Haddon Training
Safeguarding Policy and Procedure

Document version control

Document title:	Haddon Training Safeguarding Policy and Procedure
Document status:	Final
Version number:	10.10
Date:	07/09/2026
Author:	TON
Approved by:	Board
Review date:	September 2027

Haddon Training Safeguarding Policy & Procedure

Contents:

Section	Section Title	Page
1	Purpose	3
2	Scope of Policy	3
3	Definitions	4/6
4	Legal, Regulatory, and statutory Framework	6/7
5	Implementation	7/8
6	Responsibilities	9
6.1	The Board of Directors	9
6.2	The Senior Management Team	9
6.3	Managers	9
6.4	Designated Safeguarding Lead and Deputies	9/10
6.5	Haddon Training Designated Safeguarding Lead	9/10
6.6	Staff	10
6.7	Low level concerns	10
6.8	Learners	10
7	Reporting Safeguarding Concerns and Haddon Training Safeguarding Contact Details	11
8	Out of hours	12
9	Recording and Tracking	12
10	Confidentiality	12/13
11	Principles of Information Sharing	13/14
12	GDPR & Data Protection	14/15
13	Difficult Issues	15
14	Impact on the Learner	15
15	Communication	15
16	Monitoring and Review Processes	15
17	Complaints	16
18	Local Authority contacts and Prevent contacts	17/18
19	Safeguarding cause for concern form Haddon Training Employees	19/21

Haddon Training Safeguarding Policy & Procedure

1. Purpose

The purpose of this policy is to provide direction and instruction to Haddon Training on the promotion, integration, management, review and evaluation of safeguarding within all aspects of the organisation.

All vulnerable groups, regardless of age, disability, gender, racial heritage, religious belief, sexual orientation or identity, have the right to equal protection from all types of harm or abuse. Working in partnership with vulnerable groups, along with external agencies and partners is essential in safeguarding the welfare of learners.

This Policy defines the manner in which the organisation will meet its duty of care in safeguarding and prevent harm to learners. The welfare of children, young people and adults at risk is paramount in all the work we do and in all the decisions we take.

Haddon Training believes that everyone deserves the opportunity to achieve their full potential. They should be enabled to:

- Enjoy the best possible health free from abuse, victimisation and exploitation
- Fully benefit from a comprehensive range of quality education and learning opportunities
- Learn in a safe environment and be protected from harm
- Feel valued and supported by a network of reliable relationships
- Become competent in looking after themselves and coping with everyday living
- Have a positive image of themselves and a secure sense of identity, including cultural and racial identity
- Develop good interpersonal skills and confidence in social situations
- Not be disadvantaged by poverty

This policy must be read in conjunction with the following:

- Prevent Policy
- Equality, Diversity & Inclusion Policy and Procedure
- Health and Safety Policy and Procedure
- Safer Recruitment Policy
- Complaints Policy and Procedure
- Whistleblowing Policy and Procedure
- Managing Allegations against staff and volunteers Policy
- Teaching, Learning & Assessment Strategy
- Anti-bullying and Harassment Policy
- Freedom of Speech & Expression Policy
- Acceptable use of ILT and e-safety Policy
- GDPR and Data Protection Policy

2. Scope

This policy covers all organisational activities of Haddon Training. This policy applies to all managers, staff, learners, employers and associates, whilst indirectly providing direction and awareness to the wider community and partner organisations. Through the development and implementation of this policy, the Board can be assured that the organisation is adhering to the organisation's commitment to safeguarding children, young people and adults at risk.

Haddon Training recognises that safeguarding risks may arise within learning environments, workplaces, communities, family settings and online spaces. Apprentices and learners aged

16-18 may be particularly vulnerable due to their age, employment status, financial dependence, workplace power imbalances and increased online exposure.

3. Definitions

Safeguarding is defined as:

Safeguarding means preventing and protecting children, young people and adults at risk from abuse or neglect and educating those around them to recognise the signs and dangers.

Safeguarding is the action that is taken to promote the welfare of **children, young people and adults at risk** and protect them from harm. Safeguarding means: protecting **children, young people and adults at risk** from abuse and maltreatment. preventing harm to **children, young people or adults at risk**; Ensuring **children, young people and adults at risk** grow up and thrive with the provision of safe and effective care.

Haddon Training recognise that safeguarding is not just about protecting children, young people and adults at risk from deliberate harm. It includes issues such as:

- Health and safety
- Bullying
- Racial abuse
- Physical/Emotional/Sexual/Financial Abuse
- Neglect
- Harassment and discrimination, gender-based harm and misogynistic subcultures
- Stalking
- Forced marriage
- Honour-based abuse
- Female genital mutilation
- mental health deterioration
- Use of physical intervention meeting the needs of learners with medical conditions
- County Lines
- Exploitation
- Drug and substance misuse
- Internet safety
- Issues which may be specific to a local area or population
- Security of the learning environment
- Developing appropriate attitudes towards personal safety and well-being
- Cyber-bullying and harassment
- Fulfilment of the Prevent Duties and promotion of British Values

Definition of a child (including young people)

An individual under the age of 18 years.

Definition of a child at risk

The Care Act 2014 defines a child at risk as a child who: Is experiencing or is at risk of abuse, neglect or other kinds of harm; Has needs for care and support (whether or not the authority is meeting any of those needs).

Definition of Harm

Harm is defined as:

- Ill treatment this includes sexual abuse, neglect, emotional abuse and psychological abuse
- the impairment of physical or mental health (including that suffered from seeing or hearing another person suffer ill treatment).
- the impairment of physical intellectual, emotional, social or behavioural development (including that suffered from seeing or hearing another person suffer ill treatment).

Definition of an Adult at Risk – over the age of 18

The Care Act 2014: An adult at risk is any person who is aged 18 years or over and at risk of abuse or neglect because of their needs for care and or support. Where someone is over 18 but still receiving children's services and a safeguarding issue is raised, the matter should be dealt with as a matter of course by the adult safeguarding team.

Mental health

Mental health concerns, particularly where an individual presents with suicidal ideation, self-harm behaviours, significant emotional distress or where mental health difficulties place them at risk of harm. Mental health concerns are not in themselves safeguarding concerns but may become safeguarding concerns where there is a risk of harm to the individual or others

Violence Against Women and Girls

Haddon Training recognises Violence Against Women and Girls as a safeguarding issue. Violence Against Women and Girls describes a range of behaviours and offences that disproportionately affect women and girls, although people of any gender may experience these harms. Haddon Training recognises that Violence Against Women and Girls may affect learners, staff, apprentices and adults at risk.

Violence Against Women and Girls includes, but is not limited to:

Domestic abuse
Sexual violence
Coercive and controlling behaviour
Stalking and harassment
Honour-based abuse
Forced marriage
Female Genital Mutilation

Concerns relating to Violence Against Women and Girls will be responded to in accordance with Haddon Training safeguarding procedures and referred to appropriate statutory agencies and specialist support services where required.

Definition of domestic abuse

Domestic abuse is any incident or pattern of incidents of controlling, coercive, threatening, degrading or violent behaviour, including physical, sexual, psychological, emotional or financial abuse, between individuals aged 16 or over who are, or have been, intimate partners or family members, regardless of gender or sexuality. Under the Domestic Abuse Act (2021), domestic abuse includes abuse where the victim is or has been associated with the abuser.

Controlling and Coercive Behaviour is a pattern of behaviour that seeks to control, isolate, intimidate, threaten, exploit or regulate another person's everyday life. It may include monitoring communications, restricting contact with friends or family, controlling access to money, education or employment, intimidation, threats, humiliation, or other behaviours designed to make a person dependent on the

perpetrator.

Misogyny, harmful sexual behaviour, teenage relationship abuse (Child-on-Child Abuse)

Prejudiced beliefs, attitudes, or actions directed against women and girls, alongside gender-based harassment. Staff and trainer coaches must recognise that low-level misogynistic remarks, harmful gender stereotypes, and online subcultures and influencers can form a continuum of behaviour leading to sexual harassment or abuse. These must never be dismissed as trivial or "workplace banter." Teenage relationship abuse is abuse that occurs between children or young people and can include bullying (including cyberbullying), physical abuse, sexual violence, sexual harassment, consensual and non-consensual sharing of nude or semi-nude images, initiation or hazing behaviours, upskirting, and abusive behaviour within intimate relationships. Such behaviour is never tolerated, dismissed as 'banter', 'part of growing up', or accepted as harmless.

Exploitation

Exploitation occurs where an individual or group takes advantage of an imbalance of power to coerce, manipulate or deceive another person for personal gain. Exploitation may be criminal, sexual, financial, online or labour-related and can occur in person or online.

Contextual safeguarding

Contextual safeguarding recognises that abuse, harm and exploitation can occur outside the family home and may take place within workplaces, peer groups, communities and online environments. Haddon Training recognises the importance of understanding and responding to these wider safeguarding influences.

Image-Based Abuse and AI Deepfakes

The creation of nudes and semi-nudes, consensual and non consensual intimate images and/or videos including generated using AI . This includes images wholly generated or manipulated using artificial intelligence (such as AI "deepfakes" or audio/visual impersonations). All incidents involving the sharing of such material must be treated as a safeguarding concern requiring a formal response, regardless of whether they occurred on or off company/provider premises.

Family and Early Help

A focus on early identification metrics unique to Work Based Learning, recognising vulnerability markers early such as sudden drops in portfolio progress, persistent unexplained absence from workplace reviews or training sessions, or signs of financial stress/cost-of-living impacts affecting wellbeing are identified and can be referred into the team to assess for support options

4. Legal, Regulatory, and statutory Framework

Haddon Training will comply fully with all related legislation which will include, but not be limited to:

- The Care Act 2014
- Keeping Children Safe in Education Settings (KCSIE)
- The Health and Social Care Act 2012
- The Human Rights Act 1998
- The Public Interest Disclosure Act 1998
- Domestic Abuse Act 2021
- Keeping Learners Safe – September 2026
- The Equality Act 2010
- ALN Transformation Programme
- The Children Act 1989

- The Children Act 2004
- Mental Capacity Act 2005
- The Protection of Children Act 1999
- The Police Act 1997
- United Nations Convention on the Right of the Child
- Data Protection Act 2018
- General Data Protection Regulations 2018
- Safeguarding Vulnerable Groups Act 2006 and the Protection of Freedoms Bill
- Sexual Offences Act 2003
- Rehabilitation of Offenders Act 1974
- Statutory guidance Keeping children safe in education
- Statutory guidance Working together to safeguard children
- Government Paper – Inclusive Britain from the Race Disparity Unit
- The Online Safety Act 2023

5. Implementation

Haddon Training adopts a learner-centred and trauma-informed approach to safeguarding. Learners who experience abuse, neglect, exploitation or violence will be listened to, taken seriously and supported. All safeguarding decisions will seek to promote the welfare, safety and wellbeing of the learner. Haddon Training recognises that safeguarding risks such as people trafficking, female genital mutilation (FGM), county lines, drug trafficking and modern-day slavery etc, may vary according to variables such as locations, seasons, etc.

We recognise the responsibility to keep abreast of local priorities through sources such as statutory agencies, local authorities and broadcast media as well as through more informal channels such as social media, learners, employers, community forums.

To fulfil its commitment to safeguarding, and to ensure appropriate action is taken, Haddon Training have adopted the '5 Rs Model'.

To meet the requirements of this model, we will:

- Value, listen to and respect the individual
- Be proactive in the promotion and education of safeguarding issues to staff and learners to prevent safeguarding issues arising as far as reasonably practicable
- Ensure all staff receive information on safeguarding issues, the safeguarding strategy and procedures
- Ensure that all staff receive appropriate training and refresher training
- Ensure that all designated safeguarding personnel receive appropriate training and refresher training
- Treat all concerns and allegations of abuse seriously and respond appropriately with learners being fully supported and informed
- Ensure that principles of safer recruitment are adhered to
- Ensure that all procedures and reporting systems are maintained
- Ensure that where appropriate, external referrals are undertaken in a timely manner
- Recording, storing and using information professionally and securely, in line with data protection legislation and guidance.
- Using our procedure to manage any allegations against staff and volunteers appropriately
- Creating and maintaining an anti-bulling environment and ensuring that we have a policy and procedure to help us deal effectively with any bulling that does arise
- Building a safeguarding culture where staff, volunteers, children, young people, their families, and adults, treat each other with respect and are comfortable about sharing concerns

Haddon Training will ensure that safeguarding information and training is communicated at all appropriate opportunities and the relevant records maintained for reference and audit. Staff

will ensure that effective communication is achieved with learners, stakeholders and the wider community.

The 5 R's model.

Recognise
Respond
Report
Record
Refer

Recognise
It is of utmost importance that you can recognise behaviour which may indicate abuse or neglect. Recognition of safeguarding concerns extends to workplace environments, employer settings, peer groups and online spaces . Some learners may disclose an issue to you, whereas others may find this difficult and not say anything specific. Signs and indicators will vary from learner to learner, and this can make it difficult to identify where a learner may be at risk. Many of the indicators outlined may have other explanations so it is important not to over-react. If you have any concerns or a learner is displaying any signs/behaviours which may indicate abuse or neglect then you should either speak to the learner, if this is difficult or not feasible then you should notify the Designated Safeguarding Lead, this will initiate guidance to support your learner.

Respond
Never ignore a disclosure. It is important to remain calm and objective. You will need to determine the nature of the allegation and at whom the allegation is directed, whether someone at home, another learner, or a member of staff. Don't react in an emotional way. Use effective listening skills and ask plenty of open questions to gather sufficient information. It is not your responsibility to carry out any investigations. Be mindful not to promise confidentiality. Advise the learner that you have a duty of care to ensure that the learner does not come to any harm and that you will need to document and pass on the information to your Designated Safeguarding Lead.

Report
You must ensure that you know the correct Haddon Training reporting procedure, who your Designated Safeguarding Lead is and how to contact them. If they are not available, you will need to contact their deputy. Once you have made a report, the Designated Safeguarding Lead then takes on responsibility to ensuring appropriate actions are taken. You have the right to check that the actions taken have been appropriate, but due to the need for confidentiality, it may not be possible to provide details. If you are not satisfied and you feel that a learner is still at risk, it is your responsibility to take this further and contact the appropriate body to protect an individual. A debrief will be held with each individual who has raised a cause for concern by the Designated Safeguarding Lead or Deputy Safeguarding Lead to offer support following any disclosures which may affect their own mental health and wellbeing.

Record
Using the Cause for Concern Form you will need to document exact details of a disclosure or indicators which have given you a reason to be concerned about the safety and welfare of a learner. There is no need to do this whilst speaking with the learner but do so immediately afterwards so that the details are fresh in your memory.

Refer
This is the responsibility of the Designated Safeguarding Lead as it ensures that numerous referrals about the same concern are avoided and ensures that external agencies have one consistent contact. But remember if you are not satisfied with the actions taken, you are able to make a direct referral to the appropriate external body.

The safeguarding status of all learners is assessed at programme enrolment. At each visit, the

safeguarding status of the learner is reviewed against the safeguarding system.

6. Responsibilities

6.1 The Board of Directors:

Providing strategic direction to the senior management team on the implementation of this policy and its aims.

6.2 The Senior Management Team:

- Ensuring that the safeguarding policy and procedures are fully embedded within the activities of the organisation
- Ensuring that the implementation of the safeguarding policy and its associated procedures is reviewed to ensure that it remains effective
- Ensuring that the safeguarding policy and procedures are effectively communicated to staff and learners
- Providing both strategic and operational support to all managers and staff
- Ensuring that a Designated Safeguarding Lead and Deputies are appointed and that these appointments are clearly communicated to staff and learners

6.3 Managers

- Monitoring and evaluating the implementation of all safeguarding related procedures and practices
- Ensuring consistent behaviours and standards across all staff
- Ensuring compliance with legislation relating to vulnerable groups and maintaining the required levels of governance

6.4 Designated Safeguarding Lead and Deputies:

- Ensuring that the Designated Safeguarding Lead and their deputies have received appropriate training
- Keeping the Safeguarding Group and Board informed of any issues and ensuring that there is always cover for the Designated Safeguarding Lead role
- Ensuring that delivery and other staff have received appropriate training
- Providing support and guidance to relevant stakeholder safeguarding personnel
- Liaising with external agencies on safeguarding matters
- Ensuring that the safeguarding policy and procedures are evaluated and reviewed at least annually
- Ensuring that the organisation completes and retains all appropriate records securely and in compliance with appropriate legislation
- When a completed DBS Consent Form is received, that the process is followed with the applicant to apply for a DBS Certificate. Any convictions/concerns identified upon return of the certificate will need to be investigated further to determine risk factors. The necessary steps will take place to reduce harm and/or danger to the learner. If a Parent/Carer/Guardian consent form is completed this must be sent to the DSL and authorised by Haddon SLT.
- Ensuring learners understand and have access to the safeguarding policy which alerts them to the fact that referrals may be made and the role of the provider in this to avoid conflict later
- Providing support and guidance to staff on safeguarding issues
- Ensuring all staff know where to access the Keeping Learners safe Summary
- Ensuring all staff know what actions to take should a potential issue by identified
- Referring safeguarding issues to the appropriate authorities in a timely manner

- To act as a source of support, advice and expertise within the organisation when deciding whether to make a referral by liaising with relevant agencies
- Ensuring safeguarding records are maintained securely using MyConcern software and in compliance with legislation.

6.5 Staff:

- Ensuring that they are aware of this policy and know how to follow the correct monitoring and reporting procedures
- Ensuring that any safeguarding concerns are raised promptly and in line with safeguarding procedures
- Trainer Coaches and delivery staff acting as frontline observers must maintain professional curiosity during employer visits and challenge and report inappropriate workplace cultures, harassment or safeguarding concerns.
- Where concerns are felt to have not been appropriately addressed, staff have the responsibility to raise concerns directly with the Haddon Training Head of Quality and Compliance
- There will be occasions when learners under the age of eighteen will live on-site with their employer or/and other staff members. If the employer and/or staff members are over the age of eighteen, Haddon Training staff need to ensure that they have received a completed DBS Consent Form from the individual/s and must pass the completed form onto the Designated Safeguarding Lead. A consent form from the learner's parent/carer/guardian can be provided should a DBS application be delayed – this must be authorised by a member of the Haddon Senior Leadership Team.

6.6 Low-Level Concerns About Staff and Volunteers

Haddon Training promotes a culture of openness and accountability. A low-level concern is any concern, no matter how small, that an adult working in or on behalf of Haddon Training may have acted in a manner that is inconsistent with the Staff Code of Conduct, professional expectations or safeguarding practice, but which does not meet the threshold for a formal allegation.

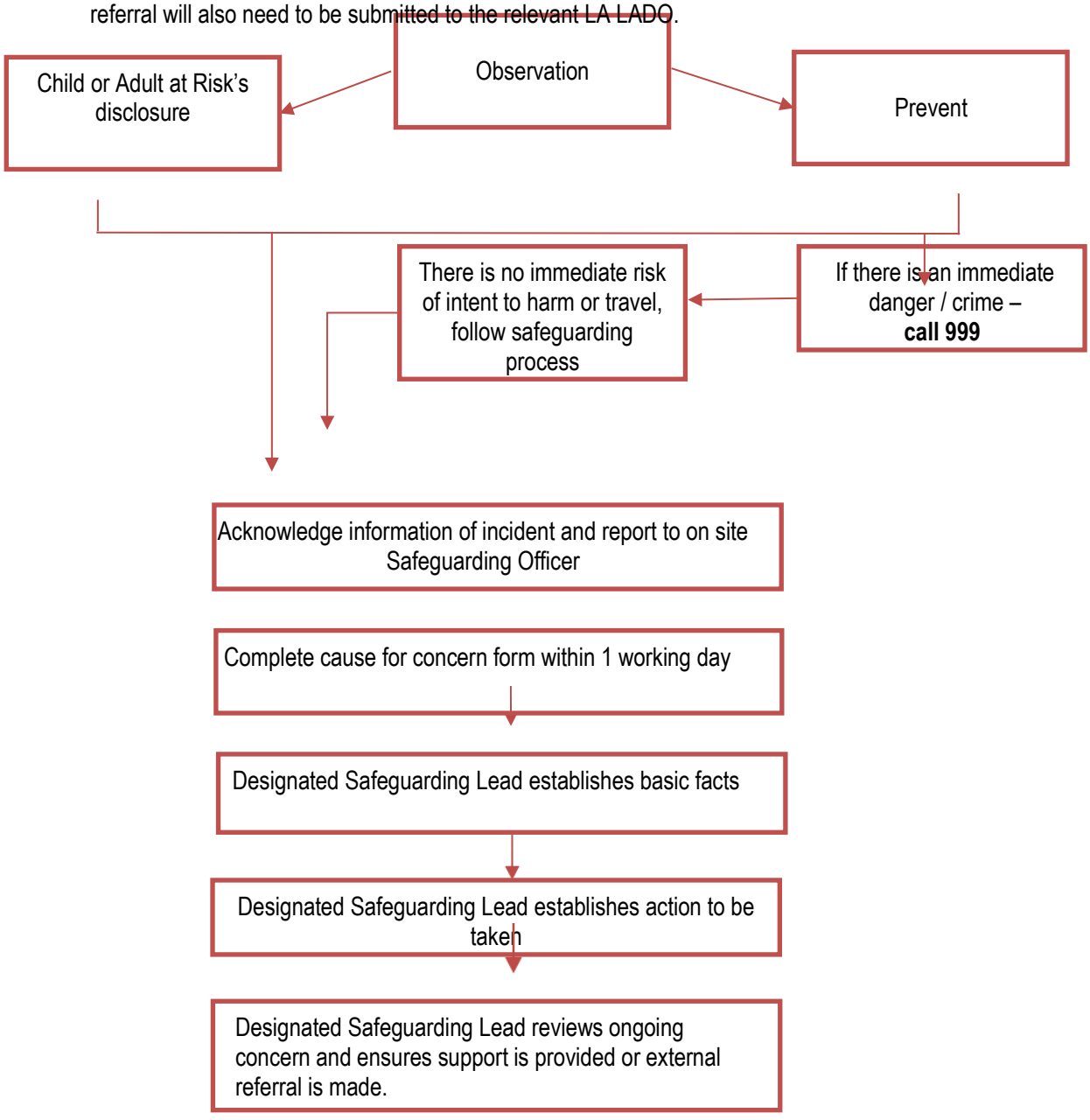
All low-level concerns should be reported to an appropriate manager or the Designated Safeguarding Lead and recorded in accordance with organisational procedures.

6.7 Learners:

Raising any safeguarding concerns with their Trainer Coach or to the Designated Safeguarding Lead.

7. Reporting Safeguarding Concerns and Haddon Training Safeguarding Contact Details

All staff have a responsibility to ensure any safeguarding concerns are appropriately reported. Haddon Training aim to ensure that this process is as simple as possible to ensure prompt actions are taken where needed. If a Prevent referral is made to counter terrorism policing, an additional referral will also need to be submitted to the relevant LA LADO.



Haddon Training	Designated Safeguarding Lead	Lorraine John	Safeguarding@haddontraining.co.uk	07745 647524
	Deputy	Michael Legg	Safeguarding@haddontraining.co.uk	07377096670
	Deputy	Kirsten Clements-Jarvis	Safeguarding@haddontraining.co.uk	07795 900735
	Safeguarding concerns: 07745 647 524		Safeguarding@haddontraining.co.uk	

8. Out of hours

We understand that safeguarding concerns can happen out of normal working hours. If staff, employers, parents/carers and learners need to contact Educ8 Training Group out of normal working hours (8.30am – 4.30pm), they will need to contact the Safeguarding line on 07745647524. Should the call direct to the answerphone message, please follow the instructions.

The instructions are:

I am not able to take your call at the moment.

Please contact 07769 537 474 alternatively you can contact head office on 01443 749 000.

If you or someone else is in danger, call 999 or go to A&E now.

If you need help urgently for your mental health, but it's not an emergency, you can get help from NHS 111 online or call 111.

If you need to talk to someone, please contact the Samaritans on 116 123.

9. Recording and Tracking

In order to ensure that all safeguarding concerns are effectively monitored, reported and referred as appropriate, Haddon Training have a confidential monitoring and reporting system in place.

Where a Cause for Concern form is submitted the organisation's Designated Safeguarding Lead will:

- Review the Cause for Concern Form
- Update the Haddon Training Safeguarding Tracker 'MyConcern'.

The Designated Safeguarding Lead will advise, monitor and review all reported safeguarding issues to ensure that such concerns are addressed appropriately to ensure a positive learner outcome.

10. Confidentiality

'Keeping learners safe' refers to listening to the child and duty of confidentiality.

3.51
The duty of confidentiality is not absolute and may be breached where this is in the best interests of the child and in the wider public interest. If professionals judge that disclosure is necessary to protect the child or other children from a risk of serious harm, confidentiality may be breached.

Haddon Training takes the issues of safeguarding and confidentiality very seriously. Data protection and confidentiality of information about or disclosed by learners has been considered in all of Haddon Training's safeguarding procedures.

The MIS system used to record learner safeguarding status is password protected and only authorised staff have access to this system. The MyConcern system is also password protected and only authorised users have access.

All cause for concern forms are securely held with access restricted to the Designated

Safeguarding Lead, their deputies and the person who initially raised the concern.

All learners will be advised that where a learner is deemed to be at substantial risk, the member of staff has a duty of care to act on disclosures or observations made. Consent from the learner will be sought where possible, but the safety of the learner takes priority and information may be provided to external agencies if needed. This will only be done, under the guidance of the Haddon Training Designated Safeguarding Lead.

11. Principles of Information Sharing

There are key principles to sharing information which allow those working with children, young people and adults at risk to make sound decisions regards sharing information.

Golden rules to sharing information

1. Remember that the General Data Protection Regulation (GDPR), Data Protection Act 2018 and human rights law are not barriers to justified information sharing but provide a framework to ensure that personal information about living individuals is shared appropriately.

2. Be open and honest with the individual (and/or their family where appropriate) from the outset about why, what, how and with whom information will, or could be shared, and seek their agreement, unless it is unsafe or inappropriate to do so.

3. The GDPR gives people the right to be informed, which means they need to be made aware of how their data is being used. However, under the GDPR and Data Protection Act 2018 you may share information without consent if, in your judgement, there is a lawful basis to do so. You will need to base your judgement on the facts of the case. When you are sharing or requesting personal information from someone, be clear of the basis upon which you are doing so. Where you do not have consent, be mindful that an individual might not expect information to be shared.

4. Seek advice from other practitioners, or your safeguarding lead, if you are in any doubt about sharing the information concerned, without disclosing the identity of the individual where possible.

5. Consider safety and well-being: base your information sharing decisions on considerations of the safety and well-being of the individual and others who may be affected by their actions.

6. Necessary, proportionate, relevant, adequate, accurate, timely and secure: ensure that the information you share is necessary for the purpose for which you are sharing it, is shared only with those individuals who need to have it, is accurate and up to date, is shared in a timely fashion, and is shared securely (see Principles).

7. Keep a record of your decision and the reasons for it – whether it is to share information or not. If you decide to share, then record what you have shared, with whom and for what purpose.

Principles

Practitioners should use their judgement when making decisions about what information to share and should follow organisation procedures. The most important consideration is whether sharing information is likely to support the safeguarding and protection of a child.

There are a number of principles that can assist practitioners in making decisions about sharing information:

Necessary and proportionate - When taking decisions about what information to share, you should consider how much information you need to release. Not sharing more data than is

necessary to be of use is a key element of the GDPR and Data Protection Act 2018, and you should consider the impact of disclosing information on the information subject and any third parties. Information must be proportionate to the need and level of risk.

Relevant - Only information that is relevant to the purposes should be shared with those who need it. This allows others to do their job effectively and make informed decisions.

Adequate - Information should be adequate for its purpose. Information should be of the right quality to ensure that it can be understood and relied upon.

Accurate - Information should be accurate and up to date and should clearly distinguish between fact and opinion. If the information is historical then this should be explained.

Timely - Information should be shared in a timely fashion to reduce the risk of missed opportunities to offer support and protection to a child. Timeliness is key in emergency situations, and it may not be appropriate to seek consent for information sharing if it could cause delays and therefore place a child or young people at increased risk of harm. Practitioners should ensure that sufficient information is shared, as well as consider the urgency with which to share it.

Secure - Wherever possible, information should be shared in an appropriate, secure way. Practitioners must always follow their organisation's policy on security for handling personal information.

Record - Information sharing decisions should be recorded, whether or not the decision is taken to share. If the decision is to share, reasons should be cited including what information has been shared and with whom, in line with organisational procedures. If the decision is not to share, it is good practice to record the reasons for this decision and discuss them with the requester. In line with each organisation's own retention policy, the information should not be kept any longer than is necessary. In some rare circumstances, this may be indefinitely, but if this is the case, there should be a review process scheduled at regular intervals to ensure
data is not retained where it is unnecessary to do so.

12. GDPR & Data Protection

Working Together to Safeguard People information sharing to safeguard children state:

The GDPR and Data Protection Act 2018 do not prevent, or limit, the sharing of information for the purposes of keeping children and young people safe.

To effectively share information:

- all practitioners should be confident of the processing conditions, which allow them to store, and share, the information that they need to carry out their safeguarding role. Information which is relevant to safeguarding will often be data which is considered 'special category personal data' meaning it is sensitive and personal.
- where practitioners need to share special category personal data, they should be aware that the Data Protection Act 2018 includes 'safeguarding of children and individuals at risk' as a condition that allows practitioners to share information without consent.
- information can be shared legally without consent, if a practitioner is unable to, cannot be reasonably expected to gain consent from the individual, or if to gain consent could place a child at risk.
- relevant personal information can be shared lawfully if it is to keep a child or individual at risk safe from neglect or physical, emotional or mental harm, or if it is protecting their physical, mental, or emotional well-being.

It is also important that:

- Fears about sharing information should not be a barrier to safeguarding and promoting the well-being of children at risk of abuse or neglect.
- Every practitioner must take responsibility for sharing the information they hold and cannot assume that someone else will pass on information, which may be critical to keeping a child safe.
- Practitioners must understand how to work in collaboration with other agencies to share information

in a proportionate and timely way to prevent harm.

Remember, you can always speak to your Designated Safeguarding Lead.

13. Difficult Issues

Those working with children, young people or adults at risk understand that they have a duty to share information when they or others have evidence that someone is being or is at risk of being abused or neglected. The more difficult situations are where: -

There is little or no clear evidence, but you may have a worry that the child or adult at risk may be at risk of abuse or neglect.

Or

The concern is not about abuse or neglect, but about other aspects of the child or adult's at-risk welfare or well-being, such as a health issue, their attendance and performance at work or in their placement, or that they may become involved in criminal behaviour.

There have been many cases in the media where failure to report even seemingly minor concerns have led to serious consequences for the welfare of a child, adult at risk, or for others. In the relatively short amount of time you may spend with a learner, it is unlikely that you will see the full picture. Sometimes it is not until information is shared and understood, that a clearer picture emerges, which may confirm or allay concerns about a child or adult's at-risk safety and welfare. Cases such as Peter Connelly and David Pelka or the widespread issues which emerged from Winterbourne View care home are extreme examples of cases where serious issues have not been identified at an early opportunity.

14. Impact on the Learner

The implementation of this policy will ensure that the safety and welfare of learners is put at the forefront of all Haddon Training undertakings. It will ensure that Haddon Training are able to support learners where safeguarding concerns arise.

15. Communication

Haddon Training will ensure that safeguarding information and training is communicated at all appropriate opportunities and the relevant records maintained for reference and audit. Staff will ensure that effective communication is achieved with learners, stakeholders and the wider community.

This policy will be made available in hard copy and in an electronic format on SharePoint and Team8. This policy will also be made available bilingually and in large print upon request.

16. Monitoring and Review Processes

The process of integrating the safeguarding of vulnerable groups into the provision is led by a senior level safeguarding lead with the board being informed on a number of issues raised, to ensure that the highest levels of commitment are achieved. Areas for development will be incorporated within the Quality Development Plan.

Curriculum audits and other quality assurance activities within the delivery of learning will monitor, regulate and report on the standard of safeguarding of vulnerable groups related learning and manage the continuous improvement of this through existing systems.

The policy and procedures will be reviewed on an annual basis and/or in line with changes to legislation.

17. Complaints

All complaints will be taken seriously and dealt with in a timely and sensitive manner, in accordance with company procedures and the Group's Complaints Policy and Procedure.

18. Local Authorities (LA)

As each local authority/county council has overall responsibility for the safeguarding of children and adults, the first point of contact will always be to the local authority at which that person at risk resides at. If the risk of harm or danger is imminent then this would therefore warrant an immediate call to the emergency services by dialling 999.

The link below contains an A-Z of all local authorities in England. The referral process for each local authority may not be the same and so it is important that you locate the child protection /adult and family department/LADO to establish their process and to then make the necessary referral.

A-Z of councils online | Local Government Association

Domestic Abuse Support Services

National Domestic Abuse Helpline - 0808 2000 247

Women's Aid - https://womensaid.org.uk/

Respect Men's Advice Line - 0808 801 0327

Emergency Services - 999 in an emergency

Prevent

The Prevent duty - statement from the Home Office:

The aim of Prevent is to stop people from becoming terrorists or supporting terrorism. Prevent also extends to supporting the rehabilitation and disengagement of those already involved in terrorism.

The Prevent duty requires specified authorities such as education, health, local authorities, police and criminal justice agencies (prisons and probation) to help prevent the risk of people becoming terrorists or supporting terrorism. It sits alongside long-established safeguarding duties on professionals to protect people from a range of other harms, such as substance abuse, involvement in gangs, and physical and sexual exploitation. The duty helps to ensure that people who are susceptible to radicalisation are supported as they would be under safeguarding processes.

Education settings that are subject to the Prevent duty (as outlined in the specified authority's section) should understand these requirements as part of their wider safeguarding and welfare responsibilities. For schools and colleges, this guidance should be read alongside relevant safeguarding guidance. In England, this includes 'Working together to safeguard children' and 'Keeping children safe in education'.

Police specified authorities

The police specified authorities listed in Schedule 6 of the Counterterrorism and Security Act 2015 (CTSA 2015) are as follows:

- police forces in England and Wales (through their Chief Officers of Police)
- Police and Crime Commissioners
- the British Transport Police
- port police forces
- the Civil Nuclear Police Authority

National Police Prevent Advice Line: **0800 011 3764**

A more detailed account of Prevent can be found in the Haddon Training Prevent Policy.

19. Safeguarding Referral Process – Haddon Training Employees

Working Instruction	Cause for Concern Reporting

Table of Contents

1. Purpose

To ensure that any cause for concern raised about a learner is recorded and monitored appropriately, and that these learners are provided with the appropriate support and referral information. To ensure that the Safeguarding and Prevent policies and procedures are adhered to.

2. Application

This instruction applies to all Haddon Training staff.

3. Procedure

i. A Cause for Concern form should be completed if you or a learner identifies any of the issues below, however this is not an exhaustive list. This form can be found in your forms section on Team8. Once completed the form will automatically be sent to the Designated Safeguarding Lead and deputies.

Safeguarding:

Abuse
Bullying
Cyber-bullying
Impairment of health
Inappropriate behaviour
Neglect
Radicalisation
Risk of self-harm
Unsafe working practices
*__This is not an exhaustive list__

ii. The identified category should be ticked in Smart Assessor:

S = Safeguarding

Diagram 1 is a copy of the cause for concern form
Diagram 2 is a copy of the notification which is received by the Designated Safeguarding Lead

Cause for Concern for Haddon Training Employees

You can find the cause for concern form in your forms section on Team8.

Diagram 1

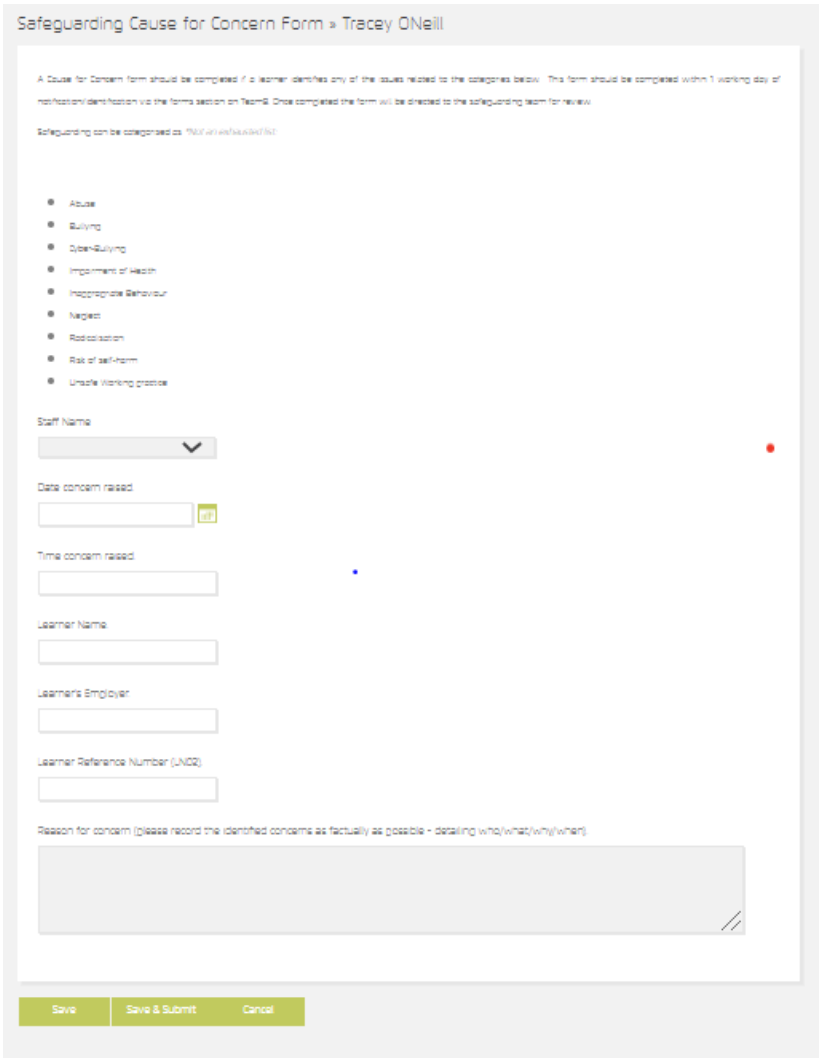


Diagram 2

Staff Name	**ONeill, Tracey (38)**
Date concern raised:	**18/03/2021**
Time concern raised:	**12:00:00**
Learner Name:	**Joe Bloggs**
Learner's Employer:	**Test**
Learner Reference Number (LN02):	**LN02 000000**
Reason for concern (please record the identified concerns as factually as possible - detailing who/what/why/when):	**Test**

Cause for Concern Form in word format



Safeguarding and Cause for Concern Fo

Living on site Parent/Carer/Guardian Consent Form



Consent Form - Apprentice living onsi

Additional Information – For Designated Safeguarding Officer (DSL) use only: