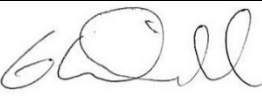


<u>Policy/procedure</u>	Safeguarding Children and Vulnerable Adults Policy and Procedures
<u>Senior Manager Responsible</u>	Gary Wiswell 
Author	Gary Wiswell
Approved by	FLM Training Board & Safeguarding Team
Date approved	17 th Dec 24
Next review date	17 th Dec 25
Changes Made	<p>Added Online Safety Act (2023): Introduces duties for online platforms to protect users, especially children, from harmful content.</p> <p>Added Worker Protection (Amendment of Equality Act 2010) Bill (2024): Covers protections against workplace harassment.</p> <p>Dealing with Concerns about Learners added a specific paragraph on Online Safety</p> <p>Recording Low-Level Concerns added a paragraph under Staff Responsibilities</p> <p>Added a paragraph on signposting for learners to local mental health services and crisis support helplines</p> <p>Updates to staff training to include emerging risks</p> <p>Included a section referencing online threats in the Prevent Risk Assessment</p>

Safeguarding Policy and Procedure

Safeguarding Statement

FLM Training is fully committed to safeguarding the welfare of all stakeholders by taking all reasonable steps to protect them from harm and accepts its responsibility for the well-being and safety for its stakeholders including children and vulnerable adults. Stakeholders includes employers, learners both commercial and funded including apprentices, employees and visitors. This list is not exhaustive.

The company recognises its responsibility and acknowledges that it is the duty of all staff to uphold British Values and to safeguard the welfare of all stakeholders by creating an environment that protects them from harm and reduces any potential risks of being exposed to violence, extremism, exploitation or victimisation. FLM Training staff are aware of and follow current legislation regarding the safeguarding of all stakeholders. FLM Training Directors have the ultimate responsibility and this Policy along with the Safeguarding Procedure both of which are reviewed annual by the Board of Governors.

It is recognised by FLM Training that the majority if not all are adult learners and will ensure that all aspects of abuse to Young People and Adults is a key priority.

Definitions

Children

Child(ren) means everyone under the age of 18.

Vulnerable Adults

Vulnerable adults are those 18 years or over who are or may be eligible for community care services, and whose independence and well-being would be at risk if they did not receive appropriate health and social care support.

Adult safeguarding is about preventing and responding to concerns of abuse, harm or neglect of adults.

Legislative/Quality Framework

This policy and procedures have been written and will be implemented in-line with the safeguarding and child protection procedures established by [Greater Manchester Safeguarding Partnership : Manchester Safeguarding Boards](#) It is also written in accordance with legislation established by the Children Acts 1989 and 2004, the Education Act 2002 and other core legislation and guidance listed below

The protection of vulnerable adults contributes to the wider safeguarding agenda and this policy operates in conjunction with statutory guidance for reporting concerns [Greater Manchester Safeguarding Partnership : Manchester Safeguarding Boards](#)

Legislation & Guidance (please note this is not exhaustive)

Working Together to Safeguard Children (2023)
Keeping Children Safe in Education (2024)
Sexual violence and sexual harassment between children in schools and colleges (2021)
Online Safety Act (2023)
What to do if you're worried a child is being abused (2015)
Information sharing advice for practitioners providing safeguarding services to children, young people, parents and carers (2018)

Disqualification under the Childcare Act 2006
Counter Terrorism and Security Act 2015 (inc. the 'Prevent Duty' 2019)
Modern Slavery Act 2015
Education inspection framework 2019 (Inspecting safeguarding in early years, education and skills settings 2019)
Care and Support statutory guidance 2022
Mental Capacity Act 2005
Human Rights Act 1998
Care Act 2014
ADSS 2005 (Safeguarding Adults National Framework of Standards)
The Equality Act 2010 (Including the Public Sector Equality Duty)

Designated Safeguarding Leads

Gary Wiswell – gary.wiswell@flmtraining.co.uk – 01942 255913

Dave Floyd – dave.floyd@flmtraining.co.uk – 01942 255913

- Both Company Directors are Designated Safeguarding Leads (DSL)
- The Designated Safeguarding Lead (Gary Wiswell) is responsible for providing information, advice and guidance to staff and learners on Prevent and Safeguarding issues.
- The Designated Safeguarding Lead is deputised by The Deputy Safeguarding Officer (Dave Floyd)

DSL Responsibilities

- The DSLs must ensure complaints of abuse, unfair treatment, harassment, or bullying/Sexualisation/ concerns of radicalisation are dealt with promptly and accordance with procedures.
- They will be responsible for overseeing the referral of suspected abuse allegations/concerns.
- The DSL must ensure all Learner incidents are logged within the Safeguarding file.
- The DSL must ensure that staff CPD of safeguarding is maintained and communicated during the full staff meetings.
- The DSL must encourage support and good practice of procedures to protect learners.
- The DSL must maintain confidentiality unless reporting /referring specific incidents for investigation.
- The DSL will run the monthly Safeguarding meeting, attended by the Deputy Safeguarding Officer and a member of staff, minutes are recorded and held on file
- The DSL will raise any issues and update staff at the monthly Management & Staff Meetings.
- DSL must update the FLM Training Board at quarterly meetings.

Staff Responsibilities

- FLM staff have no investigative role where child and vulnerable adult protection is concerned. This is a matter for police and children's and adult's social care. However, all staff have a responsibility to provide a safe environment in which children and vulnerable adults can learn and all staff, have a responsibility to act to safeguard and promote children and vulnerable adult welfare.
- FLM staff are in a good position to identify concerns early, provide help for learners and prevent concerns from escalating.
- All staff have a responsibility to provide a safe environment in which learners can learn.
- All staff should be aware of systems and policies within FLM which support safeguarding, and these should be explained to them as part of staff induction.
- All staff should receive appropriate safeguarding and child protection training which is regularly updated. In addition, all staff should receive safeguarding and child protection updates (for example, via email, e-bulletins and staff meetings), as required, and at least annually, to provide them with relevant skills and knowledge to safeguard learners effectively.
- All staff should know what to do if a learner tells them they are being abused or neglected. Staff should know how to manage the requirement to maintain

an appropriate level of confidentiality. This means only involving those who need to be involved, such as the DSL (or a deputy) and social care. Staff should never promise a learner that they will not tell anyone about a report of abuse, as this may ultimately not be in the best interests of the learner.

- Staff must report low-level concerns about staff behavior, as per *Keeping Children Safe in Education (2024)* guidelines. These concerns will be logged and reviewed to prevent escalation and ensure a safe environment for all stakeholders.

Staff Recruitment

- FLM Training will ensure that [Safer Recruitment](#) practices are followed in accordance with the company's procedures, government legislation and the [Disclosure and Barring Service](#).
- One of the DSL will review all CV's and applications of candidates selected for interview.
- One of the DSL's will sit on all interview panels.
- A review of candidate social media and online presence prior to any job offer being made.
- 2 references will be collected for any new members of staff these will be followed up with additional phone calls.
- All staff working with learners will be subjected to relevant DBS disclosure.
- FLM Training will hold a central list of all DBS and right to work results.

Staff Training

- FLM Training has a [Staff Training and Development Procedure](#) which includes Prevent and Safeguarding.
- All FLM Training staff will be required to complete the Safeguarding in Education training to include sexualisation.
- All FLM delivery staff will be required to complete the Prevent and Radicalisation training.
- The Safeguarding Officer will inform Staff of any safeguarding updates via the monthly staff meetings as per the company's Communication Strategy, or via email if the communication is time restrictive.
- The annual appraisal procedures will review staff training needs which includes Prevent and Safeguarding.
- Staff training on safeguarding will be updated annually to include emerging threats such as online radicalisation, modern slavery, county lines exploitation, and harassment protections as outlined in recent legislative changes.

Dealing with Concerns about Learners

The 4 R's

Recognise the signs and indications of abuse

Respond as soon as possible

Record everything you have heard, was said or any actions seen

Refer to the Designated Safeguarding Lead (DSL)

FLM Training have a [Safeguarding & Wellness Ladder](#) to help all members of staff assess if a concern is low or high risk along with examples, action and follow up arrangements. The poster acts as an aid memoire only and any concerns need to be raised with the safeguarding officer.

FLM Training Ltd recognises that an allegation of abuse made against a member of staff may be made for a variety of reasons and that the facts of the allegation may or may not be true. It is imperative that those dealing with an allegation maintain an open mind and procedures are thorough and not subject to delay. FLM Training will follow its [Safeguarding Procedure](#) where there are any allegations, disclosures or suspected abuse.

FLM Training recognises that learners who are abused or neglected or witness violence, including [domestic violence](#), may find it difficult to develop a sense of self-worth. Learner behaviour may be challenging or withdrawn, FLM Training will endeavour to support learners.

FLM Training also acknowledges it has a responsibility to educate and look to prevent learners from being drawn into [radicalisation](#). FLM Training will ensure staff are trained to investigate potential changes of behaviour/views that may cause concern, learners also undertake sessions in Radicalisation & prevent throughout their Apprenticeship, including Side by Side Training.

FLM Training acknowledges it has a responsibility to educate and look to prevent learners from being drawn into drug dealing networks known as county lines. [County lines](#) is a term used to describe gangs and organised criminal networks involved in exporting illegal drugs using dedicated mobile phone lines or other form of "deal line". This activity can happen locally as well as across the UK – no specified distance of travel is required. Children and vulnerable adults are exploited to move, store and sell drugs and money. Offenders will often use coercion, intimidation, violence (including sexual violence) and weapons to ensure compliance of victims. FLM Training will ensure staff are trained to investigate potential changes of behaviour/views that may cause concern.

FLM Training recognises that it has a responsibility to support learners facing and or dealing with [Mental Health](#) problems. FLM Training understands that learners facing poor mental health could become vulnerable, as a result all FLM Training staff undergo L2 Mental Health Awareness Training and staff will endeavour to support learners. In addition FLM training also provides MHA Training for its learners so they can better understand and recognise MH.

In addition to Level 2 Mental Health Awareness Training, FLM Training will provide clear signposting to local mental health services and crisis support helplines, as per *NHS Digital and Mental Health Strategy 2023*.

FLM Training recognises that it has a responsibility to safeguard all learners by challenging unacceptable behaviour and improving children and young people's [knowledge and understanding of healthy relationships](#). We do this by providing annual staff training and delivering Sexualisation Training to all Apprentices and raising awareness with Adults.

FLM Training understands with the growth of internet, social media and online learning, more and more students access digital media and could become subject to [cyberbullying](#). Online bullying, or cyberbullying, is when someone uses the internet to target and deliberately upset someone. FLM Training recognises its responsibility to raising awareness of cyberbullying with both staff and learners by providing training and education and investigate and concerns or disclosures.

FLM Training will comply with the Online Safety Act 2023 by implementing robust digital safety measures. This includes safeguarding learners and staff from harmful or inappropriate online content, training on digital resilience, and monitoring usage of provided IT equipment to ensure adherence to acceptable use policies.

Further reading and information and resources can be found at <https://safeguarding.network/>

Range of potential abuse

Abuse and neglect are forms of maltreatment of a young person or vulnerable adults. Somebody may abuse or neglect a young person or vulnerable adult either directly by inflicting harm, or indirectly, by failing to act to prevent harm. We aim to safeguard young people and adults, from abuse and discrimination. We use the Safeguarding Network guidance factsheets to help recognise the signs of abuse. If you do suspect abuse discuss your concerns with FLM Training's Safeguarding Officer(s).

There are various forms of Abuse which include;

Risks within the home	Risks outside the home
<u>Parental issues</u>	<u>Bullying</u>
<u>Children in the care of others</u>	<u>Cyberbullying</u>
<u>Domestic abuse</u>	<u>Child Exploitation</u>
<u>Fabricated or Induced Illness</u>	<u>Child Sexual Exploitation</u>
<u>Female Genital Mutilation</u>	<u>County Lines</u>
<u>Forced Marriage</u>	<u>Child abuse linked to faith or belief</u>
<u>'Honour' based abuse</u>	<u>Gangs & Youth Violence</u>
<u>Learning difficulties</u>	<u>Gender based violence</u>
<u>Mental ill health</u>	<u>Hate Crimes</u>
<u>Poverty</u>	<u>Missing Children</u>
<u>Substance misuse</u>	<u>Modern Slavery</u>
<u>Young carers</u>	<u>Online safety</u>
	<u>Child on Child abuse</u>
Abuse & Neglect	<u>Radicalisation</u>
<u>Emotional abuse</u>	<u>Sexual violence/harassment</u>
<u>Neglect</u>	<u>Trafficking</u>
<u>Physical abuse</u>	
<u>Sexual abuse</u>	
<u>Risks for children with additional needs</u>	
<u>Child mental health</u>	

Detailed advice and support for adults can also be found on the NHS website

- <https://www.nhs.uk/conditions/social-care-and-support-guide/help-from-social-services-and-charities/abuse-and-neglect-vulnerable-adults/> or call the [Hourglass helpline](#) on 0808 808 8141 for advice
- FLM Training have also produced a [Safeguarding & Wellness Ladder](#) to help all members of staff assess if a concern is low or high risk along with examples, action and follow up arrangements. The poster acts as an aid memoire only and any concerns need to be raised with the safeguarding officer.

Additional Policies & Procedures

FLM Training have a suite of policies and procedures that link with the Safeguarding Policy and Procedure, these include the following and can be found on the company's internal shared folder.

[Appeals Policy](#)

[Bullying & Harassment Policy](#)

[Health & Safety Policy](#)

[Equality & Diversity Policy](#)

[Confidentiality Policy](#)

[Prevent Policy](#)

[Privacy Policy](#)

[Learner Induction Procedure](#)

[Initial Assessment Procedure](#)

[Online Learning Policy](#)

[Learner at Risk Procedure](#)

[Complaints Procedure](#)

[Learner Grievance Procedure](#)

[Learner Punctuality & Attendance](#)

[Staff Selection and Recruitment](#)

[Whistle Blowing Policy](#)

FLM Training acknowledge that it is important to record and monitor all concerns and allegations, no matter how trivial the person reporting it may think it is at the time. We do this by raising it with all learners and staff at their induction and throughout their course and employment with FLM Training. All concerns no matter how trivial are recorded on a central spreadsheet and monitored by the Safeguarding Team and reported on at the Management Meeting.

Learner Disclosure

FLM Training Ltd recognises that the Children Act 1989 states that the welfare of the child or young person is the paramount concern. We apply this urgency to adults at risk as well. It is also recognised that hasty or ill-informed decisions in connection with a member of staff or other person can irreparably damage an individual's reputation, confidence, and career. Therefore, those dealing with such allegations within FLM Training Ltd will do so with sensitivity and will act in a careful, measured way.

In circumstances where a learner decides to disclose an incident of abuse or neglect to a member of staff the following steps must be followed:

- Find a comfortable place to talk, stay calm and listen, don't show any shock.
- Inform the individual they have done the right thing and try to remove any feelings of guilt.
- Do not promise to keep a secret.
- Inform the learner of your legal duty.
- Do not ask any leading questions or criticise the learner.
- Inform the learner that you will need to potentially contact the Safeguarding Officer, or other designated appropriate person, LADO Wigan lado@wigan.gov.org or Careline 0800 1013333
- The Staff member must write a written account at the time of the discussion. Even if on scrap paper this must then be filed along with an incident form at the next available moment. Record the actual words. Do not use assumption or interpretation.
- Remember that an allegation of abuse can lead to a criminal investigation. Do not do anything that may jeopardise a police investigation, such as asking leading questions or attempting to investigate the allegation yourself.
- Immediately inform the Safeguarding Officer.

Learner Safeguarding Incident Reporting

- When a safeguarding incident arises the Safeguarding Officer(s) must be immediately informed.
- A learner incident form must be completed and placed in the logging file along with any associated notes. The incident form must be factual, recording details of situation. Do not use assumption or interpretation.
- If relevant to the situation the Safeguarding Officer must contact the [Safeguarding Board](#) or Careline for advice and guidance on dealing with the situation. The incident form must be updated to reflect this. If the Safeguarding Officer is not available, then the staff member must contact the assistant Safeguarding Officer (Dave Floyd) and gain advice. Ensure the incident form is updated with the points discussed.
- Any witnesses must be asked to complete a Statement Form. The form must be factual, in own words and record dates and times.

- The Statement Form must be signed and dated and filed with the incident form.
- If the incident is taken over by an external agency, then the incident form must be updated to reflect this.
- The incident log must be monitored by the Safeguarding Officer to ensure all incidents are fully signed off.
- Access to this file will be restricted.
- The file will be locked away.

Steps to follow if abuse is suspected

- Try to obtain as much information as possible using non-leading questions, but do not start to investigate the situation.
- Tell the learner that you will have to share the information
- Notify the DSL of the concerns.
- Assess if there is any immediate danger to learner.
- If you have genuine concern about a learner under the age of 18, and the DSL is not available, contact [Social Services](#) or [Careline](#) on 0151 233 3700 (Children Services). Over the age of 18 [Careline](#) on 0151 233 3800 (Adult Services). Contact the police if a criminal act is apparent. Inform the learner of the steps you are going to take.
- DSL will record the incident on the log form with details of concern and steps suggested by Careline.
- If there is no cause for further concern, then monitor the learner through the normal review process.

Suspected Radicalisation

Learners can be exposed to the messages of extremist groups by many means. This can put them at risk of being drawn into criminal activity. Here are some potential signs that may suggest a learner is/has been radicalised.

- Ideological, political or religious influences on the learner?
- Significant shift in a learner's behaviour or outward appearance suggesting a new social/political or religious influence
- The learner in conflict with others over religious beliefs, lifestyle or dress choice?
- The learner witnessing or been the perpetrator of radical or religious hate crime
- Use of inappropriate language
- Possession of violent extremism literature
- Behavioural changes
- Expression of extremist views
- Advocating violent action and means
- Association with known extremists
- Seeking to recruit others to an extremist ideology

Steps to follow if radical or extremist behaviour is suspected

- Staff member to gain further information from learner and/or report issue to DSL
- Contact [NSPCC help line](#) for advice and guidance if necessary 0808 8005000 or Local Police Advice line [0800 01113764](#)
- DSL to conduct initial investigation. This may include an interview with staff and learners.
- Where DSL is concerned a learner may/is being radicalised, case to be reported to [Careline/Local Prevent Officer Advice line 0800 01113764](#) Or NSPCC [0800 8005000](#)
- DSL to write up incident form with details of concerns and steps taken to refer learner
- If there is no cause for further concern, then monitor the learner through our normal review process.

Prevent Risk Assessment

- FLM Training will conduct an annual [Prevent Risk Assessment](#) in conjunction with latest information from the Northwest regional coordinator. The risk assessment will be reviewed and updated monthly by the safeguarding team.
- FLM Training will incorporate considerations for online radicalization threats into its Prevent Risk Assessment, as advised under the Counter-Terrorism and Security Act 2015 and updates from the North West Prevent Coordinator.

FLM Training will be guided by information and updates from the Head of the FE (Further Education) and HE Regional Delivery Network (Prevent and Counter Extremism), Claire Little - North West Regional Prevent Coordinator claire.little@education.gov.uk to assess potential threats and put in place measures to eliminate risks where possible.

- As part of the risk assessment FLM Training will identify local or national events that may impact on learners.
- FLM Training will educate learners to consider the impact/consequences of such events. (Updates from Nigel Lund)
- FLM Training will monitor the outcome of the risk assessment to ensure all agreed actions have been completed.

Digital

Staff and or Learners who utilise equipment or internet which has been provided by FLM Training must take the following into account:

- FLM Training has produced an [Online Learning Policy](#) which provides a framework for the safe and effective use of ICT for remote teaching & learning.
- It is prohibited for anyone to browse, download, access or share content, which is illegal, harmful, violent, extremist, exploitative in any way, abusive, offensive, or otherwise inappropriate using equipment or internet which has been provided by FLM Training.
- Parameters for acceptable usage of equipment are set by FLM Training and FLM Training may use software to limit what apps or tools staff, learners and sub-contractors are able to access on FLM Training equipment.
- Equipment provided by FLM Training ensures that technical solutions are in place to protect the user, e.g. anti-virus and filtering software.
- FLM Training will advise, support and train its learners how to mitigate risk when using equipment and internet which it has provided.
- FLM Training will ensure that at the end of individual tenure of IT equipment all personal data will be removed.
- FLM Training will support and train its staff and learners in the safe use of social media platforms.

Appendix A

List of Greater Manchester Support Contacts

Local Authority Designated Officers (LADOs)

Bolton

Paula Williams

Telephone: 01204 337 474.

E-mail: boltonsafeguardingchildren@bolton.gov.uk

Bury

Mark Gay

Telephone: 0161 253 5342.

E-mail: m.gay@bury.gov.uk

Manchester

Majella O'Hagan

Telephone: 0161 234 1214.

E-mail: quality.assurance@manchester.gov.uk

Oldham

Rochdale

Louise Hurst
Telephone: 0300 3030 350.
E-mail: lado@rochdale.gov.uk

Salford

Steve Westhead / Liz Peppiatt
Telephone: 0161 603 4350.
E-mail: stephen.westhead@salford.gov.uk / elizabeth.peppiatt@salford.gov.uk

Stockport

Gill Moore
Telephone: 0161 474 5657.
Mobile: 07866999683.
E-mail: gill.moore@stockport.gov.uk

Tameside

Tania Brown
Telephone: 0161 342 4398.
E-mail: tania.brown@tameside.gov.uk

Trafford

Anita Hopkins
Telephone: 0161 912 5024.
E-mail: anita.hopkins@trafford.gov.uk

Wigan

Diane Kitcher
Telephone: 01942 486 034.
E-mail: lado@wigan.gov.uk

Local Prevent Contacts

Bolton

Vivienne Morris
E-mail: vivienne.morris@bolton.gov.uk

Bury

Tom Houghton
Tel: 0161 253 5099
E-mail: T.L.Houghton@bury.gov.uk
Web: www.bury.gov.uk

Manchester

Samiya Butt
E-mail: S.butt@manchester.gov.uk

Oldham

Bruce Penhale

E-mail: bruce.penhale@oldham.gov.uk

Rochdale

Sajjad Miah

E-mail: Sajjad.Miah@Rochdale.gov.uk

Salford

Jo Rutter

E-mail: josephine.rutter@salford.gov.uk

Tel: 0161 778 0315

Stockport

Rachel Smith

E-mail: rachel.smith@stockport.gov.uk

Tameside

Emma Varnam

E-mail: Emma.Varnam@tameside.gov.uk

Trafford

Kerry Purnell and Dave Pilling

E-mail: kerry.purnell@trafford.gov.uk

E-mail: Dave.pilling@trafford.gov.uk

Tel: 01619122115

Wigan

Paul Whitemoss and Amanda Crane

E-mail: A.Crane@wigan.gov.uk

Tel: 0161 856 6362