

## Diamond People (NE) trading as Tyneside Training Services



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## Safeguarding and Prevent Policy and Procedure

### Foreword

This is an overarching Safeguarding Policy which is supported by a range of policies and procedures. Diamond People (NE) Limited trading as Tyneside Training Services (TTS) provides educational provision on behalf of the Department for Education, local authorities across the North East Combined Authority (NECA). TTS recognises that it is part of a broader system of safeguarding and supports other agencies and institutions in safeguarding learners and staff from abuse and neglect.

The six principles of safeguarding that underpin TTS policies and procedures are:

- **Empowerment:** Supporting and encouraging people to make their own decisions.
- **Prevention:** Principles of resilience and self-determination are developed to prevent abuse and neglect.
- **Proportionate:** The least intrusive response is made balanced with the level of risk.
- **Protection:** Providing and contributing to a system- wide protection of those in greatest need.
- **Partnership:** Working with other services and institutions within the community.
- **Accountability:** Transparency of response.

### 1. Context and Scope

- 1.1 This policy and procedure relate to all activities of Diamond People (NE) Limited trading as Tyneside Training Services (TTS).
- 1.2 TTS is a provider of commercial and funded training primarily within the Transport and Logistics sectors. Provision is blended and includes face-to face delivery for both theory and practical sessions and online learning, primarily from its Cramlington and Killingworth training sites.
- 1.3 These factors have been considered by TTS when developing policies and procedures around Safeguarding and Prevent.
- 1.4 This policy details how TTS will maintain procedures and practices which safeguard and promote the welfare of all learners, staff and stakeholders by ensuring the safeguarding policy meets, wherever relevant, the Department for Education's statutory guidance (Keeping Children Safe in Education).
- 1.5 This policy details how TTS will ensure that safeguarding is person led, engages with the person all the way through, is outcome focussed and works with other system institutions as a partner.
- 1.6 This policy details how TTS will fulfil its obligations to the UK Government Prevent Duty and CONTEST Strategy as detailed in the Counterterrorism and Security Act 2015 and the Prevent Duty Guidance for Further Education Providers. The policy takes into account the UK threat level from terrorism and extremism which is.
- 1.7 This policy shall apply to all stakeholders and partners of TTS, including employers.
- 1.8 This policy shall apply to all employees of TTS. For the avoidance of doubt, references to "employees" shall include contractors, associates, volunteers and workers.

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- 1.9 This policy shall apply from the start of all contractual relationships and will be made available to potential contractors, partners, employees and learners via the company's website. It is the responsibility of the interested party to ensure that they have read, understood and are compliant with the policy, prior to any meeting with TTS. For the avoidance of doubt, "start of all contractual arrangements" shall include the commencement of recruitment processes and accordingly prospective employees should ensure that they are familiar with the policy prior to application. At all times, safer recruitment processes will be adhered to.
- 1.10 This policy shall apply from the commencement of a learner's journey. For the avoidance of doubt this will include the initial contact between the learner and TTS.
- 1.11 This policy is just one element within the general arrangements that safeguard and promote the welfare and wellbeing of all learners associated with the statutory obligations set out in the Education Act 2002.

### 2. Definitions:

- 2.1 All references to "**learners**" applies to all learners undertaking training with TTS including apprentices; those undertaking government or other devolved funded learning opportunities; and those learners undertaking commercial programmes of learning with TTS who are not utilising government or devolved education funding of any kind.
- 2.2 All references to "**children**", means any person under the age of 18. A detailed definition is provided at:  
<https://www.gov.uk/government/publications/keeping-children-safe-in-education--2>
- 2.3 All references to "**vulnerable adults**" mean those that fall into the definition covered by the Care Act 2014; *"an individual, over the age of 18, at risk of abuse, neglect or exploitation, due to their need for support or personal circumstance. This includes those suffering; physical disability, frailty, learning difficulty, addiction, social or emotional issue or mental impairment. This definition is non-limiting."*
- 2.4 All references to "**terrorism**" will mean: *"the use or threat which: involves serious violence against a person; involves serious damage to property; endangers a person's life (other than that of the person committing the act); creates a serious risk to the health or safety of the public or section of the public; or is designed seriously to interfere with or seriously to disrupt an electronic system. The use or threat of such action must be designed to influence the government or an international governmental organisation or to intimidate the public or a section of the public and be undertaken for the purpose of advancing a political, religious, racial or ideological cause."*
- 2.5 All references to "**extremism**" will mean: *"Vocal or active opposition to fundamental British values, including democracy, the rule of law, individual liberty and mutual respect and tolerance of different faiths and beliefs, and/or calls for the death of members in our armed forces, whether in this country or overseas"*.
- 2.6 All references to "**violent extremism**" will mean: *"the endorsement of violence to achieve extreme ends."*
- 2.7 All references to "**radicalisation**" will mean: *"the process by which a person comes to support terrorism and forms of extremism leading to terrorism."*

### 3. The Safeguarding Team and Responsibilities

- 3.1 The Designated Safeguarding Lead (DSL) shall have overall accountability for policies, procedures. Practices and culture relating to safeguarding and the Prevent duty, welfare and British Values. They



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are also the final decision maker regarding serious disclosure, issues, incidents or concerns and their external referral to Local Authority Designated Officer (LADO), Channel or other relevant body.

3.2 The appointed Designated Person will be an individual with the appropriate seniority and understanding required to:

3.2.1 Design and implement an appropriate degree of reference to safeguarding responsibility and the Prevent Duty in the learner course materials used by the partner providers and TTS.

3.2.2 Ensure they, or an appointed deputy, are always accessible during opening hours should any safeguarding concerns arise.

3.2.3 Refer all cases of suspected abuse to local authority social care services, Channel programme, Disclosure and Barring Service, or Police, as required.

3.2.4 Maintain detailed, accurate, and secure written records of any concerns and referrals raised by partner providers; including follow up checks to verify ongoing welfare.

3.2.5 Liaise with the Executive Team as appropriate to consistently keep them apprised of the partner providers' management of safeguarding incidents, especially ongoing enquiries under section 47 of the Children Act 1989 and police investigations.

3.2.6 Act as a source of support, advice and expertise to staff and partner providers on matters of safety and safeguarding and when deciding whether to make a referral; by liaising with relevant agencies – including, but not limited to, the Regional Prevent Coordinator for Further Education and the Safeguarding Children and Adults Boards local to the partner provider in question.

3.2.7 Ensure the business' safeguarding policy is reviewed annually, the procedures and implementation are updated and reviewed regularly, and the Executive Team and all staff are consulted on/aware of amendments and republication.

3.2.8 Support the Quality Team in Self-Assessment, by contributing a quarterly report to the Executive Team setting out how TTS has discharged its duties and reporting deficiencies in procedure or policy identified the earliest opportunity.

3.2.9 Possess the appropriate level of experience within the Logistics Sector so as to implement policies appropriate to the learner's working environment.

3.3 Details for members of the safeguarding team as in section 16 of this policy.

3.4 The DSL shall hold regular meetings with the safeguarding team, consulting with the Safeguarding Governor and report regularly to the Board of Directors.

3.5 The DSL will be responsible for appointing, training and engaging with the designated safeguarding officers (DSOs). DSOs will be strategically placed throughout the business to provide support, guidance and leadership to all stakeholders. A minimum of two DSOs should be in place at all times.

3.6 DSOs will deputise for the DSL in their absence.

3.7 DSOs will have responsibility for upholding and promoting the aims and purpose of this policy, supporting the DSL to develop and maintain a culture of safeguarding and to complete the specific tasks referred to in this policy.

### 4. Statutory Requirements

TTS is committed to complying with the following legislation:

4.1 Keeping Children Safe in Education 2025

4.2 Working Together to Safeguard Children 2023

4.3 GDPR Act 2018

4.4 The Protection of Children Act 1999

4.5 The Care Act 2014.

4.6 The Safeguarding Vulnerable Groups Act 2006

4.7 The Equality Act 2010

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- 4.8 Sexual Violence and Sexual Harassment Between Children in Schools and Colleges (guidance) 2018/2021
- 4.9 Learning together to be safe.
- 4.10 "Prevent Strategy" resources guide.
- 4.11 Tackling extremism in the United Kingdom.
- 4.12 Teaching approaches that help build resilience to extremism especially among young people.

### **5. Policy Statement and Interpretation**

- 5.1 TTS is committed to compliance with its statutory and moral obligations in relation to safeguarding and Prevent at all times.
- 5.2 TTS is fully committed to safeguarding the welfare of all stakeholders and will take reasonable steps to safeguard the welfare, health, safety and well-being of all stakeholders, including and particularly, children, young people and vulnerable adults.
- 5.3 TTS aims to ensure that all children, young people and vulnerable adults are protected and kept safe from harm\* while they are actively engaged in learning; and that they are supported in their understanding of how to keep themselves safe outside of the learning environment.
- 5.4 TTS is committed to maintaining procedures and practices which safeguard and promote the welfare of all learners and staff by ensuring the safeguarding policy meets, wherever relevant, the Department for Education's statutory guidance ([Keeping Children Safe in Education](#)).
- 5.5 TTS is committed to promoting the rights of all stakeholders and empowering individuals to make informed decisions regarding their own safety.
- 5.6 TTS commits to creating an environment for employees, learners and stakeholders that:
  - Promotes British Values.
  - Safeguards welfare.
  - Builds resilience and self determination.
  - Empowers independent decision making.
  - Reduces the risk of harm including, but not limited to, those defined in Section 12 of this policy.
- 5.7 TTS embeds the principles of the 5 Rs: Recognition, Response, Reporting, Recording, Referral.

### **6. Policy Aims and Objectives**

- 6.1 This policy will support the aims of the CONTEST Strategy, which are:
  - 6.1.1 To RESPOND to the ideological challenge of terrorism
  - 6.1.2 To PREVENT our stakeholders from being drawn into terrorism and provide context, support and advice.
  - 6.1.3 COLLABORATE with other sectors to ensure a cross multi-agency approach to addressing the risks posed as a result of the promotion of terrorist views.
- 6.2 TTS has the following organisational objectives regarding safeguarding and Prevent:
  - 6.2.1 To provide a framework and culture that protects stakeholders from harm.
  - 6.2.2 To recognise that all stakeholders regardless of gender, religion, age, ethnic origin, disability, and sexuality, learning difficulties or any other grounds have a right of equal protection from all types of abuse, harm, exploitation and radicalisation.
  - 6.2.3 To ensure that all reported concerns, issues or incidents are dealt with consistently, confidentially, empathetically, collaboratively and in a timely fashion.
  - 6.2.4 To ensure that our staff have the confidence and support to deliver this policy comprehensively and effectively.

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- 6.2.5 To provide a robust induction to all stakeholders that provides knowledge and skills needed to build confidence to identify those at risk of becoming vulnerable to abuse, and to be able to provide the support needed, should abuse occur.
  - 6.2.6 To regularly update training for personnel around Safeguarding and Prevent Duty to ensure the most recent trends and data are understood.
  - 6.2.7 To embed British Values, Prevent Duty and to build resilience, where possible to vulnerability.
  - 6.2.8 To provide a clear process for raising concerns, issues, complaints or asking for help.
  - 6.2.9 To ensure that all stakeholders within scope of this policy understand their obligations pursuant to this policy and are committed to its implementation. This includes the parents of children and young people as part of our workforce or cohorts of learners.
- 6.3 This policy should be read in conjunction with the Equality and Diversity Policy, The Modern Slavery Policy, The Safer Recruitment Policy, Whistleblowing Policy and the Acceptable use of IT/ Internet Policy.
- 6.4 TTS is committed to the promotion of this policy.

### 7. Monitoring and Review

- 7.1 TTS is committed to reviewing all its policies regularly, including the Safeguarding Policy. This will be conducted **every year as a minimum** but also in the following circumstances:
- 7.1.1 Audit recommendations made by a relevant organisation such as Ofsted that require the review of policy, practice or procedure.
  - 7.1.2 A change to the law, resulting in a change to policy, practice or procedure.
  - 7.1.3 The publication of a relevant report by an external organisation that results in the requirement to review policy, practice or procedure.
  - 7.1.4 Trend or incident analysis within the company or stakeholders that pertains to policy, practice or procedure that requires review.
  - 7.1.5 When a new Designated Safeguarding Leader is appointed.

### 8. Building a Culture of Safeguarding

(Including policy promotion, gaining commitment, training and preventative measures).

#### Safer Recruitment

- 8.1 TTS recognises that a formal and comprehensive “safer recruitment” process is required to ensure that all stakeholders are protected from harm. To safely recruit, TTS will:
- 8.1.1 Post thorough job advertisements that include consideration of inclusivity, equality and diversity.
  - 8.1.2 Ensure that recruitment practices are fair and inclusive. For example, by ensuring that reasonable adjustments are provided where needed.
  - 8.1.3 Verifying all qualifications and suitability to work in an education environment, prior to individuals commencing work. Qualifications should not be limited solely to the education environment. TTS considers it highly appropriate to ensure that all staff have the relevant sector experience to fully understand the safeguarding challenges faced by learners on a day-to-day basis.
  - 8.1.4 Complete DBS checks at the appropriate level for successful applicants.
  - 8.1.5 Maintain records of all DBS details on a single, central register.
  - 8.1.6 Follow an appropriate reference procedure.

#### Building Commitment – Induction

- 8.2 All stakeholders, including volunteers, employees, contractors and governors will receive a robust induction to build their commitment to this policy. The induction will provide them with skills, knowledge and behaviours required to support the aims of the policy and will include:

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- 8.2.1 How to access all documentation in relation to the policy.
  - 8.2.2 How to support all stakeholders but especially those in vulnerable groups.
  - 8.2.3 How to implement the policy and procedures with consistency.
  - 8.2.4 How to respond to issues.
  - 8.2.5 How to report issues.
- 8.3 As part of the induction process, the following information will be made available to participants:
- 8.3.1 Access to the organisational policies and procedures governing Safeguarding and Prevent.
  - 8.3.2 Understanding of what Safeguarding is.
  - 8.3.3 Understanding of what the Prevent Duty is.
  - 8.3.4 Recognising situations that could make them vulnerable to harm.
  - 8.3.5 A Code of Conduct for their behaviour.
  - 8.3.6 Minimum expectations for those in power positions.
  - 8.3.7 The identity and contact details of the Safeguarding Team (including the DSL) and how to report concerns.
  - 8.3.8 Contextualised scenario materials to develop understanding.
- 8.4 All stakeholder groups will be provided the following training as part of their induction process:
- 8.4.1 Equality and Diversity
  - 8.4.2 Safeguarding
  - 8.4.3 Prevent

### **Building Commitment – Continuous Training**

- 8.5 TTS has an effective Continuous professional Development (CPD) Policy in place that provides for the continuous refreshment an embedding of safeguarding and Prevent skills, knowledge and behaviours. The requirement to undertake CPD in safeguarding and the Prevent Duty will be either as part of the CPD policy and as such annualised, or as a result of an individual need identified during the quality assurance process (QAP).
- 8.6 Learner's skills, knowledge and behaviours will be continuously reviewed by their tutor. Continuous and additional support will be provided throughout the provision and curriculum, tailored to suit the individual progress and development of the respective learner.
- 8.7 Safeguarding, Equality and Diversity, Prevent and British Values are embedded into the curriculum of all programmes. All Curriculum Plans are regularly refreshed, taking account of learner, employer and tutor feedback.

### **Building Commitment- Employers**

- 8.8 TTS considers that the culture of employers' organisations is paramount to the effectiveness of the mechanisms to protect learners from harm. Accordingly, TTS takes all reasonable steps to ensure the engagement of employers around safeguarding and the Prevent Duty.
- 8.9 Employers are engaged around safeguarding, British Values, equality and diversity and Prevent from the commencement of the relationship. Employers are supported to understand how they can identify and support those at risk of abuse, radicalisation and exploitation.
- 8.10 TTS will make a determination on the employers working environment to ensure that it is appropriate for learners and that the employer is committed to embedding a culture of safeguarding. In instances where the employer environment fails to meet these high expectations, TTS will provide the employer with a Risk Assessment, determining how the culture and environment can be strengthened, to the benefit of employees. The relationship will always be supportive.



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- 8.11 TTS will regularly refresh employers understanding of this policy and their responsibilities. This shall be as a minimum, on an annual basis but will be sooner in the event that the QAP identifies any trends requiring intervention.

### **Embedding Commitment**

- 8.12 TTS incorporates mutual respect and inclusivity into its culture. These concepts are embedded into all curriculum and organisational policies, procedures and practices. Active discussion of the concepts is encouraged by learners and via all other stakeholders during organisational meetings.
- 8.13 The DSL has extensive links with local, regional and national Safeguarding and Prevent boards. This information is disseminated to stakeholders via regular newsletters and interactive “theme” materials.
- 8.14 Safeguarding and Prevent will be discussed during every learner progress review.

### **9. Promotion of this Policy**

- 9.1 The policy and its procedures are available to personnel via the company intranet and all other stakeholders via the company website.
- 9.2 Regular themes or hot topics are conducted with all stakeholders to raise awareness of particular issues. These will be promoted via the company website, the Learner Management System, the Virtual Learning Environment and via social media channels.

### **10. Online Safety and IT Usage**

- 10.1 TTS utilises a Virtual Learning Environment (VLE) and incorporates self-directed study into its programme curricula. Due to its blended learning offer, TTS recognises the inherent risks to stakeholders in utilising online platforms or communicating online. This risk is particularly pertinent to children and vulnerable adults.
- 10.2 TTS has Acceptable Use Policies covering the use of IT equipment by all categories of employee and learners.
- 10.3 TTS recognises its responsibility to educate learners to the risks online and to support the development of critical thinking skills to support learners to remain safe. Critical thinking skills are embedded into all programmes.
- 10.4 Safety online is embedded in all programmes within the provision and reinforced by Tutors during progress reviews.
- 10.5 All IT usage in contradiction of the Safe IT Use Policy will be treated with the utmost severity and in accordance with stakeholder Code of Conducts.

### **11. Online Safety – social media and Communication**

- 11.1 TTS discourages the use of applications other than those platforms provided by TTS for communication by personnel with learners. The exception to this is where there is a significant and material benefit to the quality of education delivered. Such contact should be pre-approved by the Directorship and full transcripts provided for the LMS.
- 11.2 Unapproved contact of TTS learners by any stakeholder outside of the approved, internal learning platforms will be dealt with as gross misconduct in accordance with the Disciplinary Policy. This type of contact will be considered as an “abuse of position” in accordance with this policy and may also result in a referral to a LADO, the Police and a potential removal from the register of teachers.



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- 11.3 Where inappropriate contact from personnel to learners via social media involves a child, young person or vulnerable adult, or contains explicit content, incitement to commit criminal acts, or achieves the definition of any form of abuse pursuant to this policy; TTS will immediately involve the police.
- 11.4 TTS however recognises its obligations to support learners to gain the skills necessary to operate and communicate safely on social media. Communicating safely via social media is embedded in the programme curricula.
- 11.5 References to social media include social networking sites (such as Instagram and Twitter), social communication applications (such as WhatsApp), blogging sites, vlogging sites, community sites (such as Pinterest), auction sites (such as eBay) and sales platforms (such as Facebook).
- 11.6 TTS acknowledges the difficulty in legislating for all these different platforms and consequently adopts overarching principles when using these platforms. These principles are embedded into the program curriculum. Online principles:
- 11.7 **Careful Content.** To always communicate on these platforms as if you were face to face. Avoid the use of ambiguous statements that could be misinterpreted. Do not swear or use innuendo. Be as careful in content online as you would be in person. Be polite and respectful.
- 11.8 **Maintain confidentiality.** Do not disclose things that should not be in the public domain. For personnel this includes adopting GDPR principles and avoiding referencing TTS or any learner. Learners should avoid disclosing personal information such as their address, bank details.
- 11.9 **Avoid the Secret.** Certain applications allow communications to be completely anonymous. These situations represent a greater risk to children, young people and vulnerable adults.
- 11.10 **Email.** Private communications are safer when they are easily traceable. Email is a safer way to make sure you are communicating with someone genuine with good intentions

## 12. Recognising Vulnerability or Safeguarding and Prevent Concerns

### Abuse

- 12.1 Abuse is a form of mal- treatment that is inflicting either by causing harm or failing to prevent harm.
- 12.2 Abuse can occur in many settings. Some common settings of occurrence are; domestic, familial, institutional, individual and in groups.
- 12.3 TTS recognises that abuse can occur to anyone in any situation but identifies the following clear types of abuse that can occur:
1. Violence and Physical abuse
  2. Sexual abuse
  3. Emotional abuse
  4. Neglect or self-neglect
  5. Psychological abuse
  6. Financial or material abuse
  7. Modern slavery
  8. Discriminatory abuse
  9. Organisational or institutional abuse
  10. Radicalisation

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- 12.4 Abuse does not need to fall solely into one of these categories. Often an individual suffering abuse may experience several different types of abuse. The categories are not exhaustive but are the most likely forms of abuse to be identified within the TTS educational setting.
- 12.5 Abuse can be committed by persons of any demographic or age group against any demographic or age group.
- 12.6 TTS recognises that abuse can be perpetrated by those with institutional power and accordingly has robust preventative measures in place (discussed later) and adopts an “it can happen here” approach. TTS also maintains strong relationships with LADO and has an effective reporting procedure in place (discussed later).
- 12.7 It can be difficult for individuals, particularly children, young people, and vulnerable adults to talk about abuse. All personnel are trained to listen without judgement or pressure and to provide an empathetic, supportive environment for disclosure.
- 12.8 These types of abuse and the signs to help recognise them are further defined in Annex 1 of this policy

### **13. Respond**

#### **Raising Concerns**

- 13.1 All personnel are trained to respond to an initial disclosure, complaint, incident etc. in an appropriate manner and in line with company Safeguarding Processes. It is therefore acceptable to raise a concern with any member of personnel. Ordinarily, tutors/ assessors/ line managers of the HR team will likely be the first point of contact for concerns to be raised.
- 13.2 There may be circumstances however that reduces the appropriateness of making a disclosure/ raising a concern to a direct line manager or tutor. Examples of these situations are as follows:
- 13.2.1 Where the direct line manager, HR, tutor or assessor is subject to the complaint.
  - 13.2.2 Where the individual raising the concern does not feel comfortable raising a concern to these parties.
  - 13.2.3 Where the individual raising the concern chooses not to raise the concern to one of these parties.
- 13.3 The DSL and the safeguarding team will make themselves available to all stakeholders to hear or receive concerns.
- 13.4 Contact information for the safeguarding team and DSL are included in the table of contacts.
- 13.5 In instances of direct contact with the safeguarding team, initial contact can be made by email, telephone or face to face.
- 13.6 Whilst each circumstance will be dealt with individually, the disclosing person is likely to be asked to provide the following information:
- 13.6.1 Age bracket of learner/ stakeholder (under or over the age of 19)
  - 13.6.2 Your name
  - 13.6.3 Your telephone number
  - 13.6.4 Your job role/relationship to the learner
  - 13.6.5 A brief description of the incident/ongoing issue
  - 13.6.6 Details of any steps taken so far to manage the incident/address the issue
  - 13.6.7 Details of anyone externally involved in supporting the learner (social worker, mental health professional, probation officer etc.).

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### **Dealing with Concerns**

13.7 All personnel will:

- 13.7.1 Make the disclosure/ complainer feel as comfortable as possible without crossing personal boundaries.
- 13.7.2 Listen effectively to the situation. Any interviews etc will be completed by trained personnel at a later stage in this process.
- 13.7.3 Remain calm.
- 13.7.4 Explain the Safeguarding Process to the individual to reassure them of how things will be dealt with.
- 13.7.5 Avoid making unrealistic promises around confidentiality.

13.8 Where appropriate, a Safeguarding Officer of the same gender, etc. will be made available.

### **14. Reporting and Recording**

#### **Reporting Concerns**

14.1 The DSL will ensure processes are in place to record all disclosures, issues, incidents and concerns, are recorded in a central, confidential and GDPR compliant central location.

14.2 All disclosures, incidents, issues and concerns must be reported. This applies in all situations and remains important even where the eventual decision of the organisation is to take no further action.

14.3 When recording a disclosure, incident, issue or concern, the Safeguarding Officer or front-line personnel should:

- 14.3.1 Record all conversations exactly as they are stated. This should use the exact language of the individual, including their turn of phrase, swear words and event descriptions.
- 14.3.2 Include factual observations where appropriate. This is likely to be required when reporting concerns, issues or incidents, or in situations where a disclosure is made and there are concerns relating to self-harm or continued harm against that individual. Factual observations should be just that. Try to avoid including personal opinions. Include only symptoms, such as visible bruises or withdrawn behaviour. Avoid interpreting these symptoms as supporting the disclosure.
- 14.3.3 Notify the Designated Safeguarding Lead immediately following the conversation.

#### **Decision Making**

14.4 On receipt of a Safeguarding record, the DSL will review the matter and determine the course of action to be taken. Actions can include, pastoral intervention, further investigation, no further action (monitoring) and serious external referral.

14.5 In all instances, the DSL will ensure that all decisions will prioritise the need to safeguard the individual from harm. In serious situations, this may involve the referral to a third-party body, against the wishes of the disclosing individual.

14.6 The DSL will ensure arrangements are considered when dealing with a child, young person and vulnerable adult.

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- 14.7 The DSL will never make a decision that stretches the organisational resources (including personnel) beyond their capacity or capability. This measure ensures that individuals are always provided with the best care and support, by experts and the organisation avoids detailed specific involvement in matters for which they have no expertise.
- 14.8 The DSL will consider all the facts before deciding on the appropriate course of action.
- 14.9 The most common decisions are; take no action, pastoral intervention, further investigation or a referral to an external body.

### **Taking No Action**

- 14.10 The DSL may decide that no action is required. If no action is determined, the DSL will ensure that the Safeguarding Record is centrally recorded and will confirm whether further monitoring of the situation is required.
- 14.11 Where monitoring is required, the DSL will ensure the appropriate arrangements are in place.

### **Pastoral Intervention**

- 14.12 Pastoral Intervention covers a wide range of actions and is the most common action taken.
- 14.13 Pastoral intervention offers individuals support for a situation or group of situations that is causing them to currently be vulnerable to abuse or harm. The intervention will assist them with; obtaining financial support, receiving education, obtaining help with welfare needs, obtaining counselling or other therapy, or receiving medical support.
- 14.14 Pastoral interventions are ordinarily completed via an external referral to an approved third party. The DSL will make the appropriate arrangements with the individual (their parents if required) and the referring company.
- 14.15 The DSL will ensure that a central record is kept of the intervention.

### **Further Investigation**

- 14.16 The DSL may decide that further investigation of the situation is required. It should be noted that in cases where a serious referral is required, the referral body such as the Police or LADO will conduct an investigation independently. Before deciding whether further investigation is needed, the DSL should give consideration to the seriousness of the situation, so has not to commence an investigation that could ultimately prejudice the investigation of a body with more authority.
- 14.17 Further investigation can be either formal or informal.
- 14.18 Informal investigation may be a chat with the individual or a review of a particular ILP or learning plan.
- 14.19 In the case of further formal investigation for potentially serious issues, the DSL will ensure:
- 14.19.1 A full record of the investigation is centrally stored.
  - 14.19.2 Confidentiality (where disclosure is not required by law) is maintained.
  - 14.19.3 All individuals are treated with respect and in accordance with The Equality and Diversity Policy and in within the aims of this policy.
  - 14.19.4 All statements made are recorded in the actual language of the speaker and that in no circumstance are the personal views of the investigation team considered as part of the decision-making process.
- 14.20 The DSL will review the output of the investigation and consider the appropriate action to take.



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### 15. Refer

15.1 In the **most serious of cases**, the DSL may be required to make a serious external referral. These types of referrals are detailed below.

#### Abuse of Power Allegations

15.2 The company may receive allegations that relate to the abuse of a position or power. These allegations can relate to positions such as medical practitioners, carers, educational professionals, policepersons etc.

15.3 Whilst every effort is made to safeguard learners in the care of TTS, it may be the case that allegations are made relating to the abuse of position of our personnel. In this instance, personnel refers to employees, associates, subcontracts, governors and volunteers.

15.4 In all instances of Abuse of Power, the DSL will make a referral to the Local Authority Designated Officer (LADO). The LADO should be alerted in all instances of allegation that a person in a position of power has:

- 15.4.1 harmed, or behaved in a way that may have harmed a person in their care.
- 15.4.2 Committed a criminal offence against a person in their care.
- 15.4.3 Caused a person in their care to feel at risk.

15.5 The purpose of the LADO is to ensure effective recording of allegations of abuse against those in positions of power who work with children, young persons or vulnerable adults. They act as an effective conduit between the provider and other organisations such as the Police and medical professionals.

15.6 The LADO should be notified within 24 hours of an allegation being paid. The DSL retains accountability for this notification. Whilst the LADO does not investigate the case, they should be notified of the allegation prior to the investigation commencing. Thereafter, LADO will seek to provide advice and guidance to the DSL on the best way to commence investigations.

15.7 On referral, the LADO will determine whether the allegation meets the threshold for their involvement, so where there is doubt, the DSL will refer the matter to LADO in the first instance.

15.8 The LADO may determine that the allegation requires investigation by the Police. If this is the case, they will provide this advice. **No internal investigation should begin until the LADO has made this determination.**

15.9 In cases concerning an allegation relating to TTS personnel (including employees, contractors and volunteers), the alleged perpetrators resignation does not bring the matter to a close. A full investigation should still be carried out. Whilst matters relating to the alleged perpetrators contract of employment are for TTS to determine internally, no settlement agreement will remove the co-operation of TTS from any investigation to determine allegations of abuse of power against its personnel.

#### Third Party Abuse Allegations

15.10 TTS is committed to upholding its obligations to the legislation detailed in this policy and to the moral obligations of providing education.

15.11 TTS may receive allegations of physical or sexual abuse from a child, young person or vulnerable adult.

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15.12 In these circumstances, TTS has a legal obligation to protect them from harm. This obligation includes the involvement of Local Authorities, the Police, the Ambulance Service and Social Services.

15.13 The Designated Safeguarding Lead will decide on the whether the situation requires the involvement of a third-party authority and will fully co-operate with any third party notified thereafter.

### Peer on Peer Abuse Allegations

15.14 TTS operates an “it can happen here” approach to peer on peer abuse and recognises that smaller disclosures of bullying, sexting, social media abuse etc. can be symptoms of a much bigger pattern of abuse between peers.

15.15 TTS personnel are trained to appropriately encourage conversations around peer abuse and support individuals following disclosure.

15.16 TTS understands that often the fear of formality can deter learners from reporting peer abuse. TTS values the voice of the learner and will (where it is appropriate to do so i.e.) support their wishes in dealing with matters

15.17 “Appropriateness” in this instance refers to the seriousness of the circumstance and the individual learner’s age and capacity to understand the nature of the abuse. For the avoidance of doubt, in all situations TTS will prioritise the need to protect learners from harm.

15.18 Given the range of situations of that could occur under this title, TTS acknowledges that methods of addressing abuses can range from informal discussions with learners to expulsion from programme, or even the referral to the police.

15.19 In all instances of peer-on-peer abuse, the reporting process should be followed. The DSL will have accountability for deciding the best way to deal with the individual situation.

### Potential Radicalisation

15.20 The DSL may decide to refer to the Channel Process for further support. Where a referral is made, the DSL will attend the relevant meetings.

15.21 A referral to the police may be made in situations where there is an immediate fear of harm to the individual or others within their lives.

## 16. Table of Key Contacts

Individual	Email	Telephone
Safeguarding General	<a href="mailto:safeguarding@tynesidetrainingservices.co.uk">safeguarding@tynesidetrainingservices.co.uk</a>	0191 286 2919
Louise Murray - DSL	<a href="mailto:Louise.murray@tynesidetrainingservices.co.uk">Louise.murray@tynesidetrainingservices.co.uk</a>	0191 286 2919
Allan McNaught - DSO	<a href="mailto:Allan@tynesidetrainingservices.co.uk">Allan@tynesidetrainingservices.co.uk</a>	0191 286 2919
Kayleigh Johnson - DSO	<a href="mailto:Kayleigh.Johnson@tynesidetrainingservices.co.uk">Kayleigh.Johnson@tynesidetrainingservices.co.uk</a>	0191 286 2919
Jeff Nutter – Safeguarding Governor	<a href="mailto:Jeff.Nutter@tynesidetrainingservices.co.uk">Jeff.Nutter@tynesidetrainingservices.co.uk</a>	191 2919

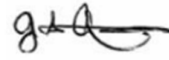
## 17 Contravention of Policy

15.22 Failure to comply with any of the requirements of this policy is a disciplinary offence and may result in disciplinary action being taken under TTS’s Disciplinary Procedure.

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### 18. Version Control

#### Version Control

<b>Version:</b>	8
<b>Reviewed by:</b>	John Jones
<b>Reviewer's position:</b>	Executive Director
<b>Reviewer's signature:</b>	
<b>Review date:</b>	October 2025
<b>Next Review date:</b>	October 2026

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## Annex 1: Definitions of Forms of Abuse and Prevent Concerns

### Physical Abuse

Physical abuse means causing harm, or failing to prevent harm, to an individual's person. Where individuals have specific care needs, this can include a failure to properly restrain or a misuse of medication.

Physical abuse includes but is not limited to:

- Poisoning
- Burning
- Hitting
- Scalding
- Drowning
- Suffocating
- Shaking

Signs that someone may be suffering physical abuse may be:

- Unexplained bruising
- Flinching when approached
- Withdrawal or a change in behaviour
- Aggressive behaviour and temper outbursts
- Injuries inconsistent with the explanation

### Sexual Abuse

Sexual abuse involves the forcing or enticement of an individual (child or adult), to take part in sexual activities. This can include violence, but equally can be an act of coercion that restricts the individual's ability to provide informed consent.

Sexual abuse includes but is not limited to:

- Rape
- Penetration with an object
- Kissing
- Oral intercourse
- Masturbation
- Looking at pornographic material or sex acts.

Signs that a person is being sexually abused:

- Avoidance of a specific person. This can include a family member.
- Sexually inappropriate behaviour.
- Physical problems including medical problems with their genitals or pregnancy.

### Emotional Abuse

Emotional abuse occurs where there is persistent emotional ill treatment or neglect or rejection.

It causes severe and adverse effects on a person's behaviour and emotional, resulting in low self-worth.

Some level of emotional abuse is usually present in all forms of abuse.

Emotional abuse can involve, but is not limited to:

- Overprotectiveness that limits the individual to learn and experience
- Silencing them
- Inference of conveyance that the individual is unloved or worthless
- Bullying (face to face/ cyber)
- Causing fright to fear consequence
- Exploitation
- Expectations placed on an individual beyond their understanding or developmental capability

Signs that an individual is being emotionally abused include, but are not limited to:

- Confusion
- Developmental delay
- Self-harm



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- Personally over-critical
- Socialisation issues
- Behaviour change

### Neglect

Neglect is the persistent or severe failure to meet a vulnerable person basic physical and/or psychological needs. It will result in serious impairment of the person's health or development.

Neglect may include, but is not limited to:

- Failure to provide sustenance
- Failure to provide care needs
- Failure to adhere to medical practitioners' guidance
- Failure to provide housing or removal of housing

Signs that an individual is being neglected can be:

- Dishevelled and unkempt appearance
- Appears dirty or smelly
- Is hungry; perhaps steals food
- Is constantly tired

### Psychological Abuse

Psychological abuse involves the regular and deliberate use of a range of words and non-physical actions used with the purpose to manipulate, hurt, weaken, frighten a person mentally and emotionally, and influence a person's thoughts within their everyday lives.

Psychological Abuse can include:

- Gaslighting
- Name calling
- Insulting the person
- Threats against the person or a threat to take something away from the person
- Mocking
- Isolating the person
- Ignoring the person
- Excluding the person

Signs that an individual is being psychologically abused can be:

- Isolation
- Withdrawal from support networks
- Deference
- Unexplained paranoia
- Ambivalence about care giver
- Excessive tiredness
- Low self esteem

### Financial Abuse

It is a misconception that financial abuse always involves fraud or theft. In fact, financial abuse is often subtle and can be therefore very difficult to detect.

Financial abuse is often used as part of other forms of abuse including domestic violence and psychological abuse.

Financial abuse may look like:

- Denying access to personal finances
- Tricking someone into bad investments
- Borrowing money or property and not returning it
- Forcing the sale of assets

Signs of Financial abuse include:

- Inability to access bank accounts

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- Lack of money to pay for essentials
- Unusual payments in bank statements

### Modern Slavery

Modern slavery is defined as when an individual is exploited by others, for personal or commercial gain. Whether tricked, coerced, or forced, they lose their freedom.

Modern slavery may include, but is not limited to:

- Debt bondage/bonded labour where people trapped in poverty borrow money and are forced to work to pay off the debt, losing control over both their employment conditions and the debt
- Human trafficking where violence, threats or coercion are used to transport, recruit or harbour people for purposes such as forced prostitution, labour, criminality or marriage

Modern Slavery often involves other types of abuse including physical, psychological and financial abuse

Signs that an individual is involved in modern slavery can be:

- Signs of physical abuse such as unexplained injuries
- Isolation
- Excessive tiredness
- Low self esteem
- Or any other indicators described above

TTS recognises some learners, particularly migrants or those in poverty may be more susceptible to modern slavery.

### Radicalisation

The legislation is not prescriptive on the possible signs of radicalisation, although it is assumed that the most obvious signs will be extreme changes in behaviour, which will vary in its obviousness from case to case. Possible indicators are:

- General changes in demeanour, behaviour or viewpoint
- Changes in faith
- Becoming involved with a narrow view of politics
- Isolation
- Expressing views that are “them” and “us”
- Association with known terrorist organisations.

TTS recognises some learners may be in vulnerable social and domestic situations to include (mental health issues, single parent families, involvement in gangs). These learners may be at greater risk of radicalisation than others.