

Safeguarding and Prevent Policy and Procedure (including Child Protection)

Intertrain UK LTD

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Document revision history

Version	Changed by	Summary of change	Approval date
01	Christina Chambers	New policy – Moved to ITT	26th November 2025
02	Nicola Clark	Amendments made to update document numbers and include National Contacts and Guidance details	12 th January 2026
03	Nicola Clark	Amendments made to update document with DSL contact details	25 th February 2026

1. Safeguarding Contact Details

If someone is in immediate danger and therefore an emergency occurs, calls to the Police on 999.

If you have a safeguarding/prevent concern, want to make a disclosure, or need advice on an immediate basis, contact:

Intertrain UK LTD - Designated Safeguarding Leads

- Nicola Clark, Safeguarding@intertrain.biz, 07535 727370
- John Sutton, Safeguarding@Intertrain.biz

In each centre we have posters that clearly provide support but also a means to report by using the QR code selecting safeguarding and complete the details requested and submit, which will then be sent to central Safeguarding Leads.

1. Purpose and Scope

This policy and procedure apply to all staff and learners within Intertrain UK LTD particularly those aged under 18 and/or vulnerable adults.

Intertrain UK LTD is committed to promoting the welfare of children and vulnerable adults as defined in the Children Acts of 1989 and 2004 and Safeguarding Vulnerable Groups Act 2006 and uphold its legal responsibilities as defined in the Education Act 2002. Furthermore, Intertrain UK LTD is committed to the statutory frameworks set out including Keeping Children Safe in Education 2021 and Working Together to Safeguard Children 2018.

Safeguarding is an integral part of all activities, functions, and culture within Intertrain UK LTD. We will go beyond implementing statutory protections and are committed to taking all reasonable measures to safeguard all employees and learners. The purpose of the guidance is to provide help and support to meet the needs of children as soon as problems emerge.

Relationship to other Policies This policy should be read in conjunction with the following policies:

- Prevent Duty • Equality & Diversity • Safer Recruitment & Induction • Bullying & Harassment
- Online Safety

2. Formal Definitions

Safeguarding is defined as the action that is taken to promote the welfare of children and vulnerable adults and protect them from harm.

In Keeping Children Safe in Education, safeguarding and promoting the welfare of children is defined as:

- Providing help and support to meet the needs of children as soon as problems emerge
- protecting children from maltreatment, whether that is within or outside the home, including online
- preventing impairment of children's mental and physical health or development
- ensuring that children grow up in circumstances consistent with the provision of safe and effective care.
- taking action to enable all children to have the best outcomes

Child Protection is a part of safeguarding and promoting welfare and refers to the activity that is undertaken to protect specific children who are suffering, or are likely to suffer, significant harm.

In this policy, a child is defined as anyone who has not yet reached their 18th birthday.

The Protection of Vulnerable Adults Scheme (PoVA 2004) defines a vulnerable adult as a person aged 18 or over who:

- has need for care or support.
- is experiencing, or at risk of, abuse or neglect.
- is unable to protect themselves against significant harm or exploitation.

3. Principals

Intertrain UK LTD recognises that although safeguarding legally applies to children and vulnerable adults it is appropriate to apply it to anyone at any level or age. For individuals (including children and vulnerable adults) who have been abused, or who are being subjected to abuse, our training centres may be the only stable and secure element in their lives – it is therefore essential that we do what we can to help our staff and learners feel safe. Our safeguarding policy and procedures are based on the following principles:

- an ethos that promotes a positive, supportive, and secure environment where everyone feels valued and can thrive.
- liaison with other agencies (such as social/children’s services) is essential.
- all allegations and suspicions of abuse or other concerns are taken seriously and responded to swiftly and appropriately.
- safeguarding related issues are sadly very widespread and we will have a culture of vigilance where risk is assessed and managed.
- commitment to ensuring that all learners on all programmes have the best opportunity to learn in an informed and appropriate environment.

There are five main elements:

- ensuring that we practice safer recruitment in checking the suitability of our staff, subcontractors, and volunteers by completing the relevant DBS checks.
- raising awareness of issues, including child protection amongst staff
- developing and implementing procedures for identifying and reporting cases or suspected cases of abuse
- supporting the individual
- establishing a safe environment in which individuals can learn, work, and develop, where they are able to talk and be listened to

To promote this, the Safeguarding Policy is displayed online and within each training centre. All staff, volunteers, contractors, and learners are issued with the most up to date policy and are updated on any changes to that policy.

4. Roles and Responsibilities

Employees

All employees have an important role to identify concerns early, provide help and prevent concerns from escalating. It is the responsibility of all staff members to provide a safe environment and to be aware of their duty to report concerns, the guidance for identifying child abuse and what to do if someone (particularly a child or a vulnerable adult) makes an allegation of abuse.

Training Solutions staff are trained to understand their responsibilities. Failure to comply with these responsibilities will be seen as a serious matter which may lead to disciplinary action. Staff are expected to:

- attend or complete safeguarding related training as required.
- familiarise themselves with the Safeguarding Policy, associated procedures and Part 1 of Keeping Children Safe in Education on an annual basis.
- safeguard and promote the welfare of children and vulnerable adults.
- report to the Designated Safeguarding Leads if they have concerns about a child or vulnerable adult.

Sub-Contractors

All sub-contractors are expected to be aware of our safeguarding policy, to cover Prevent ED&D and KSCSIE Pt 1, to ensure they compliant with all our processes.

Designated Safeguarding Leads

Designated Safeguarding Leads (DSL) play a critical role and are responsible for:

- Providing support, advice and expertise on safeguarding issues including risk analysis
- Dealing with allegations or suspicions of abuse
- Liaising with senior managers and those who are responsible for governance.
- Overseeing the referral of cases or allegations to the Local Authority, or other agencies (such as the police, Channel) as appropriate
- Obtaining information and maintaining records
- Ensuring that parents/carers are aware of the Safeguarding Policy
- Liaising with the relevant Local Authority departments, Prevent Coordinators, employers, signposting organisations, and other appropriate agencies.
- Ensuring that all staff receive training.
- Annual review of this policy
- Keeping up to date with developments in safeguarding/prevent issues including training.
- Reporting and monitoring statistics and trends
- Lead responsibility for filtering, monitoring and online safety.

Business Area	Designated Safeguarding Leads
Intertrain	Nicola Clark John Sutton

Governance Responsibility

Safeguarding is reported on to ensure strategic oversight. Senior Leadership Teams and Governors are responsible for ensuring that:

- Safeguarding policy and procedures are fully implemented and followed by staff.
- Designated Safeguarding Leads (DSL) have sufficient time and resources to carry out their roles.
- All staff feel able to raise concerns about the safety of children and vulnerable adults.
- Concerns are dealt with sensitively, effectively and in a timely manner.
- Actions related to Prevent are identified and monitored.
- Noting and challenging the Safeguarding reports

Additionally, safeguarding information is also reported to the Audit and Risk Committee and the Executive at C&G.

5. Forms of Abuse and Concerns

The Children Acts 1989 and 2004 define four types of abuse: physical, emotional, sexual and neglect. Other forms of abuse also exist, and they are described in more detail below.

Additionally, being subjected to harassment, violence and or abuse, including that of a sexual nature, may breach the Human Rights Act 1998.

Abuse: a form of maltreatment of a child. Somebody may abuse or neglect a child by inflicting harm or by failing to act to prevent harm. Harm can include ill treatment that is not physical as well as the

impact of witnessing ill treatment of others. This can be particularly relevant, for example, in relation to the impact on children of all forms of domestic abuse, including where they see, hear or experience its effects within or outside the home, including online. Children may be abused in a family or in an institutional or community setting by those known to them or, more rarely by others. Abuse can take place wholly online, or technology may be used to facilitate offline abuse.

5.1 Physical Abuse

Physical abuse may take many forms e.g., hitting, shaking, throwing, poisoning, burning, or scalding, drowning, or suffocating or otherwise causing physical harm. It may also be caused when a parent or carer feigns the symptoms of, or deliberately causes, ill health to a child or vulnerable adult. This unusual and potentially dangerous form of abuse is now described as fabricated or induced illness.

Possible signs of physical abuse include:

- Unexplained injuries or burns, particularly if they are recurrent
- Refusal to discuss injuries
- Improbable explanations for injuries
- Untreated injuries or lingering illness not attended to
- Admission of punishment which appears excessive
- Shrinking from physical contact
- Fear of returning home or of parents being contacted.
- Fear of Undressing
- Fear of medical help
- Aggression/bullying
- Over compliant behaviour or a 'watchful' attitude
- Running away
- Significant change in behaviour without explanation
- Deterioration of work
- Unexplained pattern of absence which may service to hide bruises or other physical injuries.

5.2 Emotional Abuse

Emotional abuse is persistent emotional ill treatment causing severe and persistent effects and may involve:

- conveying the message that they are worthless or unloved, inadequate, or valued only in so far as they meet the needs of another person.
- imposing developmentally inappropriate expectations
- causing the child/person to feel frightened or in danger – e.g., witnessing domestic violence.
- exploitation or corruption of children or vulnerable adults
- not giving the person, the opportunity to express their views, deliberately silencing them or 'making fun' of what they say or how they communicate.

Some level of emotional abuse is involved in most types of ill treatment, although emotional abuse may occur alone

Possible signs of emotional abuse include:

- Continual self-deprecation
- Fear of new situations
- Inappropriate emotional responses to painful situations
- Self-harm or mutilation
- Compulsive stealing/scrounging
- Drug/solvent abuse
- 'Neurotic' behaviour – obsessive rocking, thumb-sucking, and so on
- Air of detachment – 'don't care' attitude
- Social isolation – does not join in and has few friends
- Desperate attention-seeking behaviour
- Eating problems, including overeating and lack of appetite
- Depression, withdrawal

5.3 Sexual Abuse

Sexual abuse involves forcing or enticing a child or vulnerable adult to take part in sexual activities, whether or not they are aware of what is happening and includes penetrative and non-penetrative acts. It may also include non-contact activities, such as looking at, or being involved in the production of pornographic materials, watching sexual activities, up skirting, suggestive remarks, and innuendos, or encouraging children or vulnerable adults to behave in sexually inappropriate ways or grooming a child in preparation for abuse. It also includes other contact activities such as groping, inappropriate touching, and other forms of non-consensual contact.

Sexual abuse can take place online and technology can be used to facilitate offline abuse.

Possible signs of sexual abuse include:

- Bruises, scratches, burns or bite marks on the body
- Scratches, abrasions, or persistent infections in the anal or genital regions
- Sexual awareness inappropriate to the person's age – shown, for example, in drawings, vocabulary, games and so on
- Public masturbation
- Attempts to teach others about sexual activity
- Refusing to stay with certain people or to go to certain places
- Aggressiveness, anger, anxiety, tearfulness
- Withdrawal from friends
- Promiscuity, prostitution, provocative sexual behaviour
- Self-injury, self-destructive behaviour, suicide attempts
- Pregnancy – particularly in the case of young adolescents who are evasive concerning the identity of the father.
- Recoiling from physical contact
- Eating disorders
- Tiredness, lethargy, listlessness
- Over-compliant behaviour
- Genital discharge/irritation
- Sleep disturbance
- Unexplained gifts of money
- Depression
- Changes in behaviour

5.4 Neglect

Neglect involves the persistent failure to meet basic physical and/or psychological needs, likely to result in serious impairment of the child or vulnerable adult's health and development. This may involve failure to provide adequate food, shelter or clothing, failure to protect from physical harm or danger or failure to ensure access to appropriate medical care or treatment. It may also include neglect of basic emotional needs.

Possible signs of neglect include:

- Constant hunger
- Poor personal hygiene
- Inappropriate clothing
- Frequent lateness or non-attendance at college
- Untreated medical problems
- Low self-esteem
- Poor social relationships
- Compulsive stealing or scrounging
- Constant tiredness

5.5 Child on Child Abuse

Children can abuse other children, often referred to as child on child (previously peer on peer abuse). This can be inside or outside of education and or online. We will endeavour to support victims, perpetrators and any other children involved. We also recognise that even if there are no known cases, this may be a case of abuse not being reported.

Intertrain UK LTD maintains a zero-tolerance approach to any form of bullying or child-on-child abuse, whether online and/or in person, including sexual harassment and violence, racist, sexist, and homophobic (or any other trans-related/gender phobias **LGBT**) behaviour and abuse.

Low-level disruption and the use of offensive language can have a significant impact including reluctance to report behaviour. This behaviour will be challenged and should not be dismissed as banter or horseplay.

Child-on-child abuse may include, but is not limited to:

- bullying (including cyberbullying, prejudice-based and discriminatory bullying)
- abuse in intimate personal relationships between peers.
- physical abuse such as hitting, kicking, shaking, biting, hair pulling, or otherwise causing physical harm this may include an online element which facilitates, threatens and/or encourages physical abuse.
- sexual violence, such as rape, assault by penetration and sexual assault may include an online element which facilitates, threatens and/or encourages sexual violence.
- sexual harassment, such as sexual comments, remarks, jokes, and online sexual harassment, which may be stand alone or part of a wider pattern of abuse.
- causing someone to engage in sexual activity without consent, such as forcing someone to strip, touch themselves sexually, or to engage in sexual activity with a third party.
- **consensual and non-consensual** sharing of nude or semi-nude images and/or videos. Consensual image sharing, especially between older children of the same age, may require a different response. It might not be abusive – but children still need to know it is illegal, whilst non-consensual is illegal and abusive. UKCIS provides detailed advice about sharing of nudes and semi-nude images and videos
- up skirting, which typically involves taking a picture under a person's clothing without their permission, with the intention of viewing their genitals or buttocks to obtain sexual gratification, or cause the victim humiliation, distress, or alarm.

- initiation/hazing type violence and rituals (this could include activities involving harassment, abuse or humiliation used as a way of initiating a person into a group and may also include online)

5.6 Domestic Abuse

Domestic abuse can encompass a wide range of behaviours and may be a single incident or a pattern of incidents. That abuse can be, but is not limited to, psychological, physical, sexual, financial, or emotional. Children can be victims of domestic abuse. They may see, hear, or experience the effects of abuse at home and/or suffer domestic abuse in their own intimate relationships (teenage relationship abuse). All of which can have a detrimental and long-term impact on their health, well-being, development, and ability to learn.

5.7 Children who are absent or missing from education.

Employees should be aware that children going missing, particularly repeatedly, could be an early warning sign of a range of safeguarding possibilities. This may include abuse and neglect, sexual abuse, or exploitation. There could be indicators of criminal exploitation including involvement in county lines.

It could also be an indication of mental health problems, risk of substance abuse, risk of travelling to conflict zones, risk of female genital mutilation, 'honour' –based abuse or of forced marriage. Early intervention is key, and staff should report any absences or prolonged periods of absence to the DSL to prevent risks of children going missing in the future. Staff should be clear about the reporting of unauthorised absences or when a learner has not reported an absence on the day of training.

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

Both CSE and CCE are forms of abuse and both occur where an individual or group takes advantage of an imbalance in power to coerce, manipulate or deceive a child into sexual or criminal activity. This power imbalance may be due to a range of factors including age, gender, sexual identity, cognitive ability, physical strength, status and access to economic or other resources.

In some cases, the abuse will be in exchange for something the victim needs or wants and/or will be to the financial benefit or other advantage (such as increased status) of the perpetrator or facilitator. The abuse can be perpetrated by individuals or groups, males or females and children or adults. The abuse can be a one-off occurrence or a series of incidents over time and range from opportunistic to complex organised abuse.

It can involve force and/or enticement-based methods of compliance and may or may not be accompanied by violence or threats of violence. Victims can be exploited even when activity appears consensual, and it should be noted exploitation as well as being physical can be facilitated and/or take place online.

5.9 Serious Violence

All staff should be aware of indicators which may signal that child/person is at risk from or are involved with serious violent crime. These indicators may include increased absence from education or their workplace, a change in friendships or relationships e.g., with older individuals or groups, a significant decline in performance, signs of self-harm or a significant change in wellbeing, or signs of assault or unexplained injuries.

Criminal exploitation of children or vulnerable adults is a geographically widespread form of harm that is a typical feature of county lines criminal activity, drug networks or gangs groom and exploit children and vulnerable adults to carry drugs and money from urban areas to suburban and rural areas, market, and seaside towns.

5.10 Honour-based Violence/Child Marriage

Honour-based violence includes incidents or crimes which have been committed to protect or defend the honour of the family and/or the community including female genital mutilation (FGM)

and forced marriage. Abuse committed in these honour-based contexts often involves a wider network of family or members of the community.

It is a crime to carry out any conduct whose purpose is to cause a child to marry before their 18th birthday, even if violence, threats or any other form of coercion are not used. As with existing forced marriage law, this applies to non-binding, unofficial marriages as well as legal marriages.

5.11 Female Genital Mutilation (FGM)

The Female Genital Mutilation Act 2003 sets out specific statutory duty on all staff members to report an act of FGM if they discover that such an act appears to have been carried out on a girl under the age of 18 to the police. FGM is illegal in the UK and is a form of child abuse with long-lasting harmful consequences.

5.12 Harassment

Harassment (as defined by Section 26 of the Equality Act 2010) includes unwanted behaviour or conduct which has the purpose or effect of violating a person's dignity or creating an intimidating, hostile, degrading, humiliating or offensive environment because of, or connected to, one or more of the following protected characteristics:

- Age
- Disability
- Gender reassignment
- Marriage and Civil Partnerships
- Pregnancy and Maternity
- Race
- Religion or belief
- Sex
- Sexual orientation

Under our definition, harassment included domestic violence and abuse (which can also involve control, coercion, and threats) and stalking.

We would also consider harassment to include any incidents of physical violence towards another person(s) on the basis of a protected characteristic, and hate crimes, such as those criminal offences which are perceived by the victim or any other person, to be motivated by hostility or prejudice, based on a person's disability or perceived disability; race or perceived race; or religion or perceived religion; sexual orientation or perceived sexual orientation or transgender identity or perceived transgender identity.

5.13 Sexual Misconduct

Sexual misconduct relates to all unwanted conduct of a sexual nature. This includes but is not limited to:

- Sexual harassment
- Unwanted conduct which creates an intimidating, hostile, degrading, humiliating or offensive environment
- Assault
- Rape
- Physical unwanted sexual offences
- Intimidation, or promising resources or benefits in return for sexual favours
- Distributing private and personal explicit images or video footage of an individual without their consent

These definitions include harassment and sexual misconduct through any medium, including for example, online.

5.14 Mental Health

Mental health problems can, in some cases, be an indicator that a child has suffered or is at risk of suffering abuse, neglect or exploitation. Additionally, where children have suffered abuse and

neglect or other potentially traumatic childhood experiences, this can have a lasting impact throughout childhood, adolescence and into adulthood.

5.15 Radicalisation

There is no single way of identifying an individual who is susceptible to an extremist ideology. However, research has shown that children and vulnerable adults are more likely to be susceptible. In respect of safeguarding individuals from radicalisation and preventing children and susceptible adults from being drawn into terrorism, we are subject to the Prevent Duty under section 26 of the Counter Terrorism and Security Act 2015.

Extremism

Extremism is the vocal or active opposition to fundamental values, including democracy, rule of law, individual liberty and the mutual respect and tolerance of different faiths and beliefs. Everyone has the right to have different views, but if these views are hateful, dangerous or against the law they may be extremist. Extremism comes in many forms e.g., religious, environment or political.

Radicalisation

Radicalisation refers to the process by which a person comes to support terrorism and extremist ideologies associated with terrorist groups. This is the process where people support extreme views. People who are lonely, depressed, angry, isolated can be at higher risk of radicalisation.

Prevent cases often have 'push' factors – things that make the person look for new groups or situations – and 'pull' factors – things that attract them to the ideology or set of beliefs.

Push factors might include:

- gaps in knowledge or understanding of national/international affairs.
- a sense of injustice/disaffection
- victim or witness to discrimination, racism, bullying and/or humiliation.
- exclusion or lack of belonging
- gaps in knowledge or understanding of faith and belief.
- conflict with family or friends
- lack of purpose or sense of achievement
- traumatic events, which could be personal, national, or global.

Pull factors might include:

- influential individuals or peer groups
- networks and groups
- extreme community views
- social media and networking and/or persuasive messages.

The common threads are gaps in knowledge and understanding. Therefore, teaching learners to question and evaluate information is so important.

Where deemed appropriate we will seek external support e.g., through referrals to the Channel Programme. This programme aims to work with the individual to address their specific susceptibilities, prevent them becoming further 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.

A Prevent Risk Assessment/Action Plan for each business is in place.

If you believe you or someone you know are at risk or vulnerable to extremist ideology or radicalisation, contact the Safeguarding Team who will liaise with the Police's Prevent Team.

Possible signs of radicalisation include:

- The individual's views become increasingly extreme regarding another section of society or government policy.
- The individual becomes increasingly intolerant of more moderate views
- The individual expresses a desire/intent to take part in or support extremist activity.
- They are observed downloading, viewing, or sharing extremist propaganda from the web.
- They become withdrawn and focused on one ideology
- 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.

5.16 Financial/Economic Abuse

Financial abuse is often part of wider economic abuse, can be a form of domestic abuse and is often a way of having power over an individual. It involves someone else controlling spending or access to cash, assets, and finances. This can leave an individual feeling isolated, lacking in confidence and trapped.

Sometimes (but not always) financial abuse will be recognised by the police as coercive or controlling behaviour, which is also a criminal offence. You do not have to be living with the person for the coercive or controlling behaviour offence to apply. Financial abuse can continue, or even start, after separation for example.

Financial abuse can take different forms and can happen to anyone of any age. Abusers can be partners, ex-partners, family members or others, such as carers.

Economic abuse can include:

- stopping an individual from going to work, college or university,
- causing an individual to lose out on benefits by not letting them go to appointments at the Jobcentre or apply for jobs, and
- controlling your access to essential things, such as food, clothing or transport.

Possible signs of financial abuse include:

- Loss of jewellery and personal property
- A bill not being paid when money is entrusted to a third party
- Lack of money to purchase basic items
- Misuse of benefits
- Inadequate clothing
- Theft of property

- | | |
|--|--|
| <ul style="list-style-type: none"> • Unexplained withdrawal of cash | <ul style="list-style-type: none"> • Over protection of money or property • Loss of money from a wallet or purse |
|--|--|

5.17 Modern Slavery

Modern slavery is a serious crime. Victims can be exploited, controlled, or held captive, threatened, or punished to stop them escaping or reporting the crime. Anyone can be a target for modern slavery. But some people can be at more risk because of money, social or health issues, or because of their age or immigration status.

Threats and punishments can often be violent, but not always. They can include threatening to tell the authorities about the victim's immigration status to get them deported from the country.

Modern slavery includes human trafficking. This is when victims are taken between countries or around a country so they can be exploited.

5.18 Special education needs, disabilities, or health issues

Children or adults with special educational needs or disabilities (SEND) or certain medical or physical health conditions can face additional safeguarding challenges both online and offline. Additional barriers can exist when recognising abuse and neglect. These can include:

- assumptions that indicators of possible abuse such as behaviour, mood and injury relate to the condition without further exploration.
- being more prone to peer group isolation or bullying (including prejudice-based bullying) than other children
- the potentially being disproportionately impacted by behaviours such as bullying, without outwardly showing any signs.
- communication barriers and difficulties in managing or reporting these challenges.
- cognitive understanding e.g., being unable to understand the difference between fact and fiction.

Any reports of abuse will therefore require close liaison with safeguarding staff. We will also offer extra pastoral support and ensure any appropriate support for communication is in place.

5.19 Bullying and Harassment

Bullying is behaviour by an individual or group, repeated over time, that intentionally hurts another individual or group either physically or emotionally. Bullying can take many forms (for instance, cyber-bullying via text messages, social media or gaming, which can include the use of images and video) and is often motivated by prejudice against particular groups, for example on grounds of race, religion, gender, sexual orientation, special educational needs or disabilities, adoption status, being in care or has caring responsibilities. It might be motivated by actual differences, or perceived differences.

Intertrain UK LTD maintains a zero-tolerance approach to any form of bullying, whether online and/or in person, including sexual harassment and violence, racist, sexist, and homophobic (or any other trans-related phobias) behaviour and abuse.

Low-level disruption and the use of offensive language can have a significant impact. This behaviour will be challenged and should not be dismissed as banter or horseplay, and it can also lead to reluctance to report other behaviour. Early intervention can help to set clear expectations of the behaviour that is and isn't acceptable and help stop negative behaviours escalating.

Learners and staff are encouraged to report any concerns or issues, however small, to a member of staff/ or the Safeguarding Team so that appropriate and timely action can be taken, and relevant support offered. The Safeguarding Team will always be informed of concerns raised.

5.20 Adverse Childhood Experiences

Adverse Childhood Experiences (ACEs) are traumatic events that affect children while growing up, such as suffering child maltreatment or living in a household affected by domestic violence, substance misuse or mental illness. Traumatic events could include:

- death of loved ones
- abusive environments
- violence in the home or community
- suffering abuse, harm, or neglect
- homelessness and threat of homelessness
- substance/alcohol misuse
- abandonment/estrangement within families
- living with gambling and gaming addiction.

Experiences like these can lead to increased vulnerability and a range of behaviours and mental health issues, including depression, anxiety, low self-esteem, anger, eating disorders and self-harm.

6. Duty to Report

Everyone has a duty to report, including members of staff, contractors, and volunteers. We are all responsible for safeguarding/prevent, promoting the welfare of children and vulnerable adults and to be alert to signs of abuse.

If someone (including children or vulnerable adults) discloses to any staff member that they (or indeed another child or vulnerable adult) have been, or are being abused/radicalised or have any concerns they must do the following:

DO

- **Do** make sure that the person is safe and consider whether there is an imminent risk of harm or criminal activity.
- **Do** listen very carefully and calmly to what they tell you.
- **Do** take what is said seriously and accept what you are told.
- **Do** stay calm and talk reassuringly to the child or vulnerable adult that they have done the right thing in talking to you.
- **Do** guarantee confidentiality, but NOT secrecy.
- **Do** tell them that you must pass this information on but that only those that need to know will be told. Tell them to whom you will report the matter.
- **Do** tell them that with their consent they can get help and support.
- **Do** write down accurately using the person's own words.

DO NOT

- **Do not** panic.
- **Do not** promise to keep things secret. You have a duty to refer a child or vulnerable adult who is at risk.
- **Do not** lie or say that everything will be fine now that they have told.
- **Do not** criticise the abuser, especially if it is a parent/carer.
- **Do not** ask lots of detailed or leading questions such as: 'What did he/she do next?' Instead, ask open questions such as: 'Anything else to tell me? 'Yes', or 'And...?'
- **Do not** press for answers the student is unwilling to give.

For immediate concerns all staff are expected to contact the Designated Safeguarding Team in the business areas. Please see the front cover or the businesses addendum at the back of this policy to get contact information.

In all causes for concern, it is very important to record, as accurately as possible, what was said to you when you received the disclosure of abuse or what are the causes for concern. All written records should be handled confidentially, and information recorded clearly. **The Safeguarding Referral Form MUST be used in all cases.**

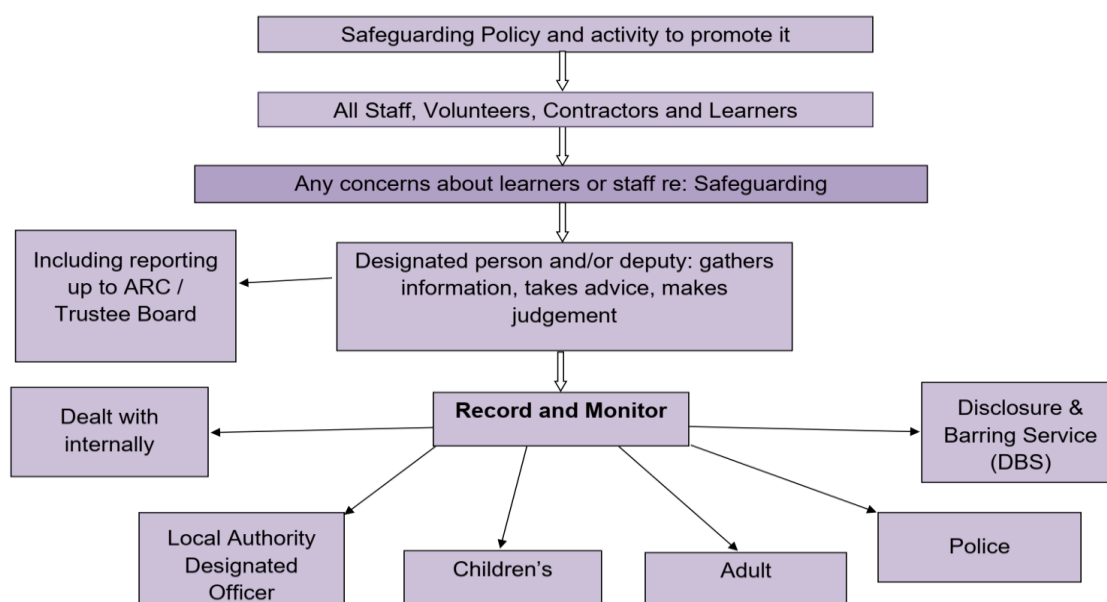
This should be completed immediately or in non-urgent cases, the earliest opportunity within the day and sent to the safeguarding team. The safeguarding team will then determine next steps and will also take appropriate steps to ensure the safety of the learner, and any others who may be at risk.

If a child or vulnerable adult discloses to you that they or another child or vulnerable adult have been abused/radicalised, or if you suspect from what you observe that they are being abused, you **MUST REPORT THIS**. It is important to note that some children may not feel ready or know how to tell someone they are being abused. Initial disclosures may come from nonverbal communication for example. In some cases, the victim may not make a direct report, a friend may make a report, or a member staff may overhear a conversation that suggests a child has been harmed or a child's own behaviour might indicate that something is wrong.

It is important that the person to whom disclosure is made does not investigate or question the person concerned except to clarify what they have heard. This is particularly important in cases of sexual abuse.

Staff should never give absolute guarantees of confidentiality to children and vulnerable adults wishing to tell them about something serious. They should however guarantee that they will only pass on information to the minimum number of people who must be told to ensure that the proper action is taken to protect the child/vulnerable adult.

All records should be kept securely. The reporting of any concerns will be recorded on a tracker. This will be monitored by the Safeguarding Team. Cases will be closed after discussion with the safeguarding team.



7. Allegations Against Staff and Contractors

Allegations of abuse, or concerns raised against members of staff or contractors, will always be treated seriously. The allegation must always be referred to one of the Designated Safeguarding Leads who will follow the Safeguarding Procedure in the same way as for other safeguarding allegations (see Duty to Report above).

The Designated Safeguarding Leads will take the appropriate steps to ensure the safety of the child or vulnerable adult, or any others who may be at risk. The Designated Safeguarding Leads will also inform the relevant Line Manager in order that procedures may be followed, and a Disciplinary Investigation may be carried out.

If the allegation or concern is against one of the Designated Safeguarding Leads, it should be reported to the Managing Director of the business. Where there are concerns or allegations about the Managing Director, these should be referred to the Managing Director for Employer Solutions at City & Guilds.

Where there is a complaint against a member of staff there may also be criminal (police) investigations and/or a child/vulnerable adult protection investigation, carried out by Social Services.

Employers of supply staff or contractors will be informed if any concerns (low level or otherwise) are raised.

The Local Authority Designated Officer (LADO) is likely to be consulted, and the DBS may be informed.

8. External Speakers & Events

A risk assessment should be undertaken by the relevant manager prior to hosting an external speaker or open event. The risk assessment should consider whether the views expressed or likely to be expressed would constitute inappropriate or extremist views and materials that could draw people into terrorism. In these cases, the event must not be allowed to go ahead and should be cancelled. Any formal risk assessment would clearly identify what mitigating actions are required. External speakers must be escorted by a staff member during the entirety of their visit to our centers. They may also be required to provide a reference/Disclosure and Barring Service (DBS) certificate upon request. Any safeguarding concerns should be addressed in accordance with this procedure and advice sought from the relevant Designated Safeguarding Lead.

9. Distribution & Publication of Extremist Materials

Staff, contractors, volunteers, and learners must not promote or distribute extremist literature or other media materials likely to incite radicalisation, racial or religious hatred or acts of violence. Staff, contractors, and learners must not distribute or publicise or use any platform to share or display materials that may cause discrimination or stress to others, offensive, indecent or obscene material.

The distribution and publication of images or videos that contain material relating to radicalisation and extremism themes or are of an offensive, indecent, or obscene nature is prohibited.

10. First Aid Arrangements

First Aid is the immediate care given to a person who has been injured, or who has become ill prior to the arrival of qualified medical assistance. The most important role of a first aider is to ensure that the aims of first aid are put into practice in an emergency. A DBS is carried out for all First Aiders.

It is vital to have consent from the patient before providing first aid. The first aider must introduce themselves, tell the patient they are first aiders and ask if they can help them. It is important for

first aiders to maintain communication with a patient while providing first aid. This should involve informing the patient what the first aider is going to do, why they need to do it and asking if it is okay for them to do it. If a first aider needs to make physical contact with a patient, then the first aider must tell them what they need to do and why and ask them if it is okay to do so. Consent is a continual process and therefore this communication must be continually maintained while providing first aid treatment.

Consent can be implied, for example where a patient is unconscious, a first aider must still introduce themselves and ask for the patient's permission to help them. If the patient cannot reply it is assumed that they would want a first aider to help. However, the first aider must still ask to rely on implied consent. If the patient becomes conscious, the first aider must ask them again for permission to help.

If a patient cannot respond verbally, for example if they are choking and cannot speak, they could nod to confirm their consent, or if the patient stretches out their hand this may also be deemed to be consenting.

11. Health & Safety Vetting

Each C&G Training business should take reasonable steps to ensure the health and safety of all in accordance with the Health and Safety Policy. The employer has the primary responsibility for the health and safety of the apprentices and should be managing any significant risks.

12. Online/Digital Safety and Remote Learning

Digital safeguarding is about educating and empowering children, young people and adults about the risks and issues of technology and the online world, while having good processes and procedures in place to manage and mitigate risk. Please see the Online Safety E-Safety Policy

In remote learning environments:

- sessions could be hacked or 'zoom bombed' – in other words, a person or a group of people could hack into a remote learning session and share illicit content or abuse participants.
- learners could be bullied or groomed via the chat function and/or video calls.
- explicit or inappropriate content could be shared.
- a member of staff could notice that a learner is at risk (e.g., they are drunk, or there is a domestic incident in the background).

In addition to these online risks, remote learning may make it more difficult to assess 'offline' risks, as you are not able to see learners in person.

Staff, learners, Employers and contractors are required to adhere to the businesses policies and procedures relating to online safety. The relevant IT training is given to staff and learners during their induction program.

It is the responsibility of all staff and learners to report any abuse of the email or electronic communication systems which they become aware of. Any individual found to have failed to report abuse may result in subsequent disciplinary action.

The 2025 guidance adds **disinformation**, **misinformation** and **conspiracy theories** to the list of content risks under online safety. **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

A Filtering and Monitoring Audit takes place annually. The outcomes of the audit are recorded on an action plan/risk assessment. KCSIE 2025 includes a link to the DfE guidance **Generative AI: product safety expectations**. This guidance on generative artificial intelligence (AI) explains how

filtering and monitoring requirements apply to the use of generative AI in education and supports schools to use generative AI safely.

13. Data Protection

The Data Protection Act 2018 and General Data Protection Regulations (GDPR) do not prevent or limit the sharing of information for the purposes of keeping children and vulnerable adults safe. Concerns or fears about sharing information must not stand in the way of the need to promote welfare and protect the safety of children and vulnerable adults.

14. Safe Recruitment of Staff

Intertrain UK LTD undertakes Safer Recruitment procedures to ensure staff are fit to work in our learning environments with children and vulnerable adults. We also reserve the right to deny employment to individuals where they are deemed not suitable to work with children or vulnerable adults. Further information for each business is available in the appendices.

15. Disclosure and Barring Service

Intertrain UK LTD undertakes DBS checks to ensure staff are fit to work in our learning environments with children and vulnerable adults.

Employers can check the criminal record of someone applying for a role. This is known as getting a Disclosure and Barring Service (DBS) check. The Disclosure and Barring Service helps employers make safer recruitment decisions each year by processing and issuing DBS checks for England, Wales, the Channel Islands, and the Isle of Man. There is a mandatory requirement for contractors who engage in regulated activity to complete a DBS check.

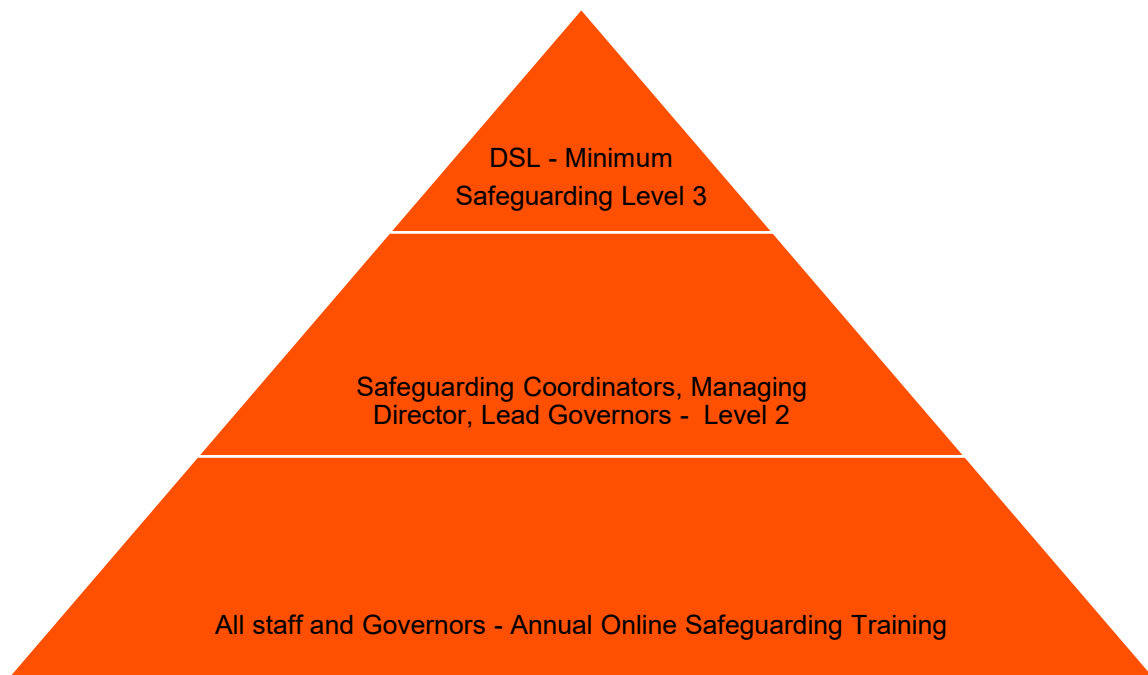
DBS also maintains the adults' and children's Barred Lists and makes considered decisions as to whether an individual should be included on one or both lists and barred from engaging in regulated activity. When the DBS has completed its check, a DBS certificate will be sent to the applicant.

16. Staff Training and Development

Intertrain UK LTD ensures that staff are fit to work in our learning environments including, if necessary, with children and vulnerable adults. All staff are expected to complete safeguarding and prevent training on appointment and on an annual basis (including contractors). In cases of non-compliance, details will be escalated to the SLT member responsible for that area. If non-compliance continues, then the matter will be raised with HR where the employee can face disciplinary action and/or removal from teaching.

All staff to adhere to the staff code of conduct policy.

Below is a diagram which shows the minimum level of training expected.



17. Staff Resignations

If, during an investigation relating to safeguarding, an employee tenders their resignation, or ceases to provide their services, we are not prevented from following up an allegation in accordance with these procedures. Every effort will be made to reach a conclusion in cases relating to the welfare of children or vulnerable adults, including those where the person concerned refuses to co-operate with the process.

18. Support for Staff

Intertrain UK LTD is aware that safeguarding cases can be distressing and that staff who have been involved may find it helpful to talk about their experiences, in confidence, with our Designated Safeguarding Officers or via other support in place. Specific arrangements for each business are identified in each of the separate arrangements.

19. Equality & Diversity

All individuals have the right to be safeguarded from harm and exploitation whatever their protected characteristic e.g., race, religion or belief, gender reassignment, sex, age, sexual orientation, marriage/civil partnership status, pregnancy/maternity status or disability.

We will not discriminate against learners because of their protected characteristics and endeavour to support learners as appropriate, this includes support for LGBTQ+ related issues.

Any EDI related issues will be monitored and if necessary, action, including positive action may be required.

20. Visibility

All staff, learners, contractors, and visitors are required to sign in upon arrival and must wear an identity badge / visitor's pass. ID badges will be issued to staff at the start of their employment and learners will be issued with a badge during their induction programme. Any staff member or learner who are not wearing an ID badge should be challenged and requested to either retrieve their badge immediately or report directly to be issued with a replacement badge.

All internal teaching staff wear a uniform; support staff do not.

All staff are advised to maintain appropriate boundaries, even more so on a one-to-one basis. Where possible staff should always work with learners in view of other learners or staff.

21. Learners

We reserve the right to refuse to admit learners to safeguard other learners and staff. For example, where a current criminal conviction is disclosed a risk assessment will be undertaken.

There may be cases where some learning groups are of mixed ages, including under 18's with over 18's. This is all part of our ethos of learning for all. Tutors are aware of the potential for mixed age classes and mitigate any risks by carrying out the following:

- Tutor supervision
- Adhere to the learner code of conduct
- Setting out classroom expectations that encourage respect for all.
- Be mindful of differences in levels of maturity between learners and encourage open and honest conversations if any learner feels uncomfortable.
- Ensure all learners are aware of and can access support.
- Tutors can seek advice and support from these services if they feel dynamics in the class are less than harmonious.
- Tutors to report any concerns re: safeguarding immediately.

22. Whistleblowing

Intertrain's learner whistleblowing policy can be found on Employee shared drive/policies.

23. Quality Assurance Monitoring Procedure

Monitoring of this procedure will be captured through statistical reporting of incidents, lessons learned and updated guidance or best practise as required.

Execution

Signed by: **Christina Chambers**

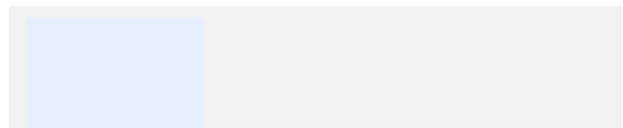


Signature of authorised representative

Christina Chambers

20/10/2025

Signed by:



Signature of authorised representative

[Full Name]

[Click to enter a date]

Safeguarding Policy and Procedure – Intertrain

This is a separate addendum to the overarching C&G Training Solutions Safeguarding Policy to reflect the arrangements in place at Intertrain.

1. Designated Safeguarding Team

Intertrain has a Designated Safeguarding Lead whose role it is to deal with cases of suspected abuse. You must inform this immediately if you have concerns (even if you think they are low level concerns) that a child or vulnerable adult has been, or is, being abused or radicalised. They should be informed in person, or by telephone or (in extreme circumstances) by email.

Nicola Clark Designated Safeguarding Lead the designated member of staff responsible for safeguarding children and vulnerable adults and dealing with Safeguarding and Prevent issues.

Contact Details

Nicola Clark

Designated Safeguarding Lead

Safeguarding@intertrain.biz

07535 727370

John Sutton

Designated Safeguarding Lead

Safeguarding@intertrain.biz

2. Doncaster Context - Safeguarding Children Partnership and Safeguarding Adults Board

The [Children and Social Work Act \(2017\)](#)⁽²⁾ and [Working Together to Safeguarding Children \(2018\)](#), removed the statutory requirement for Local Safeguarding Children Board and this was replaced by the Doncaster Safeguarding Children Partnership (DSCP).

Intertrain will report to the Keeping Children Safe in Education subgroup, who will directly report into the DSCP Business Group. The responsibility for reporting cases lies with the Designated Safeguarding Leads.

The local safeguarding arrangements will be led by the statutory safeguarding partners, as set out in Working Together 2018: local authorities, chief officers of police, and NHS clinical commissioning groups. In Doncaster these partners are:

- Doncaster Council
- Doncaster Children's Services Trust
- South Yorkshire Police
- Doncaster Clinical Commissioning Group

The DSCP will continue to undertake the functions including the delivery of multiagency training, carrying out multi-agency audits, undertaking reviews and publishing learning.

3. Reporting Cases

Children

Doncaster Safeguarding Children Partnership (DSCP)
 Tel: 01302 734214 Email: dscp@doncaster.gov.uk
 Safeguarding Adults Unit 01302 737063

Early Help Hub Tel: 01302 734110
Early Help Coordinator team Tel:01302 736250

All staff must be aware of the guidance issued by Doncaster Safeguarding Children’s Board in [Early Help](#). Early help means providing support as soon as a problem emerges at any point in a child’s life. Where a child would benefit from co-ordinated early help, an early help interagency assessment should be arranged.

Local Authority Designated Officer (LADO):

Birmingham	Ladoteam@birminghamchildrenstrust.co.uk	Tel: 01216 751669
Doncaster	LADO@doncaster.gov.uk	Tel: 01302 735829
London	LADO@hackney.co.uk	Tel: 020 8356 4569
Portsmouth	LADO@secure.portsmouthcc.gov.uk	Tel: 02392 882500
Warrington	LADO@warrington.gov.uk	Tel: 01925 442079
Bristol	LADO@bristol.gov.uk	Tel 0117 903 7795

Emergency Contact Details

Adult Social Care & Children’s Services Social Service & Welfare Organisations

	Adult Care:	
	https://www.birmingham.gov.uk/info/20018/adult_social_care	
Birmingham	Child Care:	Tel: 01213 031234
	https://www.birmingham.gov.uk/info/20019/children_young_people_and_families	
Doncaster	www.yourlifedoncaster.co.uk	Tel: 01302 737391
London	https://lewisham.gov.uk/contact-us/contact-directorysearch?sort=title	Tel: 02083 146000
Portsmouth	Adult Care: https://www.portsmouth.gov.uk/ext/health-andcare/adult-social-care/adult-social-care	Tel: 02392 680810
	Child Care: MASH@secure.portsmouthcc.gov.uk	
Warrington	https://www.warrington.gov.uk/children-young-people-and-families	01925 443322
Bristol	https://www.bristol.gov.uk/residents/social-care-and-health/children-and-families/concerns-about-a-child/first-response-for-professionals-working-with-children	

4. Intertrain Forms

- Safeguarding Referral Form – ITT.FRM.0441
- Channel Referral Form - ITT.FRM.0356
- Cause for Concern Form – CGT.FRM.014

5. Key Local Contacts

Hospitals (Accident & Emergency Services)

Heartlands Hospital, Bordesley Green, Birmingham , B9 5SS	Tel: 01214 242000
Doncaster Royal Infirmary, Thorne Rd, Doncaster , DN2 5LT	Tel: 013 0236 6666
North Middlesex University Hospital, Sterling Way, London , N18 1QX	Tel: 020 8887 2000
Queen Alexandra Hospital, Southwick Hill Rd, Cosham, Portsmouth , PO6 3LY	Tel: 023 9228 6000
Warrington Hospital, Lovely Lane, Warrington , WA5 1QG	Tel: 019 25 635911

Police

Grove St, Redditch, Birmingham , B98 8DD	Tel: 0300 333 3000
70 Waterdale, Doncaster , DN1 3BU	Tel: 0114 219 6905
41 Baker St, Enfield London , EN1 3EU	Tel: 020 8807 1212
Airport Service Rd, Portsmouth , PO3 5GE	Tel: 0845 3300247
101 Arpley St, Warrington , WA1 1LQ	Tel: 01244 350000

Channel (Prevent)

Birmingham	enquiry@sellyoak-nur.bham.sch.uk	Tel: 01213 037682
Doncaster	Rachael.Long@doncaster.gcsx.gov.uk	Tel: 01302 737469
London	revent@lbhf.gov.uk	Tel: 02079 317142
Portsmouth	pccg.enquiries@nhs.net	Tel: 02392 680810
Warrington	prevent@merseyside.police.uk	Tel: 01925 443126

Safeguarding Policy and Procedure – National Contacts and Guidance

SEND code of practice: 0 to 25 years - GOV.UK (www.gov.uk)

Keeping children safe in education 2023 (publishing.service.gov.uk)

Working together to safeguard children - GOV.UK (www.gov.uk)

National Society for the Prevention of Cruelty to Children (NSPCC):

42, Curtain Rd, Shoreditch, London, EC2A 3NH, Tel: 0808 8005000

UK National Drugs Helpline

Tel: 0800 776600

Useful Web Site Addresses

Sexual Health (Cumbria & Lancashire)	www.clashonline.co.uk	
Sexual Health; Drug Abuse; Alcohol; etc.	www.ypsh.net	Tel: 0800 282930
Sexual Health	www.likeitis.org	
Sexual Health	www.brook.org.uk	
Eating disorders	www.b-eat.co.uk	
Drug Abuse 600	www.talktofrank.com	Tel: 0800 776
Drug Abuse 8909	www.addictionadvisor.co.uk	Tel: 0845 033
Alcohol Issues	www.alcoholissues.co.uk	
Alcohol; Drug Abuse; Eating Disorders	www.recovery.org.uk	
Substance Abuse 7175	www.rehabguide.co.uk	Tel: 0844 800

UK National Mental Health Helpline

Mind	Tel: 0300 123 3393
Samaritans	Tel: 116 123
Young Minds	Tel: 0808 802 5544
SANE	Tel: 0300 304 7000

Useful Web Site Addresses

Sexual Health; Drug Abuse; Alcohol etc.	www.ypsh.net	0800 282 930
Sexual Health	www.victimsupport.org	0808 1689111
Eating Disorders	www.b-eat.co.uk	0808 8010711
Drug Abuse	www.talktofrank.com	0800 776 600

Alcohol Issues	www.nacoa.org.uk	0800 3583456
Alcohol; Drug Abuse; Eating Disorders	www.recovery.org.uk	0203 5530324
Substance Abuse	www.rehabguide.co.uk	0844 8007175
Learning Disabilities	www.mencap.org.uk	0808 8081111
Relationship Counselling	www.relate.org.uk	0300 0030396
Stress Helpline	https://www.supportline.org.uk/problems/stress/	01708765200
Bullying	https://www.nationalbullyinghelpline.co.uk/contact.html	08452 255787
Harassment	https://www.supportline.org.uk	<input type="text"/>