

- Make themselves familiar with C&W Chamber Training Safeguarding Policy and Procedures, which will be provided at induction, and regular reminders in staff meetings and other briefings;
- Read Keeping Children Safe in Education Part one as part of annual training expectations and will be circulated to all staff when updates are released;
- Be alert to the signs of abuse as detailed and act in accordance with this policy if a learner presents with indicators of abuse;
- Report any concerns immediately to the Designated Safeguarding Lead and identify learners who may benefit from Family Help support and contribute to referral processes where appropriate
- Raise concerns about poor or unsafe practice with the Designated Safeguarding Lead;
- Understand C&W Chamber Training procedures for dealing with peer on peer or child on child abuse;
- Have a responsibility to provide a safe environment, where individuals can learn;
- Should know what to do if a child or adult in particular situations who may be vulnerable tells them that he/she is being abused or neglected;
- Will be able to identify indicators of abuse;
- Understand safeguarding risks associated with artificial intelligence, deepfake technology and online exploitation.
- Recognise indicators of prejudice-based harm, discrimination and hate-related incidents.
- Understand CWCT filtering and monitoring arrangements and their role in maintaining online safety.
- Receive annually updated training on their safeguarding roles and responsibilities;
- Have an awareness of safeguarding issues that put individuals at risk of harm and behaviours associated with these risks;
- Know what to do if a someone makes a disclosure of abuse and never promise confidentiality when a disclosure is made;
- Be aware of Family Help processes and understand their role in identifying need, making referrals and supporting multi-agency intervention.
- Receive safeguarding updates throughout the year as part of continuous professional development;
- Be able to contribute to the development of safeguarding policy and practice;
- Seek advice from the Designated Safeguarding Lead if they are unsure.

1.2 The Executive Director will:

- Ensure that the policies and procedures are adopted by all staff and are appropriately monitored by the Designated Safeguarding Lead in relation to their safeguarding responsibilities.

1.3 The Designated Lead for Safeguarding will:

- Act as the point of contact for all matters concerning safeguarding in relation to learners, co-ordinate action within C&W Chamber Training and liaise with external agencies where appropriate;
- Help to promote educational outcomes of individuals who have experienced or are experiencing safeguarding or child protection issues by sharing relevant information with staff and the senior leadership team;
- Promote a 'culture of safeguarding', in which every member of C&W Chamber Training acts in the interests of the individual;
- Monitor all safeguarding concerns and ensure that these are followed up in a professional and timely manner;
- Ensure that appropriate strategies for recording and reporting incidents are in place and reviewed regularly;
- Act as a source of support, advice and expertise to staff on all matters of safeguarding, including supporting staff when they are deciding whether to make a referral to an external agency including a referral to the Channel programme where there is a radicalisation concern;
- Liaise with the Coventry Prevent Co-ordinator and West Midlands Counter Terrorism Police to discuss any concerns and make referrals as appropriate;
- Refer all Prevent referrals that become part of the Channel process, as per the funding guidance;
- Provide refresher training for all staff on Prevent.
- CWCT will maintain robust cover arrangements whenever the Designated Safeguarding Lead is unavailable. Deputy Designated Safeguarding Leads will be appropriately trained and authorised to undertake all safeguarding responsibilities in the DSL's absence. No safeguarding concern should be delayed because of the temporary absence of the DSL. Secure safeguarding communication systems will remain available to all staff.

1.4 The Board of Directors will:

- Appoint a member of C&W Chamber Training leadership team to the role of Designated Safeguarding Lead;
- Nominate a named board member to liaise with the Designated Safeguarding Lead;
- Ensure that C&W Training has the following policies and procedures in place;
- A safeguarding policy which complies with the statutory guidance and is updated annually;
- Recruitment and selection policies and procedures in place which prevent people who pose a risk of harm from working with children and vulnerable adults;
- Ensure that C&W Chamber Training contributes to inter-agency working, in line with the statutory guidance Working Together to Safeguard Children;
- Monitor safeguarding arrangements to ensure that they consider the procedures and practices set up by the Coventry Safeguarding Children Partnership;
- Ensure that C&W Chamber Training encompasses local authority and Coventry Safeguarding Children Partnership policies and supply information as requested by the three safeguarding partners (the Local Authority, a clinical commissioning group for an area within the local authority and the police);
- Ensure that any member of staff found not suitable to work with learners, will be notified to the Disclosure and Barring Service (DBS) for consideration for barring;
- Ensure that there are procedures in place to handle allegations against the Senior Leadership Team, members of staff, volunteers and other children and vulnerable adults.

1.5 Learners (children and vulnerable adults) will:

- Maintain vigilance and have a pro-active approach to the safety and welfare of themselves, their peers, and others on site
- Report any concerns to a member of staff or directly to the Safeguarding Team with whom they feel comfortable discussing these concerns
- Ensure behaviour is appropriate and in a way that does not compromise them or lead to allegations of a criminal or safeguarding nature

1.6 Multi-Agency Working

- C&W Chamber Training is committed to multi-agency working and operates under Working Together to Safeguard Children (2018) and local safeguarding arrangements.

- C&W Chamber Training will work with social care, the police, health services, local Family Help Practitioners and other relevant agencies to promote the welfare of individuals and protect them from harm.

  Senior staff member with lead responsibility is:

  Name: Sarah Williams
  Location: Commerce House, St. Nicholas Street, Coventry, CV1 4FD
  Telephone No: 024 76231122

- This person is a member of the management team. They have a key duty to take lead responsibility for raising awareness within the staff of issues relating to the welfare of young people and adults in particular situations who may be vulnerable and the promotion of a safe environment within C&W Chamber Training. In addition, the lead has the responsibility for ensuring that statutory guidance (Keeping Children Safe in Education Part one and Working Together to Safeguard Children) is read and followed by all staff.

- Designated Safeguarding Lead appointed is:
  Name: Gill Dickson
  Location: Commerce House, St. Nicholas Street, Coventry, CV1 4FD
  Telephone No: 024 7623 1122

- Mental Health First Aider:
  Name: Sharon Miles-Waugh
  Location: Commerce House, St. Nicholas Street, Coventry, CV1 4FD
  Telephone No: 024 7623 1122

APPENDIX 2: RECRUITMENT AND SELECTION OF STAFF

1.1 C&W Chamber Training adopts recruitment and selection procedures that help to deter, reject or identify people who are unsuitable to work with young people and vulnerable adults. Recruitment information will explicitly state our commitment to safeguarding and promoting the welfare of learners and the need for the successful applicant to have an enhanced DBS disclosure.

1.2 The personal qualities, qualifications and experiences needed for the successful applicant are provided in the applicants' job description. A successful applicant must supply contact details of at least two referees.

1.3 Shortlisted candidates will be invited for interview and references obtained. The interview will assess the merits of each candidate against the job requirements and explore their suitability to work with young people and adults in particular situations who may be vulnerable.

1.4 An offer of appointment will be made subject to pre-appointment checks. The DBS check will be completed upon take up of employment. Individuals will not be permitted to work with learners without a DBS Disclosure completed by C&W Chamber Training. Evidence of identity will be required such as a passport or a driving license with a photograph.

1.5 Pre-appointment checks include references (character and where appropriate professional), identity**,** UK resident/right to work in UK**,** DBS enhanced disclosure**,** overseas criminal record check where necessary**,** qualifications (where appropriate) and previous employment history.

2.1 C&W Chamber Training will:

- Maintain a record of all checks on members of staff will be held on a single record;
- All new members of staff will be required to obtain DBS clearance. C&W Chamber Training reserves the right to re-check DBS clearance for any member of staff where information is received that indicates that they may pose a risk to children;
- At least one member of every interview panel will have undergone safer recruitment training;
- We take proportionate decisions on whether to check individuals beyond what is required;
- Any visitor to the centre who has not been subject to the necessary checks will be supervised at all times;
- All safer recruitment practices comply with Keeping Children Safe in Education**.** See Part 3 of Keeping Children Safe in Education for further information;
- Monitor compliance with the DBS Policy and Procedure by ensuring that there are sound arrangements for appropriate checks on staff;
- Maintain a single central record of all checks on staff, including external tutors and volunteers;
- Ensure that appropriate action is taken to refuse employment to any individual who may pose a risk to children or adults in particular situations who may be vulnerable;
- Ensure that risk assessments are completed for new staff that don't have a completed DBS check in place on commencement of employment;
- To notify the Local Authority Designated Lead Officer (LADO) of any allegations made against a member of staff and to instigate appropriate C&W Chamber Training processes where appropriate;
- Nominate a member of senior staff to oversee the investigation of any member of staff who is deemed to have breached safeguarding legal requirements, as per the contractual obligations;
- Ensure that there are clear systems and processes in place for identifying when individuals may be experiencing mental health problems;
- Ensure that any member of staff found not suitable to work with learners will be notified to the Disclosure and Barring Service (DBS) for consideration for barring;

- Ensure that there are procedures in place to handle allegations against the Senior Leadership Team, members of staff, volunteers and other children;
- Ensure that C&W Chamber Training encompasses Local Authority Safeguarding Children Partnership policies and supply information as requested by the three safeguarding partners (the Local Authority, the clinical commissioning group and the police).

APPENDIX 3: SAFEGUARDING PROCEDURES AND GUIDANCE FOR STAFF

1.1 All members of staff working at C&W Chamber Training have a responsibility to be mindful of issues related to their safety and welfare, and a duty to report and refer any concerns however "minor" they appear to be.

1.2 In cases where it is deemed that a child or adult in particular situations who may be vulnerable lacks sufficient understanding to make informed decisions about his/her own care and treatment, parents/carers have a right to be informed of any concerns about the child's/vulnerable person's welfare, or of any action taken to safeguard and promote the child's/vulnerable adult's welfare, providing this does not compromise the child's/vulnerable adult's safety.

1.3 Where there are possible concerns about a child's/vulnerable adult's safety unconditional confidentiality cannot be guaranteed and should not be offered.

1.4 C&W Chamber Training will be proactive and take positive steps to inform learners of their rights to safety and protection, and the options available to express their fears or concerns.

1.5 C&W Chamber Training recognises that abuse can take many different forms. Staff will also receive training on the following issues and action will be taken if C&W Chamber Training believe that a child or vulnerable adult is at risk of or is the victim of:

- physical abuse
- sexual abuse
- emotional abuse
- neglect
- radicalisation and extremism
- bullying, including cyber- or online-bullying
- child sexual exploitation
- child criminal exploitation (including involvement in county lines)
- domestic abuse
- upskirting
- fabricated or induced illness
- faith-based abuse
- female genital mutilation (a form of so-called 'honour-based' abuse)
- forced marriage; (a form of so-called 'honour-based' abuse)
- gangs or youth violence
- gender-based violence
- hate
- radicalisation
- relationship abuse
- serious violence
- sexual violence or sexual harassment (including peer on peer abuse);
- sexting
- so-called 'honour-based' violence
- trafficking and modern slavery
- homelessness
- Increased absence
- Prejudice-based harm
- Racism and discriminatory abuse
- Misogyny and misandry
- Financial exploitation
- Online scams and fraud
- AI-generated sexual imagery and deepfakes
- Carrying or use of weapons
- Repeated suspensions or exclusions
- Part-time timetables indicating disengagement risk
- Self-harm

- Suicidal thoughts or behaviours
- Parental offending or imprisonment
- Pregnancy and young parenthood requiring additional support.

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

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

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

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

1.10 Child sexual exploitation (CSE) is a form of child sexual abuse. It occurs where an individual or group takes advantage of an imbalance of power to coerce, manipulate or deceive a child or young person under the age of 18 into sexual activity (a) in exchange for something the victim needs or wants, and/or (b) for the financial advantage or increased status of the perpetrator or facilitator. The victim may have been sexually exploited even if the sexual activity appears consensual. Child sexual exploitation does not always involve physical contact; it can also occur through the use of technology Further information about Child Sexual Exploitation can be found in Keeping Children Safe in Education.

2. Child or Vulnerable Adults Potentially at Greater Risk of Harm

2.1 C&W Chamber Training recognises that some individuals require a social worker due to abuse, neglect or family circumstances and that abuse and trauma can leave individuals vulnerable to further harm as well as educational disadvantage.

2.2 The Designated Safeguarding Lead will hold information relating to social workers working with children at C&W Chamber Training. This information will inform decisions about safeguarding and promoting welfare.

3. Mental Health

3.1 C&W Chamber Training recognises that safeguarding and promoting the welfare includes preventing the impairment of children's mental health or development.

3.2 All staff will be aware that mental health problems may be an indicator that an individual is suffering or is at risk of suffering abuse, neglect or exploitation.

3.3 Staff will not attempt to make a diagnosis of a mental health problem unless they are appropriately trained.

3.4 C&W Chamber Training recognise that staff are well-placed to observe behaviour that may indicate that an individual is experiencing amental health problem, or is at risk of developing one. There are clear systems and processes in place for identifying possible mental health problems.

3.5 If staff are concerned that a child or adult in particular situations who may be vulnerable are experiencing a mental health problem that is also a safeguarding concern, they must report this to the Designated Safeguarding Lead (or deputy Designated Safeguarding Lead) immediately. Further information, guidance and advice regarding mental health can be found in paragraph 45 of Keeping Children Safe in Education.

4 Prejudice-Based Harm

CWCT recognises that young people or adults in particular situations who may be vulnerable may experience harm arising from discrimination, harassment, victimisation or exclusion linked to race, religion, disability, sex, sexual orientation, gender reassignment or any other protected characteristic. Such experiences can affect wellbeing, mental health, attendance and educational engagement. All incidents will be addressed promptly and may constitute safeguarding concerns where appropriate. Staff are expected to challenge discriminatory language and behaviour and promote an inclusive culture

5 Special educational needs or disabilities (SEND)

As outlined in Keeping Children Safe in Education, C&W Chamber Training is aware that individuals with additional needs or disabilities may be more vulnerable to abuse and additional barriers may exist when recognising abuse and neglect. CWCT will ensure their protection policy reflects the fact that additional barriers can exist when recognising abuse neglect in this group.

This could be because;

- assumptions that indicators of possible abuse such as behaviour, mood and injury relate to the young person or adult in particular situations who may be vulnerable condition without further exploration;
- being more prone to peer group isolation or bullying (including prejudice-based bullying) than others;
- the potential for young people or vulnerable adults with SEND or certain medical conditions being disproportionally impacted by behaviors such as bullying, without outwardly showing any signs; and communication barriers and difficulties in managing or reporting these challenges

Any reports of abuse involving young people or adults in particular situations who may be vulnerable with SEND will therefore require close liaison with the designated safeguarding lead and ALS Manager. Staff will also be trained in recognising signs of abuse in children and young people/vulnerable adults with SEN and disabilities or certain medical conditions.

Staff will consider the needs of a young person or adult in particular situations who may be vulnerable when responding to concerns of abuse or when taking a disclosure. C&W Chamber Training recognise that some individuals require specialist intervention to communicate and advice from the SENDCO will be sought in these circumstances. Safeguarding learning opportunities within the curriculum will be appropriately differentiated to ensure all young people and adults in particular situations who may be vulnerable can access it.

6 Confidentiality

Safeguarding information should be treated as confidential and only shared as part of the protocols agreed by C&W Chamber Training and local authority Safeguarding Children Partnership. All staff have a responsibility to share relevant information about protection of young people or adults in particular situations who may be vulnerable with other professionals. Staff who receive information about individuals and their families in the course of their work, shall only share that information within appropriate contexts.

7 Safer Recruitment of Staff

C&W Chamber Training will comply with the guidance set out in Part 3 of Keeping Children Safe in Education. C&W Chamber Training undertakes to ensure that their staff are fit to work with children and adults in particular situations who may be vulnerable. It reserves the right to refuse to employ anyone whom it has reasonable belief may pose a risk to its learners. At least one member of every appointment panel will have gained accreditation through Safer Recruitment training

8 What should staff do if they have concerns about safeguarding practices

8.1 All staff and volunteers should feel able to raise concerns about poor or unsafe practice and potential failures in C&W Chamber Training's safeguarding regime and know that such concerns will be taken seriously by the senior leadership team. Appropriate whistleblowing procedures are in place for such concerns to be raised. Where a staff member feels unable to raise an issue with their employer, or feels that their genuine concerns are not being addressed, other whistleblowing channels may be open to them.

8.2 General guidance can be found at: Advice on whistleblowing.

8.3 The NSPCC whistleblowing helpline is available as an alternative route for staff who do not feel able to raise concerns regarding child protection failures internally or have concerns about the way a concern is being handled by CWCT .Staff can call 0800 028 0285 – line is available from 8:00 AM to 8:00 PM, Monday to Friday and email: help@nspcc.org.uk

9 Online Safety

9.1 C&W Chamber Training's recognise that technology is an integral part of everyday life and that online activity can present safeguarding risks. Learners may be exposed to harmful content such as misinformation, extremist material and hate-related content, while online interactions can increase the risk of grooming, exploitation, radicalisation and abuse. Risks may also arise through cyberbullying, image-based abuse, AI-generated content, deepfakes and online harassment, as well as phishing, scams, fraud and financial exploitation.

9.2 C&W Chamber Training's Staff will receive safeguarding updates to help identify and respond appropriately to AI-related concerns. Any AI-related safeguarding concern must be reported immediately to the DSL.

9.3 C&W Chamber Training's is committed to promoting safe online practices through education, appropriate filtering and monitoring systems, staff awareness and timely safeguarding intervention where concerns arise.

9.4 C&W Chamber Training's maintains appropriate filtering and monitoring systems across organisation-owned devices, networks and digital services. Filtering and monitoring arrangements will be reviewed at least annually and whenever significant changes occur to technology or safeguarding risks. Records of reviews and actions taken will be maintained.

9.5 C&W Chamber Training's IT system will be continuously monitored using robust, industry standard software to ensure its usage is appropriate and that no unacceptable sites are accessed or communications undertaken. A report is sent to the DSL on a weekly basis detailing IT usage. The monitoring of internet use within C&W Chamber Training's facilities will be publicised around the building to raise awareness of monitoring arrangements.

9.6 Teaching Online Safety in Schools guidance provides a framework for ensuring curriculum design and delivery encompasses online safety of children and vulnerable adults.

9.7 Risks guidance to online safety includes disinformation, misinformation and conspiracy theories. Disinformation is the deliberate creation and spread of false or misleading content, such as fake news. Misinformation is the unintentional spread of this false or misleading content.

10 Bullying and Technology

10.1 The use of the Internet and other modern technologies as bullying toosl between people is becoming increasingly common and can be extremely damaging to the victim.

10.2 Any concerns about a learner's use of IT, photographs, mobile phones or text messages should be reported to the appropriate named Designated Protection Person.

10.3 Any concerns about the use of technology by any member of staff or volunteer should be reported to the Executive Director and the appropriate named Designated Protection Person.

11 Promoting Safeguarding and Welfare in the Curriculum

C&W Chamber Training plays a crucial role in preventative education. Preventative education is most effective in the context of a whole organisation approach that prepares learners for life in modern Britain and creates a culture of zero tolerance for sexism, misogyny/misandry, homophobia, biphobic and sexual violence/harassment. C&W Chamber Training will have a clear set of values and standards, upheld and demonstrated throughout all aspects. These will be underpinned by the C&W Chamber Training's behaviour policy and support systems.

APPENDIX 4: STAFF TRAINING

1.1 Staff who work with learners, particularly those under the age of 18 and adults in particular situations who may be vulnerable as well as those who access personal data will undertake safeguarding training to at least level 1. The Designated Protection Person will be trained to level 2.

1.2 Annual safeguarding training and updates will include Family Help processes, child-on-child abuse, prejudice-based harm, online safety developments, filtering and monitoring responsibilities, artificial intelligence related safeguarding risks, information sharing responsibilities and emerging safeguarding themes identified through Keeping Children Safe in Education updates.

1.3 All staff are reminded about safeguarding and protection arrangements throughout the year and are encouraged to report any concerns they may have about a learner's welfare.

1.4 Guidance will be given to staff in the code of practice and by regular reminders in staff meetings and other briefings about how to avoid putting themselves at risk, for example from situations in which they may be the subject of allegations. This includes guidance for staff travelling with learners or taking educational visits, as well as general guidance on the professional use of language, comments about appearance or clothing and appropriate electronic communication with learners

1.5 Staff Training in Safeguarding Plan:

1.5.1 New Staff

New staff joining C&W Chamber Training will undertake Safeguarding training appropriate to their role during their induction period. This will consist of a workshop where they will gain a strong grasp of safeguarding and safer recruitment.

1.5.2 Designated Protection Person

The Designated Protection Person has undertaken Facilitator training to enable them to deliver safeguarding training to wider C&W Chamber Training's staff on an initial and ongoing basis.

1.5.3 Existing Staff

Existing staff will be trained by C&W Chamber Training's Designated Protection Person. Staff will be subject to annual refresher updates.

Members of the Board of Directors will receive suitable training in safeguarding.

In addition, the statutory guidance – Keeping Children Safe in Education – must be read and followed by:

- Board of Directors
- Management

The above persons must ensure that all C&W Chamber Training staff read Part one of the guidance. The above persons must ensure that mechanisms are in place to assist staff to understand and discharge their role and responsibilities as set out in Part one of the guidance.

Senior management must also read and follow statutory guidance – Working Together to Safeguard Children – which focuses on the core legal requirements, making it clear what individuals, organisations and agencies must and should do to keep children safe with a particular focus on multi-agency working to deliver a child centred approach.

1.6 Teaching Online Safety in Schools guidance provides a framework for ensuring curriculum design and delivery encompasses online safety of children and vulnerable young people.

APPENDIX 5: SAFEGUARDING PROCEDURES AND GUIDANCE FOR STAFF
WHAT TO DO IF YOU SUSPECT ABUSE

1.1 If it is believed that a learner is suffering or may be at risk of suffering significant harm, even in the absence of any physical evidence, this must be brought to the attention of the Safeguarding Lead/Designated Senior Safeguarding Lead, who will liaise with the statutory bodies, or as a minimum within 24 hours, in writing, or with written confirmation of a telephone referral. In cases of serious harm, the police will be informed from the outset.

1.2 Someone may become aware of potential abuse in 2 main ways:

a. someone may observe signs in a learner that lead them to suspect that they have been physically, emotionally or sexually abused or suffer severe neglect or are becoming radicalised; or in addition in the case of a vulnerable adult, they may be experiencing financial, discriminatory or institutional abuse.

b. the learner themselves may disclose that they have been abused.

1.3 If a learner makes a disclosure about abuse, staff must do the following:

- Allow the learner to lead the discussion, never stop a learner who is freely recounting significant events, and do not press for details by asking questions e.g. “what did they do next?”
- Listen and be supportive – staff should not investigate, put words in the learner’s mouth or ask leading questions. Questions such as “Is there anything else you’d like to tell me?” may be used as part of a discussion.
- Accept what the learner says without challenge - staff should reassure them that they are doing the right thing, and that they recognise the difficulty of the situation.
- Not lay blame or criticise either the learner or the alleged perpetrator.
- Never promise complete confidentiality – staff should advise learners that they will be passing the information on to the appropriate person at C&W Chamber Training in order to keep them and other learners safe.
- Report the information immediately to the Safeguarding Lead/Designated Senior Safeguarding Lead, and do not discuss the matter with anyone else unless requested to do so by the Designated Lead for safeguarding.
- Write an account of the conversation immediately afterwards, including the time, date and location of the conversation, and the name of anyone else present. This should be signed and handed to the Safeguarding Lead/Designated Senior Safeguarding Lead as soon as possible.
- Follow up with the Designated Senior Lead if you have further concerns.
- Remember that it is not the responsibility of C&W Chamber Training to investigate suspected cases of abuse. It is, however, C&W Chamber Training responsibility to follow local safeguarding procedures, and to recognise that a learner making a disclosure, may be the beginning of a legal process as well as the process of recovery for the young person or vulnerable adult.
- Legal action against the perpetrator can be seriously damaged by any suggestion that the victim’s account has, in any way, been influenced by the person they may have told.

1.4 Allegations of Child on Child abuse

C&W Chamber Training adopts a zero-tolerance approach to child-on-child abuse and will never dismiss concerns as banter, part of growing up, harmless fun or normal behaviour. Child-on-child abuse may include:

- Bullying, including prejudice-based bullying
- Racist or faith-based abuse
- Sexual harassment and sexual violence
- Harmful sexual behaviour
- Online abuse
- Sharing of nude or semi-nude images
- AI-generated sexual images and manipulated content
- Physical abuse
- Coercive or controlling behaviour
- Initiation or hazing-type violence

1.4.1 Staff should recognise that young people and vulnerable adults may also be vulnerable to physical, sexual and emotional bullying and abuse by their peers. There is no clear boundary between incidents that should be regarded as abusive, and incidents that are more properly dealt with as bullying, sexual experimentation, etc. However, it may be appropriate to regard an individual's behaviour as abusive if:

- There is a large difference in power (for example age, size, ability, development) between the individuals concerned; or
- The perpetrator has repeatedly tried to harm one or more other young/vulnerable people; or
- There are concerns about the intentions of the alleged perpetrator.

1.4.2 If the evidence suggests that there was an intention to cause severe harm to the victim, this should be regarded as abusive whether or not severe harm was actually caused. C&W Chamber Training's staff should not automatically dismiss some abusive behaviour as 'normal' between learners. Concerns must be raised with the Designated Safeguarding Lead.

Action when an individual has suffered or is likely to suffer harm

This diagram illustrates what action should be taken and who should take it when there are concerns about an indiviidual. If, at any point, there is a risk of immediate serious harm, a referral should be made to social care immediately.

Anybody can make a referral.

Sharing/recording concerns
An individual with concerns about a young person (see NSPCC signs of abuse and neglect) shares these with the designated safeguarding lead who records them. The individual with concerns may refer to children's social care directly.

Consideration
If referred to them, the designated safeguarding lead considers if an early help assessment is needed or if s/he should swiftly move to the next step.

Referral to children's social care
An individual with concerns or the designated safeguarding lead may make a referral to children's social care.

No referral to children's social care
The individual with concerns and/or the designated safeguarding lead should monitor the situation

If the child's situation does not appear to be improving the referrer should press for re-consideration

Children's social care consideration
Children's social care decides within one working day what action will be taken, including if an assessment is needed,

Assessment	**No assessment**
Children's social care completes the assessment within 45 working days of the referral; it could be a section 17 or 47 assessment. All schools and colleges should allow local authorities access to facilitate arrangements.	If no section 17 or 47 assessment is recommended an early help assessment may be recommended and/or onward referral to other specialist or universal services; children's social care will feed back to the referrer

- where a child and family would benefit from coordinated support from more than one agency(eg, education, health, housing, police) there should be an inter-agency assessment. These assessments should identify what help the child and family require, to prevent needs escalating to a point where intervention would be needed via a statutory assessment under the Children Act 1989. The early help assessment should be undertaken by a lead professional who could be a teacher, special educational needs coordinator, General Practitioner (GP), family support worker, and/or health visitor.

- where there are more complex needs, help may be provided under section 17 of the Children Act 1989 (children in need). Where there are child protection concerns local authority services must make enquiries and decide if any action must be taken under section 47 of the Children Act 1989.

APPENDIX 6: COUNTER TERRORISM AND PREVENT

1.1 The Government's Prevent Strategy was published in 2011 and forms part of an overall Counter Terrorism Strategy known as CONTEST. The Contest Strategy has four elements which are detailed below:

- Pursue
- Protect
- Prepare
- Prevent

1.2 Prevent is a key part of the Contest Strategy which aims to stop people from becoming terrorists or supporting terrorism. Early intervention is at the heart of Prevent in diverting people away from being drawn into terrorist activity as Prevent happens before any criminal activity takes place. It is about recognising, supporting and protecting individuals who might be susceptible to radicalisation.

1.3 Radicalisation is defined as the process by which people come to support terrorism and extremism and, in some cases, then participate in terrorist groups

1.4 Extremism is vocal or active opposition to fundamental British values, including democracy, the rule of law, individual liberty and mutual respect and tolerance of different faiths and beliefs.

1.5 In respect of safeguarding individuals from radicalisation, C&W Chamber Training has a legal responsibility to work to the Prevent element of the Government's Counter Terrorism Strategy, and where deemed appropriate seeks external support through the Channel Scheme for learners, aiming to work with the individual to address their specific vulnerabilities, prevent them becoming radicalised and possibly entering the criminal justice system because of their actions. It is recognised that radicalisation can occur to an individual from any section of society and is not particular to any racial, ethnic or social group. It is further recognised that in many instances the process of radicalisation is essentially one of grooming by others.

Possible signs of radicalisation include:

- The individual's views become increasingly extreme regarding another section of society or government policy
- They are observed downloading, viewing or sharing extremist propaganda from the web
- The individual becomes increasingly intolerant of more moderate views
- They become withdrawn and focused on one ideology
- The individual expresses a desire/intent to take part in or support extremist activity
- The individual may change their appearance, their health may suffer (including mental health) and they may become isolated from family, friends, peers or social groups

2. Learner Support and Protection

2.1 C&W Chamber Training will have the necessary information to take preventative action working with partner agencies, professionals, relatives and employers to protect apprentices and staff. This will be achieved through:

- maintaining robust support arrangements for staff and learners
- ensuring learners have clear communication channels with appropriate support
- implementing anti-bullying strategies and challenging any discriminatory behaviour
- focus on supporting groups of individuals identified as higher risk

3. Referral and Intervention Process

3.1 Any identified concerns as the result of observed behaviour or reports of conversations to suggest that a young person supports terrorism and/or extremism must be reported to the designated safeguarding officer immediately.

3.2 Where an individual is thought to be in need/or at risk of significant harm, and/or where investigations need to be carried out the designated Safeguarding person will refer to the relevant Child Protection Officer/Local Authority Work Related Team. However, it should be noted that concerns of this nature, in relation to extremism, are most likely to require a police investigation (as part of the Channel process) therefore the designated safeguarding person will contact:

Warwickshire: Safer Neighbourhood Team, Leamington Police Station on 01926 684248
(Voicemail 11680)

Coventry: prevent@coventry.gov.uk
Balbir Sohal, Prevent Education Officer Balbir.sohal@coventry.gov.uk
Viv Brosnahan, Prevent Education Officer Viv.brosnahan@coventry.gov.uk

DFE Contact: Contact: Sheri Alamgir Email: Alamgir.SHERIYAR@education.gov.uk

APPENDIX 7: REPORTING AND DEALING WITH ALLEGATIONS AGAINST MEMBERS OF STAFF

1.1 Because of their frequent contact with young people and adults in particular situations who may be vulnerable, staff may have allegations made against them. C&W Chamber Training recognises that an allegation made against a member of staff may be made for a variety of reasons and that the facts of the allegation may or may not be true.

1.2 C&W Chamber Training recognises that the welfare of the individual is of paramount concern. It is also recognised that hasty or ill-informed decisions in connection with a member of staff can irreparably damage an individual's reputation, confidence and career.

1.3 A member of staff who receives an allegation about another member of staff should follow the guidelines in Appendix 5.

1.4 The allegation should be reported immediately to the Executive Director, unless the Executive Director is the person against whom the allegation is made, in which case the report should be made to the Operations Director. The Executive Director (or Board Director if the allegation is against the Executive Director) should obtain written details of the allegation from the person who received it, that are signed and dated. The written details should be countersigned and dated by the Executive Director. Information about times, dates, locations and names of potential witnesses should be recorded.

1.5 The Executive Director (or designated person) should make an initial assessment of the allegation, consulting with the Senior Staff Member with Lead Responsibility. Where the allegation is considered to be either a potential criminal act or indicates that the individual has suffered, is suffering or is likely to suffer significant harm, the matter should be reported immediately to the appropriate authorities.

1.6 The Executive Director will not investigate the allegation. The initial assessment should be on the basis of the information received and is a decision whether the allegation warrants further investigation. Other outcomes may be:

- The allegation represents inappropriate behaviour or poor practice by the member of staff and is neither potentially a crime nor a cause of significant harm to the individual. The matter should be addressed in accordance with C&W Chamber Training's disciplinary procedures.
- The allegation can be shown to be false because the facts alleged could not possibly be true.

2. Enquiries and Investigations

2.1 C&W Chamber Training's shall hold in abeyance our own internal enquiries while the formal third party agencies investigations proceed. Any internal enquiries shall conform with the existing staff disciplinary procedures.

2.2 Confidentiality will be maintained in connection with the enquiries, in the interests of the members of staff about whom the allegation is made. The Executive Director (or designated person) will consult with the police or other investigating agency, particularly in relation to timing and content of the information to be provided and shall inform relevant parties regarding the investigation and the likely process.

3. Suspension of Staff

3.1 Suspension will not be automatic. In respect of staff other than the Executive Director, suspension can only be carried out by the Executive Director. Suspension may be considered at any stage of the investigation. It is a neutral, not a disciplinary act and shall be on full pay. Alternatives may include change of, or withdrawal from, specified duties.

3.2 The member of staff should be informed that an allegation has been made and that consideration is being given to suspension. The interview will not be a formal disciplinary hearing, but solely for raising a serious matter which may lead to suspension and further investigation.

3.3 If the Executive Director considers that suspension is necessary, the member of staff shall be informed that he/she is suspended from duty. Written confirmation of the suspension, with reasons, shall be dispatched as soon as possible and ideally within one working day. The suspended member of staff should be given appropriate support during the period of suspension. He/she should also be provided with information on progress and developments in the case at regular intervals.

4. The Disciplinary Investigation

4.1 The disciplinary investigation will be conducted in accordance with the current staff disciplinary procedure.

5. Confidentiality

5.1 It is extremely important that when an allegation is made, every effort is made to maintain confidentiality and guard against unwanted publicity while an allegation is being investigated or considered. The Executive Director, Designated Lead, police and Social Care services (if applicable), to agree the most appropriate way in which to manage the situation.

5.2 Parents/carers of the young person/vulnerable adult (without mental capacity) involved in the safeguarding issue, will be told about the allegation as soon as possible, if they do not already know of it. However, where a strategy discussion is required, or police or Social Care services need to be involved, the Designated Lead should not do so until those agencies have been consulted and have agreed what information can be disclosed to parents/carers.

5.3 Parents/carers will also be kept informed about the progress of the case, and told the outcome where there is not a criminal prosecution, including the outcome of any disciplinary process. Although the deliberations of a disciplinary hearing, and the information considered in reaching a decision, cannot normally be disclosed, the parents/carers will be told the outcome in confidence.

5.4 Parents/carers should also be made aware of the requirement to maintain confidentiality about any allegations made against individuals while investigations are on-going.

6. Timescales

6.1 It is in everyone's interest to resolve cases as quickly as possible, consistent with a fair and thorough investigation. The statutory guidance Keeping Children Safe in Education outlines clear expectations in relation to timescales for the resolution of cases of allegations against staff, which will take precedence over any timescales outlined in C&W Chamber Training's disciplinary procedure.

7. On Conclusion of a Case

7.1 If the allegation is substantiated and the individual is dismissed following a disciplinary hearing, or C&W Chamber Training ceases to use the individual's services, or the individual resigns or otherwise ceases to provide his/her services, the Executive Director will discuss with the Senior Designated Safeguarding Lead whether C&W Chamber Training needs to make a referral to the Disclosure and Barring Service (DBS), for consideration of whether inclusion on the barred lists is required

7.2 If an allegation is shown to be deliberately invented or malicious, the Executive Director and Senior Designated Safeguarding Lead should consider whether any disciplinary action is appropriate against the individual who made it, or whether the police should be asked to consider if action might be appropriate against the person responsible.

8. Effectiveness and Monitoring

8.1 At the conclusion of a case in which an allegation is substantiated, the Executive Director will review the circumstances of the case with the Senior Designated Safeguarding Lead and other colleagues as appropriate to determine whether there are any improvements to be made to C&W Chamber Training's procedures or practice to help prevent similar events in the future, including staff training. This should include issues arising from the decision to suspend the member of staff if applicable, the duration of the suspension and whether or not suspension was justified. The Executive Director and Senior Designated Lead should also consider how future investigations of a similar nature could be carried out without suspending the individual.

9. Record Keeping

9.1 Details of allegations that are found to have been malicious will not be kept on an individual's personnel file. However, for all other allegations, a clear and comprehensive summary of the allegation, details of how the allegation was followed up and resolved, and a note of any action taken and decisions reached, will be kept on the personnel file of the staff member concerned, and a copy provided to the person concerned.

9.2 The purpose of the record is to enable accurate information to be given in response to any future request for a reference, where appropriate. It will also provide clarification in cases where future DBS checks reveal information from the police about an allegation that did not result in a criminal conviction and will help to prevent unnecessary re- investigation if an allegation re-surfaces after a period of time.

9.3 The record should be retained at least until the member of staff concerned has reached normal pension age or for a period of 10 years from the date of the allegation if that is longer.

APPENDIX 8: CODE OF PRACTICE AND LEARNER PROTECTION

1.1 The relationship between staff and learners is a professional one. It is fully expected - and indeed, hoped – that C&W Chamber Training staff have a friendly and caring approach to learners. Nevertheless, the basis of that relationship is professional not personal.

1.2 Social networking sites such as Instagram, Facebook, Twitter and other social media, pose risks for all staff in terms of professional integrity and the welfare of learners. Staff must not use these sites to contact or communicate with learners or learners who have recently left (within the 12 months of leaving learning). Should you become aware of material about yourself, CWCT or a learner which is inappropriate, the Designated Senior Lead must be informed and they will check the allegations and determine any course of action. You must not check it out yourself.

1.3 Individuals (staff members) who have left CWCT must not contact current learners or ex-learners (within the 12 months of them leaving training) within 12 months of the staff member leaving CWCT on social media or by any other means.

1.4 Good practice includes valuing and respecting children, young people and vulnerable adults as individuals, and the adult modelling of appropriate conduct – which would exclude bullying, aggressive behavior and discrimination in any form.

1.5 If staff are concerned about anything which has occurred or which has made them uncomfortable, they should discuss the matter with the Designated Senior Lead or Deputy at the earliest opportunity even if it turns out that nothing untoward has happened. Staff must make a written record, dated and signed, of the issue that concerns them.

2. The following code of practice applies to all C&W Chamber Training staff working with children, young people or adults in particular situations who may be vulnerable:

- Always work in an open environment avoiding private or unobserved situations and encouraging open communication.
- Treat everyone as individuals with equal concern, respecting their background and culture.
- Always put the welfare of each person first.
- Maintain a safe and appropriate distance from each person, including no physical contact without the person's permission, whilst maintaining supervision.
- Do not take a learner alone in a car on journeys, however short. If this is unavoidable, ensure you tell someone else where you are going, what you are doing and why.
- Do not speak inappropriately to a learner *i.e*. do not use bad language or sexually suggestive language.
- Avoid unnecessary physical contact.
- Unless circumstances make it impossible to comply, do not take a child or vulnerable adult to the toilet unless either (a) another adult is present or (b) another adult is aware
- If you find you are in a situation where you are alone with a child, young person or vulnerable adult, wherever practicable make sure that others can clearly observe you.
- Avoid close personal relationships with a child, young person or vulnerable adult in relation to whom you are in a position of trust.
- Do not disclose personal information to learners/employers such as home address, personal contact information such as email or telephone.
- Do not engage in social media groups with learners.
- Always use official, traceable communication channels such as email rather than closed media such as 'What's app'.
- Do not use 'What's app' groups as a means of communicating with learners/employers.

- Do not make suggestive or inappropriate remarks to or about a child, young person or vulnerable adult, even in fun, as this could be misinterpreted.
- If a child, young person or vulnerable adult accuses a student or member of staff of abuse or inappropriate behaviour, you should report this immediately to the relevant person.
- The duty to report applies equally to complaints or accusations of historic, and not just recent, abuse/inappropriate behaviour.
- Participate in the training available to you to support you in your work with children, young people and vulnerable adults.
- Be sensitive to heritage, culture and faiths.
- Always seek permission and explain any physical contact such as administering first aid or comforting a distressed learner.

Use of mobile phones by staff:

- Staff (including volunteers, contractors and anyone else otherwise engaged by CWCT) are not permitted to use their personal mobile devices while children/ young people are present/during contact time. Staff keeping their phone with them during contact times must ensure their phone is switched off (not silent/ vibrate only).
- Staff must not use their personal mobile phones to process personal data, or any other confidential CWCT information. Staff must use CWCT equipment when taking pictures – not personal devices
- Staff must secure their phones as much as possible, including using passwords or pin codes to protect access to the phone's functions. Staff must also secure any work phone provided to them.
- Staff must not give their personal contact details to apprentices, including connecting through social media and messaging apps. Failure by staff to do so could result in data breaches.
- Staff must not use their mobile phones to take photographs or recordings of children/young people, their work, or anything else.
- If it's necessary to take photos or recordings as part of a training session/ activity, this must be done using CWCT equipment.
- Only authorised staff are permitted to use CWCT phones, and access to the phone must not be provided to anyone without authorisation.
- Staff must only use phone functions for work purposes, including making/receiving calls, sending/receiving emails or other communications, or using the internet
- Ensure that communication or conduct linked to the device is appropriate and professional at all times, in line with our staff code of conduct.

APPENDIX 9: FURTHER INFORMATION

1.1 Child Sexual Exploitation

Child sexual exploitation is a form of child sexual abuse. It occurs where an individual or group takes advantage of an imbalance of power to coerce, manipulate or deceive a child or young person under the age of 18 into sexual activity (a) in exchange for something the victim needs or wants, and/or (b) for the financial advantage or increased status of the perpetrator or facilitator. The victim may have been sexually exploited even if the sexual activity appears consensual.

1.2 Female Genital Mutilation (FGM)

Female Genital Mutilation (FGM): CWCT staff , need to be alert to the possibility of a girl being at risk of FGM, or already having suffered FGM. Victims of FGM are likely to come from a community that is known to practice FGM.

1.3 So, called Honour Based Violence

So-called 'honour-based' violence (HBV), encompasses crimes which have been committed to protect or defend the honour of the family and/or the community, including Female Genital Mutilation (FGM), forced marriage, and practices such as breast ironing. All forms of so- called HBV are abuse (regardless of the motivation) and should be handled and escalated as such.

1.4 Forced Marriage

Forcing a person into a marriage is a crime in England and Wales. A forced marriage is one entered into without the full and free consent of one or both parties and where violence, threats, or any other form of coercion is used to cause a person to enter into a marriage.

1.5 Youth Produced Sexual Imagery ('sexting')

This includes:

- A person under the age of 18 creating and sharing sexual imagery of themselves with a peer under the age of 18;
- A person under the age of 18 sharing sexual imagery created by another person under the age of 18 with a peer under the age of 18 or an adult;
- person under the age of 18 being in possession of sexual imagery created by another person under the age of 18.

1.6 C&W Chamber Training staff are to be vigilant and noticing any concerns about young people sending, receiving and/or disseminating indecent images of themselves and other young people.

1.7 C&W Chamber Training staff will not view images or videos on learners' devices. Confiscated devices will be stored securely and passed to the relevant agencies. We will work with parents as necessary if their child is involved in 'sexting'. We operate a culture of safeguarding and young people should feel confident to disclose if they have sent an inappropriate image of themselves. Children will be supported to retrieve and delete the images.

1.8 Family Help

Any child may benefit from Family Help support. Staff should be particularly alert to learners whose circumstances indicate that early intervention and coordinated support may improve outcomes. Family Help may be appropriate where learners:

- have special educational needs or disabilities
- are young carers
- experience mental health concerns
- are affected by domestic abuse
- are at risk of criminal or sexual exploitation
- are vulnerable to radicalisation
- have repeated absences or suspensions
- are affected by parental offending or imprisonment
- are experiencing financial hardship or family instability
- are showing signs of abuse, neglect or emotional distress.

The Designated Safeguarding Lead will work with external agencies where appropriate to ensure families receive the right help at the right time and that concerns are addressed at the earliest possible stage

For further information about the Coventry Safeguarding Children Partnership's 'Right Help, Right Time' guidance, which is used by C&W Chamber Training to make decisions about protecting children, please visit http://www.coventry.gov.uk/righthelprighttime.

1.9 Directory of Agencies for Additional Support and Guidance

In the first instance, the Designated Protection Person will be the point of contact. Additional sources of support and guidance can be provided by the following agencies:

Police	0845 113 5000 Out of hours Emergency Duty Team (Social Services): 024 7683 2222
Children and Families	Refer to the local authority. Speak to someone about a "child protection concern"
NSPCC	0808 800 5000 (free 24 hour help line)
Child Line	0800 1111 (free 24 hour help line)
Eating Disorders Association	0845 634 7650 Open 4pm to 6.30pm, Monday to Friday (Calls charged at local rate but they can call back)
Cruse Bereavement Centre	0808 808 1677 (free) Open 9.30am to 5pm, Monday to Friday (Gives support, information and advice to people)
Kidscape	www.kidscape.org.uk (Gives practical advice on bullying and keeping safe)
National Drugs Help Line	0800 77 66 00 (free 24 hour help line) (Free confidential advice and help to anyone affected by drugs)
National AIDS Help Line	0800 567 123 (free 24 hour help line) (Confidential advice and information to anyone concerned about HIV and AIDS)

Saneline	0845 767 8000 Open 12 noon to 2am every day (Provides listening, crisis support and useful information to anyone coping with mental health difficulties, including those of friends or relatives)
Brook	https://www.brook.org.uk/find-a-service/ (Free, confidential sexual advice, contraception, pregnancy testing and counselling for young people)
Who Cares? Trust Link line	0500 564570 (free) Open 3.30pm to 6pm Monday, Wednesday, Friday (Confidential support and information to young people who are in or have left the care system)
Medical Advice	NHS 111 by dialling 111 (England and Wales, all-age)
Emotional Support & Mental Health	Samaritans call 116 123
	CALM call 0800 58 58 58 / webchat (all-age)
	Switchboard: call 0300 330 0630 /online chat (LGBTQ+, all-age)
	Shout text Shout to 85258 (all-age)
	The Mix call 0808 808 4994 / email / online chat (under 25s)
Domestic Abuse & Sexual Violence	Rape Crisis call 0808 802 9999 / online chat (16 and over)
	Victim Support call 0800 123 6600 / online chat (all-age)
	GALOP call 0800 999 5428 (LGBTQ+, all-age)
	The Survivors Trust call 08088 010 818 (all-age)
	Shorespace shorespace.org.uk (13-19)
Anti-terrorist hotline	0800 789 321
Prevent Co-ordinator	0121 251 0239 prevent@west-midlands.pnn.police.uk

RECORD OF WORRIES OR SUSPICIONS CONCERNING THE CONTRAVENTION OF:

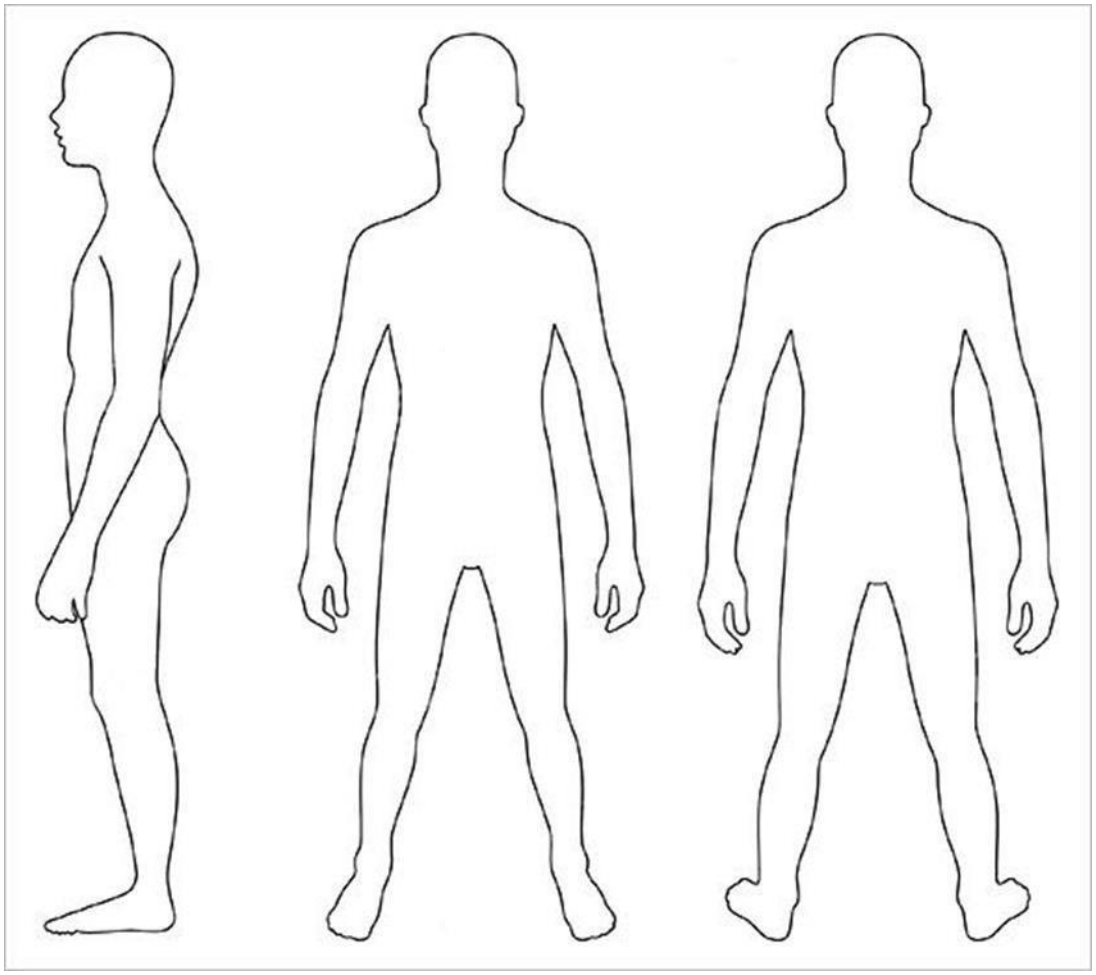
CW CHAMBER TRAINING SAFEGUARDING YOUNG PEOPLE & VULNERABLE ADULTS POLICY

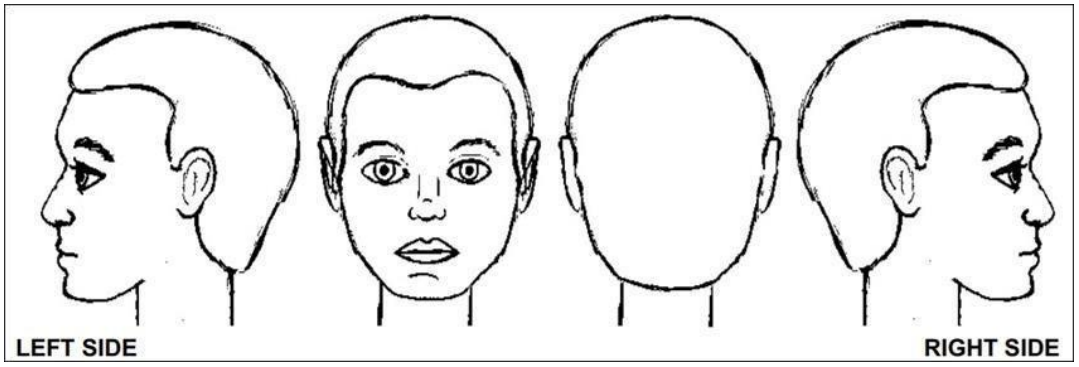
This form will be used by members of staff or volunteers to record disclosures or suspicions of abuse. The completed form should be sent to the DSL dealing with the allegations.

Your name:	Your position:
Place of work	Contact phone number
Case Number: Status: Live/ closed (delete as applicable)	Risk Rating (Actions to follow) 1. Low Risk 2. Medium 3. High
The child / young adult's details	
Name	
Address/phone number	
Date of birth	
Other relevant details about the child/ young adult/adult *Eg family circumstances, physical and mental health, any communication difficulties.*	
Parent/guardian/carers details (if appropriate)	
Details of the allegations/suspicions	
Are you recording: • Disclosure made directly to you by the child/young adult/adult? • Disclosure or suspicions from a third party? • Your suspicions or concerns?	
Date and time of disclosure	
Date and time of incident	

Details of the allegation/suspicions. *State exactly what you were told/observed and what was said. Use the persons own words as much as possible*
What has prompted the concern – include dates/times of any specific incidents.
Are there any physical signs/behavioural signs/indirect signs?

The Body Map is intended to be used to record a physical injury to an individual particularly if it is felt to be non-accidental or part of a pattern of injuries. Staff should not attempt a thorough medical examination or diagnosis of the injury, it is a record of what can be seen and what has been said.





Has anybody been alleged to be the abuser? If so record details. Has anyone else been consulted e.g. Manager, employer or colleague? If so record details.

Has a referral been made? (Police, Mash, Prevent) If so record details.
Have parents/guardians been informed (if appropriate)?

Is the individual in immediate risk of harm ?	Yes	No	Agreed action taken

Is the individual safe to return home ?	Yes	No	Agreed action taken

Signature: (name of member of staff) Role:	Date form completed (DD MM YY):
Signature of DSL:	

Action taken (including reasons for decisions) and Outcomes (NB – this section is only to be completed by DSL)	By Whom	When

LAC Information	Review details

CHRONOLOGY

DATE (DD MM YY)	DETAILS	SIGNATURE