SAFEGUARDING POLICY AND PROCEDURES

SCOPE & PURPOSE

1. Sheldrake Training is committed to prioritising and promoting safeguarding and protecting children, young people and adults at risk of harm and considers safeguarding to be everybody's responsibility.

2. This policy applies to all those working in, studying or visiting any site including learners, staff, directors, volunteers and visitors. It applies to all groups regardless of age, disability, gender (including trans-sexual), marital status, parental responsibilities, sexuality, race, religion, and it is the duty of all staff, directors, learners, visitors, and contractors to follow it.

3. For the purpose of clarity, any person under the age of 18 is deemed to be a child, and an adult at risk, is deemed to be a person who is, or may be in need of, community care services by reason of mental or other disability, age, or illness, and who is, or may be unable to take care of him or herself, or unable to protect him or herself against harm or exploitation. An adult is considered at risk of harm, if they receive a health, personal or social care service from a professional. Personal services would include, for example, help with financial matters, feeding, washing or dressing. Any person up to the age of 24 with a current Educational Health Care Plan (EHCP) in place is treated as a child for the purposes of safeguarding and child protection legislation.

4. It may also include those who are vulnerable for some other reason for example those with caring responsibilities or have suffered abuse or trauma.

5. Safeguarding and promoting the welfare of children is defined for the purpose of the policy as:

   a. Protecting children from maltreatment.
   b. Preventing impairment of children's mental and physical health and development.
   c. Ensuring that children grow up in circumstances consistent with the provision of safe and effective care; and
   d. Taking action to enable all children to have the best outcomes.

6. The purpose of this policy is to provide a framework by which Sheldrake Training carries out its duty to protect children, young people, and adults at risk (hereafter referred to as learners) from harm. The Policy provides clear information and direction to all members of the company to ensure all child protection concerns, referrals and monitoring are handled correctly. Sheldrake Training does not have responsibility to investigate incidents of alleged abuse but has a statutory duty to assist local authorities with child protection issues.

7. All existing staff and new staff are required to receive, read and acknowledge this policy and Part 1 of Keeping Children Safe in Education[1] .

[1] This Policy has been updated to consider changes promulgated through KCSIE 25. As a minimum, Annex A to

8. The policy and supporting documents will be revised annually or before when there are changes to relevant legislation. Sheldrake Training has clearly defined responsibilities under several legislative requirements and this policy should be used in conjunction with the following legislation where necessary:

- Children Act 1989, 2004.
- Adoption and Children Act 2002.
- Protection of Freedoms Act 2012.
- Sexual Offences Act 2003.
- Section 26 (1) of the Counter Terrorism and Security Act 2015.
- Prevent duty guidance for Further Education institutions 2021.
- Mandatory Reporting of Female Genital Mutilation, Oct 2015.
- Controlling or Coercive Behaviour Statutory Guidance Framework Dec 2015 (currently under review).
- Ofsted - Inspecting Safeguarding in Early Years, Education and Skills 1 Sep 2022.
- Working Together to Safeguard Children (updated 2020).
- Coronavirus (COVID-19): safeguarding in schools, colleges and other providers.
- Keeping Children Safe in Education 2023.
- Education and Training (Welfare of Children) Act 2021.
- Children's & Social Work Act 2017.
- Domestic Abuse Act 2021.
- Information Sharing 2018.

9. Sheldrake Training is also committed to ensuring freedom of speech in relation to Section 43 of the Education Act 1986, The Equality Act 2010 and The Human Rights Act 1998.

10. The term 'safeguarding children and young people' embraces both child protection and a preventative approach to keeping young people safe. Therefore, safeguarding encompasses learner's health and safety, preventing and dealing with:

a. Abuse.

b. Bullying and harassment (in person or electronically).

c. Meeting the medical needs of those with medical conditions, providing first aid.

d. Personal security (including eSafety).

e. Safeguarding from drugs, substance and alcohol abuse.

f. Child on child abuse (formerly known as peer on peer)

g. Sexual harassment and sexual violence.

h. Criminal and sexual exploitation (CCE & CSE).

i. It also gives due regard to the prevention of young people becoming extremist or being radicalised (Prevent).

KEY PRINCIPLES

11. The following principles underpin Sheldrake Training's work with children, young people and adults at risk of harm. The approach will:

KCSIE must be read by all Sheldrake Training staff and directors of Board.

a. Provide a safe environment for all persons to work and learn.

b. Be compliant with key safeguarding legislation including the Prevent Duty.

c. Have a coordinated approach, safeguarding is everyone's responsibility.

d. Be focussed on early intervention and help for emerging issues.

e. Be learner centred.

f. Actively involve learners and their families.

g. Support the achievement of best possible outcomes for learners be holistic in approach.

h. Ensure equality of opportunity.

i. Be part of a multi-agency in approach.

j. Ensure sharing of relevant information takes place.

k. Ensure a continuous process rather than an event to facilitate a contextualised approach in safeguarding learners.

l. Design procedures to provide the services required and monitor the impact the provision has on a learner's developmental progress.

m. Comply with the regulations and guidance provided on the vetting of staff, including temporary staff and volunteers to minimise the risk of recruiting unsuitable people as laid out in the guidance from the Disclosure and Barring Service and KCSIE comply with 'safer recruitment' procedures and undertake disclosure and barring checks, to ensure that all employees and workers under terms of engagement are suitable to work at Sheldrake Training.

n. Develop and implement procedures for identifying, reporting cases or suspected cases of abuse and make appropriate referrals to the Disclosure and Barring Service.

o. Ensure employers and other partners are aware of the safeguarding and Prevent duties and receive timely information and support to promote these duties to learners in the workplace. Sheldrake Training Prevent Policy is available to all staff, trustees and learners via the Sheldrake Training website and through the organisation's G Drive for those with access.

p. Educate and support learners in staying safe and being healthy including full-time and part-time learners, apprentices and work-based learners.

q. Ensure that any child, young person or individual with additional needs, including Looked After Children or Care Leavers going missing from education, place of residence, particularly if repeated, is reported to the appropriate authority.

HELPING LEARNERS TO KEEP THEMSELVES SAFE

12. Learners will be advised about Sheldrake Training procedures in relation to safeguarding as part of their induction. The web page will provide learners with reminders about who to contact should they have a safeguarding concern.

13. Learners will be advised about health and safety procedures to ensure that they know how to stay safe within their training environment; whilst undertaking practical activities and when on placement or in the workplace.

14. Learners will be provided with guidelines about keeping themselves safe online as part of their induction into using the online learning environment. These include e-Safety, sexual

health and exploitation, drugs and alcohol awareness, healthy relationships, domestic violence, child on child abuse, crime, road safety, anti-bullying, equality and diversity, emotional resilience and the dangers of being drawn into extremism or radicalisation.

15. Learners will learn about British Values[2] and their impact in creating a Safe and Respectful environment.

16. Where apprentices choose the option to live-in, particularly those who are under 18 or adults at risk, Sheldrake Training will carry out initial and ongoing checks on wellbeing as per Annex F of this policy.

PROMOTING THE WELFARE OF CHILDREN, YOUNG PEOPLE AND ADULTS AT RISK

17. Safeguarding and promoting the welfare of children is everyone's responsibility. It is recognised that because of the day-to-day contact with young people, staff can identify concerns early, provide help, promote welfare and prevent concerns from escalating. It is important that all staff (including those who do not encounter learners) recognise the important role they play in protecting children. Sheldrake Training therefore will:

a. Establish and maintain an environment where learners feel secure, are encouraged to talk, and are listened to.

b. Ensure that young people and adults at risk know who to contact if they are worried.

c. Where specific safeguarding issues arise, expert and professional organisations will be contacted to provide up to date guidance and practical support. These will include the NSPCC advice which can be found on www.nspcc.org.uk and the Prevent Regional HE/FE Coordinator Southwest for the Department for Education (DfE).

d. These issues could include:

- Child sexual exploitation.
- Child-on-child abuse.
- Child missing from education.
- Children missing from home or care.
- Bullying including cyberbullying.
- Domestic violence.
- Alcohol/Drugs.
- Fabricated or induced illness.
- Faith abuse.
- Honour based violence which can include female genital mutilation (FGM) and forced marriage.
- Gangs and youth violence.
- Gender-based violence/violence against women and girls (VAWG).
- Mental health.
- Modern Slavery.
- Private fostering.
- Extremism and radicalisation.
- Sexting.
- Sexual violence and sexual harassment between children.

[2] Guidance in Promoting British Values in Schools: https://www.gov.uk/government/news/guidance-on-promoting-british-values-in-schools-published.

- Teenage relationship abuse.
- Trafficking.
- Self-harm, risky behaviour.
- Crime, fear of crime.
- Exploitation including financial, sexual and criminal.
- Victimisation and prejudice due to race, sexuality, faith, gender, disability etc.
- Upskirting.
- Serious Violence.

CHILD ON CHILD (formerly known as PEER ON PEER) ABUSE

18. Children can abuse other children, and it can take many forms. It can happen both inside and outside of the working environment and online. It is important for all staff to recognise the indicators and signs of child-on-child abuse and know how to identify and respond to reports. This can include (but is not limited to):

a. Bullying including cyberbullying, prejudiced based and discriminatory bullying.

b. Abuse with intimate partner relationships.

c. Physical abuse, such as hitting, kicking, shaking, biting, hair pulling or otherwise causing physical harm.

d. Sexual violence and sexual harassment.

e. Consensual and non-consensual sharing of nude and semi-nude images and/or videos.

f. Causing someone to engage in sexual activity without consent.

g. Upskirting and initiation/hazing type violence and rituals.

19. Staff should challenge inappropriate behaviours and not tolerate or dismiss sexual violence or sexual harassment as ‘banter’, ‘part of growing up’ or ‘just having a laugh’. Physical behaviours will also be challenged.

20. If an allegation is received victims should be reassured that they are being taken seriously and that they will be supported and kept safe. As is always the case, staff in doubt should always speak to the Designated Safeguarding Lead (DSL) or Designated Safeguarding Officer (DSO).

LEARNER BEHAVIOUR AND EQUALITY OF OPPORTUNITY

21. Sheldrake Training recognises that young people/adults at risk who are abused, or witness violence may find it difficult to develop a sense of self-worth. They may feel helpless, humiliated and some sense of blame. When in training their behaviour may be challenging and defiant or they may be withdrawn. Therefore, Sheldrake Training will endeavour to support the young person by ensuring that:

a. The ethos promotes a positive, supportive and secure environment and gives learners a sense of being valued.

b. The behaviour expectations are communicated through a safe and respectful culture campaign and upheld by British Values, which are aimed at supporting all learners.

c. Learners know that certain behaviour is unacceptable, they are valued and not to be blamed for any abuse which has occurred towards them.

d. It liaises with other agencies that support the learner such as the local Multi

Agency Safeguarding Hub (MASH), Children's Social Care, Child, and Adolescent Mental Health Service (CAMHS), the Education Welfare Service, and local authorities.

e. Provides an environment that is safe, promotes equality, inclusion, self-confidence, a feeling of worth and the knowledge that learners' concerns are listened to and acted upon. This will be promoted through the Safe and Respectful Culture ethos.

ON-LINE SAFETY AND E-SAFETY

22. All staff should be aware that technology is a significant component in many safeguarding and wellbeing issues. Children are at risk of abuse online as well as face to face. In many cases
abuse will take place concurrently via online channels and in daily life. Children can also abuse their peers online, this can take the form of abusive, harassing, and misogynistic messages, the non-consensual sharing of indecent images, especially around chat groups, and the sharing of abusive images and pornography to those who do not want to receive such content. In all cases the online safety policy should be adhered to and if staff are unsure, they should always speak to the DSL or DSO.

WEARING OF ID BADGES

23. All staff will wear name badges within the training establishment and on workplace visits. During group sessions learners are also encouraged to use name cards. In the workplace for health and safety reasons this may not be required or possible. All staff are encouraged to challenge person not known to them whilst traversing through buildings and ensure they have been booked in and visitors passes issued.

LEARNERS STUDYING AT AN EMPLOYER'S PREMISES

24. Sheldrake Training will ensure safeguarding policies and procedures are in place and that both the employer and learner are provided with information about the DSL and DSO, including contact details – this will be carried out by regular governance and assurance checks conducted by the DSL/DSO whilst reporting to the Board of Directors quarterly. Learners will be provided with safeguarding information including how to report any concerns they have in relation to their workplace.

25. Where apprentices choose to live-in specific risk assessments must be carried out by the appropriate Sheldrake Training staff (Business Development Manager and/or Programme Manager), with regular monitoring and reviews conducted as outlined and directed at Annex F.

26. Safeguarding is a key theme in initial discussions when working with new employers. The Business Development Manager provides new employers with information relating to Safeguarding to ensure that they understand their responsibilities, and how to alert the Training Provider to any concerns they may have in relation to a learner's wellbeing.

27. Mentoring staff discuss safeguarding at each review with each learner and employer to ensure it remains a key theme. Employers are supported to ensure that they understand Safeguarding requirements within the context of their business, including the risks of radicalisation and the Prevent Duty. Where necessary, for example if a particularly vulnerable learner attends their workplace, additional measures may be taken, such as requiring a member of staff to undertake appropriate training or requiring DBS checks of staff

working in close contact with the learner where it takes place.

28. It is the responsibility of all staff to understand their role in supporting the safeguarding policy across all aspects of provision and for familiarising themselves with the appropriate procedures and other policies that support this overarching document.

IMPLEMENTATION & RESPONSIBILITY

29. Sheldrake Training has a DSL, supported by a DSO, who have the responsibility of ensuring that the Safeguarding Policy and Procedures, which are reviewed annually, are adopted by the company, and are fully implemented. The DSL and/or DSO will:

a. Ensure that all staff are aware of their individual responsibility for the protection of children and adults at risk in their care and that they are aware of the name, contact details and the role of the DSL and DSO.

b. Provide safeguarding training for all staff in child abuse awareness at induction and on a least a yearly rolling basis. This to include what to do if they are worried about a child or adult at risk and how to respond to a child or adult at risk who tells them about abuse.

c. Set up a good, accurate record-keeping system to monitor all learners about whom concerns have been expressed, whether these concerns lead to a child protection referral or not. These records will be held electronically in a secure drive, with access limited to the Sheldrake Training Safeguarding team.

d. Ensure that clearance is received from the Disclosure and Barring Service (DBS) service for all staff who may, in the course of their work, be alone with a learner.

e. With staff colleagues, develop effective links with other agencies, such as Social Services, Police and Health Services and contribute to inter-agency enquiries, child protection conferences, meetings and other related groups as appropriate.

f. Publish the responsibilities for safeguarding and the protection of children and adults at risk on the website.

g. Fulfil any special responsibilities or task required in the care of children on the child protection register.

h. Ensure that child protection type concerns or allegations that do not meet the harms threshold are reported, recorded, and dealt with appropriately. By encouraging an open and transparent culture it will enable staff to identify concerning, problematic or inappropriate behaviour early to minimise the risk of abuse and ensure that adults working in or on behalf of Sheldrake Training are clear about professional boundaries and act within these. These types of concerns are classed as ‘low-level’ concerns.

i. Ensure that where a member of staff has been dismissed or they cease to use the services of a teacher because of serious misconduct or might have dismissed them or ceased to use their services had they not left first, they must consider whether to refer the case to the Secretary of State (via the Teaching Regulation Agency).

j. Have a widely communicated Prevent procedure and Channel referral process in place.

k. Be trained and supported in the task of overseeing all child protection

matters and undertake regular bi-annual training.

Sheldrake Training's DSL is Lee Hunt and the DSO is Hayley Johnson. The DSL and DSO's contact details are at Annex B to this policy.

SUPPORTING LEARNERS

30. Sheldrake Training recognises the importance of high self-esteem and self-confidence in keeping learners safe. They seek to support those learners who may be especially vulnerable to abuse through sensitive monitoring, sharing of information and a contextualised approach to safeguarding and by ensuring that all learners have around them a network of people they can go to for help when necessary.

31. It recognises that young people can be at particular risk of being radicalised and drawn into extremism so as part of the Prevent Duty will:

a. Encourage respect and tolerance, building self-esteem through the curriculum and enrichment, whilst not condoning aggression or bullying.

b. Promote the embedding of British Values into teaching and learning.

c. Liaise and work together with all other support services and those agencies involved in the safeguarding of children and young people.

d. Use the Prevent procedure and the Channel process to identify and support any young person/adult at risk from being drawn into radicalisation or extremism.

CONFIDENTIALITY

32. Sheldrake Training recognises that all matters relating to child protection need to be handled
sensitively but confidentiality should not be promised. The DSL and/or DSO will disclose any information about a learner to other members of staff on a 'need to know' basis only. All staff must be aware that they have a professional responsibility to share information with the DSL or DSO so that other agencies can be informed to safeguard children, young people and adults at risk.

33. All staff must be aware that they cannot promise a young person to keep secrets which might compromise the young person's safety or wellbeing or that of others who may be at risk.

34. Sheldrake Training will always undertake to share its intention to refer a young person to Social Care with their parents/carers unless to do so could put the young person at greater risk of harm or impede a criminal investigation. If in doubt, we will consult with the relevant MASH team.

SUPPORTING STAFF

35. We recognise that staff working with Sheldrake Training who have become involved with a young person who has suffered harm, or appears to be likely to suffer harm, may find the situation stressful and upsetting. We will support such staff by providing an opportunity to talk through their anxieties with the DSL, DSO or HR and/or their immediate line manager, and to seek further support as appropriate. HR will also provide guidance and support through the staff handbook on how staff should keep themselves safe.

GUEST SPEAKERS / EXTERNAL EVENTS

37. On occasions guest speakers may be invited onto premises controlled by Sheldrake Training where learners may be engaged. Before any guest speaker is invited to engage with learners, the Sheldrake Training SMT are to be consulted to that Safeguarding and Prevent threats can be risk assessed. All external speakers are to be accompanied by at least one Sheldrake Training member of staff, especially when they are engaged with learners or in areas/locations where learners are present.

38. Where Sheldrake Training manage in-house events and/or hire premises, it is unlikely learners will be involved. The organisation's SMT will be required to afford due diligence on organisations/individuals using such hired premises, as well as consider managing access to staff and learners (where applicable). This must be in place to mitigate risks associated with Safeguarding and/or Prevent.

EQUALITY STATEMENT

39. It is intended that this policy is 'fair to all'. Where any part could potentially lead to unequal outcomes, the procedure then justifies why this is a proportionate means of achieving a legitimate aim.

POLICY REVIEW AND OWNERSHIP

40. This policy will be reviewed and amended as required, and at least every year by the DSL/DSO or appropriate substitute and submitted for final approval and adoption by the Senior Leadership Team and onto the relevant member of the Board of Directors where the policy will be endorsed by the Chair. This policy should be read in conjunction with Sheldrake Training health and safety procedure, as there is a specific process and checklist on health, safety and welfare to be followed for all live in apprentices (see Annex F to this policy).

Annexes:

A. Definitions and what do we mean by Regulated Activity, Abuse and Neglect?
B. Responding to an Allegation or Suspicion of Abuse.
C. Safeguarding Procedure For Learners - Flowchart.
D. Safeguarding Record Keeping.
E. Safeguarding Incident Form.
F. Live-in Apprentices – Process to check on Health, Safety and Welfare.

Version Control	
Policy Title:	Sheldrake Training Safeguarding Policy and Procedures
Version Number:	Ver 6
Originator:	N/A
Approved by:	Michelle Culshaw (outgoing DSO)
Date Approved:	9 May 2025 Minor changes due to restructuring of RACPD and Sheldrake link to H&S policy (live-in apprentices) plus minor changes to KCSIE 24 24 Nov 25 changes to DSO contact
Review Interval:	Annually (or where changes to regulations occur)
Review Date:	May 2026 (in line with probable changes to KCSIE)

DEFINITIONS

Child

1. For this Policy Statement a child means those under the age of eighteen (cease being child on their 18th Birthday) as defined by The Children Act 1989.

2. The new definition of what regulated activity relating to children comprises are those that include (for Sheldrake Training purposes):

a. Unsupervised activities: teach, train, instruct, care for or supervise children, or provide advice/guidance on well-being, or drive a vehicle only for children

b. Work under 2.1 is regulated activity only if done regularly.

What is 'regulated' activity?

3. For this policy the term Vulnerable Adult is no longer appropriate. The new definition of regulated activity relating to adults no longer labels adults as 'vulnerable'. Instead, the definition identifies the activities which, if any adult requires them, lead to that adult being considered vulnerable at that particular time. This means that the focus is on the activities required by the adult and not on the setting in which the activity is received, nor on the personal characteristics or circumstances of the adult receiving the activities. There is also no longer a requirement for a person to do the activities a certain number of times before they are engaging in regulated activity.

4. There are six categories of people who will fall within the new definition of regulated activity (and so will anyone who provides day to day management or supervision of those people). A broad outline of these categories is set out below. For more information please see the Safeguarding Vulnerable Groups Act 2006, as amended by the Protection of Freedoms Act 2012.

5. The Six categories are:

a. Providing health care.
b. Providing personal care.
c. Providing social work.
d. Assistance with cash, bills and/or shopping.
e. Assistance in the conduct of a person's own affairs.
f. Conveying.

6. Given the nature of training delivered by Sheldrake Training it is highly unlikely that training would be delivered to any adult who required any of the above categories. However, it recognises that they have a duty of care to all staff and learners and as such understand when delivery to adults would become a 'regulated activity'.

WHAT DO WE MEAN BY ABUSE AND NEGLECT?

7. Abuse is behaviour towards a person that either deliberately or unknowingly causes that person harm or endangers their life or their human or civil rights. It can be passive (such as failing to take action to care for someone or failing to raise the alarm about abuse) or active. Abuse can be:

a. Financial or material abuse – including theft, fraud, internet scamming, coercion in

relation to an adult's financial affairs or arrangements, including in connection with wills,

b. property, inheritance or financial transactions, or the misuse or misappropriation of property, possessions or benefits.

c. Physical abuse – including assault, hitting, slapping, pushing, misuse of medication, restraint or inappropriate physical sanctions.

d. Neglect and acts of omission – including ignoring medical, emotional or physical care needs, failure to provide access to appropriate health, care and support or educational services, the withholding of the necessities of life, such as medication, adequate nutrition and heating.

e. Sexual Violence and Sexual Harassment - This includes rape and sexual assault or sexual acts to which the young person has not consented, or could not consent to, or was pressured into consenting. Sexual abuse can occur between people of the same sex, and it can also occur within a marriage or any long-term relationship. A relationship of trust should exist between a member of staff or a volunteer and the person for whom they are caring, it would be seen as a betrayal of that trust, and therefore abusive, for that member of staff or volunteer to have a sexual relationship with the person they are caring for.

f. Psychological / Emotional abuse – including emotional abuse, threats of harm or abandonment, deprivation of contact, humiliation, blaming, controlling, intimidation, coercion, harassment, verbal abuse, cyber bullying, isolation or unreasonable and unjustified withdrawal of services or supportive networks.

g. Organisational abuse – including neglect or poor care practice within an organisation or specific care setting, such as a hospital or care home. It can also be in relation to care provided in your own home. This may range from one-off incidents to ongoing ill-treatment. It can be through neglect or poor professional practice as a result of the structure, policies, processes and practices within an organisation.

h. Discriminatory abuse – including forms of harassment, slurs or similar treatment because of race, gender and gender identity, age, disability, sexual orientation or religion.

i. Self-neglect – this covers a wide range of behaviour such as neglecting to care for your personal hygiene, health or surroundings and includes behaviour such as hoarding.

j. Domestic abuse – including psychological, physical, sexual, financial, emotional, or so-called 'honour' based violence.

k. Modern slavery – encompasses slavery, human trafficking, forced labour and domestic servitude. Trafficking and slave masters use whatever means they have at their disposal to coerce, deceive and force individuals into a life of abuse, servitude and inhumane treatment.

.

RESPONDING TO AN ALLEGATION OR SUSPICION OF ABUSE

1. Any suspicion, allegation or incident of abuse should be reported immediately and in any event within two hours to the DSL or DSO.

2. If the allegation is considered an emergency the DSL or DSO depending on the severity the Police. If not considered an emergency a report will be made through appropriate channel or if the allegation is involving Sheldrake Training Staff to the DSL or DSO.

3. The DSL or DSO must inform the nominated safeguarding contact for the employer or where appropriate, the college safeguarding DSL with which the learner is registered.

4. Where deemed appropriate and/or necessary, the DSL or DSO will notify the relevant authorities (LADO, MASH, Prevent Team etc) and make a formal referral if required. The DSL or DSO will produce a written report that should be submitted to the Chief Executive and Board of Directors safeguarding lead – extracts may be taken from the formal referral should that be deemed appropriate to the incident.

5. Outcomes of any possible Safeguarding incidents will be reported quarterly to the Board of Trustees

6. A written record (using Annex E) of the date and time of the report shall be made, and the report must include the name and position of the person to whom the matter is reported. The telephone report must be confirmed in writing within 24 hours. The confirmation may be handwritten, posted or faxed but, in any event, a copy of the letter must be kept on file.

7. Staff must not investigate concerns or allegations themselves but should report them immediately to the DSL or DSO.

8. Promises of confidentiality should not be given as the matter may develop in such a way that these cannot be honoured.

9. Questions should be kept to the minimum necessary to understand what is being alleged and leading questions should be avoided. Care must be taken in asking or interpreting responses to questions about indications of abuse. The same considerations apply when a person makes an accusation of abuse or volunteers' information which amounts to that. Staff should be aware that the way in which they talk to a complainant could influence the evidence, which is put forward if there are subsequent criminal proceedings. They should not ask the complainant leading questions as this can later be interpreted as putting ideas into their mind. They should, therefore, not ask questions which encourage the complainant to change his or her version of events in any way or impose the staff's own assumptions.

10. Individuals with Special Educational Needs (SEN) may be especially vulnerable to abuse. Extra care should be taken to interpret correctly apparent signs of abuse.

11. Contact details for the DSL and DSO are:

DSL: Lee Hunt – Leehunt@sheldraketraining.co.uk or 01980 845482.

DSO: Hayley Johnson – hayleyjohnson@sheldrake.co.uk or 01980 845789.

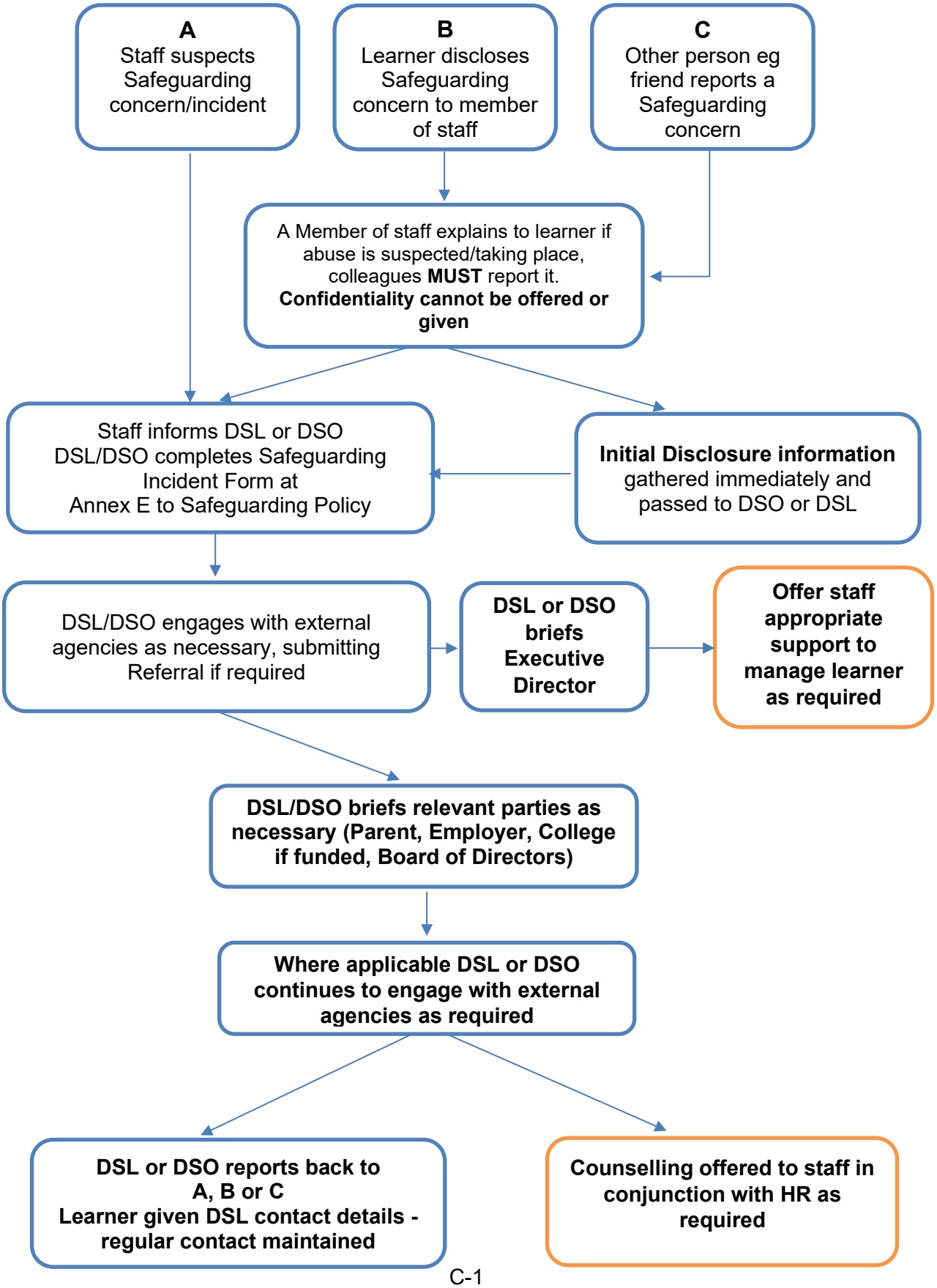
12. Agencies that can support the DSL or DSO with safeguarding incidents are included below:

Local Safeguarding Children's Board	http://www.wiltshirescb.org.uk/ Tel: 01225 718093
Disclosure and Barring Service	www.gov.uk/government/organisations/ Tel: 0870 90 90 811
Salam Katbi, Prevent Regional HE/FE Co-ordinator Southwest for the Department for Education (DfE)	email:salam.katbi@education.gov.uk Tel: 0782 4083307
Local Social Care Team	0300 456 0100

MASH Contacts for areas of delivery

Bristol	https://www.bristol.gov.uk/policies-plans-strategies/keeping-children-safe-group
East Midlands	https://www.nottinghamshire.gov.uk/care/childrens-social-care/nottinghamshire-children-and-families-alliance/pathway-to-provision/multi-agency-safeguarding-hub-mash
Hampshire	https://www.hants.gov.uk/socialcareandhealth/childrenandfamilies/safeguardingchildren/childprotection/mash
Shepton Mallet	https://sheptonmallet-tc.gov.uk/wp-content/uploads/2019/07/1907-Child-Protection-and-Safeguarding.pdf
Shropshire	https://www.safeguardingshropshireschildren.org.uk/
South & West	https://www.bristol.gov.uk/social-care-health/first-response-for-professionals-working-with-children https://sheptonmallet-tc.gov.uk/wp-content/uploads/2019/07/1907-Child-Protection-and-Safeguarding.pdf https://westsussex.local-offer.org/services/731
Warwick	https://directory.warwickshire.gov.uk/service/multi-agency-safeguarding-hub-mash
West Sussex	https://westsussex.local-offer.org/services/731
Wiltshire	https://www.wiltshire.gov.uk/children-young-people-protection
Worcestershire	https://www.worcestershire.gov.uk/safeguardingchildren

SAFEGUARDING PROCEDURE FOR LEARNERS – FLOWCHART



SAFEGUARDING RECORD KEEPING PRACTICE GUIDANCE

1. All records should be:

   a. **Timely**.

      Records should be made as soon as possible.

   b. **Accurate**.

      If mistakes in information have been recorded, they are unlikely to be questioned by a new worker. The inaccurate information will be perpetuated inadvertently. At times, information may be gathered in a stressful situation. However, every effort must be made to ensure accuracy. It may be advisable to check the information recorded at a later date.

   c. **Factual**.

      It is essential to record the nature and the source of the information.

      What is said and by whom.

         (1) What was observed and by whom.

         (2) Hearsay and third-party information must be clearly recorded as such.

   d. **Ethical**.

      All records should be non-judgmental and non-discriminatory. It may be a useful guide to record information with an assumption that the person you are writing about will read it.

2. The importance of good record keeping is essential for all agencies and not just Local Authorities. From a legal perspective, the Human Rights Act 1998, which came into effect 1st October 2000, brings into English law a distinct and different approach to thinking about rights, responsibilities, and remedies. Additionally, courts appear increasingly willing to hold Local Authorities, and individual practitioners, to legal account. In the light of this, it is important to keep detailed records.

3. Record keeping is an integral part of the professional practice and should assist the process. It is not separate from the process and not an optional extra to be fitted in if time and circumstances allow. Practitioners must be aware of the Human Rights articles and if they feel that they are possibly contravening any Human Rights article, they must refer to this in written records, including a justification. For more information regarding the Human Rights Act, refer to the *"Code of Practice"*.

PROCEDURE

4. Whenever a complaint or allegation of abuse is made all agencies should keep clear and accurate records and each agency should identify procedures for incorporating all relevant agency and vulnerable adult's records into a file to record all actions taken. In the case of providers of services these should be available to the commissioners of services and to the Care Quality Commission.

5. **When Should Information be recorded?**

a. Records must be kept from the time that a concern, allegation or disclosure is made.
b. Each entry must be dated and timed.
c. The name of the person recording the information must be written in full. Do not use initials.

6. **What to Record?**

a. All entries must provide factual information, for example, times, dates, names of people contacted.
b. Avoid expressions of opinion (remember that the person you are writing about may have the right to read what you have said).
c. All contact with the vulnerable person and alleged perpetrator must be recorded.
d. Record the exact words the vulnerable person and alleged perpetrator used.
e. Use body maps to illustrate any physical injuries.
f. All consultation with a Manager and/or Senior Manager must be recorded.
g. When contacting other agencies the questions asked and information received must be recorded.
h. If a decision is made not to contact the Police, the details of why this decision was made and on whose authority, it was made must be recorded.
i. All telephone calls, those received and made in relation to the abuse, must be recorded even if there was no reply to outgoing calls.
j. Those who attend Safeguarding Strategy Meetings must be named.
k. The decisions taken at all meetings must be recorded.
l. It is essential to demonstrate how an assessment of risk, responsibility, rights, autonomy and protection of the vulnerable adult was undertaken.
m. If no investigation is to take place, the reasons why and on whose authority this decision was taken must be recorded.

7. **How to Record Information**.

a. All records should be typed but if not possible, they must be written in black ink.
b. Any alteration to records must be made by drawing a single line through the word(s).
c. Correction fluid must not be used.
d. Other Documentation
e. Any rough notes made during the investigation must be kept with the record.
f. Minutes from Safeguarding Strategy Meetings must be kept with the record.
g. Minutes from the Case Conference must be kept with the record.
h. All Safeguarding plans and reviews must be kept with the record.

8. **Legal Requirements**. Records should not breach a person's legal rights. All agencies should identify arrangements, consistent with principles of fairness, for making records available to those affected by and subject to the investigation.

9. **Learner as Perpetrator**. If the alleged perpetrator is a learner, then information about his/her involvement in a safeguarding investigation, including the outcome of the investigation, should be included on his/her case records.

10. **Storing of Information**. All records must be stored in accordance with policies with regard to the Data Protection Act 1998.

11. **Standards of Recording**. Best practice in recording is based on key principles of partnership, openness and accuracy.

ANNEX E
TO SAFEGUARDING
POLICY & PROCEDURES
VER 6 - 1 January 26

SAFEGUARDING INCIDENT FORM (staff-in-confidence when complete)

Incident Serial Number:	

1	Your details: - The person completing the form		
Title:-	First Name:-		Surname:-
Date:	Time:		Appointment:
Telephone:		Email:	

2	Details of the person affected:		
Title:-	First Name:-		Surname:-
Telephone:		Email:	

3	Details of the incident (please describe in detail using only the facts, this should be an objective record of the observation or disclosure.

Please find some key points to consider:

- *The place where the alleged incident happened*
- *The nature of the alleged incident*
- *A description of any injuries observed*
- *The account which has been given of the allegation/incident*
- *The exact words spoken by the person*

4	The names of any other persons present		
Title:-	First Name:-		Surname:-
Telephone:		Email:	

5	Additional relevant information (please detail anything else that you believe to be helpful or important)

Signed by:

Sheldrake Training Staff: …… Date:

Apprentice: Date:

A separate sheet can be used but must be attached to this form and signed and dated.

Notes:

1. Learners with Special Educational Needs and disability (SEND) may be especially vulnerable to abuse. Extra care should be taken to interpret correctly apparent signs of abuse and neglect. Particular attention may have to be given to SEND learners with speech impediments as these can make communication difficult and those who are deaf and have difficulty in communicating orally or with adults.

2. Should a formal Referral to external agencies be required (LADO, MASH etc) the DSL or DSO will use the most up-to-date referral format directed by the external organisation, extracting information from this Safeguarding Incident Form as required.

ANNEX F
TO SAFEGUARDING
POLICY & PROCEDURES
VER 6 - 1 January 26

Live-in Apprentices – Process to check on Health, Safety and Welfare

Enrolment of apprentice:

- Complete Health and Safety Checklist by appropriate Sheldrake Training member of staff
- Sheldrake Training member of staff conduct a physical check of accommodation and facilities
- Sheldrake Training member of staff conduct a Risk Assessment of site

Month 3:

- Coach to check on welfare and wellbeing of apprentice – complete associated paperwork
- Physical check of accommodation and facilities by coach

Month 6:

- Coach to check on welfare and wellbeing of apprentice – complete associated paperwork
- Physical check of accommodation and facilities, formally reviewing initial Risk Assessment by Sheldrake Training member of staff

Month 9:

- Coach to check on welfare and wellbeing of apprentice – complete associated paperwork
- Physical check of accommodation and facilities by coach

Month 12/completion @ L2:

- Coach to check on welfare and wellbeing of apprentice – complete associated paperwork
- Future proofing – any learnings from live in apprentices experience
- Health and safety checklist (redo @ year point by Sheldrake Training member of staff if L3 learner)
- Formally review Risk Assessment of site (redo @ year point by Sheldrake Training member of staff if L3 learner).

Month 15:

- Coach to check on welfare and wellbeing of apprentice – complete associated paperwork
- Physical check of accommodation and facilities by coach

Month 18/completion @ L3:

- Coach to check on welfare and wellbeing of apprentice – complete associated paperwork
- Future proofing – any learning from live in apprentices' experience
- Formally review site for future use if required. Action by BDM or appropriate member of Sheldrake Training staff

Live-in Apprentice Wellbeing Checklist

Check @ initial	Check @ 3mths	Check @ 6mths	Check @ 9mths	Check @ 12mths	Check @ 15mths	Check @ 18mths

Date of Check:		**Observed ✓**
How is the accommodation? Are you comfortable? Is it clean and safe from hazards?		
Is it an ambient temperature? Is there any excessive damp?		
Is the space sufficient?		
How are the facilities? Does everything work well, or is it repaired quickly if faulty? Can you report faults? Who to?		
Does the employer undertake checks on your accommodation for hygiene and looking after your room?		
Do they warn you of their visit? Do you feel safe when they visit?		
Does the employer listen if you have any concerns about your accommodation or the colleagues you share your accommodation with? Would you know who to talk to if you had any concerns/not just employer?		
Do you have any concerns about people you share with?		
How are the relationships between you and the colleagues you share with?		
When did you last carry out a fire drill? Have you been told about emergency exits/procedures?		
How are you getting on with cooking and cleaning for yourself? Are you cooking yourself some nutritious meals?		
Are you managing your money?		
What have you learnt about looking after yourself?		
Are there any challenges? Are you still happy with your accommodation and living in?		

Additional Comments:
Actions arising (include by who & date required):

Completed by:

Sheldrake Training Staff: …… Date:

Apprentice: Date:

Employer: ……