



Safeguarding and Prevent Policy & Processes

Contents

Document History	5
Scope & purpose of this policy	6
The aims of this policy.....	6
Key Training Commitment.....	7
Introduction	11
The 5 R's	12
Definition.....	12
Legislation and guidance	13
Prevent Duty	13
Channel	15
How Does Channel Work?	15
What Does Channel Support Look Like?.....	16
Who Can Make a Referral?	16
What Happens with the Channel Referral?	16
Abuse of Position of Trust.....	16
Anti-bullying.....	17
Role of the Designated Local Safeguarding Lead, Champion and Director	17
Responding to Concerns.....	19
Talking to Parents / carers	22
Abuse Requiring Immediate Response	22
E-Safety	23



Online Safety and Social Media	24
Online Learning Delivery	25
Considerations when delivering online learning	26
Safeguarding awareness during an online learning session	27
Content Considerations	27
Responding to Safeguarding concerns during an online session	28
Recording	28
Use of equipment	28
Online Safety - Information and support	28
Allegations Against Staff, Delivery Partners or Contractors	29
Reporting low level concerns	30
Support for the Referrer	31
Protect Yourself Against Allegations of Abuse	32
Record Keeping	36
External speakers and events	39
Safer Recruitment and Training for Staff	41
Learner Recruitment	42
Wellbeing and Learners 'in centre' safety	43
Welfare and Pastoral Care	43
Appendix A - Record of Concern – reporting via MyConcern	44
Appendix B – Reporting Flow Chart	45



Appendix C – Safeguarding Contact Information	46
Appendix D - Relevant Agencies Contact Details	47
FE/HE Regional Prevent Coordinators	48
Appendix E – Complaint’s process	49
Complaints Procedure	49
Appendix F - Organisational Chart.....	50



Document History

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This document is issued, controlled, and can only be modified after proposed modifications have been accepted by the Operations Director and have been accepted by the Company Directors.

The latest version will be maintained on the company central storage area (Intranet).



Scope & purpose of this policy

The purpose of this document is to outline Key Training's commitment to the safeguarding and protection of young people under the age of 18 years and vulnerable groups. This policy and procedures provide guidance to all staff that may experience concerns regarding the safeguarding and protection of children/young people or vulnerable groups within the context of their work.

This policy has been developed to describe the responsibilities of Key Training staff, learners, volunteers, supply chain partners (SCP), subcontractors, contractors and associates, to support in being able to recognise and prevent abuse and to explain the actions to take when abuse is suspected or identified.

For the purposes of this policy staff are defined as:

- All adult staff on site or home based, including Directors.
- Temporary, supply and ancillary staff

When referring to learners in this policy, this relates to all learners including those on an apprenticeship, a traineeship or any other type of learning programme delivered by Key Training.

The aims of this policy

- Support the learner's development in ways that foster security, confidence, and resilience.
- Provide a positive environment in which learners feel safe, secure, valued and respected, feel confident and know how to approach staff if they are in difficulties.
- Raise awareness of all staff of the need to safeguard learners and of their responsibilities in identifying and reporting possible cases of abuse/extremism or radicalisation.
- Provide a systematic means of monitoring learners known or thought to be at risk of harm, and ensure we contribute to the assessments of need and support plans for those children, young people or vulnerable adults.
- Acknowledge the need for effective and appropriate communication between all members of staff in relation to safeguarding of learners.
- Develop a structured procedure within each location, which will be followed by all staff in cases of suspected abuse/extremism.
- Develop effective working relationships with all other agencies involved in safeguarding learners including the Prevent Coordinator
- Ensure that all adults within each location who have access to learners have been checked for their suitability.

Key Training Commitment

Key Training is fully committed to safeguarding the welfare of all stakeholders by taking all reasonable steps to protect them from harm and accepts its corporate responsibility for the well-being and safety for its stakeholders including children and vulnerable groups. Key Training will promote this policy on our website and by providing copies of relevant documents to all learners and employers we work with throughout their programme.

The company recognises its responsibility and acknowledges that it is the duty of Key Training's workforce in its entirety to uphold British Values and to safeguard the welfare of all stakeholders by creating an environment that protects them from harm and reduces any potential risks of being exposed to violence, extremism, exploitation, or victimisation.

Therefore, employees, delivery partners and contractors will always show respect and understanding for the rights, safety and welfare of all parties and conduct themselves in a way that reflects the principles, values and culture of our organisation and be aware and follow current legislation regarding the safeguarding of all stakeholders. Our policy sets out, in detail, the roles and responsibilities of all parties in providing a safe working and learning environment whereby everyone is protected from abuse of any kind.

It is Key Training's intention to:

- Ensure that all stakeholders are protected from abuse regardless of sex, race, disability, age, sexual orientation, religion or belief, gender reassignment, maternity or because someone is married or in a civil partnership.
- Ensure that staff are appropriately trained in safeguarding and to understand the risk of radicalisation, their role in implementing the Prevent Duty, and the impact this has on their job role and how to refer an individual who they feel is at risk.
- Ensure that appropriate supervision is given where required.
- Take the necessary steps to inform all stakeholders of relevant policies and procedures and Ethical Code of Conduct
- Regularly review and monitor Key Training's policies and procedures to ensure our legal, moral and social responsibilities are met.
- Take all suspicions and allegations of abuse and risks of radicalisation extremely seriously and to respond to concerns with due speed and consideration.
- Work in partnership with and in accordance with organisations' procedures where required, including Designated Person in Local Authority, Safeguarding Children's Boards, Safeguarding Adults Boards and the Channel multi-agency panel.
- To comply with and maintain knowledge of all relevant legislation, codes of practice and appropriate guidance of any amendments to such.



- Have Designated Safeguarding Director / Lead and local Champions in place to advise on and manage any concerns and referrals made.
- Ensure that relevant employment and security checks are undertaken, as required.
- All personal data will be processed in accordance with the requirements of the GDPR 2018.
- Personal information is confidential and should only be shared with the permission of the individual concerned (and or those with parental responsibility) unless the disclosure of confidential information is necessary in order to protect a child or vulnerable adult from serious harm or promote their welfare. In all circumstances, information must be confined to those people directly involved in the professional work of each individual child or vulnerable adult and on a strict “need to know” basis.

The following policies demonstrate and support Key Training's shared commitment to safeguarding and promoting the welfare of its stakeholders.

Bullying and Harassment	Safer Recruitment and Selection
Ethical Code of Conduct	Disciplinary
Grievance	Equality and Diversity
Data Protection	Complaints / Whistle-Blowing Policy
Health & Safety	IT Policy
E-Safety	GDPR / Data Protection Policy

Key Training will follow the guidance that is outlined in ‘**Working Together to Safeguard Children**’ (updated in July 2022) and **Keeping Children Safe in Education September 2022**. Within both guidance documents, there are external support services and further sources of information within the appendix sections. The need to refer allegations or concerns about possible risk posed by staff, delivery partners or contractors to the Designated Local Authority Person (formerly LADO) is a requirement as detailed in the government guidance Working Together to Safeguard Children.



Introduction

Key Training believes that it is always unacceptable for a child or vulnerable adult to experience abuse or discrimination of any kind and recognises its responsibility to safeguard the welfare of all children and vulnerable adults by a commitment to practice which protects them. Key Training have a commitment that no child or vulnerable adult will be treated less favourably than others in being able to access services which meet their specific individual needs, and this is linked to our Equality and Diversity Policy and social inclusion strategies.

This policy has been developed to describe the responsibilities of Employees, Delivery Partners and Contractors for the recognition and prevention of abuse and to clarify the actions to take when abuse is suspected or identified. Therefore, the aim of this Policy is to ensure that Key Training fulfils its responsibilities towards the protection, welfare and safety of children and vulnerable groups.

Abuse is the violation of an individual's human rights. It can be a single act or repeated acts. It can be physical, sexual or emotional. It also includes acts of neglect or an omission to act. Abuse can take many forms and is not acceptable in any way.

Key Training will endeavour to safeguard children and vulnerable adults by:

- Valuing, listening to and respecting them
- Adopting Policies, guidelines and an Ethical Code of Conduct and behaviour for Employees, Delivery Partners and Contractors
- Sharing information about concerns with agencies which need to know, and involving parents and children appropriately
- Ensuring that the DBS, in accordance with their guidelines, checks all staff and delivery partners with responsibilities for children and vulnerable groups
- Recruiting staff safely, ensuring all necessary checks are made
- Making all new staff, delivery partners and contractors aware of our safeguarding policy and procedures
- Providing all staff and delivery partners with safeguarding training
- Ensuring that all children, vulnerable adults their parents and carers are aware of our safeguarding policy and procedures

Key Training is committed to reviewing its policies and excellent practice annually unless there is a change to legislation with immediate effect or there has been a significant change within the organisation. The



Safeguarding Director and the Safeguarding Lead are responsible for updating the policy with support from the Board of Directors.

Key Training operates a culture of openness and transparency and embeds the principles of the 4R's across all our services and ensure all staff, delivery partners and contractors understand their responsibilities with regard to Safeguarding.

The 5 R's

Recognise – the signs and indications of abuse.

Respond – as soon as possible.

Report – all concerns should be reported in line with company policy outlined in this document

Record – Everything you have heard, was said or any actions seen

Refer – To the designated person

Definition

For the purpose of this policy and stated procedures, children are any persons up to the age of 18 years. A vulnerable adult is a person who is over the age of 18 years who is or may need of advisory services because of mental or other disability, age or illness and may be unable to take care of themselves or unable to protect themselves from significant harm or serious exploitation. A vulnerable adult may be a person who:

- has a physical or sensory disability
- is physically frail or has a chronic illness
- has a mental illness or dementia
- has a learning difficulty
- misuses' drugs and or alcohol
- has social and or emotional issues
- exhibits challenging behaviours



Statutory guidance and legislation differ in relation to working with these two groups e.g., children and vulnerable adults. Practitioners are familiar with the differences if they are working across the age groups and take advice from the Safeguarding team when appropriate.

This policy and associated procedures have been developed in response to government guidance and legislation.

Legislation and guidance

- The Children Act 1989 and 2004
- UN Convention on the Rights of the Child 1991
- GDPR 2018
- Sexual Offences Act 2003
- Protection of Freedoms Act 2012
- Education Act 2005
- Human Rights Act 1998
- Health and Social Care Act 2008
- Domestic Violence, Crime and Victims Act 2012
- Domestic Abuse Act 2021
- Safeguarding Vulnerable Groups Act 2006
- Statutory guidance Working Together to Safeguard Children 2018
- Keeping Children Safe in Education 2022
- Information Sharing Advice for practitioners providing safeguarding services to children, young people, parents and carers (last updated 2018)
- The Care Standards Act 2014
- The Mental Capacity Act 2005
- The “No Secrets” guidance which sets out a code of practice for the protection of vulnerable adult
- Equality Act 2010
- Prevent Duty and Channel Duty guidance 2019

Prevent Duty

The Counter Terrorism and Security Act 2015 places a duty on certain bodies to have 'due regard to the need to prevent people from being drawn into terrorism'.

The Prevent strategy, published by the Government in 2011, is part of the overall counter-terrorism strategy, CONTEST. The aim of the Prevent strategy is to reduce the threat to the UK from terrorism by



stopping people becoming terrorists or supporting terrorism. In the Act this has simply been expressed as the need to “prevent people from being drawn into terrorism”.

The 2011 Prevent strategy has three specific strategic objectives:

- respond to the ideological challenge of terrorism and the threat we face from those who promote it.
- prevent people from being drawn into terrorism and ensure that they are given appropriate advice and support.
- work with sectors and institutions where there are risks of radicalisation that we need to address.

The government have defined extremism in the Prevent Strategy as vocal opposition to fundamental British Values including democracy, the rule of law, individual liberty and mutual respect and tolerance of different faiths and beliefs, and radicalisation / a process by which an individual or group comes to adopt increasingly extreme political, social, or religious ideals and aspirations that reject and/or undermine contemporary ideas and expressions of freedom of choice.

Key Training will, in partnership with other professionals including those involved in Safeguarding, investigate further to assess the nature and extent of the risk. The relevant local police prevent teams will complete an initial assessment which will be used to inform the decision as to whether an individual should be referred to Channel.

Prevent work depends on effective partnership. To demonstrate effective compliance with the duty, specified authorities must demonstrate evidence of productive co-operation, in particular with local Prevent co-ordinators, the police and local authorities, and co-ordination through existing multi-agency forums, for example Community Safety Partnerships. Key Training have connections with the Prevent coordinators around the UK, as we operate nationally, and information is disseminated monthly to all staff.

Key Training will follow safeguarding procedures in the first instance to report any concerns relating to Prevent, to the Safeguarding team, who will then investigate further.

[Prevent duty guidance](#)

Frontline staff who engage with the public should understand what radicalisation means and why people may be vulnerable to being drawn into terrorism because of it. They need to be aware of what we mean by the term “extremism” and the relationship between extremism and terrorism.



Key Training will maintain a Prevent risk assessment which is regularly reviewed and updated, with the overall responsibility with the Board of Directors.

All apprentices will be asked to complete 4 online training modules, which have been produced by the Education & Training Foundation – this is called ‘Side by Side’, to raise awareness of extremism and radicalisation. [CLICK HERE](#) to access the main home page.

Channel

Channel is a voluntary, confidential support programme which focuses on providing support at an early stage to people who are identified as being vulnerable to being drawn into terrorism. Prevent referrals may be passed to a multi-agency Channel panel, which will discuss the individual referred to determine whether they are vulnerable to being drawn into terrorism and consider the appropriate support required. A representative from the school or college may be asked to attend the Channel panel to help with this assessment. An individual’s engagement with the programme is entirely voluntary at all stages. The designated safeguarding lead should consider if it would be appropriate to share any information with the new school or college in advance of a child leaving. For example, information that would allow the new school or college to continue supporting victims of abuse or those who are currently receiving support through the ‘Channel’ programme and have that support in place for when the child arrives.

Statutory guidance on Channel is available at: [Channel guidance](#)

How Does Channel Work?

The Channel Panel is an early intervention multi-agency process and will develop the most appropriate support package for the individual concerned and review progress.

Channel is designed to work with individuals of any age and is shaped around the circumstance of each individual and can provide support for any form of radicalisation or personal vulnerabilities.

Each Channel Panel is chaired by a local authority and brings together a range of multi-agency partners to collectively assess the risk and can decide whether a support package is needed. The group may include statutory and non-statutory partners, as well as lead safeguarding professionals. If the group feels the person would be suitable for Channel, it will look to develop a package of support that is bespoke to the



person. The partnership approach ensures those with specific knowledge and expertise around the vulnerabilities of those at risk can work together to provide the best support.

What Does Channel Support Look Like?

Channel interventions are delivered through local partners and specialist agencies. The support may focus on a person's vulnerabilities around health, education, employment or housing, as well as specialist mentoring or faith guidance and broader diversionary activities such as sport. Each support package is tailored to the person and their circumstances.

A person will always be informed first if it is felt that they would benefit from Channel support. The process is voluntary, and their consent would be needed before taking part in the process. This process is managed carefully by the Channel Panel.

Who Can Make a Referral?

Anyone can make a referral. Referrals come from a wide range of partners including education, health, youth offending teams, police and social services.

What Happens with the Channel Referral?

Referrals are first screened for suitability through a preliminary assessment by the Channel Coordinator and the local authority. If suitable, the case is then discussed at a Channel Panel of relevant partners to decide if support is necessary.

Abuse of Position of Trust

Key Training recognises that our staff, delivery partners and contractors are in a position of trust with our customers in our care whether children, young people or vulnerable adults and acknowledge that it could be considered a criminal offence to abuse that trust.

Key Training acknowledges the principle of equality embedded into the legislation of the Sexual Offenders Act 2003 applies irrespective of sexual orientation, neither homosexual or heterosexual relationships are acceptable within a position of trust.



We recognise that the legislation is intended to protect young people who are over the age of consent but under the age of 18 years.

Key Training recognises the importance that its staff, delivery partners and contractors protect the rights and needs of all children, young people and vulnerable adults on our programmes and in our care.

Anti-bullying

Key Training acknowledges that to allow or condone bullying may lead to consideration under safeguarding children or vulnerable adult's procedures. All incidents of bullying, including cyber-bullying, racist, homophobic and gender related bullying, will be dealt with in accordance with our anti-bullying policy. Key Training recognise that children and vulnerable adults with special needs and or disabilities are more susceptible to being bullied. Key Training maintain a log of bullying incidents in our programmes. Our policy on bullying is explained at the induction process for new customers and their parents / carers.

The [Keeping Children Safe in Education guidance 2022](#), recognises the fact that a child or a young person may be LGBT is not in itself an inherent risk factor for harm. However, children who are LGBT can be targeted by other children. In some cases, a child who is perceived by other children to be LGBT (whether they are or not) can be just as vulnerable as children who identify as LGBT.

Risks can be compounded where children who are LGBT lack a trusted adult with whom they can be open. It is therefore vital that staff endeavour to reduce the additional barriers faced and provide a safe space for them to speak out or share their concerns with members of staff.

Role of the Designated Local Safeguarding Lead, Champion and Director

Key Training has appointed Safeguarding Champions within the business, with a Safeguarding Director and Safeguarding Lead to have overall responsibility for issues related to safeguarding children and vulnerable adults. Key Training also employ the external services of a Safeguarding Consultant and work in partnership with our regional Prevent Coordinators. The Safeguarding Director is responsible for acting as a source of advice on child, young persons, and vulnerable adult safeguarding matters, for coordinating action within the organisation and for liaising with health, children's services, adult services and other



agencies about suspected or actual cases of abuse. The Safeguarding Director and Safeguarding Lead will be assisted by other designated members of staff drawn from senior management and suitably experienced staff. Designated members of staff have a key responsibility for raising awareness, within the staff, of issues relating to the welfare of children and vulnerable groups and the promotion of a safe environment for children and vulnerable adults within Key Training.

Designated members of staff receive training in Safeguarding children and vulnerable groups and inter-agency working as required by the LSCB and receive refresher training annually as required by Key Training. The team are required to keep up to date with developments in safeguarding children and vulnerable adults as required.

The Safeguarding Director has governance over safeguarding matters across Key Training and the Chairman has overall responsibility for safeguarding at Board level, in accordance with the statutory guidance set out in Part Two of KCSIE (2022) and related guidance or legislation.

There is a clear and robust job description for the safeguarding role within Key Training which can be accessed on the system.

- The Safeguarding Director is responsible for reviewing the child, young persons and vulnerable adults safeguarding policy annually along with any policies linked to the safeguarding policy and processes and procedures that support the embedding and working practices of this policy
- The Safeguarding Director is responsible for ensuring the child, young persons and vulnerable groups policy is available publicly and to parents and carers and that parents and carers are aware that suspected abuse referrals may be made and Key Training's role in this
- The Safeguarding Director will alert the DBS where a person has been dismissed or left due to risk to or harm that they presented or may have presented to a child or vulnerable adult
- The Safeguarding Director will alert the Police – where a crime may have been committed
- The Safeguarding Lead will foster strong links with the relevant LSCB and Designated Local Authority Person(s)
- The Safeguarding Director / Lead will refer all cases of suspected abuse to the local authority children's social care agency or in the case of a vulnerable adult to the local authority adult's social care agency.
- The Safeguarding Director / Lead will liaise with senior management to inform them of issues especially ongoing enquiries and police investigations.
- The Safeguarding Lead / Champion will maintain a proper record of any safeguarding referral, complaint or concern – even where that concern does not lead to a referral.
- The Safeguarding Lead / Champion will act as a source of advice, support and expertise to staff on matters of safety and safeguarding.



- The Safeguarding Lead will liaise with relevant agencies following a referral to ensure it has been dealt with and nothing has slipped through the net and whether a resolution has been achieved.
- The Safeguarding Lead ensures that Key Training works with employers and other training organisations that provide apprenticeships and or work placements for children young people or vulnerable adults from Key Training to ensure that appropriate safeguards are in place.
- The Safeguarding Director provides information monthly to the Board setting out how Key Training has discharged its duties. The Safeguarding Director is also responsible for reporting deficiencies in procedure or policy identified by the LSCB at the earliest opportunity.

Under no circumstances should a member of staff or contractor undertake any investigative activities of alleged or actual abuse, nor should they contact any of the external agencies that will deal with a referral. It is the responsibility of the Safeguarding Director & Lead, with support from the senior management team to decide whether a referral should be made and to which agency or agencies. It is the role of the relevant Safeguarding and Police Services agencies to decide if abuse has taken place. Delivery partners may make their own referrals but must inform their Key Training supply chain manager immediately.

Responding to Concerns

It is important to note that children and young people may not find it easy to tell staff about their abuse verbally. Children can show signs or act in ways that they hope adults will notice and react to. In some cases, the victim may not make a direct report. For example, a friend may make a report, or a member of staff may overhear a conversation that suggests a child or young person has been harmed or a child's own behaviour might indicate that something is wrong. As per part one of [Keeping Children Safe in Education](#) guidance, if staff have any concerns about a child's welfare, including those relating to sexual violence and sexual harassment, they should act on them immediately rather than wait to be told. When an allegation of abuse is made to a member of staff, the member of staff who receives it should:

- Reassure the individual (child or vulnerable adult) making the allegation that they have done the right thing.
- Listen and not interrupt.
- Not promise that the matter will be kept confidential. Explain to them that you must report the matter to a member of Key Training designated safeguarding team as part of your legal duty, if you are in doubt as to whether the matter is a safeguarding issue, check with one of the designated safeguarding team members.
- Let the individual finish speaking and then only ask questions if you are still unsure whether this is a safeguarding issue.



- Note, this is not an investigation, simply establish the key facts, remember TED –Tell, Explain, Describe
- Only ask simple, open, non-leading questions, e.g., if a child or vulnerable adult tells you they have been hurt ask “Can you describe how that happened” rather than “did someone hit you”.
- Accept what the individual is saying and do not offer an alternative interpretation of the alleged events.
- Raise the concern with the Safeguarding Champion, do not ask any more questions.
- Write down what has been said immediately afterwards, to the best of your memory, in the words used by the individual and you ensure you make clear what is fact and what is opinion or hearsay in any given piece of information.
- Do not ask the individual to sign anything at this stage.
- Note anything about the individual which may be connected e.g., any visible injuries including the position and description.
- Report the matter to the Safeguarding Champion / Lead immediately.
- Complete a record of your concern on the [My Concern](#) system using personal log in detail, which will then immediately notify the Safeguarding team of the date, time and person raising a concern.
- Ensure you tell the individual what will happen next (this is within month one of the Key to Wellbeing resource book).

Remember, if a child, young person or vulnerable adult tells you about abuse that happened a long time ago or some time has lapsed since it last occurred, doesn't make it any more real and distressing for the child, young person or vulnerable adult. Abuse can be historic and relate to incidents that happened a long time ago.

The Safeguarding Champion / Lead will ensure that the member of staff reporting the incident/concern is reassured that their concerns are being appropriately addressed and that they have access to staff support if needed.

If a child or vulnerable adult chooses to disclose, you should **never**:

- Take photographs of injuries
- Examine marks or injuries solely to assess whether they may have been caused by abuse (there may be a need to give appropriate first aid)
- Investigate or probe, aiming to prove or disprove possible abuse.
- Make promises to the individual about confidentiality or keeping secrets.
- Assume that someone else will take the necessary action.
- Jump to conclusions or react in any way to what the individual is disclosing.
- Speculate or accuse anybody.
- Confront another person (adult or child) allegedly involved.
- Offer opinions about what is being said or about the persons allegedly involved.



- Forget to record what you have been told – what may seem insignificant to you could be extremely important in supporting external agencies to decide whether abuse has occurred or is indeed likely to occur. Remember: IF ANY STEP IN THE PROCESS IS NOT RECORDED THEN IT IS ASSUMED THAT IT DID NOT HAPPEN
- Fail to pass the information on to the designated safeguarding team.
- Ask the individual to sign a written copy of the disclosure or a statement.

Where a child, young person or vulnerable adult has communication difficulties or use alternative / augmented communication systems, you may need to take extra care to ensure that signs of abuse and neglect are identified and interpreted correctly, but concerns should be reported in the same manner as for other children, young people or vulnerable adults.

Guidance on sexual violence and sexual harassment between children in schools and colleges is available within [Keeping Children Safe in Education](#) (2022)

A learner can report safeguarding concerns to Key Training by discussing their concerns with their Learning Coach, or by contacting the Key Helpline using the following details.

Telephone or text	07769 279325
Email	keyhelpline@keytraining.co.uk

Learners will be issued with a handbook which provides information relating to safeguarding and prevent, with ongoing communication and learning throughout the programme to ensure that knowledge is developed and maintained. The helpline contact details are communicated monthly in our learner newsletter and details are on all main pages of their E-Portfolio.

Employers are provided with an employer handbook to ensure awareness of their responsibilities, including how to get in touch with Key Training to report concerns, and this is provided prior to a learner being placed onto a programme. These documents and this policy are also promoted on our website and are accessible to all.



Talking to Parents / carers

In most cases, it is good practice to be open and honest at the outset with parents / carers about concerns and any action that Key Training intends to take. Where a referral is to be made the Key Training Safeguarding Lead will make all reasonable efforts to ensure parents / carers are informed. However, an inability to inform parents / carers should not prevent a referral being made. Consideration will be given to not informing them when a child or vulnerable adult expresses a wish that their parent/carer are not informed at this stage.

There are cases where it would not be good practice for the Safeguarding Champion to discuss concerns with parents / carers before referral.

In these cases, arrangements for discussing concerns with the parents / carers should be agreed in advance with Social Care and or the Police. Concerns must not usually be discussed with parents / carers before referral where:

- Discussion would put a child or vulnerable adult at risk of significant harm.
- Discussion would impede a police investigation or social work enquiry.
- Sexual abuse is suspected.
- Organised or multiple abuse is suspected.
- The fabrication of an illness is suspected.
- To contact parents / carers would place you or others at risk.
- It is not possible to contact parents / carers without causing undue delay in making the referral.

In each case the Safeguarding Lead, with support from the Safeguarding Director and Consultant, must make a reasoned judgement. Where further guidance is needed, contact should be made with the Designated Local Authority Person or relevant social care department or Police.

Abuse Requiring Immediate Response

If medical attention is required, then contact the emergency services on 999.

Inform the Key Training Safeguarding Lead without delay.

The Safeguarding Lead / Director will contact the relevant Social Care and or Police services



The Safeguarding Lead / Director must consider if it is safe for the child or vulnerable adult to return home to a potential abusive situation, seeking advice from Social Care or Police as required

Managers in the Police or Social Care agencies will then advise about how to proceed to ensure immediate well-being of the child, young person or vulnerable adult.

If the child, young person or vulnerable adult is in immediate danger or in need of medical attention they should remain with Key Training staff, delivery partner or contractor.

Where there is any doubt about the safety of the child, young person or vulnerable adult if they were to return home to a potentially abusive situation, the Safeguarding Lead must inform the relevant Social Care agency and or the Police of their concerns. Managers in the Police or Social Care agencies will then advise about how to proceed to ensure the immediate well-being of the child, young person or vulnerable adult.

If after 48 hours no action has been taken the Safeguarding Director or Safeguarding Lead should utilise the escalation process with the LSCB.

Key Training staff must also be aware that if they feel the referral has not been dealt with, no action has been taken or that the organisation is trying to disregard the referral, they should follow the procedures as set out in the Key Training Whistleblowing Policy.

E-Safety

All staff, delivery partners and contractors if relevant are trained in and receive regular updates in e-safety and recognising and reporting concerns. Our Acceptable Use Policy recognises that internet safety is a whole team/organisation responsibility which includes customers and their parents and carers.

Children, young people and vulnerable adults may expose themselves to danger, whether knowingly or unknowingly, when using the internet and other technologies. Additionally, some children, young people and vulnerable adults may find themselves involved in activities which are inappropriate or possibly illegal.

Key Training therefore recognise our responsibility to educate our customers, teaching them the appropriate behaviours and critical thinking skills to enable them to remain both safe and legal when using the internet and related technologies. These issues are addressed within the learner journey and relevant policies and procedures and with parents and carers.



Key Training will ensure filters are in place to prevent access to unsuitable sites and we will monitor the use of the network and internet to ensure that any customer, staff, volunteer, delivery partner or contractor attempting to access inappropriate, abusive or harmful material is appropriately advised and or supported. If inappropriate or indecent images are found, then the Police will be informed immediately, and Key Training will fully support their investigation. If involving a member of staff/volunteer, immediate suspension in line with the disciplinary process will immediately take effect and the managing safeguarding allegations procedure may need to be instigated by the Safeguarding Director. Key Training will take advice from the Police when this is involving a customer as to whether the relevant Commissioner should be informed.

The welfare and protection of our children, young people and vulnerable adults is paramount and consideration should always be given to whether the use of photography will place them at risk. Images may be used to harm children, young people or vulnerable adults for example, as a preliminary to grooming or by displaying them inappropriately on the internet, particularly social networking sites. For this reason, consent is always sought when photographing customers and additional consideration given to photographing vulnerable children (particularly looked after children where approval must be sought from the individual's social worker) or vulnerable adults, those known to be fleeing domestic violence.

Consent must be sought from those with parental responsibilities (this may include the Local Authority in the case of looked after children).

We are aware of the escalation procedures for raising concerns in respect of poor practice and recognise our responsibility to utilise these as and when necessary, in the interest of safeguarding and promoting the welfare of children and vulnerable adults.

Online Safety and Social Media

Online safety also involves being aware of the risks to young people, our staff and vulnerable adults when communicating via the internet, digital and mobile devices and using social media. Social media includes blogs, Wikis, online communities, and social networking sites such as Facebook and Twitter.

As detailed in the Keeping Children Safe in Education guidance, the use of technology has become a significant component of many safeguarding issues. Child sexual exploitation; radicalisation; sexual predation: technology often provides the platform that facilitates harm. An effective approach to online safety empowers Key Training to protect and educate all staff and learners in their use of technology and



establishes mechanisms to identify, intervene in, and escalate any incident where appropriate.

The breadth of issues classified within online safety is considerable, but can be categorised into four areas of risk:

- Content – being exposed to illegal, inappropriate or harmful material, for example pornography, fake news, racist or radical and extremist views.
- Contact – being subjected to harmful online interaction with other users; for example, commercial advertising as well as adults posing as children or young adults.
- Conduct – personal online behaviour that increases the likelihood of, or causes, harm; for example, making, sending and receiving explicit images, or online bullying.
- Commerce - risks such as online gambling, inappropriate advertising, phishing and or financial scams. If you feel learners or staff are at risk, please report it to the Anti-Phishing Working Group (<https://apwg.org/>).

As an organisation working with young people and vulnerable adults, it is acknowledged by Key Training the impact and involvement that social networking sites such as Facebook and Twitter have on the lives of young people and vulnerable adults and their role in the ways which they interact with each other. These tools are used by Key Training to encourage learners in their projects and involvement with activities. At the same time, we recognise the dangers and potential risks that these sites can pose to young people, vulnerable adults and Key Training staff and that they have the potential to be abused as a means of interacting with them.

There is a wide range of ways to communicate with young people and vulnerable adults and this is a rapidly changing environment as new technologies, applications and social media sites emerge. No code of conduct for e-safety can cover all of these separately. However, there are broad principles that we expect all staff to adhere to in order to safeguard young people, vulnerable adults and themselves in respect of using all these forms of media, devices, apps and social networking sites.

Key Training staff are to always observe our IT policy and related documents and any breaches of these policies may result in disciplinary action being taken.

Online Learning Delivery

Key Training now offer a fully remote, online learning delivery model to all learners across our programmes. As with other online harms, every employee needs to be aware of the risks posed by the online activity,



including that of extremist and terrorist groups. If you have a concern for the safety of a learner, including the risk of radicalisation, you should follow Key Training's safeguarding procedures outlined in this policy.

The term 'online learning' is used in this policy to mean courses that are delivered online, in real-time, with Learning Coaches and learners connected to each other by an online meeting platform, for example 'Zoom' or 'Teams'. Learning in a digital environment enables people from all backgrounds to access learning and valuable knowledge.

Considerations when delivering online learning

- Where you are communicating with a member of staff or learner on an individual basis, please remember you are 'at work' and therefore will behave in the same way as you would if meeting in person in one of our offices.
- Be mindful of wearing appropriate clothing as should anyone else who is likely to be within your camera's range. It is recommended that you blur your background.
- Consider the background that will be in view. You may want to consider not using your bedroom for example and possibly being against a neutral background. Consideration needs to be given about what can be seen, such as family photographs. The online meeting platforms offer a virtual background so this function should be considered.
- Think about the language you are using. Do not forget about any family members or other persons who may be in the background.
- Although learning is being delivered via an online platform, it is still a learning environment and professional behaviour is expected. Ensure that expectations of behaviour and etiquette are covered at the start of each online learning session.
- Online learning sessions may be recorded as part of ongoing quality assurance processes and as part of safeguarding all parties. You must ensure that you follow GDPR and Data Protection guidelines when doing so and that all attendees are aware the session is being recorded.
- If staff member feels uncomfortable with something said or done during session end call as soon as possible and report to the Safeguarding Lead
- In an emergency if session is ended consider phoning the learner or contacting directly on another platform
- Learners must join through the secure link which is sent to them via their online portfolio and links should only be sent via email in exceptional circumstances.
- Only the Tutor taking a group session to be able to share screen as default, to reduce risk of inappropriate information or content being shared.
- Sessions sizes are limited to allow for all learners to be seen on screen at the same time e.g., no scrolling in case miss something.



Safeguarding awareness during an online learning session

All delivery staff should be fully aware of the learners in their group and remain vigilant for any signs of abuse of safeguarding issue which may need to be reported. During any online delivery session, be conscious of the following:

- Being/becoming withdrawn
- Having bruises/cuts
- Clothes that seem inappropriate – e.g., covering up in hot weather
- Never being alone at the home end of the virtual classroom
- Appearance of unease in the presence of another family member
- Family member constantly checking on the learner in the virtual classroom
- Visible distress on the part of the learner – e.g., crying
- Visible but non-verbal learner responses to delivery staff input on safeguarding
- Use of Signal for Help (information on this has been passed out to learners)
- Keeping microphone unmuted
- Keeping video/camera off
- Intoxication
- Posters in background/tattoo symbols/ profile images which are inappropriate

Content Considerations

Content Considerations – What do we need to think about?

- When communicating with young people/vulnerable adults online observe the same rules of behaviour as if speaking with them in person that is by being professional -polite, respectful, not swearing or saying anything (using the written word, images or icons) that could be regarded as sexual innuendo, bullying or discrimination.
- Ask yourself whether the content of the message could be misunderstood or misinterpreted by someone else.
- Always ensure the content of any online communication has a clear work purpose.
- Do not use any text speak abbreviations or symbols/emoticons even if you ordinarily use these in your personal life.
- Never disclose non-public and confidential information about Key Training, its staff or the young people and vulnerable adults with whom we are working.
- Do not say anything or re-tweet any posts that could be deemed offensive, controversial, or socially inappropriate in any way.
- Contact with young people or vulnerable adults online should only be a recognised element of your work and done strictly for the business of Key Training only.
- Do not send any illegal or inappropriate content (written, images or icons) including sexting via mobile phones.



Openness and scrutiny – remember...

- Always communicate with young people and vulnerable adults in a way that is open to others to see if necessary.
- Do not use private messaging facilities on social networks or apps rather if it needs to be private then do this by email exchange or phone and note the conversation afterwards.
- Ensure there is always a record of such conversations that would be open to others to check if necessary.
- It should always be clear who the communication is from when Key Training is communicating with a young person or a vulnerable adult.
- There should be no use of anonymous apps – that is where the sender can remain anonymous.

Responding to Safeguarding concerns during an online session

Guidance on how to respond to situations that may be identified during an online session, along with the use of technology, is detailed in the [Responding to online safeguarding](#) process document.

Recording

Only use social media and apps where there is a permanent record of what has been said and sent thereby being open to scrutiny e.g., the use of Snapchat is not appropriate.

Use of equipment

Key Training IT equipment (including computers, laptops, mobile phones, notebooks, etc.) must not be used to view, download, create or share (with colleagues or children) illegal content including abusive images of children or young people or vulnerable adults. IT policies are held on the company intranet.

Online Safety - Information and support

Within the [Keeping Children Safe in Education](#) 2022 guidance, Annex B has further information and support to support online safety, including cybercrime.



Allegations Against Staff, Delivery Partners or Contractors

All allegations of abuse made against a member or members of staff, delivery partners or contractors will be managed in line with Key Training safeguarding and employment policies and procedures.

These procedures apply to a wide range of allegations, including those that indicate a person may be unsuitable to work with children, young persons or vulnerable adults in their present position or in any capacity. It is essential that any concerns for the welfare of a child, young person or vulnerable adult arising from abuse or harassment by a member of staff, volunteer, delivery partner or contractor should be reported immediately to the Safeguarding Champion who will contact the Designated Local Authority Person (formerly known as LADO).

The procedures are, therefore, to be followed in respect of allegations that a member of staff, volunteer, delivery partner or contractor has:

- Behaved in a way that has harmed, or may harm a child or vulnerable adult.
- Possibly committed a criminal offence against, or related to, a child or vulnerable adult.
- Behaved towards a child, children, young person or vulnerable adult in a way that indicates they are unsuitable to work with children, young persons or vulnerable adults.

Where you have concerns about a colleague, delivery partner, employer at which a person works, or contractor, you should report these concerns to the Safeguarding Champion immediately, detailing your concerns on the Key Training safeguarding referral form, who will manage the allegations in line with agreed policy.

The Safeguarding Director or Safeguarding Lead will discuss allegations against staff, delivery partners or contractors with the Designated Local Authority Person. The purpose of this discussion is to consider the nature, content and context of the allegation and to agree what further action, if any, is necessary, notifying the parents / carers, the person the allegation has been made against will be suspended partly to protect them during any investigation, risks to other children, communication with relevant organisations/bodies, supporting the person the allegation has been made against and ensure they are treated fairly and with impartiality as detailed in Key Training disciplinary policy and procedures and will include any support from the other agencies involved and managing possible media interest.

This may include:



- Child Protection or Vulnerable Adult Safeguarding Investigation – this will assess whether the child/adult is in need of protection or in need of services – led by Social Care
- Criminal Investigation – led by the relevant Police Agency
- A Disciplinary Investigation – in line with Key Training disciplinary procedures

In the first two instances, Social Care and or the Police will lead on investigations. Key Training HR Manager will notify the Data Barring Services (DBS) where –

- Key Training have permanently removed a member of staff, delivery partner or contractor from regulated activity.
- Key Training thinks that the person has either:
 - Engaged in relevant conduct, or satisfied the harm test, or
 - Received a caution for, or been convicted of, a relevant offence.

For most cases, the DBS only has the power to bar a person who is, has been or might in future engage in regulated activity.

Key Training Safeguarding Director will act as Key Training Named Senior Manager to provide high level support to the H.R. Director/Safeguarding Lead in handling allegations of abuse made against a member of staff, volunteer, delivery partner or contractor in line with current Key Training policy.

Where the allegation is found to be of a malicious nature, unfounded and with no further action to be taken the individual the allegation was made against will be supported back into work and their team environment by a member of the Senior Management Team with an agreed support plan put in place.

Reporting low level concerns

A low-level concern is any concern that an adult has acted in a way that:

- is inconsistent with the staff code of conduct, including inappropriate conduct outside of work
- doesn't meet the threshold of harm or is not considered serious enough for the school or college to refer to the local authority

Low-level concerns are part of a spectrum of behaviour. This includes:

- inadvertent or thoughtless behaviour
- behaviour that might be considered inappropriate depending on the circumstances
- behaviour which is intended to enable abuse.



Examples of such behaviour could include:

- being over friendly with learners
- having favourites
- adults taking photographs of children on their mobile phone
- engaging with a child on a one-to-one basis in a secluded area or behind a closed door
- using inappropriate sexualised, intimidating or offensive language.

The reporting of all LLC should be recorded in writing and this complaint should be sent to the Safeguarding Director or the Designated Safeguarding Lead.

When sending this written concern, you should include the following information:

- Date
- Name of individual you have concerns about
- Name of person reporting
- Details of concern raised
- Details of investigation
- Rationale for decisions made
- Action taken

Individuals may self-refer an issue of concern. The raising of low-level concerns is a professional dialogue in line with good practice and should provide opportunities for shared learning. It is an important step if the adult has found themselves in a situation which could be misinterpreted, might appear compromising to others, and / or on reflection they believe they have behaved in such a way that they consider falls below the expected professional standards.

Support for the Referrer

Key Training will fully support and protect staff, delivery partners and contractors who, in good faith (without malicious intent), make a referral about a colleague who may be abusing a child, young person or vulnerable adult and reports his or her concern about a colleague's practice.

This support may take the form of counselling, moving the person reporting the abuse/potential abuse to another workplace temporarily whilst the incident is investigated. Key Training Whistleblowing procedures can be followed if they feel their concerns are not being acted upon appropriately. However, all staff,



delivery partners and contractors have a duty to safeguard and promote the welfare of children and vulnerable adults. However, in order to investigate concerns robustly, it may not be possible to maintain complete anonymity, but the interests of the referrer will be protected when concerns are raised.

Following a referral, staff, delivery partners and contractors may be involved in the assessment and management process led by the relevant Social Care Team and may be invited to take part in any strategy meeting or attend an initial Case Conference, where there is a criminal investigation, they may be required to co-operate with the Police. In all these circumstances, they will be offered sufficient time to prepare and attend meetings with the support of their line manager and Key Training Safeguarding Lead.

They will also receive appropriate senior management support and the Safeguarding Champion will continue to provide support and guidance as required/appropriate records will be kept of every concern raised and they will be detailed as what actions have been taken, whether an external agency has been involved and is leading on any investigation and what the outcome has been so that the file can be closed and then stored for legal purposes on the secure system.

Protect Yourself Against Allegations of Abuse

Avoid personal and social contact with children, young persons or vulnerable adults and seek to minimise the risk of any situation arising in which misunderstandings can occur. Learning from all allegations against staff investigations should be incorporated in our records, not just from those that are concluded and substantiated.

The KCSIE guidance now makes clear that we can choose to whom low level concerns about staff are reported to, so long as it is clear in their policies. For Key Training, this remains within the safeguarding team as all of us are trained as designated safeguarding leads (DSL).

<https://www.gov.uk/government/publications/keeping-children-safe-in-education--2#full-publication-update-history>

You Should NOT:

- Engage in flirting, innuendo or make suggestive terms or gestures, or indicate favouritism for a child or vulnerable adult.
- Issue or threaten any form of physical punishment.



- Initiate or engage in sexually provocative games, conversations or activity involving or observed by young people, whether based on talking or touching.
- Make sexually suggestive remarks or discriminatory comments to or in front of a young person or discuss staff's own sexual relationships in front of them.
- Engage in any sort of sexual relationship with a young person even where the young person is aged 16 or over and therefore legally able to consent.
- Use any type of physical punishment in order to discipline. Shouting at young people should be avoided whenever possible and only if alternative forms of discipline have failed.
- Photograph or film young people for which no prior consent has been sought.
- Broadcast or view any audio and/or visual material (CDs, DVDs, videos, computer or games etc.) that has inappropriate content for young people.
- Invite, or allow a young person or vulnerable adult who you have met through your work to your home or another location where the purpose is one of friendship or an intimate relationship.
- Engage in, or tolerate, any inappropriate physical activity involving young people.
- Allow the use of inappropriate language to go unchallenged.
- Do things of a personal nature for children or vulnerable adults that they can do for themselves.
- Dismiss an allegation of any sort relating to a customer's welfare or delay the reporting of an allegation.
- Discourage anyone from reporting concerns or ask individuals to keep secrets.
- Make promises to keep secrets, keep any disclosure confidential or overreact or be judgemental should they suspect abuse.
- Spend excessive amounts of time alone with children or vulnerable adults, away from others.
- Make unnecessary physical contact with children or vulnerable adults, however, there may be occasions where physical contact is unavoidable, such as providing comfort at times of distress or physical support in contact sports or similar. In all cases, contact should only take place with consent of the child or vulnerable adult.
- Do not arrange to meet a child or vulnerable adult or their families with whom you work outside of working hours unless it is with consent of the parents/carers and person in charge of the activity.
- Accept any 'friend requests' of any type, on any social media platform from personal accounts. This means that staff can only communicate with learners via social media using official Key Training sites. This is for the protection of all learners and staff.
- Give or receive gifts and/or substances such as drugs, alcohol, cigarettes, e- cigarettes from or to a young person or their family.
- Consume alcohol, take illegal drugs or legal highs, during the working day/evening or at events, including during any breaks or when in the presence of young people.
- Smoke/vape with, or in front of, young people.
- Steal, or condone someone else's stealing, regardless of the value of the stolen item.

You Should:



- Work in a room where you can be visibly seen, leave the door open and make sure other adults visit the room regularly whilst respecting children and vulnerable adults' rights to privacy and encourage children and adults to feel comfortable enough to report attitudes or behaviours they do not like.
- Plan activities that involve more than one other person being present, or at least within sight and hearing of others. If it is unavoidable always ensure your line manager knows where you are, with whom and why.
- All staff, delivery partners and contractors at organised activities will be expected to act with discretion with regard to their personal relationships.
- This should ensure their personal relationships do not affect their leadership role within the organisation. All pre-existing relationships between staff, delivery partners, contractors and or participants of the organised activities must be declared.
- Respect a young person's/adult's right to personal privacy but never agree to keep any information relating to the harm of a young person/adult confidential. Provide support to a child, young person or vulnerable adult making a complaint.
- Remain calm and ensure that no one is in immediate danger if they suspect abuse. Report any concerns to the Safeguarding Champion without delay and record all the facts.
- Ensure that if a young person who has become distressed needs comfort that this is done in a way that is both age appropriate and respectful of their personal space. Never act in a way which may be perceived as threatening or intrusive. Always ask a young person before you act. Hugging should be limited and never initiated by staff. Any hugging should be done by the side of the young person with an arm placed around the shoulders side by side.
- Ensure that if any kind of physical support is required during any activities, it is provided only when necessary, in relation to the activity and that this is done in a way that other colleagues can observe you.
- Avoid working in isolation with children, young persons, and vulnerable adults, follow the recommended adult-to young people ratios for meetings and activities.
- Never give out a personal mobile number or private e-mail address and ensure working hours of contact ability are stated.
- Everyone should be aware of the procedures for reporting concerns or incidents and be familiar with the contact details of the Safeguarding Champions and Leads
- Treat all young people and adults equally and listen to them; avoid favouritism and gossiping.
- Ensure allegations or disclosures by a young person or another adult are taken seriously and reported, including any made against you. Follow the procedures for reporting concerns.
- Never befriend or chat to children, young persons or vulnerable adults on social network sites. Always use professional language when writing, phoning, emailing or using the social media to communicate with young people or vulnerable adults.
- Be aware that young people can develop heterosexual and homosexual infatuations (crushes) towards adults working with them. If this is happening, tell your line manager and then respond to the situation in a way that maintains the dignity of all concerned.
- If staff, delivery partners and contractors have concerns relating to the welfare of a child, young person or vulnerable adult in their care, be it concerns about actions/behaviours of another colleague or concerns based on any conversation with the child, young person or vulnerable adult, particularly where they make an allegation, they should report this immediately.



- Act as a role model
- Set and monitor appropriate boundaries and relationships when working with children and vulnerable adults based on openness, honesty and respect for the child or vulnerable adult. Ensure that the focus of your relationship with a young person that you have met through any programmes, always remains professional. The aim should never be to develop the relationship into a friendship or intimate relationship.

Upon induction to the programme the child/ young person or vulnerable adult will be given a copy of the Learner Safeguarding Handbook which describes expected conduct and their roles and responsibilities. Staff employed by Key Training should also be issued with and asked to complete CPD course on SST for Safeguarding Children and Vulnerable adults' level 4. Key Training staff will go through all safeguarding documents with them to ensure they understand their responsibilities.

If a child, young person or vulnerable adult feels that there has been a breach of conduct by a Key Training member of staff, they should report this breach by utilising the Key Training complaints process. The complaint will be fully investigated as per the policy/process and actions taken to ensure the individual making the complaint is fully supported. If the complaint is regarding another child, young person or vulnerable adult there may be a need for immediate actions to be implemented to ensure the safety of both the individual making the complaint and the person the complaint has been made against.

The breach of conduct may need the intervention of the Safeguarding Lead and the Key Training safeguarding procedures should be followed. All complaints are recorded and followed up to a satisfactory conclusion.

Staff who breach this code of behaviour may be subject to Key Training's disciplinary procedures. All children, young people and vulnerable adults should be treated with respect and this policy has been written with respect, dignity and safety for every individual in mind, however staff understand that children/young people can abuse their peers. Peer abuse can take many forms such as sexting, bullying, physical and emotional abuse, and inappropriate banter.

All staff should also refer to the sections in this policy on 'E-safety', 'Online Safety and Social Media', and 'Safeguarding awareness during an online learning session'.

All low level concerns will be kept via a low level concerns log, accessed only by DSL's.



Record Keeping

The Keeping Children Safe in Education Guidance for 2022, reminds staff that children / vulnerable adults are not always ready or able to talk about their experiences of abuse and/or may not always recognise that they are being abused. This is where we all must be extra vigilant in identifying signs that learners may be at risk of harm or abuse, especially within remote settings where this is more difficult to identify.

Well-kept records are essential in situations where it is suspected or believed that a child or vulnerable adult may be at risk from harm.

Records should state who was present, time, date, and place. Be factual, state exactly what was said, observed or alleged, be written in ink, and signed by the recorder if in paper format.

Records must also be stored, retrieved, and destroyed within current Data Protection laws and Key Training's robust Data and Information Security requirements. All concerns must be raised via the [My Concern](#) system by the individual that identified the concern, which will then be sent directly to the Safeguarding team for review.

Staff, delivery partners and contractors are guided in recording, to be mindful of the possibility that this may be shared with others at some stage and in exceptional circumstances, the possibility that they may become evidence in court proceedings. Equally staff, delivery partners and contractors must be aware that documents regarding an individual that Key Training hold may be subject to a Freedom of Information request under the Freedom of Information Act. Under the Act individuals have the right to access their own records unless the situation is covered by the following exemptions:

- Information that would be likely to prejudice the prevention and detection of a crime, or the capture or prosecution of an offender.
- Information held for the purposes of social work where disclosure would be likely to prejudice the work, by causing serious harm to the physical or mental health or condition of the data subject or another person.

Records are kept for the time required legally and or contractually by the various government Commissioners and there is a robust storage, retrieval and disposal process and system in place.

Where a request for information sharing is made the Safeguarding Director, Safeguarding Lead, LSO Team and senior management would decide as to whether they are able to share the information and if



necessary, would seek relevant legal advice and advice from other bodies such as the NSPCC and Childline. Once the decision has been made regardless of whether it is to be shared or not this is still recorded identifying the reasons for the decision. If the request has come from the LSCB, they will provide Key Training with clear rationale as to why the information is needed and the request should be proportionate to the reason. Key Training follow the 7 Golden Rules to Information Sharing as per the guidance document “Information Sharing: [Advice for Practitioners Providing Safeguarding Services to Children, Young People, Parents and Carers](#)”. (see **GOV.uk**)

As part of enrolment all customers sign or electronically sign to consent to Key Training holding personal data. Customer's and their parents / carers, where appropriate, are made aware of the need for Key Training and or delivery partners to hold information relating to them, what will be held, how it will be held, how long it might be held, who might have access to it and how it will be used.

The Safeguarding concern is sent to the Key Training Safeguarding team via [My Concern](#). All concerns and incidents are reported on at Board level and where appropriate, evaluations undertaken so that lessons learnt in how these were handled are discussed and where appropriate procedures are revised.

All partner's policies and procedures are checked during due diligence and any policies or procedures that do not meet Key Training and legislative standards must be revised. Key Training will support partners to revise these documents if they are unsure. Partners will follow their own policy and separate confidential folders are required to store the concern of each individual child, young person, or vulnerable adult.

Awareness sessions regarding data and information security are delivered to staff at all levels in the organisation with regular reminders through intranet news items. All information covering data protection and security are held on our system which all staff, delivery partners and where applicable contractors are made aware of through the awareness and induction sessions. The information about information security management system (ISMS) is available on the Key Training intranet, the Head of IT ensures all relevant management are informed of all security related materials.

Key Training definition of its staff's roles and responsibilities to data security and protection are detailed in several documents on our system.

In accordance with Key Trainings procedures all security elements and ISMS documents are reviewed on an annual basis, risk is managed continually through a controlled management process which is also reviewed through Senior Management Team meetings and full annual analysis.



All information security incidents will be reported to Key Training's Head of IT immediately who is responsible for ensuring the incident is correctly raised and evaluated for risk, The Head of IT will work with the identified asset owner responsible to resolve such incidents and take any further actions required for future mitigation. Where deemed appropriate, part of the process would be to inform the Key Training Board for the resolution of any such incidents. All incidents are also analysed, and a report is generated to the Board.

All Key Training direct delivery offices/sites are subject to Key Training scheduled audits against relevant security controls.

Any nonconformities are recorded in the corrective action log to be dealt with according to our corrective action procedures. Where a security incident is identified, this is followed up in accordance with Key Training ISMS process by the Head of IT.

Key Training ensure encryption is in place, data is stored on cloud systems and only authorised staff with individual passwords have access to this data. We have clear desk policies, and this is checked during audits and all policies are checked annually.

All assets relating to Key Training information systems are controlled and maintained through the Head of IT in accordance with the IT Policy.

All customer data has been classified as Corporate Sensitive and is protected under the protection method set out in the IT Policy. Aggregation of data must be considered and is covered under the classification that has been attributed. A disclaimer detail is included in all communication via email.

All physical storage media is marked with physical asset tags and recorded in the IT asset management system, held by the Head of IT.

All employees are issued with a Job Description for the Job Role they are employed for. The Roles and Responsibilities are defined within the Job Description.

All Key Training staff sign a confidentiality agreement under Key Training standard terms and conditions of employment. Data security/protection awareness is maintained by regular communications, inductions, and visits by internal auditors.



System records are maintained so that the company network and systems can be adequately monitored and audited for signs of actual, or possible, security breaches and attacks. 24 x 7 monitoring is in place through Key Training Hosted Contract and in accordance with the IT Policy.

Where we collect such items as customer CVs and / or training certificates these are all handled in the same way as any paper record in that they are stored electronically on encrypted storage drives or where a paper copy is maintained it would be stored with the customer file and stored in secure locked cabinets, all customer data is classified within our ISM systems as corporate sensitive.

Key Training has classified all data as Corporate Sensitive, a full compliant backup and restore service is applied in line with its contractual agreements.

Key Training maintain a corporate classification system to ensure that all Corporate Sensitive data is held on archive for the lifetime of the contract in addition to the agreed retention period for audit purposes, this is fully documented within our Information Management Statement.

Staff access customer's systems via Aptem which uses encrypted transport technology. Access to the Internet is via a fully managed firewall with access to web sites being restricted by Internet filtering software. No laptop or other device can access customer data away from a secure site.

Access to sensitive data will be provided only through the users of a company PC or Laptop (asset) which must be a domain member unit which will be regulated through End Point analysis. All remote connections are via SSL encrypted tunnels.

External speakers and events

An external speaker or visitor is used to describe any individual or organisation who is not a member of staff or learner working with Key Training, or one of its contracted partners, who has been invited to speak to staff/learners.

The Prevent duty does not seek to ban any speakers or impinge on freedom of speech. What the duty does is ensure that the right processes are in place to manage events and speakers. This could mean:

- Ensuring a reasonable notice period for checks to be made, which could potentially be from an open source. This could include looking into instances where potential hate speech may have taken place at previous events.



- Processes or protocols to demonstrate how information about the speaker is used to decide whether to allow their event to take place or not (risk assessed)
- A requirement for speakers to sign up to the organisation's equality and diversity policy
- Evidence of the final decision made about whether to allow the speaker into the organisation, including the mitigation measures put in place.

An event is any event, presentation, visit or initiative organised by a staff group/ department or individual that is being held on Key Training's premises or where Key Training is being represented by a stand on non-Key Training premises, e.g. at an exhibition, event or fair. It also includes events where external speakers are streamed live into an event or a pre-recorded film is shown. It also includes activity being held on Key Training premises but organised by external clients.

All speakers or visitors should be made aware by the person or group arranging the event that they have a responsibility to abide by the law and Key Training's policies, including that they:

- Must not advocate or incite hatred, violence or call for the breaking of the law
- Are not permitted to encourage, glorify, or promote any acts of terrorism, including individuals, groups or organisations that support such acts.
- Must not spread hatred and intolerance in the community and thus aid in disrupting social and community harmony
- Must be mindful of the risk of causing offence to (or seek to avoid insulting) other faiths or groups within a framework of positive debate and challenge
- Are not permitted to raise or gather funds for any external organization or cause without explicit permission of the organisation.

Key Training has policies and procedures in place for the management of events held on the premises or via a live streaming link (Zoom or Teams). The policies apply to all staff, learners and visitors and clearly set out what is required for any event to proceed.

The policies and procedures include the following:

- Sufficient notice to allow for checks to be made and cancellation to take place if necessary
- Advance notice of the content of the event, including an outline of the topics to be discussed and sight of any presentations, footage to be broadcast, etc.

In direct relation to online events, the following should be adhered to:

- **Disable guest screen sharing** – This prevents inappropriate screen sharing (accidental and deliberate 'bombing') but does not prevent guests attending. You should be able to enable screen



sharing if required during the session. Ability to screen share should only be given to individuals, not the entire group if possible.

- **Require host to be present** – Make sure the host is present before people can join. You may need to enable an option in the meeting setup to prevent guests joining before the host.
- **Use a unique meeting password** if the tool supports this – This protects the meeting from being joined by uninvited individuals and only share the password with invited guests (over-sharing means outsiders can enter the meeting). Passwords work best in conjunction with waiting room / lobby features.
- **Encourage external attendees to use a tool supported by Key Training** – Many of our external partners will be able to use the same tools as us. Where possible, please encourage them to use these supported tools. If this is not possible and attendance is necessary, some unsupported tools may be used but unsupported tools may only be used where there is a genuine business need for the meeting or collaborative session, where a supported tool cannot be used (even with reduced functionality).

Safer Recruitment and Training for Staff

Regarding safer recruitment, the KCSIE guidance clarifies that a curriculum vitae (CV) should only be accepted alongside a full application form. CVs on their own will not contain all the information required to support safer recruitment.

The guidance now states that education settings should consider conducting online searches (including publicly available social media searches) as part of their due diligence during the recruitment process. The full procedure for managing Staff Recruitment & Selection is detailed in our Safer Recruitment and Selection Policy.

When recruiting new members of staff Key Training follows the guidance set out in part 3 of the [KCSIE guidance 2022](#) and has due regard to the Safeguarding Vulnerable Groups Act 2006 and the Protection of Freedoms Act 2012. Key Training adapts the guidelines within the Baseline Security Standard (BPSS) for all appointments and the HR department uses the DBS checking service to assess applicants' suitability for positions of trust and undertakes to treat all applicants for positions fairly. DBS checks are undertaken in line with current guidance and current legislation, alongside appropriate references being obtained and ensuring qualifications are verified. Safer Recruitment training has been undertaken by senior members of staff who conduct recruitment activities in accordance with statutory guidance.



Newly appointed staff will have a job role induction, in line with the Key Training Probation policy over a 3-6-month period. A robust induction into the child safeguarding procedures will also be provided when they join the organisation. Probation is a period of both professional development and review. It provides a fair opportunity for an Employee to understand the organisation, the standard of performance required and to be given the guidance and support to be effective in his or her new role.

Probation allows the manager of the newly appointed Employee to assess objectively whether the recruit is suitable for the role, considering the individual's overall capability, skills, performance and general conduct in relation to the job in question.

Key Training shall ensure that all Employees are made aware of the standards expected of them and will put in place the appropriate support, training, and feedback to achieve these standards.

For the organisation, probation allows the assessment of the Employee's contribution, potential and suitability for the role to which they have been appointed.

Furthermore, probation aims to identify the essential development required to undertake the job role, identify any areas for development following initial interventions, and provide support in these areas through a structured plan.

They will be made aware of the relevant Safeguarding procedures as part of that induction programme and be given a copy of Key Training's Safeguarding Young People and Vulnerable Adults Policy. All staff receive Safeguarding training at least annually and are encouraged to feedback into the development of our policies and practices to ensure that we embrace the safety of our learners, employers, and staff at all times. The full policy and procedures are available via www.keytraining.co.uk

Key Training Safeguarding Lead: Vicky Harold

Key Helpline (telephone / text): 07769 279325

Email: keyhelpline@keytraining.co.uk

Learner Recruitment

When joining a programme, a detailed record of learner needs will be kept, and an Individual Learning Plan (ILP) prepared to ensure all the needs are planned for. All learners receive a learner handbook, detailing



our support policies and key contacts. There is also follow up review points to capture their journey and do their needs are being met. Delivery staff will work closely with the Designated Employer contact ensuring a tri-party support system is in place. It is the responsibility of Key Training staff to conduct checks to verify the learner's identity prior to them being enrolled on a programme.

Learners may be required by their employer, to undertake DBS checks for a role they are applying for but this will remain the responsibility of the employer to conduct the appropriate DBS check as needed.

Wellbeing and Learners 'in centre' safety

Key Training will abide by Government guidance relating to learner's safety and measures that need to be taken to minimise the risk of infection during pandemics. We will be vigilant to the mental health and wellbeing of learners during the time of any isolation and provide a support plan for regular contact where attendance is not a normal indicator of engagement. Learners will also be provided with guidance on safe home working.

Welfare and Pastoral Care

Pastoral Care is concerned with the care and promotion of all learners' personal and social wellbeing, ensuring progress, and fostering positive attitudes. Through its pastoral care provision, Key Training demonstrates its continuing concern for its learners as individuals, actively encouraging them to be secure, successful, and fully participating members of the wider community. Key Training will provide learners with sufficient support across all areas of welfare according to individual needs.



Appendix A - Record of Concern – reporting via MyConcern

If you believe that a young person is in immediate danger, call the Police immediately on 999.

WHEN DEALING WITH A SAFEGUARDING ISSUE PLEASE REMEMBER THE FOLLOWING THINGS:

- Listen but do not investigate.
- Do not promise confidentiality.
- Make sure you gain consent from the learner to share this information.
- Ask the learner what they want to happen / what support would be most helpful.
- Tell the learner what you will do next.

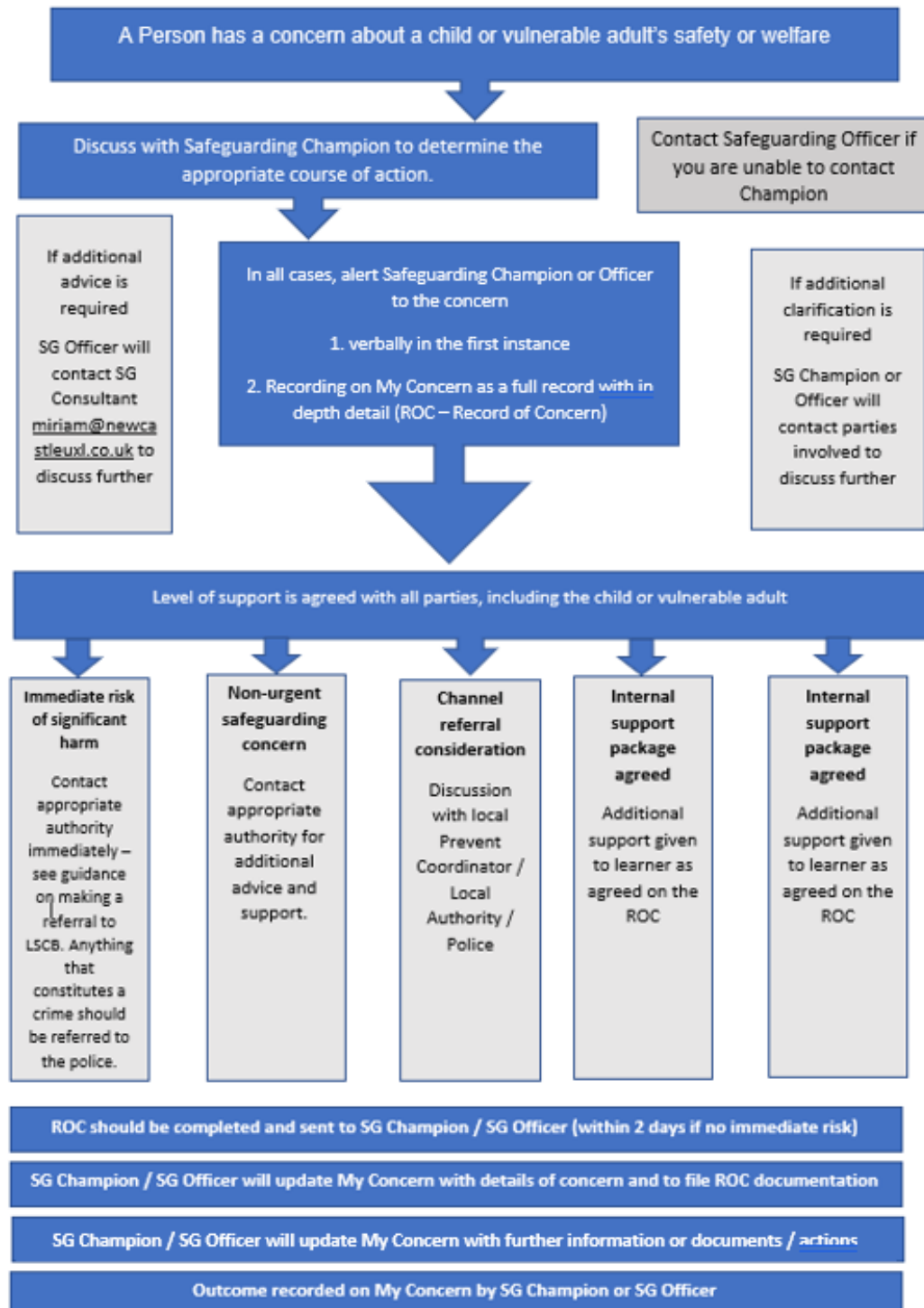
WHEN A CONCERN IS REPORTED, REMEMBER

- Provide as much information as you can, so that we have a full understanding of the circumstances.
- Record the facts; do not interpret what you have observed.

How to update a concern via My Concern – [how to submit a concern](#)



Appendix B – Reporting Flow Chart





Appendix C – Safeguarding Contact Information

Contact information for Designated Safeguarding Persons, Learners can contact the Key helpline in the following ways:

Telephone or text	07769 279325
Email	keyhelpline@keytraining.co.uk

The helpline calls, texts and emails go directly to the Safeguarding Lead who responds appropriately and records any contact made on the helpline call log.

Name and Position	Safeguarding Role Held	Contact Details
Wendy Shepherd	Managing Director & Safeguarding Director	Wendy.shepherd@keytraining.co.uk 07557 132525
Vicky Harold	Designated Safeguarding Lead	Victoria.harold@keytraining.co.uk 07958 128348
Angela Chalmers	Safeguarding Champion	Angela.chalmers@keytraining.co.uk 07824 862672
Ami Nurjandoa	Safeguarding Champion	Ami.nurjandoa@keytraining.co.uk
Miriam Jameson	Safeguarding Consultant	miriam@newcastleuxl.co.uk 07903862606



Appendix D - Relevant Agencies Contact Details

Police Non-Emergency Number	101
Crimestoppers	0800 555 111
Anti-terrorism Hotline	0800 789 321

Childline	0800 1111
Child exploitation and online protection centre (CEOP)	0870 000 3344 www.thinkuknow.co.uk/
Child and family consultation service	http://www.there4u.info/index.html
NSPCC Helpline	0808 800 5000 http://www.nspcc.org.uk/under18
NSPCC Whistleblowing Helpline	0800 028 0285 help@nspcc.org.uk
Internet Watch Foundation	https://www.iwf.org.uk/
Social Care Link for Safeguarding Concerns	https://www.gov.uk/report-child-abuse-to-local-council

Please refer to the latest [KCSIE guidance](#) for full details of additional advice and support that is available. The above are only key contacts and many other sources of support can be found within the guidance stated.



FE/HE Regional Prevent Coordinators

East Midlands: Sam Slack	sam.slack@education.gov.uk 01332 643054 07812 301215
Northwest: Nigel Lund	nigel.lund@education.gov.uk 07384 452146
Southwest: Cheri Fayers	Cheri.fayers@education.gov.uk
East of England: David Layton-Scott	David.LAYTON-SCOTT@education.gov.uk 07384 452155
Southeast: Alamgir Sheriyar	alamgir.sheriyar@education.gov.uk 07468 714372
West Midlands: Alamgir Sheriyar	alamgir.sheriyar@education.gov.uk 07468 714372
Northeast: Christopher Sybenga	chris.sybenga@education.gov.uk 07384 456640
London: Jennie Fisher	Jennie.FISHER@education.gov.uk 07880 469588



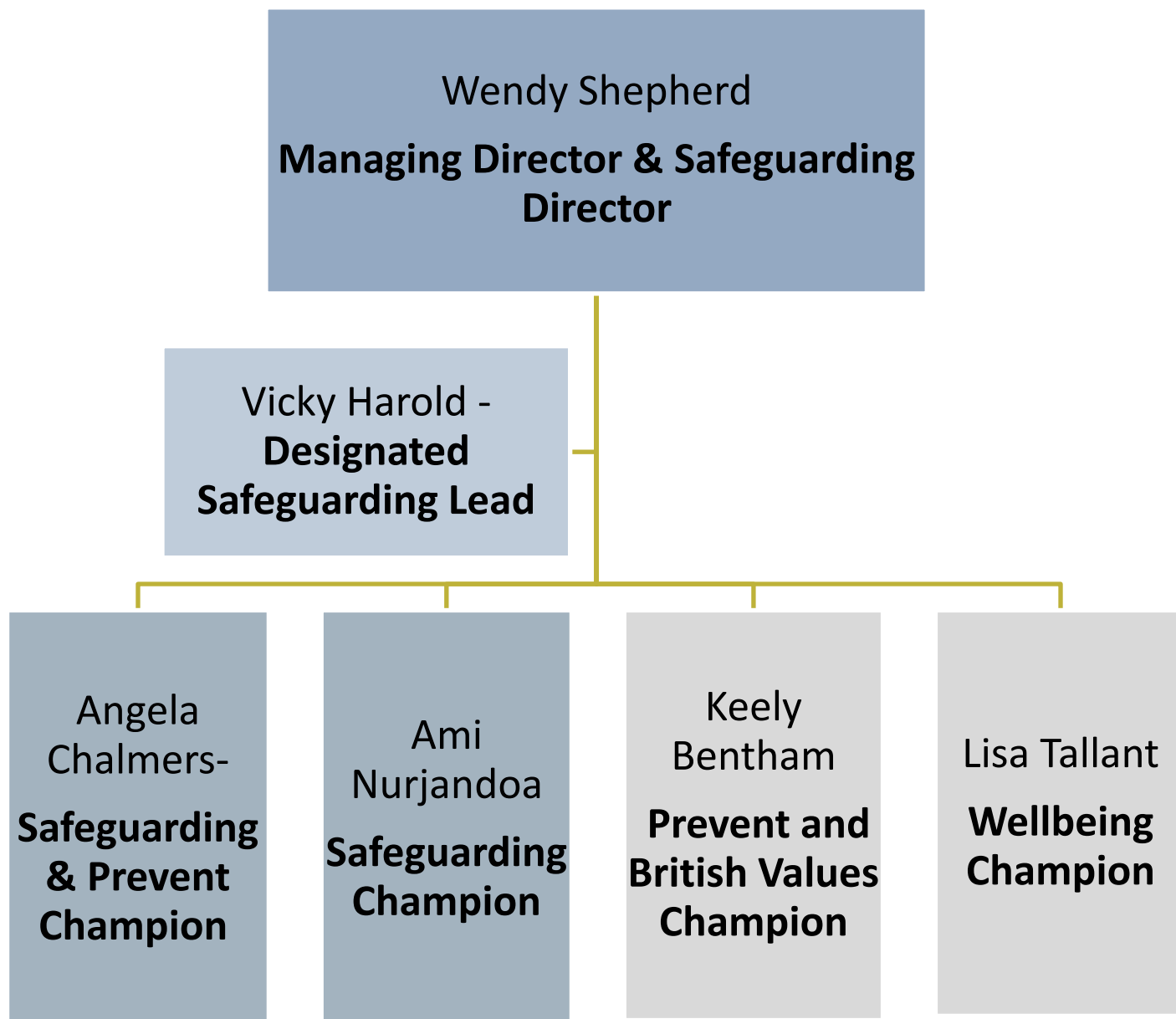
Appendix E – Complaint's process

Complaints Procedure





Appendix F - Organisational Chart





THE KEY TO SUCCESS