Unlock Skills for Success

Safeguarding and Prevent Policy

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Safeguarding and Prevent Policy

Introduction

The Safeguarding and Prevent Policy for the Specialist Skills Hub reflects the importance of our responsibility to safeguard and promote the welfare of all our apprentices and staff by protecting them from physical, sexual, or emotional abuse, neglect, and bullying. We are committed to providing a caring, friendly, and safe environment for all our apprentices so that they can learn in a relaxed and secure atmosphere. We believe every apprentice should be able to participate in all learning and social activities in an enjoyable and safe environment and be protected from harm.

Scope

This policy is applicable to all staff, apprentices, visitors, contractors, volunteers, service providers, subcontractors who may be working with children (those under 16), young adults (those aged 16-24) and vulnerable adults (as defined in section 59 of the Safeguarding Vulnerable Groups Act 2006) and/or those persons aged 18 and over who by reason of mental or any other disability, age or illness are or may be unable to look after themselves or are or maybe unable to protect themselves against harm or exploitation) whom The Specialist Skills Hub encounters through any of their programmes.

Aims

The aims of this Policy are:

- Identify the expectations of staff in relation to safeguarding.
- Ensure relevant and effective safeguarding practices are in place.
- Ensure the right of every applicant and apprentice to learn within a safe environment.
- Promote awareness to staff of the need to safeguard children, vulnerable adults and all people and to recognise that safeguarding is everyone's responsibility.
- Ensure that the fundamental rights and needs of our applicants and apprentices are observed.
- Prevent abuse through the pastoral support offered to all applicants and apprentices.
- Raise awareness of different types of abuse and children in need issues.
- Provide guidelines for staff in handling matters relating to actual or suspected child abuse.
- Ensure staff act professionally.
- Deter potential, unsuitable individuals from applying to the Specialist Skills Hub, by demonstrating our attentiveness and vigilance in relation to safeguarding through our website and job advertisements.
- Reject at interview stage anyone where we have doubts about suitability.
- Prevent the risk of abuse by ensuring procedures and standards are in place.

Throughout this policy and procedure, reference is made to 'children and young people'. This term is used to mean those under the age of 18. 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 mental and physical health or development; ensuring that children grow up in circumstances consistent with the provision of safe and effective care; and keeping action to enable all children to have the best outcomes (Keeping Children Safe in Education 2025 updated annually). Reference is made throughout to 'adults at risk of harm'. Adults at risk of harm are defined as people aged 18 years or over who may need or receive community care services by reason of mental health or other disability, age or illness and who may be unable to take care of themselves or protect themselves against significant harm or exploitation (No Secrets, Department of Health. March 2000). The procedure will be applied, with appropriate adaptations to all apprentices.

This policy has been created with reference to 'Working Together to Safeguard Children (WTST 2024), SET Procedures 2015, Counterterrorism and Security Act (2015), Ofsted's EIF (2023), Keeping Children Safe in Education (2024), Online Safety Act Statutory Guidance (Ofcom 2024–2025) and Domestic Abuse Act 2021.

Positions of Trust
All staff are reminded that they hold a Position of Trust when working with apprentices under the age of 18 or adults at risk. Under the Sexual Offences Act (2003), as amended in 2022, it is a criminal offence for any adult in a Position of Trust to engage in sexual activity with a person under 18 for whom they are responsible. Any breach of a Position of Trust will be treated as a safeguarding matter and reported to the appropriate authorities. Staff must maintain professional boundaries at all times.

Radicalisation and Prevent Radicalisation is defined as the act or process of making a person more radical or favouring of extreme or fundamental changes in political, economic, or social conditions, institutions or habits of the mind.

Extremism is the promotion or advancement of an ideology based on violence, hatred or intolerance, that aims to:

- negate or destroy the fundamental rights and freedoms of others; or
- undermine, overturn or replace the UK's system of liberal parliamentary democracy and democratic rights; or
- intentionally create a permissive environment for others to achieve the results in (1) or (2).

Extremism can lead to the radicalisation of individuals, deny people their full rights and opportunities, suppress freedom of expression, incite hatred, erode our democratic institutions, social capital and cohesion, and can lead to acts of terrorism.

At The Specialist Skills Hub, we are fully committed to safeguarding and promoting the welfare of all apprentices and staff. We recognise that safeguarding against radicalisation is no different from safeguarding against any other vulnerability.

At The Specialist Skills Hub, all employees are expected to uphold and promote the fundamental principles of British values, including democracy, the rule of law, individual liberty and mutual respect

and tolerance of those with different faiths and beliefs. The principal objectives of this policy are that: All staff will understand what radicalisation and extremism are and why we need to be vigilant. All apprentices and staff will know that The Specialist Skills Hub has policies in place to keep them safe from harm and that The Specialist Skills Hub regularly reviews its systems to ensure they are appropriate and effective.

The Specialist Skills Hub staff promotes respect, tolerance, and diversity. Apprentices and staff are encouraged to share their views and recognise that they are entitled to have their own different beliefs which should not be used to influence others. It is recognised that apprentices or staff with low aspirations are more vulnerable to radicalisation and, therefore, we strive to equip our apprentices and staff with confidence, self-belief, respect, and tolerance as well as setting high standards and expectations for themselves.

Apprentices and staff are briefed during induction and as part of ongoing standardisation and training; about how to stay safe when using the Internet and are encouraged to recognise that people are not always who they say they are online. They are taught to seek help if they are upset or concerned about anything they read or see on the Internet.

Inappropriate websites are banned and cannot be accessed from the Specialist Skills Hub premises. The Specialist Skills Hub staff, contractors, associates, and volunteers undertake appropriate training to ensure that they are clear about their role and the parameters of their responsibilities including their statutory safeguarding duties. Through various training opportunities within The Specialist Skills Hub, we ensure that our staff are fully aware of the threats, risks and vulnerabilities that are linked to radicalisation; are aware of the process of radicalisation and how this might be identified early on.

The Specialist Skills Hub will:

- Provide a safe environment for children, young people, and adults at risk of harm to learn in.
- Identify those who are suffering or are likely to suffer significant hard or who are at risk of radicalisation.
- Have a system for identifying concerns in relation to abuse of adults at risk of harm and effective methods of responding to disclosures.
- Refer concerns that a child, young person or adult at risk of significant harm or might be at risk of significant harm to the appropriate referral agents as soon as problems emerge.
- Work effectively with others as required by ‘Working Together to Safeguard Children (2023)
- Consider interagency safeguarding procedures.

The Specialist Skills Hub will approve and review policies and procedures:

- Ensuring systems are in place and effective in relation to the identification of children, young people and adults at risk of harm, and procedures for reporting concerns are widely known.
- Ensuring effective procedures for reporting and dealing with allegations of abuse by members of staff or others who come into contact with apprentices.
- Ensuring safe recruitment of staff.

- Ensuring staff are appropriately trained to discharge their duties in relation to safeguarding and PREVENT.
- In developing policies and procedures, The Specialist Skills Hub will take account of guidance issued by the Department for Education, Ofsted and other relevant bodies and groups.

Definitions

Types of abuse and neglect

The Specialist Skills Hub uses the following as definitions of abuse for children, young people, and adults at risk of harm, and The Specialist Skills Hub operates a zero-tolerance operation on each of the below:

Abuse: a form of maltreatment. Somebody may abuse or neglect by inflicting harm, or by failing to act to prevent harm. They may be abused by an adult or adults or child or children.

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

Emotional abuse: Emotional abuse is the persistent emotional maltreatment of a child or adult at risk of harm such as to cause severe and persistent adverse effects on their emotional development. It may involve conveying to them that they are worthless or unloved, inadequate, or valued only in so far as they meet the needs of another person. It may include not giving them opportunities to express their views, deliberately silencing them or 'making fun' of what they say or how they communicate. It may feature age or developmentally inappropriate expectations being imposed. These may include interactions that are beyond the developmental capability, as well as overprotection and limitation of exploration and learning, or preventing from participating in normal social interaction. It may involve seeing or hearing the ill- treatment of another. It may involve serious bullying (including cyber bullying), causing victims to frequently to feel frightened or in danger, or the exploitation or corruption of other. Additionally, 'revenge porn' has been identified as a specific criminal offence (Criminal Justice and Courts Act 2015).

The Act creates a new criminal offence of disclosing private sexual photographs and films without the consent of an individual who appears in them and with intent to cause that individual distress. Some level of emotional abuse is involved in all types of maltreatment, though it may occur alone.

Sexual abuse and harassment: Sexual abuse involves forcing or enticing a child, young person, or adult at risk of harm to take part in sexual activities. It may not necessarily involve a high level of violence, whether or not the child or adult may not be aware of what is happening. The activities may involve physical contact, including assault by penetration (for example, rape or oral sex) or non-penetrative acts such as masturbation, kissing, rubbing and touching outside of clothing. They may also include non-contact activities, such as involving children in looking at, or in the production of, sexual images, watching sexual activities, deepfake sexual imagery, AI-generated sexual content (covered under the Criminal justice Bill 2024-2025), encouraging children to behave in sexually inappropriate ways, or grooming a child in preparation for abuse (including via the internet).

Sexual abuse is not solely perpetrated by adult males. Women can also commit acts of sexual abuse, as can other children.

Child -on- Child / Peer-on-Peer abuse: This includes but is not limited to physical and sexual abuse, sexual harassment and violence, emotional harm, on and offline bullying and teenage relationship abuse. Peer on peer and child on child-on-child abuse can be motivated by perceived differences e.g. on grounds of race, religion, gender, sexual orientation, disability or other differences. It can result in significant, long lasting, and traumatic isolation, intimidation, or violence to the victim (referenced to online-facilitated abuse as mandated by the Online Safety Act guidance (2025).

Up skirting: Up skirting is specific criminal offence under the Voyeurism (Offences) Act 2019. It typically involves taking a photograph under a person's clothing without them knowing, with the intention of viewing their genitals or buttocks for sexual gratification or causing humiliation, distress, or alarm. The revised version of Keeping Children Safe in Education lists up skirting as one example of peer-on-peer abuse.

Sexual Consent: Consent is an agreement between people to engage in a sexual activity. Consent means freely choosing to say 'yes' to a sexual activity. It's needed for any kind of sexual activity, from touching or kissing to intercourse. It's always clearly communicated - there should be no mystery or doubt. There are laws around who can consent and who can't. Without consent, any sexual activity is against the law and can be harmful.

Neglect: Neglect is the persistent failure to meet basic physical and/or psychological needs, likely to result in the serious impairment of health or development. Neglect may occur during pregnancy as a result of maternal substance abuse. Once a child is born, neglect may involve a parent or carer failing to:

- provide adequate food, clothing, and shelter (including exclusion from home or abandonment).
- protect from physical and emotional harm or danger.
- ensure adequate supervision (including the use of inadequate caregivers) or
- ensure access to appropriate medical care or treatment It may also include neglect of, or unresponsiveness to basic emotional needs. This also applies to adults at risk of harm for whom neglect is an often under reported or challenged concern.

Forced Marriage: This involves a young person, or adult at risk of harm being forced into a marriage against their will.

Child Sexual Exploitation: Child sexual exploitation (CSE) is a form of sexual abuse that involves the manipulation and/or coercion of young people under the age of 18 into sexual activity in exchange for things such as money, gifts, accommodation, affection, or status. The manipulation or 'grooming' process involves befriending children, gaining their trust, and often feeding them drugs and alcohol, sometimes over a long period of time, before the abuse begins. The abusive relationship between victim and perpetrator involves an imbalance of power which limits the victim's options. It is a form of abuse which is often misunderstood by victims and outsiders as consensual. Although it is true that the victim can be tricked into believing they are in a loving relationship, no child under the age of 18 can ever consent to being abused or exploited (Barnardo's 2012).

Children who run away or who are missing from home: There are no exact figures for the number of children who go missing or run away but estimates suggest that the figure is in the region of 100,000 per year. Children may run away from a problem, such as abuse or neglect at home, or to somewhere they

want to be. They may have been coerced to run away by someone else. Whatever the reason, it is thought that approximately 25 per cent of children and young people that go missing are at risk of serious harm. There are particular concerns about the links between children running away and the risks of sexual exploitation. Missing children may also be vulnerable to other forms of exploitation, to violent crime, gang exploitation, or to drug and alcohol misuse. Although looked after children are particularly vulnerable when they go missing, the majority of children who go missing are not looked after and go missing from their family home. They can face the same risks as a child missing from local authority care.

Gang Culture/County Lines: County lines is a form of criminal exploitation where urban gangs persuade, coerce or force children and young adults to store drugs and money and/or transport them to suburban areas, market towns and coastal towns (Home Office, 2018). It can happen in any part of the UK and is against the law and a form of child abuse. Children and young people may be criminally exploited in multiple ways. Other forms of criminal exploitation include child sexual exploitation, trafficking, gang and knife crime. (Home Office County Lines Programme 2024 update)

Modern Slavery: encompasses human trafficking and slavery, domestic servitude and forced or compulsory labour. Exploitation can be sexual, involve forced labour, slavery or servitude, forced criminality, forced marriage or organ harvesting. Modern slavery can affect adults or children. (Modern Slavery Statutory Guidance (Home Office 2024 update).

Child Trafficking: Child trafficking is a form of abuse. It involves the recruiting, moving, receiving, and harbouring of children with purpose of exploiting them (HH Department for Education,2011) Child trafficking is a form of modern slavery. Children are trafficked for:

- Sexual exploitation
- Criminal activity
- Moving drugs
- Benefit fraud
- Selling pirated goods
- Forced marriage
- Domestic servitude
- Forced labour
- Illegal adoption
- Unreported private fostering

Domestic Violence: The Home Office defines domestic violence as, "Any incident or pattern of incidents of controlling, coercive or threatening behaviour, violence or abuse between those aged 16 years old or over who are or have been intimate partners or family members regardless of gender or sexuality. This can encompass but is not limited to the following types of abuse:

- Psychological

- Physical
- Sexual
- Financial
- Emotional

Controlling behaviour: a range of acts designed to make a person subordinate and/or dependent by isolating them from sources of support, exploiting their resources and capacities for personal gain, depriving them of the means needed for independence, resistance and escape and regulating their everyday behaviour. Coercive behaviour is an act or a pattern of acts of assault, threats, humiliation and intimidation or other abuse that is used to harm, punish, or frighten their victim. Children who live in households where domestic violence is taking place are seen to be highly vulnerable. There are other forms of abuse or behaviour that put children at risk; the links below provide useful information.

Female Genital Mutilation: This comprises all procedures that involve partial or total removal of the external female genitalia, or other injury to the female genital organs for nonmedical reasons.

Radicalisation: Some young people and adults at risk of harm may be vulnerable to radicalisation for the purpose of violent extremism. Concerns regarding radicalisation will be referred to Channel which is a multi-agency panel who will offer guidance and support with the aim of preventing activity which could be deemed as criminal.

Financial or Material Abuse: This applies to largely adults at risk of harm and relates to circumstances where trust in relation to financial matters is abused. Includes theft, fraud, exploitation, pressure in connection with wills, property or inheritance or financial transactions, or the misuse or misappropriation of property, possessions, or benefits.

Bullying: Bullying someone because of their age, race, gender, sexual orientation, disability and/or transgender will not be tolerated as The Specialist Skills Hub operates a zero-tolerance approach. Bullying of this nature is also against the law. Bullying can take many forms and includes:

- Emotional: Being excluded, tormented (e.g. hiding things, threatening gestures)
- Physical: Pushing, kicking, punching or any use of aggression and intimidation
- Racial: Racial taunts, use of racial symbols, graffiti, gestures
- Sexual: Unwanted physical contact, sexually abusive comments including homophobic comments and graffiti
- Verbal: Name calling, spreading rumours, teasing
- Cyber: All areas on internet, such as email and internet, chat room misuse. Mobile threats by text message and calls. Misuse of associated technology i.e. camera and video facilities, sexting.
- Online: Online abuse is any type of abuse that happens on the web, whether through social networks, playing online games or using mobile phones. Children and young people and adults may experience cyberbullying, grooming, sexual abuse, sexual exploitation, emotional abuse, financial abuse, or identity fraud.

Cyberbullying involves the use of electronic communication devices to bully people. These include mobile phones, tablets, iPods, laptops and PCs. Harmful online content including social media platforms such as Facebook, Instagram, Twitter and WhatsApp are used by cyberbullies to put out their communications. Who is most at risk? Children using social media unsupervised. Vulnerable adults are particularly at risk if they are using social media, as they may be more emotionally and mentally susceptible to the abuse. Algorithmic content systems pose a range of risks to vulnerable adults by potentially steering towards harmful content, fostering addiction, enabling financial exploitation (scams) and reinforcing social isolation.

- **Flaming** Online fights usually through emails, instant messaging or chat rooms where angry and rude comments are exchanged.
- **Denigration** Putting mean online messages through email, instant messaging, chat rooms, or websites set up to make fun of someone.
- **Exclusion** Intentionally leaving someone out of a group such as instant messaging, friend sites, or other online group activities.
- **Outing** Sharing secrets about someone online including private information, pictures, and videos.
- **Impersonation** Tricking someone into revealing personal information then sharing it with others.
- **Harassment** Repeatedly sending malicious messages to someone online.

Cyberstalking Continuously harassing and denigration including threats of physical harm. To reiterate, The Specialist Skills Hub operates a zero-tolerance policy against all types of abuse, please see Bullying and Harassment Policy for more information.

Roles and responsibilities

Our Designated Safeguarding Officer is **Beverley McGowan**: fully supported by our experienced safeguarding team detailed on the following page who are also available to support all individuals experiencing safeguarding or prevent concerns.

The Designated Safeguarding Officer has a key duty to take lead responsibility for raising awareness across all employees relating to the welfare of children and young people in the Company and of overseeing the referral of cases of suspected abuse or allegations.

Employees must remain vigilant at all times of the risk to clients of abusive behaviour from different sources including members of their family, other clients and employees. Any suspicion, allegation or incident of abuse employees must be referred to a line manager (or another manager if appropriate) for full investigation.

If the alleged perpetrator of abuse is another employee, the circumstances will be investigated fully under the Company's Disciplinary Procedure. If it is agreed to be a safeguarding matter a written record of the date and time of the report will be made including the name of the person to whom the matter is reported and sent to the Designated Safeguarding Officer within 24 hours.

The Designated Safeguarding Officer will maintain their skills and knowledge levels across Safeguarding and Prevent with annual updates from an external body, working closely with sector experts and regional LADO's and Prevent leads to ensure currency of information.

As part of this role, they will monitor and manage the dissemination of all safeguarding and prevent updates to the team.

All members of staff will undertake regular updates utilising the Education and Training Foundation series of educational qualifications annually and on commencement of employment.

The Specialist Skills Hub have created a list of key contacts including all regional LADO's we have apprentices placed in accordance with their retrospective area as detailed in Annex 1.

Designated Staff with Responsibility for Protection from Abuse In all cases where allegations are made against people who may constitute part of the children's workforce, The Specialist Skills Hub will consult with the Local Authority Designated Officer (LADO) in retrospect with their area. They will offer advice regarding appropriate next steps in relation to referral and investigation and ensure that all cases are handled in accordance with safeguarding procedures.

The Specialist Skills Hub Team with a responsibility for Safeguarding:

Beverley McGowan – Lead Designated Safeguarding Officer (Level 4 Designated Safeguarding)

Email : bev@specialistshub.co.uk Mobile: 07483361220

Email: safeguarding@specialistshub.co.uk Main number: 0800 538 5680

Teresa McGowan – Designated Safeguarding Officer

Email: Teresa@specialistshub.co.uk

Scott Sammons - Designated Safeguarding Officer/ Mental health first aider

Email: scott@specialistshub.co.uk

All staff (as a minimum) are Level 2 ETF Safeguarding and PREVENT trained.

Responsibilities include:

- Ensuring safeguarding and wellbeing concerns are recorded on the Safeguarding Concerns spreadsheet.
- Ensuring cases of suspected abuse or allegations are appropriately referred to relevant agencies.
- Providing advice and support to staff, consultants and trainers on issues relating to safeguarding is provided.
- Ensuring all records of any safeguarding referral, complaint or concern is kept, (even where that concern does not lead to a referral)

- Ensuring all staff, consultants, trainers and apprentices have access to the Safeguarding and Prevent Policy.
- Ensuring safer recruitment practices are in place.
- Ensuring Safer Recruitment guidelines are applied to apprentices applying to courses which give access to working with children, young people and adults at risk of harm.
- Ensuring identification badges are issued to staff, consultants, trainers.

Safeguarding Records, Data Protection and Retention
Safeguarding records are stored securely, separately from other staff or apprentice files, with access strictly limited to the Designated Safeguarding Team. The lawful basis for processing safeguarding information under UK GDPR is *Public Task* and *Vital Interests*. Records will be retained for a minimum of **6 years after the apprentice leaves**, or until the individual reaches **age 25 for apprentices under 18**, in line with statutory requirements. Where an apprentice under 18 transfers employer or training provider, relevant safeguarding information will be shared securely with the receiving organisation to ensure continuity of protection.

Procedure

Responding to Disclosure:

- Abused children, young adults and vulnerable adults are more likely to disclose details of abuse to someone they trust and whom they feel safe with.
- By listening and taking seriously what the child, young people or vulnerable adult is saying you are already helping the situation. The following points are a guide to help you respond appropriately.

Actions to be taken by the person being disclosed to:

- React calmly so as not to frighten them.
- Avoid asking direct questions other than those seeking to clarify your understanding of what the person has said, they may be formally interviewed by the correct authority, and they should not have to repeat their account on several occasions. (Inappropriate and excessive questioning at an early stage may also impede the conduct of a criminal investigation)
- Take what the person is saying seriously, recognising the difficulties inherent in interpreting what is being said by a person who has a speech impairment or differences in language.
- Tell them they were not to blame, and they were right to tell someone.
- Reassure the child, young person or vulnerable adult but do not make promises of confidentiality which will not be feasible in the light of the developments. Explain to them that you will have to share your concerns with the Designated Safeguarding Officer who has the authority to act.
- Record in writing on the Safeguarding Concerns spreadsheet.

- all the details that you are aware of and what was said using the child, young adult or vulnerable adults' own words immediately.

How to deal with suspicions/concerns of abuse or neglect

Key things to remember if a child, young adult or adult at risk of harm tells you about possible abuse:

- Never promise confidentiality-you will have to break it, and with it the persons trust in you
- Listen carefully and stay calm – you need to listen without making assumptions or judgements
- Do not interview a child, young adult or vulnerable adult at risk of harm. Question normally and without pressure and only to be sure that you understand what you have heard. Never ask leading questions or act as an investigator. Do not put words into their mouth.
- Reassure them that by telling you, they have done the right thing.
- Inform them that you must pass the information on, but that only those that need to know about it will be told. Inform them of to whom you will report the matter.
- Find out what the child or adult at risk of harm would like to happen but make them aware that you may have to act against their wishes (e.g. they may ask you not to disclose to anyone else). For apprentices under the age of 18; wishes regarding action to be taken will be noted, where possible. However, the learner will be made aware that this will not affect the final decision to make a referral.
- Note the main points carefully.
- Use the Safeguarding and Wellbeing system, to gather key information and as a record of your discussion. Where unavailable, use the form provided in Annexe 2
- Do not investigate concerns or allegations yourself, but report them immediately to a Designated Safeguarding Officer
- Adult apprentices have the right to make their own choices where they are capable of doing so.

Confidentiality Every effort should be made to ensure that confidentiality is maintained for all concerned in the safeguarding of children, young adult and vulnerable adults. Information should be handled and disseminated on a need-to-know basis only. This includes the following people:

- A Designated Child/Adult Safeguarding Officer.
- The parents or carers of the person who is alleged to have been abused.
- Police/Social Care Services.
- Senior Management where appropriate.
- The person making the allegation.
- The alleged abuser (and parents or carers if the abuser is a child or young person).

Reporting FGM Female Genital Mutilation (FGM) is illegal in England and Wales under the FGM Act 2003 ("the 2003 Act"). It is a form of child abuse and violence against women. FGM comprises all procedures involving partial or total removal of the external female genitalia for non-medical reasons.

The FGM mandatory reporting duty is a legal duty provided for in the FGM Act 2003 (as amended by the Serious Crime Act 2015). The legislation requires regulated health and social care professionals and teachers in England and Wales to make a report to the police where, in the course of their professional duties, they are either:

- Are informed by a girl under 18 that an act of FGM has been carried out on her; or
- Observe physical signs which appear to show that an act of FGM has been carried out on a girl under 18 and they have no reason to believe that the act was necessary for the girl's physical or mental health or for purposes connected with labour or birth

For the purposes of the duty, the relevant age is the girl's age at the time of the disclosure/identification of FGM (i.e. it does not apply where a woman aged 18 or over discloses, she had FGM when she was under 18). Complying with the duty does not breach any confidentiality requirement or other restriction on disclosure which might otherwise apply. The duty is a personal duty which requires the individual professional who becomes aware of the case to make a report; the responsibility cannot be transferred. The only exception to this is if you know that another individual from your profession has already made a report; there is no requirement to make a second.

All FGM concerns will be recorded *under updated 2024 statutory multi-agency guidance* & the failure to report will be a disciplinary matter (per WTSC 2024 clarity).

Reports under the duty should be made as soon as possible after a case is discovered, and best practice is for reports to be made by the close of the next working day, unless any of the factors described below are present. You should act with at least the same urgency as is required by your local safeguarding processes.

The Specialist Skills Hub link up with local and relevant organisations, this allowing us to make immediate referrals when necessary. A longer timeframe than the next working day may be appropriate in exceptional cases where, for example, a professional has concerns that a report to the police is likely to result in an immediate safeguarding risk to the child (or another child, e.g. a sibling) and considers that consultation with colleagues or other agencies is necessary prior to the report being made. If you think you are dealing with such a case, you are strongly advised to consult colleagues, including your designated safeguarding lead, as soon as practicable, and to keep a record of any decisions made. It is important to remember that the safety of the girl is the priority.

Concerns about individuals who are not apprentices with The Specialist Skills Hub For young people who are not apprentices with The Specialist Skills Hub, the referral must go back to the head of the organisation to which they are attached. The contact can be made direct or via the Safeguarding Lead if they are on site. Where there is no organisational contact available, the referral will be made direct to Children's Services. If there is a concern about a workplace this should be recorded on the Safeguarding Concerns spreadsheet and reported immediately to a Designated Safeguarding Officer.

Missing Apprentices and Repeated Non-Engagement
Unexplained or repeated absence from training or the workplace may indicate a safeguarding risk. Where an apprentice, particularly one aged under 18 or a vulnerable adult, fails to attend scheduled training, workplace learning, reviews or assessments, staff must follow the non-attendance protocol. This includes attempts to contact the apprentice, contacting emergency contacts where appropriate, notifying the employer, and recording the concern on the safeguarding system. Persistent non-engagement is escalated to the DSL and may result in a safeguarding referral to external agencies where there are concerns about exploitation, domestic abuse, radicalisation, or other forms of harm.

Reporting and Dealing with Allegations of Abuse against Members of Staff The procedures apply to all staff, consultants, and trainers whether teaching, administrative, management or support. Allegations of abuse against a member of staff can be defined as when a person has:

- Behaved in a way that has harmed or may have harmed a child, young person or adult at risk of harm.
- Possibly committed a criminal offence against or related to a child, young person or adult at risk of harm.
- Behaved towards a child, young person, or adult at risk of harm in a way that indicates she/he is unsuitable to work with children, young people or adults at risk of harm.

Following an allegation of abuse against a member of staff, consultant or trainer, the Designated Safeguarding Officer would inform the appropriate authority (LADO, Police, etc). The member of staff, consultant or trainer would either be suspended or not offered any further work until the outcome of the allegation is confirmed.

Where an apprentice does not attend a session, 121 or review, the Tutor must try to contact the apprentice and obtain reasoning for their absence. If there is no response or is a suspected safeguarding or wellbeing issue, this should be recorded on the on the Safeguarding Concerns spreadsheet and the DSL notified immediately. If unsuccessful in contacting the apprentice, their emergency contact will be contacted to ensure the safety and wellbeing of the apprentice.

Escalation of Safeguarding Concerns
If any member of staff believes that a safeguarding concern has not been taken seriously, has not been acted on promptly, or disagrees with the decision made by a Designated Safeguarding Officer, they must escalate the matter. Staff should raise the concern with the Lead Designated Safeguarding Officer in the first instance. If unresolved, concerns must be escalated to senior leadership. Where professional disagreement remains, staff should follow the escalation process set out by the local safeguarding partnership. No member of staff should ever feel unable to report or escalate a safeguarding concern.

Whistleblowing
Staff have a duty to raise concerns where they believe malpractice or serious safeguarding failures are taking place. The Specialist Skills Hub promotes a culture where concerns can be raised openly without fear of detriment. Staff can report concerns internally to senior leadership or directly to the Lead DSL. Where staff feel unable to raise concerns within the organisation, or concerns remain unaddressed, they may contact the **NSPCC Whistleblowing Advice Line on 0800 028 0285**. Staff are protected by the Public Interest Disclosure Act and will not suffer any detriment for raising concerns in good faith.

Recruitment and Selection

The Specialist Skills Hub aims to recruit and develop skilled and motivated staff who will deliver an outstanding service to the local community. An effective recruitment and selection process is a major contributor to this aim. The Specialist Skills Hub are committed to safeguarding and promoting the welfare of children and adults at risk of harm and expects its staff to share this commitment.

The Disclosure and Barring Service (DBS) was introduced on 1 December 2012, through the Safeguarding Vulnerable Groups Act 2006 and Protection of Freedom Act 2012. Its purpose is to reduce the risk of harm to children and vulnerable adults. All members of staff, consultants and trainers working in settings with children, young people or vulnerable adults, present on site, must have a current DBS (within 3 years) and submit a copy to the Designated Safeguarding Officer. All members of staff, consultants and trainers working in settings with children, young adults or vulnerable adults, present on site, must have completed PREVENT and safeguarding in the last year. This will be checked as part of occupational competency.

The Safeguarding Children and Safer Recruitment in Education guidance which came into force on 1st January 2011, recommends that in addition to the various staff records which are kept as part of normal business, The Specialist Skills Hub will keep and maintain a single central record of recruitment and vetting checks which is regularly updated (last update September 2024). DBS checks are renewed at least every 3 years OR monitored continuously via the DBS Update Service where used. Online searches must comply with ICO Employment Practices Data Protection Guidance. Decisions based on online search findings must be documented with objective justification.

The Specialist Skills Hub will apply principals of Safer Recruitment to staff working with children, young adults and adults at risk of harm as part of their apprenticeships. It will be the employer/ workplace's responsibility to ensure that their staff and volunteers have the relevant DBS disclosures. The Specialist Skills Hub will not undertake DBS checks for apprentices.

All staff who participate in the recruitment process are required to undergo recruitment and selection process training. In addition, every interview panel must have at least one member who has received Safer Recruitment training. Shortlisted candidates should be informed that online searches may be done as part of pre-recruitment checks.

Whilst it is a criminal offence to knowingly employ someone who is barred from working with children or adults at risk of harm in regulated activity, it is possible to allow such a person to work in controlled activity, subject to specific safeguards being in place. The decision whether to employ in controlled activity someone who is barred from working with children or adults at risk of harm in regulated activity will be made by the Directors of The Specialist Skills Hub. The Specialist Skills Hub Ltd reserve the right to take up references for all members of staff, consultants, or trainers. All members of staff, consultants and trainers working in settings with children, young people, or vulnerable adults, present on site, must have two references.

See Safer Recruitment and Selection Policy for more detail.

PREVENT

The Specialist Skills Hub strongly believes in and adheres to the governments prevent strategy laid out in the 2015 Counter Terrorism and Security Act, Updated Prevent Duty Guidance (2024 – implemented 2025) and the duty it places on training providers (Compliance expectations were strengthened under the 2024 guidance). We will carry out:

- Internal Prevent risk assessments
- Staff Prevent competency checks
- Local risk profiling against 2024 Home Office Prevent regional reports

All Apprentices engaging with The Specialist Skills Hub in any way will undertake an induction session which is to include but not exclusively; health and safety in the workplace, awareness of safeguarding and British values and prevent. It is our aim to set core values that are for all stakeholders, the SLT have our set parameters embedded into our expectations for staff. We view British values of paramount importance, underpinning what it is to be a citizen in a modern & diverse Great Britain. As well as actively promoting these values to our apprentices, we embed our strategy across the full apprentice journey, staff promote it through their delivery & embed safeguarding naturally with apprentices. Leaders & Managers champion 'Prevent' & 'Safeguarding', leading strongly on ensuring that these points are discussed in a variety of forums & relevant communication & promotions are a regular feature. We actively promote all forms of equality & foster greater understanding of & respect for people of all faiths (or those of no faith), races, genders, ages, disabilities & sexual orientations.

The Prevent Strategy will specifically:

- 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 and work with sectors and institutions where there are risks of radicalisation which we need to address.

CONTEST is the Government's Counter Terrorism Strategy, published in July 2006 and refreshed in March 2009 and July 2023. CP 903 – CONTEST: The United Kingdom's Strategy for Countering Terrorism 2023 – July 2023 (publishing.service.gov.uk). The aim of CONTEST, the UK's counter-terrorism strategy, is to reduce the risk from terrorism to the UK, its citizens and interests overseas, so that people can go about their lives freely and with confidence.

CONTEST has four strands, often known as the four Ps. The aims of the 4 Ps are:

- PREVENT - to stop people becoming terrorists or supporting violent extremism
- PURSUE - to stop terrorist attacks through disruption, investigation and detection
- PREPARE - where an attack cannot be stopped, to mitigate its impact
- PROTECT - to strengthen against terrorist attack, including borders, utilities, transport infrastructure and crowded places.

Since the last version of CONTEST in 2018, concerted counter-terrorism efforts by the UK and key allies have largely been successful in driving down risk by suppressing the most serious terrorist threats. This has enabled a rebalancing of finite national security resource into other areas of threat. The core CONTEST framework empowers government departments, devolved administrations, local authorities, frontline emergency services, intelligence agencies, and other partners, to work together to counter terrorism. Our global allies, and independent experts, recognise the core CONTEST Framework – Prevent, Pursue, Protect and Prepare – to be a world leading counter-terrorism programme. A significant majority of people feel safe from terrorism and are confident in the

government's ability to protect the UK from terrorism.

However, the threat from terrorism is enduring and evolving. Despite a prevalence of lower sophistication attacks in the UK, the threat we see today and in the coming years, is more diverse, dynamic and complex:

• a domestic terrorist threat which is less predictable, harder to detect and investigate

• a persistent and evolving threat from Islamist terrorist groups overseas

• an operating environment where accelerating advances in technology provide both opportunity and risk to our counter-terrorism efforts

What is Extremism? - The Government has defined extremism as " Extremism is the promotion or advancement of an ideology based on violence, hatred or intolerance, that aims to:

1. negate or destroy the fundamental rights and freedoms of others; or

2. undermine, overturn or replace the UK's system of liberal parliamentary democracy and democratic rights; or

3. intentionally create a permissive environment for others to achieve the results in (1) or (2).

What is Terrorism? - An action that endangers or causes serious violence to a person/people, causes serious damage to property or seriously interferes or disrupts an electronic system. The use of threat must be designed to influence the Government or to intimidate the public and is made for the purpose of advancing a political, religious or ideological cause.

What is Radicalisation? - People can be drawn into violence or they can be exposed to the messages of extremist groups by many means. The risk of radicalisation is the product of a number of factors and identifying this risk requires that staff exercise their professional judgement, seeking further advice as necessary. It may be combined with other vulnerabilities or may be the only risk identified. Potential indicators include:

- Use of inappropriate language
- Possession of violent extremist literature
- Behavioural changes

- The expression of extremist views
- Advocating violent actions and means
- Association with known extremists
- Seeking to recruit others to an extremist ideology
- Exposure to extremist content via algorithmic feeds
- Use of AI-generated extremist materials
- Participation in emerging “digital extremist ecosystems

The Government has defined extremism as "vocal or active opposition to fundamental British Values", which include:

- Individual liberty
- Rule of law
- Democracy
- Mutual respect and tolerance of different faiths and beliefs.

This includes not discriminating against those with protected characteristics (Equality Act 2010), namely:

- Age
- Disability
- Gender reassignment
- Marriage and civil partnership
- Pregnancy and maternity
- Race
- Religion and belief
- Sex
- Sexual orientation

Channel - Channel is an early intervention multi-agency process designed to safeguard vulnerable people from being drawn into violent extremist or terrorist behaviour. Channel works in a similar way to existing safeguarding partnerships aimed at protecting vulnerable people. Channel is designed to work with individuals of any age who are at risk of being exploited by extremist or terrorist ideologies. The process is shaped around the circumstances of each person 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 are able to work together to provide the best support. 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 particular circumstances. A person will always be informed first if it's 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. Anyone can make a referral. Referrals come from a wide range of partners including education, health, youth offending teams, police and social services. This policy relates to all Staff and Apprentices and Stakeholders. Providers must share relevant safeguarding information with Channel partners where appropriate.

The Specialist Skills Hub Designated officers in relation to Prevent are:

Beverley McGowan – Lead Designated Safeguarding Officer (Level 4 Designated Safeguarding)

Email : bev@specialistshub.co.uk Mobile: 07483361220

Email: safeguarding@specialistshub.co.uk Main number: 0800 538 5680

Teresa McGowan – Designated Safeguarding Officer

Email: Teresa@specialistshub.co.uk

Scott Sammons - Designated Safeguarding Officer & Mental health first aider

Email: scott@specialistshub.co.uk

All staff (as a minimum) are Level 2 ETF Safeguarding and PREVENT trained.

Martyns Law – The Specialist Skills Hub recognises the importance of Martyn's Law. We will prepare for compliance by adopting the measures outlined in the current draft Terrorism (Protection of Premises) Bill.

On Monday 19 December 2024, the Government announced details for the Protect Duty, now to be known as 'Martyn's Law' in tribute of Martyn Hett, who was killed alongside 21 others in the Manchester Arena terrorist attack in 2017. There have been 14 terror attacks in the UK since 2017. These tragic attacks have caused deaths and casualties amongst people going about their everyday lives. The terrorist threat we currently face is multifaceted, diverse, and continually evolving.

As such, it remains difficult to predict which locations could be targeted by terrorists with attempts being harder to spot and harder to stop. The Specialist Skills Hub recognise the need to improve security and ensure robust, proportionate, and consistent measures at public places to make sure we can better prepare and improve public security, considering possible future attacks. We are aware through engagement with industry that, without legal compulsion, counter terrorism security efforts often fall behind legally required activities. The prioritisation, consideration and application of security processes and measures is currently inconsistent.

What will Martyn's Law do? Martyn's Law will keep people safe, enhancing our national security and reducing the risk to the public from terrorism by the protection of public venues. It will place a requirement on those responsible for certain locations to consider the threat from terrorism and implement appropriate and proportionate mitigation measures. The legislation will ensure parties are prepared, ready to respond and know what to do in the event of an attack. Better protection will be delivered through enhanced security systems, staff training, and clearer processes.

This law will impose a duty on the owners and operators of certain locations to increase their preparedness for and protection from a terrorist attack by requiring them to take proportionate steps, depending on the size and nature of the activities that take place there. Proportionality is a fundamental consideration for this legislation. It will therefore establish a tiered model, linked to the activity that takes place at a location and its capacity:

- A standard tier will drive good preparedness outcomes. Duty holders will be required to undertake simple yet effective activities to improve protective security and preparedness. This will apply to qualifying locations with a maximum capacity of over 100. This could include larger retail stores, bars, or restaurants.
- A higher tier will see additional requirements placed on high-capacity locations in recognition of the potential catastrophic consequences of a successful attack. This will apply to locations with a capacity of over 800 people at any time. The shared Business Park at MediaCityUK falls within the scope of Martyn's Law where "qualifying activities" take place. This will include locations for purposes such as entertainment and leisure, retail, food and drink, museums and galleries, sports grounds, public areas of local and central Government buildings (e.g., town halls), visitor attractions. The Specialist Skills Hub feel it is important to consider this when making proactive efforts to safeguarding its staff and apprentices.

Prevent and Channel Information Sharing
Where a Prevent or Channel referral is made, The Specialist Skills Hub has a statutory duty to share all relevant safeguarding information with Channel partners and Prevent teams. This includes contextual information, safeguarding history, welfare concerns, and observations relevant to risk assessment. Information will be shared lawfully, proportionately, and in line with WTSC 2024 and UK GDPR requirements for safeguarding purposes.

See Annex 1 for Key contacts in relation to Channel.

Online Safety Requirements

Online Safety Compliance
The Specialist Skills Hub aligns its online safety approach with the statutory **Ofcom Codes of Practice under the Online Safety Act**. All digital platforms, communication systems and online learning environments used in delivery or support of apprentices must meet required safety standards, including reporting mechanisms, content moderation where applicable, and safeguarding responses to illegal or harmful content.

- We recognise that digital safety is a vital part of safeguarding apprentices in today's online environment.

- In line with the Online Safety Act, we commit to promoting a safe and respectful online culture. Our systems and processes will help protect apprentices from exposure to illegal content, harmful behaviour, and age-inappropriate material.
- We expect all participants (apprentices, staff, and partner organisations) to behave responsibly online, respect one another's boundaries, and promptly report any concerns, including harmful content or behaviour.
- We will provide clear guidance and training for apprentices on healthy digital practices, recognising risks such as self-harm content, exploitation, cyberbullying, or abuse. The Online Safety Act highlights the need for services to address such risks, especially for younger users.
- We require that any digital platforms, tools, or services used in our apprenticeship programme comply with required safety standards under the Act. Where appropriate, we will ensure that age-assurance, content moderation, and reporting mechanisms are in place or signposted.
- If an apprentice discloses or is exposed to content or behaviour online that could be illegal (e.g., related to exploitation, self-harm, or abuse), we will follow our safeguarding procedure, including risk assessment and referral to appropriate support.
- We will keep our online safety approach under review, aligning with Ofcom's codes of practice and any changes to regulatory requirements under the Online Safety Act.

Sources and legislation

Criminal Justice and Courts Act 2015 https://www.legislation.gov.uk/ukpga/2015/2/contents/enacted

FGM Act 2003

https://www.gov.uk/government/publications/female-genital-mutilation-resourcepack/female-genital-mutilation-resource-pack

HH Department for Education

https://www.gov.uk/government/organisations/department-for-education

Serious Crime Act 2015

https://www.legislation.gov.uk/ukpga/2015/9/contents/enacted

Safeguarding Vulnerable Groups Act 2006

https://www.legislation.gov.uk/ukpga/2006/47/contents

Protection of Freedom Act 2012

https://www.legislation.gov.uk/ukpga/2012/9/contents/enacted

Counter Terrorism and Security Act 2015

https://www.gov.uk/government/collections/counter-terrorism-and-security-bill

Counter Terrorism Strategy (CONTEST) 2018

https://www.gov.uk/government/publications/counter-terrorism-strategy-contest-2018

Working Together to Safeguard Children 2023

https://www.gov.uk/government/publications/working-together-to-safeguard-children--2

Keeping Children safe in Education 2024

https://www.gov.uk/government/publications/keeping-children-safe-in-education--2

Online Safety act 2025

Online Safety Act - GOV.UK

Annexe 1: Key contacts

Designated Safeguarding Officer: Beverley McGowan

Email : bev@specialistshub.co.uk

Email : safeguarding@specialistshub.co.uk

Phone : 0800 538 5680

Mobile : 07483361220

Greater Manchester Police

www.gmp.police.uk/advice/advice-and-information/t/prevent/prevent

Urgent: call 999

Greater Manchester Police Prevent Team: 0161 856 6345

National Police Prevent Advice Line: 0800 011 3764

Local Authority Designated Officers:

Area	**Phone number**	**Email**	**Website**
Banes, Bath and Northeast	Tel: 01225	Contact: Sarah Hogan EMAIL: Sarah_Hogan@Bathnes.gov.uk	Website: https://bcssp.bathnes.gov.uk/safeguarding-adults

Somerset Council	396 313		
Birmingham Council	Tel: 0121 675 1669	Contact: Judith Beddow EMAIL: Ladoteam@birminghamchildrenstrust.co.uk	Website: https://www.birmingham.gov.uk/homepage/143/child_protection_and_safeguarding
Bristol City Council	Tel: 0117 903 7795	Contact : Nicola Laird EMAIL : nicola.laird@bristol.gov.uk	https://www.bristol.gov.uk/social-care-health/report-suspected-abuse-safeguarding-adults-at-risk
Manchester City Council	0161 203 3232	majella.o'hagan@manchester.gov.uk	
Blackpool Council	01253 477558	lado@blackpool.gov.uk	www.blackpoolsafeguarding.org.uk
Royal Borough of Greenwich, London	0208921 3930	children's-Lado@royalgreenwich.gov.uk	www.greenwichsafeguardingchildren.org.uk
City of London	0207332 1215	pat.dixon@cityoflondon.gov.uk	
Stockport Borough Council	0161 474 5657	N/A	Contact the LADO - Stockport Council
Derbyshire Council	0133 2 642376	cypsafeguarding@derby.gov.uk	Allegations against staff and volunteers who work with children - Derby City Council
Buckinghamshire	01296	N/A	Home - Buckinghamshire Safeguarding Children Partnership (buckssafeguarding.org.uk)

Council	387915		
Wirral Council	0151 666 5525	anneking1@wirral.gov.uk	LADO Allegations - Wirral Safeguarding Children Partnership (iprogress.co.uk)
Warwickshire Council	0300 123 1650	LADO@warwickshire.gov.uk	This form should only be completed when making a referral or seeking advice from the LADO regarding a Person in a Position of Trust with children or young people (warwickshire.gov.uk)
Staffordshire Council	0800 1313 126	I am a professional - Staffordshire County Council	
Cheshire East	01606 288931	LADO@cheshireeast.gov.uk	lado-omg-2020.doc (live.com)
Monmouthshire Council (Chepstow)	01291 635669	contact@monmouthshire.gov.uk	Safeguarding and protecting children - Monmouthshire
Shropshire Council	01743 256247	michelle.taylor@shropshire.gov.uk	Managing Allegations - Shropshire Safeguarding Partnership (safeguardingshropshireschildren.org.uk)
Milton Keynes Council	**01908 254307**	**lado@milton-keynes.gov.uk**	Safeguarding Children - Milton Keynes Council (milton-keynes.gov.uk)
Gloucester Council	Tel: 01452 426994	Contact: Nigel Hattan EMAIL: nigel.hatten@gloucestershire.gov.uk	Website: https://www.gloucestershire.gov.uk/gsab/
North Somerset Council	Tel: 01275 888211	Contact: Jo Baker EMAIL: sdinputters@somerset.gov.uk	https://www.n-somerset.gov.uk/my-services/community-safety-crime/emergency-management/covid-19-north-somerset-together
Somerset and West	Tel: 030	Contact: Chris Jennings B.A Tel: 0300 123 2224 Website:	Website: https://www.somerset.gov.uk/social-care-and-health/report-an-adult-at-risk/

Taunton Council	0 123 222 4	https://ssab.safeguardingsomerset.org.uk/contact-us/ EMAIL: childrens@somerset.gov.uk	
West Midlands Council	Tel: 030 0 555 005 5	Contact: Adrian Todd EMAIL: SCSP_business@sandwell.gov.uk	Website: https://safeguarding.dudley.gov.uk/tell-us/
Wiltshire Council	Tel: 030 0 456 010 8	Contact : Jo Giles EMAIL : dofaservice@wiltshire.gov.uk	Website: https://www.wiltshire.gov.uk/children-young-people-protection

Annexe 2: Reporting Form (when system unavailable)

Safeguarding Concern Record

This form has been designed to help the Safeguarding Representatives record all the information they need when dealing with a safeguarding incident.

Name of Person Reporting the Incident		Relationship to the Student	
Name of the Student		ULN	
DOB			
Apprenticeship Programme		Trainer	
Date of Incident		Time of Incident	
Date of Report		Time of Report	
Detail of Disclosure (Give full description with as much detail as possible) *Attach any other notes.*			
Decision made			
Form completed by – name		Date	

Annexe 3: Process Flow

Procedure Flowchart – Dealing with Safeguarding Concerns/Disclosure of Harm or Abuse

Member of staff suspects a case of harm or abuse or receives a disclosure

Student has a concern or wishes to disclose something

Member of staff should make brief notes about what they have seen/heard but MUST not investigate the matter themselves

Contact the Designated Safeguarding Officers (safeguarding@specialistshub.co.uk) Designated Safeguarding Officer Bev McGowan and Teresa McGowan

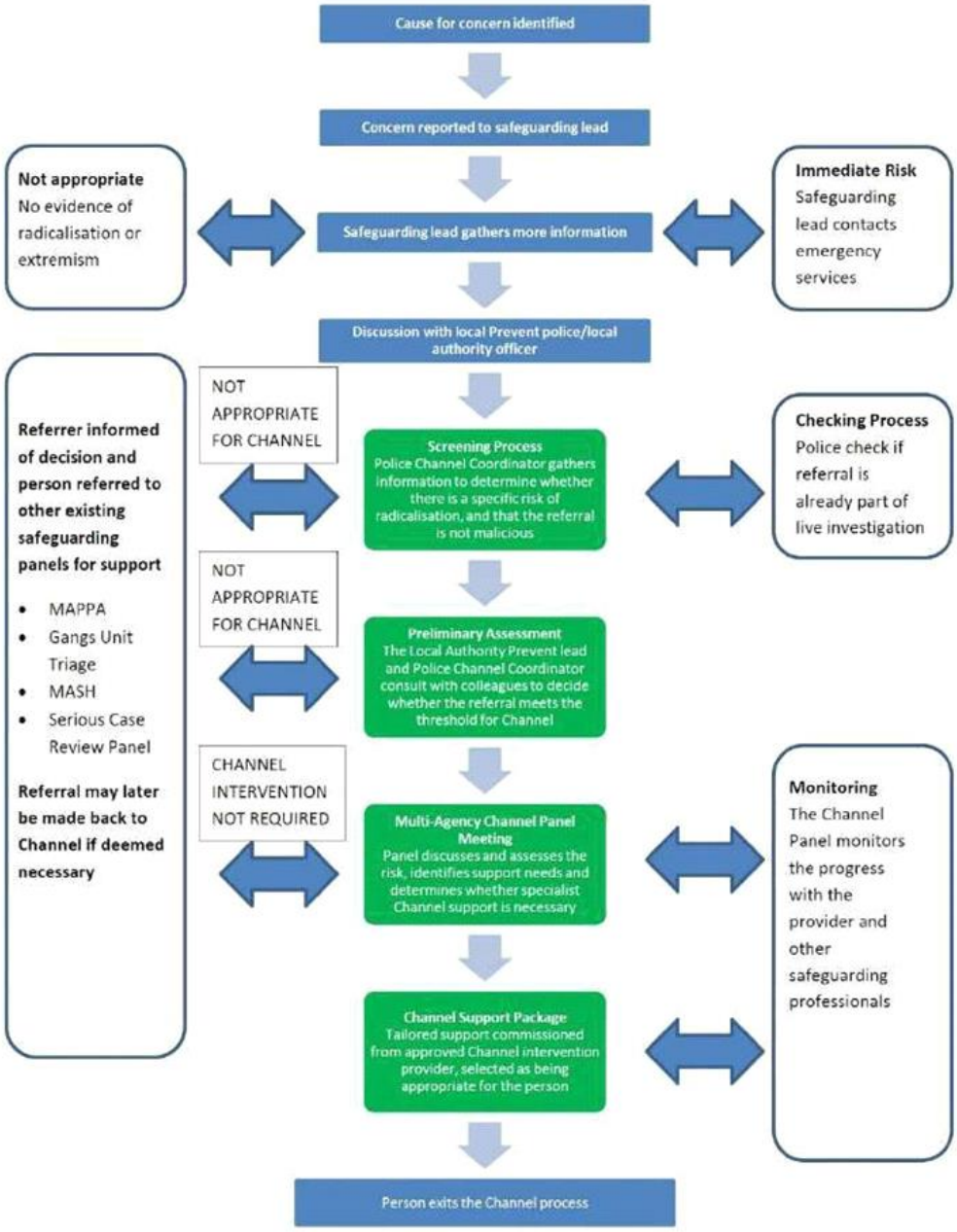
The Safeguarding Representative will investigate the matter and will provide advice and support

The Safeguarding Representative will make contact/liaise with the appropriate agencies and will make any referrals necessary

The Safeguarding Representative will maintain a record of events, actions and any details of referrals made and will ensure their confidentiality. Once completed this will be sent to the CEO, Bev McGowan

The outcome of any referrals must be recorded and passed on to the Senior Manager above

The number of referrals will be reported annually to the Board of Governors



Review

This Safeguarding and Prevent Policy is reviewed at least annually and updated immediately following any changes to legislation, statutory guidance, or local safeguarding partnership procedures. The Lead DSL is responsible for ensuring the policy remains current and compliant. It is the approved by Leaders and the Governance Board prior to issuing to stakeholders

Version control

Version	Date	Comments	Approved By	Review Due
1.0	March 2020	First draft	Bev McGowan	September 2020
2.0	May 2021	Added Version table and rebranding	Bev McGowan	October 2021
3.0	May 2021	Change of Lead Safeguarding Officer to Hannah Lloyd	Bev McGowan	October 2021
4.0	August 2021	ToC and page numbers added. Branding updated. New terms included.	Bev McGowan	February 2022
4.1	17 September 2021	Updated with Learner Services contact details	Bev McGowan	
5.0	September 2021	Appendix added.	Bev McGowan	March 2022
6.0	October 2021	Flow chart, reporting form and channel referral added	Bev McGowan	April 2022
7.0	February 2022	LADO contacts added	Bev McGowan	August 2022
7.1	May 2022	Full review, no material changes	Bev McGowan	May 2023
7.2	January 2023	January Governance Board review – Update to system, KESEC 2020 and Peer on peer abuse, sexual consent, and safer recruitment.	Bev McGowan Governance Board	January 2024
7.3	January 2023	Review and amendment re KCSIE 2022, Martyn's Law - Protect Duty, Defining process for allegations against TSH members of staff	Bev McGowan	January 2024
V8.0	September 2023	Rewrite and reformat. CONTEST update Safeguarding Lead Update	Bev McGowan Governance Board	TBC
V8.1	March 2024	Extremism Definition update	Bev McGowan	March 2025
V8.2	July 2024	Branding	Bev McGowan	March 2025
V9	October 2025	**The following have been added or updated within the Safeguarding policy:** Updated & reviewed Scope, KCSIE 2024, updated EIF & modern	Bev McGowan Approved by Board	October 2025

		slavery. Online Safety Act 2023, Policy references, **ABUSE** - Sexual harassment and violence, Gang Culture and County lines - added (Home Office County Lines Programme 2024 update), (Modern Slavery Statutory Guidance (Home Office 2024 update). Cyber Bullying -Algorithmic content, FGM - All FGM concerns will be recorded *under updated 2024 statutory multi-agency guidance* & the failure to report will be a disciplinary matter (per WTSC 2024 clarity), **The Safeguarding Children and Safer Recruitment in Education** -DBS checks are renewed at least every 3 years OR monitored continuously via the DBS Update Service where used. Online searches must comply with ICO Employment Practices Data Protection Guidance. **Prevent** - We will carry out: • Internal Prevent risk assessments • Staff Prevent competency checks • Local risk profiling against 2024 Home Office Prevent regional reports **What is Radicalisation? Added potential indicators** • Exposure to extremist content via algorithmic feeds • Use of AI-generated extremist materials • Participation in emerging "digital extremist ecosystems		

		Channel -Providers must share relevant contextual safeguarding information with Channel partners where appropriate. Martyn's Law- The Specialist Skills Hub will prepare for compliance by adopting the measures outlined in the current draft Terrorism (Protection of Premises) Bill. Online Safety Requirements added as a new Header **Escalation** Procedure (WTSC 2024) **Whistleblowing Statement** (KCSIE 2024 – applies to all with U18 Retention & Data Protection of Safeguarding Records (UK GDPR + KCSIE) **Children Missing** Education / Missing Apprentices (WTSC 2024 requirement) **Positions of Trust** (Sexual Offences Act 2003, amended 2022 – mandatory) **Ofcom Online Safety Codes Statement** (Online Safety Act – mandatory for digital providers)		