



**Safeguarding Children and Adults
and Preventing Extremism and Radicalisation Policy**

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1. Purpose and Scope

This policy details the responsibilities of Salt Training Limited (STL) in relation to safeguarding children and vulnerable adults, in line with current legislation and guidance. It also covers the STL's statutory and moral commitment towards ensuring that students are protected from, and educated about, the dangers of extremism and radicalisation.

Salt Training Limited comprises of an independent training centre in Herne Bay. Where necessary, discrete procedures and actions will be in place to reflect local safeguarding concerns, themes and issues.

Throughout the policy and supporting documentation, reference is made to 'children'. This term is used to mean those under the age of 18. STL recognises that some adults are also vulnerable to abuse and the procedures may therefore be applied (with appropriate adaptations) to allegations of abuse and the protection of adults at risk.

This policy should be read in conjunction with the STL's Safeguarding Process for Reporting which provides detailed, operational guidance on how to handle safeguarding disclosures and details specific procedures to follow for different safeguarding scenarios.

2. Policy Statement

2.1 STL's ethos is to provide a safe and welcoming environment for staff, students and visitors within its centre and whilst also representing the organisation at external venues and events. It is committed to meeting its duty to safeguard and promote the welfare of children and vulnerable adults and recognises its role in identifying cases of suspected abuse and making referrals to the appropriate investigating agency.

2.2 STL recognises the need to work with other agencies in performing its duties under the Education Act 2002, Children Act 2004 and Care Act 2014. These are, in summary:

- To have in place and follow procedures in keeping with local multiagency partnership arrangements. In the case of STL, the [Home - Kent Safeguarding Children Multi-Agency Partnership](#) (KSCMP) arrangements will be referred to
- To designate a senior member of staff as having lead responsibility for safeguarding and ensure that they receive appropriate training. In the case of STL this will be the Managing Director and the Head of Centre
- To operate safer recruitment procedures
- To have in place procedures to deal with allegations against staff
- To liaise with schools regarding any pre-16 students
- To ensure that all staff receive appropriate safeguarding training and are aware of their responsibilities
- To review policies and procedures every six months for the first two years of operating and subsequently annually, ensuring that external partners and experts are involved in the review
- To have in place robust health and safety procedures including protocols for emergency evacuation and invacuation
- To represent Salt Training Limited via the KSCMP.

- To take account of the Care Act 2014 section 42 -47 to safeguard vulnerable adults (see section 7.1)
- To have in place and follow procedures in keeping with the Kent and Medway Statutory Adult Safeguarding Board (KMSAB)

2.3 Salt Training Limited will ensure that all staff, no matter what role they hold within the organisation:

- Will be appropriately trained for their role and will receive awareness of safeguarding and Prevent procedures on a regular basis
- Will be aware of the processes in place to obtain early help for a student in need and understand their role in obtaining help
- Will take immediate action when a disclosure is made or when there is a concern that a student's safety and welfare is at risk
- Will not ignore a disclosure or assume that another colleague is aware of and/or is dealing with it
- Will not allow data protection concerns to inhibit the appropriate sharing of information
- Will work in accordance with STL's Safeguarding Processes for Reporting

2.4 The Safeguarding Board, chaired by an independent safeguarding specialist, has oversight of compliance with safeguarding legislation. The Managing Director for STL, Kurt Salter is the Strategic and Operational Lead for safeguarding and works with key staff and an external consultant to co-ordinate and manage procedures relating to the protection and safeguarding of children and vulnerable adults including safer recruitment and staff training.

2.5 The Salt College Principal, Company Director, Deputy Principal and Director of SEND also serve as the Senior Designated Officers at STL. In this capacity, they operate as the Designated Safeguarding Leads for their respective vocational programmes.

2.6 Salt Training Limited is committed to equality and diversity. Decisions and actions taken in relation to a potential safeguarding or child protection incident will not be influenced by the background or situation of any persons involved. Each case will be dealt with on its own merits.

2.7 Salt Training Limited has appropriate student admissions procedures in place and reserves the right to refuse admission to any student who may be a risk to themselves and others. This includes challenging the naming of Salt Training Limited in a student's Education, Health and Care Plan if STL deems that a student carries a significant risk and reasonable adjustments cannot be made to accommodate the student.

2.8 Safeguarding themes (e.g., staying safe online, respectful relationships, consent, exploitation, county lines) are embedded in curriculum delivery, progress reviews, and group tutorials for all programmes, including apprenticeships. Tutors are trained to identify 'teachable moments' to reinforce these topics naturally in delivery.

3. Monitoring and Review

This policy is reviewed on a six-monthly basis for the first two years of STL operating and then subsequently on an annual basis, by the Safeguarding Board/ Senior Leadership team and independent consultant. The policy will be reviewed by the Safeguarding Board/ Senior Leadership team and independent consultant outside of this schedule if deemed necessary.

Salt Training Limited will consult on the policy with external partners and experts as required.

Safeguarding expectations are built into employer agreements, and ongoing monitoring is undertaken via apprentice reviews, employer spot checks, and training provider audits. Any safeguarding concerns arising at employer sites are reported and acted on immediately.

4. Associated Safeguarding policies and procedures

This policy should not be read in isolation:

Salt Training Ltd recognises that safeguarding and EDI are interdependent. All concerns involving discrimination, hate-based incidents, or identity-based harm are logged and addressed under both the safeguarding and EDI frameworks.

Safeguarding and ensuring the safety and welfare of students and staff is at the core of STL's operational activities and staff should therefore read and familiarise themselves with the following policies and procedures:

- Access to Fair Assessment Policy
- Anti-Bribery Policy
- Complaints Policy
- Conflict of Interest Policy
- Contingency Plan Policy
- Data Protection Policy and Notice
- Document Retention and Secure Storage
- Enquiries and Appeals Policy
- Environmental Policy
- Equal Opportunities Policy
- Examination and Invigilation
- Health and Safety Policy
- Identification of Learners
- Internal Quality Assurance
- Malpractice and Maladministration
- Modern Slavery and Human Trafficking
- Reasonable Adjustment and Special Consideration
- Recognition of Prior Learning and APL
- Whistleblowing Policy
- Safeguarding Process
- Prevent Strategy

5. Local and National Safeguarding Priorities

Salt Training Limited works in accordance with the KSCMP and the KMSAB arrangements and will look to participate in the Educational Safeguarding Partnership Group which provides opportunities to raise awareness of current local and national agendas. STL operates an internal Safeguarding Board which is chaired by an independent consultant with Post 16 and Adult safeguarding expertise and many years of experience working in senior safeguarding positions in large Further Education Colleges. This measure helps STL to be apprised of national safeguarding themes and statutory requirements and assists in the planning and implementation of measures to mitigate safeguarding risks.

6. Designated Staff

A list of designated persons with responsibility for safeguarding and child protection is given at Appendix 1.

7. STL's arrangements for specific circumstances/students

Apprentices and learners contribute to shaping safeguarding strategy through learner voice forums, surveys, and representation on the Safeguarding Board. Their feedback informs updates to procedures, training content, and delivery practice.

7.1 Adult Learners and Apprentices

All adult learners and learners on apprenticeship programmes receive an induction, which includes raising awareness of the STL's commitment towards Safeguarding including preventing extremism and radicalisation, details of the support services offered and contact details for the Designated Safeguarding Lead. The understanding of all aspects of Safeguarding, preventing extremism and radicalisation and safe working practices is checked at each learner progress review and the opportunity to discuss any issues is given. Assessments are made to ensure that students' well-being is safeguarded by the workplace trainers. Prior to work related activities commencing, Salt Training Limited will carry out the following checks:

- Pre-placement Health and Safety checks of employers' premises and health and safety management arrangements are complete, including insurance details
- Employers are made aware of relevant Salt Training Limited policies
- The requirements for DBS checks are assessed and the relevant processes undertaken where required

The safeguarding principles and measures apply to all apprentices whilst on STL's premises. Where a concern is raised relating to the employer, the Salt Training Limited Designated Safeguarding Lead will liaise with the Safeguarding Body to address and decide on an appropriate course of action.

Whilst Salt Training Limited believes that all adults should be able to live free from abuse or neglect, we have a legal duty to safeguard adults at risk of harm. The Care Act 2014 defines an adult at risk of harm, more commonly termed an adult at risk, is anyone over the age of 18 who:

- Has care and support needs (whether or not these needs are being met); and
- is at risk of, or is experiencing, abuse or neglect; and
- as a result of those needs is unable to adequately protect themselves against this (risk of) abuse or neglect.

We recognise that circumstances affecting an adult's level of risk and/or ability to protect themselves may be different in different contexts and/or at different times and may be temporary or permanent.

This policy encompasses all activities run by or in association with the Salt Training Limited, including face-to-face activities in any location and online activities.

We do not expect Salt Training Limited staff to be able to determine who is an adult at risk of harm, but instead to follow the principles outlined in this policy with all adults that they come into contact with through their work activities.

This policy should be used in conjunction with the local Safeguarding Adults Board (KMSAB) safeguarding arrangements for any incident or report of concern.

7.2 Child Missing Education

Salt Training Limited will ensure that all students, regardless of their circumstances, are entitled to a full-time education which is suitable to their age, ability, aptitude and any special educational needs they may have. STL recognises its duty to establish, as far as it is possible to do so, the reasons why students are missing from their programme. STL recognises that when a 16 or 17-year-old runs away or goes missing they are no less vulnerable than younger children and are equally at risk, particularly of sexual exploitation, involvement with gangs or radicalisation. Every “missing” episode will attract proper attention and reporting from the staff involved.

7.3 ESOL Students

Salt Training Limited will ensure that additional planned support will be provided for students where English is their second language. We will ensure that induction on safeguarding, health and safety and other core induction is delivered in a manner that they gain a full understanding of the key themes. Additional training will be delivered to teaching and support staff on how best to work with ESOL students as it is required.

7.4 Students who are looked after, in care or leaving care

Salt Training Limited operates in an area where there is a relatively high number of looked after children. STL will afford children, young people and adults who are ‘looked after’ or living away from home (including those who are privately fostered) the same essential safeguards against abuse, but practice will be framed on an understanding that there may be additional risks and vulnerabilities for children and young people who are looked after.

7.5 Students aged 14-16

Primary responsibility for any school pupil attending programmes or activities at the Salt Training Limited centre remains with the home school; any incidents or issues with the safeguarding of a young person should be referred to STL’s Senior Safeguarding Officer, Kurt Salter, he will then liaise with the Local Authority as required.

Safeguarding issues relating to a student, under 16, attending Salt Training Limited as their main educational provider, will be addressed by the designated staff following the same guidelines and procedures as other students. Particular care should be taken as these learners are more vulnerable than other students because of their younger age.

Any 14-16-year-old students attending STL premises will be accompanied and supervised by their appropriate, responsible adult guardian. There will be a dedicated timetable determined by STL where 14-16-year-old students will attend separately to adult learners attending alternative timetabled provision. STL will inform guardians of the dedicated timetable which will be agreed at enrolment between the guardian and STL. The Designated Safeguarding Lead will be on call and will be immediately informed if:

- a 14-16-year-old does not return to a session after break or lunch
- Is seen outside of designated areas at any time

- Is seen leaving the STL Centre

7.6 Students with a Learning Difficulty or Disability

Students with learning difficulties and/or disabilities can face additional safeguarding challenges. STL will ensure that guardians and students who have a learning difficulty or disability are made fully aware of the safeguarding procedures during their Additional Learning Support interview. This will ensure that the information is delivered and adapted so it is accessible and meets their individual needs.

Information on how to contact the Designated Safeguarding Lead will also be adapted i.e. for deaf students and students with a speech disorder the DSL's e-mail address is available. Students with learning difficulties will have access to additional pastoral support where necessary.

Staff who work with students with learning difficulties and disabilities receive discrete training to enable them to support students appropriately. This includes aspects such as training in online safety so that they are confident in keeping students safe.

7.7 Students on subcontracted programmes

All learners on courses delivered by a subcontracted Salt Training Limited partner will receive details of the support services offered and contact details for the Designated Safeguarding Lead. The understanding of all aspects of Safeguarding including preventing extremism and radicalisation and safe working practices will be checked at each partner review and the opportunity to discuss any issues is given. Assessments will be made to ensure that the student's well-being is safeguarded by the staff in the Subcontracting Team. Arrangements will be in place to ensure that, prior to a course commencing:

- A Training Facility Health and Safety check list is completed
- A risk assessment of the premises is carried out
- All insurance documents are checked, and copies taken
- Partners are made aware of relevant Salt Training Limited policies
- An annual check of Safeguarding Policy to include Prevent Strategy is undertaken
- All staff in contact with learners are DBS checked and details monitored and updated as necessary
- All delivery staff are required to complete Safeguarding and Prevent training

8. Preventing Extremism and Radicalisation

Salt Training limited Prevent Strategy is attached within Appendix 2. The strategy outlines Salt Training Limited approach and commitment to safeguarding learners and staff by implementing the UK government's **Prevent Duty**, which aims to protect individuals from radicalisation and extremism. This strategy outlines how the organisation will identify, address, and mitigate risks while promoting British values and an inclusive learning environment.

The Prevent Strategy outlines the following

- Aims and Objectives
- Prevent duty compliance
- Roles and Responsibilities

- Recognising and reporting concerns
- Staff Training and Development
- Promoting British Values
- External Partnerships & Referrals
- Monitoring and review
- Contact information

As part of wider safeguarding responsibilities Salt Training Limited staff will be alert to:

- Disclosures by learners of their exposure to the extremist actions, views or materials of others outside of STL, such as in their homes or community groups, especially where learners have not actively sought these out.
- Graffiti symbols, writing or artwork promoting extremist messages or images
- Learners accessing extremist material online, including through social networking sites
- Guardian reports of changes in behaviour, friendship or actions and requests for assistance
- Partners, local authority services, and police reports of issues affecting learners in other STL delivery settings
- Learners voicing opinions drawn from extremist ideologies and narratives and glorifying violence, especially to other faiths or cultures or advocating violence towards others
- Use of extremist or “hate” terms to exclude others or incite violence
- Intolerance of difference, whether secular or religious or, in line with our equalities policy, views based on, but not exclusive to, gender, disability, sexuality, race, colour or culture
- Attempts to impose extremist views or practices on others
- Making remarks about being at extremist events rallies outside of STL premises

8.1 Promoting British Values

In line with the provisions of [s.78 of the Education Act 2002](#) Salt Training Limited promotes fundamental British values of democracy, the rule of law, individual liberty, and mutual respect and tolerance of those with different faiths and beliefs. This promotion takes place through:

- Lessons and learner progress reviews.
- The manner in which students are treated by staff
- The election of student representatives and Learner Voice ambassadors
- The standards of behaviour and respect students are encouraged to adopt through the ‘Student Code of Conduct’ and ‘Our Expectations’.
- The underlying messages delivered to students at student representative meetings
- The displays in classrooms, corridors, and workshops at the STL Centre
- In the manner and consistency with which students’ views are challenged should they conflict with such values.

Any students displaying such behaviours will be reported to a Designated Safeguarding Officer i.e. Director of Adult Education or Company Director.

8.2 Guest Speakers and Visitors

Salt Training Limited values the opportunities presented by external speakers for students to experience diverse opinion and to enter into debate. This is seen as an essential part of personal, professional and academic development. Salt Training Limited:

- Values the tradition of academic freedom and holds that no subject or belief should be excluded from reasonable, constructive discussion and debate.
- Values freedom of opinion and speech but recognises that, in the interests of the whole learning community, this must exist within formal procedures.
- Recognises and supports the moral and legal frameworks of the society and community within which it works.
- Will not accept the use of language by external speakers that offends and is considered to be intolerant. Specifically, this means offensive “street”, misogynistic, misanthropic, sexual or racist language irrespective of context. Direct attacks on any religions or beliefs are not permitted.
- Will not tolerate any person who intentionally demeans individuals and groups defined by their ethnicity, race, religion and/or belief, sexuality, gender, disability, age or lawful working practices and which give rise to an environment in which people will experience, or could reasonably, fear harassment, intimidation or violence.

All visitors are required to report to reception and any organisation requesting to distribute leaflets at the centre’s must seek approval from a representative of the Safeguarding Board/ Senior Leadership team prior to distribution. Other than the promotion of Salt Training Limited business, staff and students must also request the permission of the Managing Director/ Designated Safeguarding Lead before distributing leaflets.

9. Raising awareness about Safeguarding

Salt Training Limited is committed to ensuring that students are aware of behaviour towards them that is not acceptable and how they can keep themselves safe. All students know that there is a Safeguarding Team.

All staff within Salt Training Limited will inform students about who they can talk to in and out of STL and what steps can be taken to protect them from harm. Safeguarding information is delivered to students at the start of their course and reinforced throughout their programme of study. All students agree to a code of conduct, standards of behaviour & behaviour contract when they enrol.

10. E-Safety / Online Safety

E-Safety / online safety covers issues relating to young people as well as adults and their safe use of the Internet, mobile phones and other electronic communications technologies, both in and out of Salt Training Limited premises and associated activities. It includes awareness raising for all members of STL’s community on risks and responsibilities and is part of the ‘duty of care’, which applies to everyone working with young people and vulnerable adults. All members of staff will be made aware of the importance of good e-Safety / online safety practice in the learning environment in order to educate and protect the young people and vulnerable adults in their care.

The use of technology can play a significant part in many safeguarding issues. Child sexual exploitation; radicalisation; sexual predation: technology often provides the platform that facilitates the abuse. The three main areas of risk are:

- **content:** being exposed to illegal, inappropriate or harmful material; for example, pornography, fake news, racist or radical and extremist views;
- **contact:** being subjected to harmful online interaction with other users; for example commercial advertising as well as adults posing as children or young adults;
- **conduct:** personal online behaviour that increases the likelihood of, or causes, harm; for example making, sending and receiving explicit images, or online bullying.

It is important that staff take account of the Staff Safeguarding Procedure, recognising the need to maintain professional standards and where possible to support students in small groups rather than on a 1:1 basis.

Staff awareness will be raised about managing their own professional reputation online, including how to demonstrate appropriate online behaviours compatible with their role. Staff personal use of social networking, social media and personal publishing sites will be discussed as part of staff induction and safe and professional behaviour is outlined in the Acceptable Use Policy and Safeguarding Procedures. Staff will only use official Salt Training Limited provided email accounts to communicate with students and guardians.

E–Safety / online safety awareness will also be part of student induction. Safe and responsible use of the Internet and technology will be reinforced across the curriculum and subject areas. Students will be advised never to give out personal details of any kind which may identify them and / or their location. Particular attention to e-Safety education will be given where students are considered to be vulnerable. The Designated Safeguarding Lead/Managing Director will be informed of any e-Safety incidents, and any incidents involving Child Protection or vulnerable adult concerns will then be escalated appropriately. Any material that STL believes is illegal will be reported to appropriate agencies such as Internet Watch Foundation (IWF), Kent Police or CEOP (Child Exploitation & Online Protection Centre)

Apprentices and learners accessing provision remotely receive targeted safeguarding support and information. Tutors and coaches are trained to spot signs of disengagement or distress in virtual settings and escalate concerns via the safeguarding process.

Filtering Requirements

Preventative control: STL's IT systems will, by default, block illegal, inappropriate or extremist content (including self-harm, pornography, terrorism) at URL, keyword and file-type level. Filters are regularly updated by our outsourced IT company. Filter logs are checked weekly by the DSL. We use *Watch guard T145* as our primary filtering and logging software. Please note that any version of this software may and will be updated outside of the review schedule for this policy and as such the numeration or version number may potentially change out of step with this policy. This would not be considered sufficient cause to trigger a policy review and numeration/ version number will be updated within the normal policy review schedule.

Differentiated profiles: STL will use Custom risk-based settings for learners, staff, guests and remote users to balance protection with access to legitimate resources.

Monitoring Requirements

Technical monitoring: STL will log web activity, applications used, file transfers and will generate real-time alerts for policy breaches (e.g. cyberbullying, access to flagged content) via the Watch guard T145 software system.

Manual oversight: STL Staff will conduct in-session spot-checks of screens. A minimum threshold of one comprehensive report per week is maintained to identify emerging risks from our IT support Contractor.

STL will record e-Safety and online safety incidents and manage concerns in accordance with the disciplinary policies where appropriate.

An audit of the log files generated by the IT system will be performed by the DSL once per week to look for any anomalous data or improper internet usage. If any cause for concern is detected, a meeting will be called of the SLT and a course of action determined from there.

11. Parental involvement

Salt Training Limited is committed to ensuring that all parents/carers of under 18's, SEND learners Under 25 years old and Adult learners have an understanding that STL has a duty to safeguard and promote the welfare of children and vulnerable adults who are their students. Parents/carers will receive information via their young person during induction, making it clear that staff may need to share information and work in partnership with other agencies when there are concerns about a child's or Vulnerable adults welfare. Parents/carers will be asked to sign to confirm they have received this information.

The Designated Safeguarding Officers will contact Parents/carers to discuss any concerns about a child's welfare with the family and, where possible, seek their agreement to making referrals to children's and Vulnerable adults social care, unless it is deemed that it may place the student at greater risk. Where possible the Designated Safeguarding Officer will keep the parent/carer informed of actions progress for vulnerable adults and learners under 18 years old.

12. Staff Training

Designated staff will receive multi-agency safeguarding training every 2 years, and their knowledge and skills are refreshed regularly, and at least annually, to ensure they are up to date with developing local and national priorities.

All staff are required to complete the following three online courses:

- Safeguarding Children – for Education Level 1
- Safeguarding Adults Level 1 (V2)
- Radicalisation – The Prevent Duty

All staff receive mandatory training as part of their induction, to ensure they are aware of their safeguarding responsibilities and of the STL's policies and procedures. The training includes recognising signs of abuse and recording and reporting suspected abuse. They receive both online and face-to-face updates on safeguarding and child protection at least annually.

All staff are required to familiarise themselves with annual updates to the statutory guidance Keeping Children Safe in Education. The Designated Safeguarding Leads & Managing Director has received safer recruitment training and lead Safeguarding training Level 2.

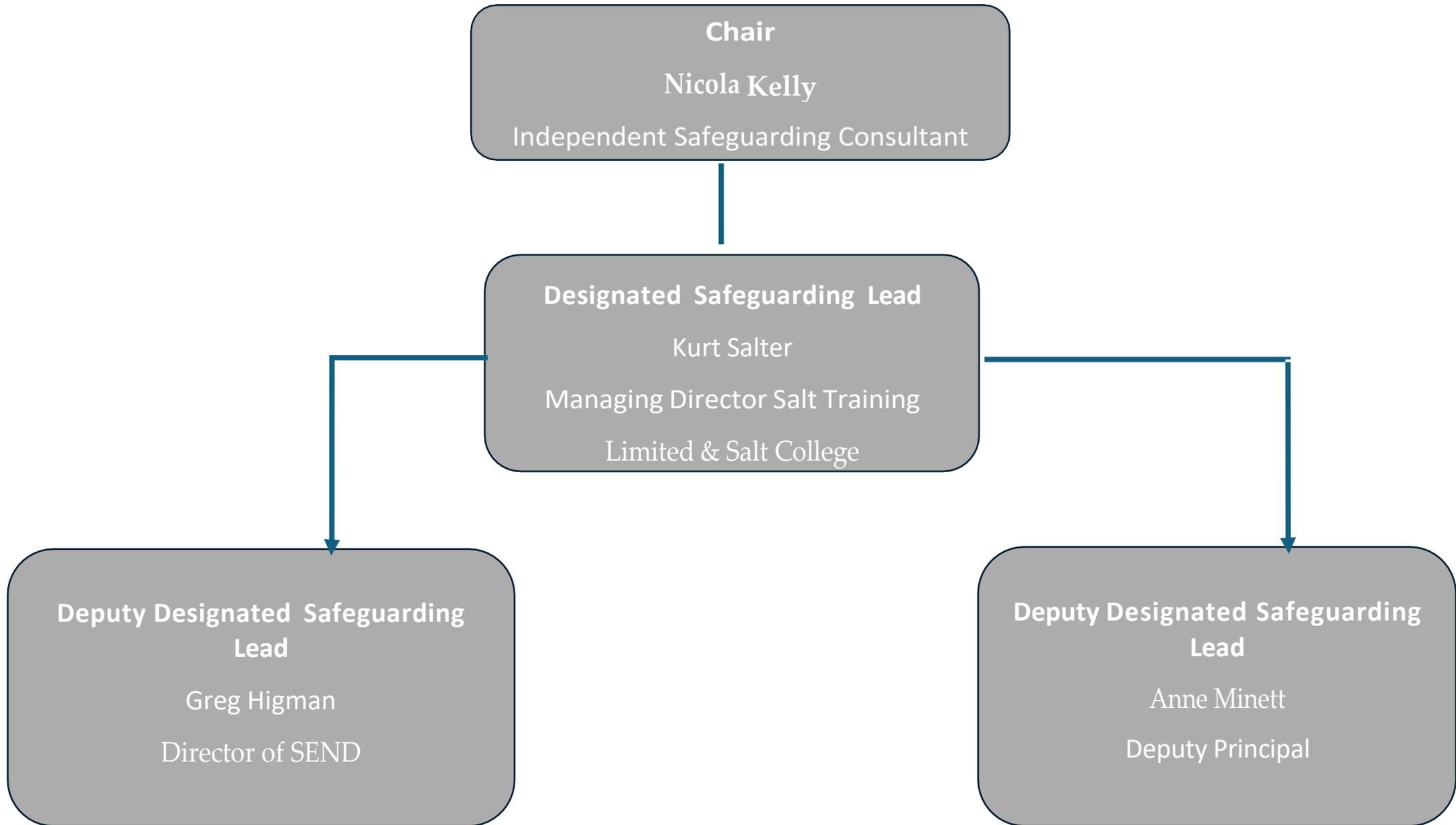
The Designated Safeguarding Lead and Deputy Designated Safeguarding leads have received Designated Safeguarding Lead training at Level 3.

All staff are made aware of duties under the Prevent agenda via staff induction and online update training.

All training is recorded on staff member's training records.



Salt Training Limited Safeguarding Board



Salt Training Limited Prevent Strategy

Effective from 01/04/2025 Review due 31/03/2026

1. Purpose and Scope

Salt Training Limited is committed to safeguarding learners and staff by implementing the UK government's **Prevent Duty**, which aims to protect individuals from radicalisation and extremism. This strategy outlines how the organisation will identify, address, and mitigate risks while promoting British values and an inclusive learning environment.

This strategy applies to:

- **All staff, learners, apprentices, and external partners** involved in training and education delivery.
- **All policies, procedures, and organisational activities** that influence safeguarding and learner well-being.

2. Aims and Objectives

Salt Training Limited's Prevent Strategy aims to:

- **Embed awareness** of radicalisation risks within the organisation.
- **Develop robust reporting mechanisms** for concerns related to extremism.
- **Provide staff training** to recognise signs of vulnerability or radicalisation.
- **Support learners** in understanding British values, critical thinking, and respectful discourse.
- **Engage with external agencies** to strengthen safeguarding practices.

3. Prevent Duty Compliance

Salt Training Limited will comply with the **Counter-Terrorism and Security Act 2015**, ensuring that:

- Staff members **identify and respond** to concerns about radicalisation.
- Safeguarding policies reflect the **Prevent Duty requirements**.
- Learners are **supported to engage safely** with sensitive topics.

4. Roles and Responsibilities

4.1 Senior Leadership Team

- Ensure Prevent Duty compliance across organisational policies and procedures.
- Oversee training and resources to support staff in implementing Prevent strategies.
- Collaborate with external agencies and safeguarding boards.

4.2 Designated Safeguarding Lead (DSL) & Prevent Lead, Deputy Designated Safeguarding Lead

- Act as the main point of contact for Prevent concerns.
- Provide guidance and training to staff and learners.
- Liaise with local authorities and counter-terrorism units where necessary.

4.3 Staff Responsibilities

- Recognise signs of radicalisation and extremism.
- Report concerns following the organisation's safeguarding procedures.
- Promote British values through curriculum and learner engagement.

5. Recognising and Reporting Concerns

Indicators of radicalisation may include:

- **Sudden withdrawal from social interactions** or increased isolation.
- **Expressions of extremist views** or a rejection of democratic values.
- **Changes in online activity**, including engagement with radical groups.
- **Disrespect towards others' beliefs** or advocacy of violence.

Reporting Process:

1. Concerns should be reported **immediately** to the **Designated Safeguarding Lead (DSL)** or Deputy Designated Safeguarding Lead
2. A confidential safeguarding assessment will be conducted.
3. If necessary, external agencies (e.g., Channel Programme) will be involved.

6. Staff Training and Development

Salt Training Limited will ensure that:

- All staff receive **Prevent Duty training** annually.
- Training materials are reviewed regularly to reflect policy updates.
- Support is available for staff dealing with safeguarding concerns.

7. Promoting British Values

Learners will be encouraged to embrace **British values**, including:

- **Democracy** – Respecting different viewpoints and engaging in open discussions.
- **Rule of Law** – Understanding the importance of rules and legal frameworks.
- **Individual Liberty** – Supporting the rights and freedoms of all individuals.
- **Mutual Respect & Tolerance** – Encouraging diversity and respect for differences.

8. External Partnerships and Referrals

Salt Training Limited will collaborate with:

- **Local Prevent Coordinators** to access expertise and guidance.
- **Police and local authorities** for advice on safeguarding concerns.
- **The Channel Programme** for early intervention and support where necessary.

9. Monitoring and Review

- This strategy will be **reviewed annually** to ensure effectiveness.
- Amendments will be made based on **new guidance and emerging risks**.
- Feedback from staff and learners will inform improvements to Prevent measures.

10. Contact Information

For Prevent-related concerns, contact: **Designated Safeguarding Lead (DSL) / Prevent Lead**

Managing Director- Kurt Salter

Email: Kurt@salttraininglimited.co.uk

Email: Safeguarding@salt-college.co.uk

Phone: 01227 2044444

Policy Owner: Managing Director
Stage of Approval: Approved
Date of Review: October 2025

11. Further Information

Further information can be found within the Salt Training limited Safeguarding policies and procedures

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Owner: Kurt Salter, Managing Director

Approving Body: Safeguarding Board– STL Managing Director and Independent Consultant

Stage of Approval: Reviewed October 2025

Date of review: October 2026

SALT TRAINING LIMITED SAFEGUARDING PROCESS

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- 9.6 Monitoring
- 9.7 Action following an allegation against a member of staff
- 9.8 Suspension
- 9.9 Information Sharing and Monitoring
- 9.10 Outcomes

10. SUPPORT FOR STAFF

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1. INTRODUCTION

The purpose of this procedure is to provide Salt Training Limited's staff and associated partner colleagues with information and guidance on the operational aspects of safeguarding within STL and to ensure that the STL meets its statutory obligations with regards to safeguarding.

Staff and associated partners should read this procedure in conjunction with the STL Safeguarding and Preventing Radicalisation and Extremism policy.

2. DEFINITIONS

Throughout this document the following definitions apply:

- 2.1 Child protection The protection of children from violence, exploitation, abuse and neglect.
- 2.2 Safeguarding The UK Government has defined the term 'safeguarding children' as: 'The process of protecting children from abuse or neglect, preventing impairment of their health and development, and ensuring they are growing up in circumstances consistent with the provision of safe and effective care that enables children to have optimum life chances and enter adulthood successfully.'
- 2.3 Abuse A violation of an individual's human and civil rights by any other person or persons. Abuse may consist of a single act or repeated acts. It may be physical, verbal or psychological, it may be an act of neglect or an omission to act or it may occur when a young person or vulnerable adult is persuaded to enter into a financial or sexual transaction to which he or she has not consented or cannot consent. Abuse can happen in any relationship and may result in significant harm to, or exploitation of, the person subjected to it'.
- 2.4 Duty of Care The duty which rests upon an individual or organisation to ensure that all reasonable steps are taken to ensure the safety of a child or young person involved in any activity or interaction for which that individual or organisation is responsible. Any person in charge of or working with young people and vulnerable adults in any capacity is considered, both legally and morally, to owe them a duty of care.

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- 2.5 Adult at Risk
- An adult at risk is any adult who has care or support needs (whether or not these are being met), is at risk of or is experiencing abuse or neglect, and as a result of their needs is unable to adequately protect themselves against this (risk of) abuse or neglect.

3. SAFEGUARDING ISSUES AND TYPES OF ABUSE

The following categories of abuse are not mutually exclusive, and a young person or vulnerable adult may be subjected to more than one type of abuse at the same time, whatever the setting. Abusers come from all walks of life; they may be parents, a known adult who has built up a trusting relationship with a child or vulnerable adult. Staff should refer to the safeguarding procedures in section 4 when dealing with a disclosure, suspicion of abuse or certain types of safeguarding issue.

3.1 Physical abuse

- Hitting, slapping, scratching, shaking, throwing
- Pushing or rough handling
- Poisoning, burning or scalding, drowning, suffocating
- Assault and battery
- Restraining without justifiable reasons
- Inappropriate and unauthorised use of medication
- Physical harm caused by feigning the symptoms of, or deliberately inducing injury in a young person or vulnerable adult
- Using medication as a chemical form of restraint
- Inappropriate sanctions including deprivation of food, clothing, warmth and health care needs

3.2 Sexual abuse

- Sexual abuse which involves forcing or enticing a young person or vulnerable adult to take part in sexual activities, not necessarily involving a high level of violence, whether or not the person is aware of what is happening, the risks involved or the consequences
- Rape or attempted rape
- Sexual assault and harassment
- Non-contact abuse e.g. voyeurism, exposing children to pornography, grooming (including via the internet), accessing or creating indecent images of children.

3.3 Psychological & emotional abuse

- Persistent emotional maltreatment
- Emotional and verbal abuse
- Humiliation and ridicule which may convey that they are worthless, unloved, inadequate or valued only insofar as they meet the needs of another person
- Threats of punishment, abandonment, intimidation or exclusion from services
- Isolation or withdrawal from services or supportive networks
- Deliberate denial of religious or cultural needs
- Removing opportunities to express their views, deliberately silencing them or 'making fun' of what they say or how they communicate

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- Failure to provide access to appropriate social skills and educational development training
- Imposing age or developmentally inappropriate expectations
- Interactions beyond the person's developmental ability, overprotection, limitation of exploration or learning, prevention of normal social interaction
- Seeing or hearing ill-treatment of another, serious bullying (including Cyber bullying) causing the person to frequently feel frightened or in danger
- Exploitation, corruption and enticed into illegal activity, especially Gang related

3.4 Self harm and suicidal tendencies

Students/Learners may suffer from a range of mental ill health conditions (anxiety, panic attacks, schizophrenia, bi-polar etc) which are managed and controlled.

Whilst the student would always be considered vulnerable in such cases, if a student's mental ill health escalates to the point of them self-harming, considering or attempting to commit suicide, it becomes a safeguarding matter and must be dealt with as such.

3.5 Neglect and acts of omission

- Failure to meet medical, physical care and psychological and emotional needs
- Failure to access care or equipment for functional independence
- Failure to ensure adequate supervision including the use of inadequate care givers or the failure to ensure access to appropriate medical care or treatment
- Failure to provide access to appropriate health, social care or educational services
- Failure to provide adequate food, shelter, heating, lighting and clothing (including exclusion from home or abandonment) etc.
- Failure to protect from physical or emotional harm or danger
- Failure to give prescribed medication
- Failure to give privacy and dignity
- Professional neglect

3.6 Financial abuse

- Misuse or theft of money
- Fraud and / or extortion of material assets
- Misuse of property, possessions or benefits
- Exploitation, pressure in connection with wills, property or inheritance

3.7 Discriminatory abuse (hate crime)

- Discrimination demonstrated on any grounds including sex, race, colour, language, culture, religion, politics, gender identity or sexual orientation
- Discrimination that is based on a person's disability or age
- Harassment and slurs which are degrading

3.8 Child on child sexual abuse, sexual violence and harassment

It is important that all staff and associated partner colleagues are aware that safeguarding issues can manifest themselves via child-on-child sexual abuse or sexual violence. Child on child sexual harassment is included in this category. This is most likely to manifest as —but is not limited to — physical and/or emotional bullying, sexual

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violence (rape or other non-consensual sexual activity), sexual harassment and nude image sharing. It also includes the practice of 'upskirting' i.e. taking images under a person's clothing without their knowledge for the purposes of obtaining sexual gratification and/or causing distress, humiliation or alarm. Upskirting was made a criminal offence in 2019. Sexual violence may take place in person or it may be undertaken on-line. Females, LGBT students and students with additional learning needs are most at risk.

The procedure for dealing with child-on-child abuse and sexual violence can be found in section 4.5. DfE has also published [guidance](#) on the subject which staff/colleagues may find useful.

3.9 Trafficking and sexual exploitation

Trafficking of children is a form of human trafficking and is defined as the "recruitment, transportation, transfer, harbouring, and/or receipt" of a child for the purpose of slavery, forced labour and exploitation. It is categorised as child abuse and considered as modern slavery in the UK. Children and vulnerable adults can be trafficked by parents, extended family members, known adults from a child's community or by strangers. A person under 18 cannot give informed consent to their own exploitation.

Children are trafficked to the UK for:

- Sexual exploitation
- Criminal activity, including cannabis cultivation and street crime
- Labour exploitation
- Informal care arrangements with related or unrelated adults for domestic servitude or benefit
- Fraud or carrying out petty crimes
- Forced marriage
- Illegal adoption

This is not an exhaustive list and children are often exploited for more than one reason. Child trafficking is child abuse and requires a child protection response and multi-agency working. All children, irrespective of their immigration status, are entitled to protection.

The DfE's definition of child sexual exploitation (CSE) is as follows:

Child sexual exploitation is a form of child sexual abuse. It occurs where an individual or group takes advantage of an imbalance of power to coerce, manipulate or deceive a child or young person under the age of 18 into sexual activity (a) in exchange for something the victim needs or wants, and/or (b) for the financial advantage or increased status of the perpetrator or facilitator. The victim may have been sexually exploited even if the sexual activity appears consensual. Child sexual exploitation does not always involve physical contact; it can also occur through the use of technology.

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Sometimes victims of child sexual exploitation are moved around geographically to cater for the needs of the group and they may be trafficked into, within and out of the UK.

Across the different categories of child sexual exploitation, the link between children being sexually exploited and children going missing is very strong. A key difficulty in tackling child sexual exploitation is the fact that often victims do not themselves recognise or acknowledge that they are being exploited. There are a number of signs which should be considered by staff as possible indicators that a young person is a victim or potential victim of sexual exploitation, although it is important to recognise that many young people may display one or more of these behaviours without being a victim at all. Possible sign of CSE may be:

- Associating with other young people involved in exploitation
- Having older boyfriends or girlfriends
- Suffering from sexually transmitted infections
- Mood swings or changes in emotional wellbeing
- Drug and alcohol misuse
- Displaying inappropriate sexualised behaviour
- Going missing for periods of time or regularly coming home late
- Running away from home
- Regularly missing classes or session at STL or not taking part in education
- Appearing with unexplained gifts or new possessions (often new mobile phones)
- Self-harming and suicide
- Bullying
- Teenage pregnancy

3.9.1 Child Criminal Exploitation (CCE)

CCE can include young people being forced or manipulated into carrying money or drugs through county lines, pickpocketing or shoplifting. Young people can become trapped into this sort of exploitation and it is important to recognise that they may also be victims despite having committed crimes. The experience of males and females may be very different when considering CCE, both sexes may be at higher risk of sexual exploitation.

3.10 Serious Violence

Young people at risk of, or involved in serious violence may display many of the same indicators as for CSE (3.9). All staff should be aware of these risk factors plus any decline in performance at STL classes/sessions, signs of unexplained injuries and changes in friendships groups. The risk factors which increase the likelihood of involvement in serious violence are:

- Being male
- Frequent absence or exclusion from school
- Having experienced maltreatment
- Having previous offending behaviour

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3.11 Initiation / hazing type violence and rituals

Hazing is any action or situation, with or without the consent of the participants, which recklessly, intentionally, or unintentionally endangers the mental, physical, or academic health or safety of a student. This can include humiliating and sometimes dangerous initiation rituals, especially imposed to gain entry / inclusion in groups.

3.12 Bullying, including cyberbullying

Bullying is repeated and intentional behaviour and can have a devastating effect and must be addressed immediately. Further information can be found in STL's anti- Bullying and Harassment Policies. Type of bullying are:

- [Physical bullying](#) - bullying that takes the form of physical abuse, such as pushing, shoving, hitting, fighting, spitting, and tripping. Emotional bullying is bullying that involves insults, derogatory remarks, name calling, and teasing. Also included are attempts to ostracize the victim, such as being left out or ignored, which is sometimes referred to as social bullying, as distinguished from verbal bullying. Emotional bullying can be done in person or via cyberbullying.
- Face-to-face bullying - bullying in which students confront each other in person.
- Cyberbullying - bullying that takes place online, through either email, chat rooms, social networking services, text messages, instant messages, website postings, blogs, or a combination of means. Cyberbullies may conceal their identity so that their victim experiences an anonymous attack. The content of cyberbullying can consist of all of the types of content including posting insulting and derogatory comments about someone or sending such comments to someone; sending mean or threatening messages; gossiping about someone online including posting sensitive or private information; impersonating someone in order to cast that person in a bad light; and excluding someone from an online page or group. Unwanted contact, also known as harassment, is another form of cyber bullying.

3.13 Nude Image Sharing

There are a number of definitions of Nude Image Sharing (also known as sexting or Youth Produced Sexual Imagery) but for the purposes of this advice it is simply defined as inappropriate offensive images or videos generated:

- by children under the age of 18, or
- of children under the age of 18 that are of a sexual nature or are indecent. These images are shared between young people and/or adults via a mobile phone, handheld device or website with people they may not even know.

There are many different types of Nude Image Sharing and it is likely that no two cases will be the same. It is necessary to carefully consider each case on its own merit apply a consistent approach when dealing with an incident to help protect staff, STL and the student. The range of contributory factors in each case also needs to be considered in order to determine an appropriate and proportionate response. All staff and students should be familiar with the seriousness of sharing inappropriate images of a sexual nature and the safeguarding procedures in section 4.6 should such situations arise.

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3.14 Female Genital Mutilation (FGM)

Female genital mutilation (FGM) comprises all procedures that involve partial or total removal of the external female genitalia, or other injury to the female genital organs for non-medical reasons.

The Female Genital Mutilation Act 2003 makes it an offence for UK nationals or permanent UK residents to carry out female genital mutilation (FGM) abroad, or to aid, abet, counsel or procure the carrying out of FGM abroad, even in countries where the practice is legal. FGM is extremely harmful. It can cause a variety of life-long problems for the girls that it is done to. Girls under 15 are at most risk.

FGM is illegal under UK law and if a member of staff suspects that this is about to happen to a child at the school/ college, they are to **immediately** report it to the police. The police will issue them with instructions which may potentially include keeping the child at school/college whilst they travel to the scene. After they have received instructions from the police and acted upon them, they should then immediately inform the DSL and SLT of the situation.

Generally, the expectation is to report safeguarding concerns to the DSL for assessment but if a child is at imminent risk of FGM staff are to go directly to the police as soon as they suspect this is about to happen as the procedure is irreversible.

3.15 Forced marriage

A forced marriage is a marriage in which one or both spouses do not (or, in the case of some vulnerable adults, cannot) consent to the marriage and duress is involved. It is an entirely separate issue from arranged marriage, and the two things should not be confused. Forced marriage is a human rights abuse and falls within the Crown Prosecution Service definition of domestic violence. Young people at risk of a forced marriage are usually experiencing emotional and/or physical abuse at home.

The majority of forced marriages involve a young female victim, but young men can also be victims. Around one-third of the cases handled by the FMU (Forced Marriage Unit) involve children under 18 years of age.

Concerns regarding any students must be reported to a Safeguarding Officer without delay. Forced marriage is closely linked to honour-based violence and honour killings. Procedures for dealing with forced marriage are detailed in section 4.7.

3.16 Extremism and Radicalisation

Extremism goes beyond terrorism and is defined in the Government's Counter Extremism Strategy as vocal or active opposition to our fundamental values, including the rule of law, individual liberty and the mutual respect and tolerance of different faiths and beliefs. We also regard calls for the death of members of armed forces as extremism. Extremists often target the vulnerable – including the young – by seeking to sow divisions between communities on the basis of race, faith or denomination; justifying discrimination towards women and girls; seeking to persuade others that minorities are inferior; or arguing against the primacy of democracy and the rule of law in our society.

Radicalisation is the process by which a person comes to support terrorism and forms of extremism leading to terrorism.

The procedure for dealing with a disclosure or suspicion of extremism or radicalisation is covered in section 4.8

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3.17 Gang based crime

Students may be targeted by gangs to participate in criminal activities such as selling drugs, laundering money, intimidation, knife crime etc. and may be enticed by a sense of belonging, rewards and promises of 'protection'. If they try to leave a gang they may be subject to intimidation and threats to their own and their relatives' safety and security.

4 SAFEGUARDING PROCEDURES

As well as providing procedures for dealing with disclosure or suspicion of a safeguarding issue, this section also covers procedures for dealing with safeguarding issues which need a specific approach. As a general principle in all cases, staff must:

- Record any safeguarding concerns, suspicions or disclosures as soon as the issue is raised. Documenting the concern is vital because verbal transmission of information may be misinterpreted or forgotten. Staff should complete a report on CPOMS to record an incident or concern. This can additionally be verbally discussed with the DSL and/ raised at safeguarding meeting held at the end of every day. It is important to note that urgent safeguarding concerns should not wait until the safeguarding meetings to share.
- The completed Safeguarding report from CPOMS will then be referred to the Designated Safeguarding Lead, STL's Managing Director, Kurt Salter.
- If there is some question as to whether an elevated response is required to a specific safeguarding concern, i.e. there is some uncertainty as to whether external agencies need to be involved in the decision making process and/or assessment of level of risk and action therefrom, one of the DSLs should contact the appropriate local authority's children services front desk. For example, for Kent County Council (KCC), the front door service will be contacted either via telephone or their email service depending on the level of urgency. The communication will then be assessed by KCC's duty social workers and guidance will be issued.

4.1 Specific safeguarding issues

All staff should have an awareness of safeguarding issues that can put children at risk of harm. Any young person or vulnerable adult may benefit from early help, but all staff should be particularly alert to the potential need for early help for an individual who:

- Is disabled and has specific additional needs
- Has special educational needs
- Is a young carer
- Is frequently missing/goes missing from care or home
- Is misusing drugs or alcohol
- Is involved in criminal activities and/or gang culture
- Is at risk of being radicalised, exploited, trafficked or enslaved
- Is in challenging family circumstances such as substance abuse, adult mental health problems or domestic abuse
- Has returned home to their family from care
- Is privately fostered.

It is important to recognise that some young people or adults who are or may become vulnerable may reveal abuse themselves by talking about or drawing attention to physical signs or displaying certain actions / gestures. This may be their only means of communication. Staff should be alert to these signs and to consider what they might mean.

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Other than the types of abuse detailed in section 3, there may be safeguarding concerns connected with individuals in the following circumstances:

- Children and the court system
- Children missing from education
- Children with family members in prison
- Child criminal exploitation: county lines
- Domestic abuse
- Homelessness
- Preventing radicalisation
- Private fostering

4.2 Welfare concerns

Safeguarding young people and vulnerable adults is a whole company/organisation task. All staff members have an important role to play in helping to identify welfare concerns and possible indicators of abuse or neglect at an early stage. For some young people and vulnerable adults a “one off” serious incident or concern may occur and you will have no doubt that this must be immediately recorded and reported (see section 5.2). Most often however, is the accumulation of a number of small incidents, events or observations that provide the evidence of harm being caused to a young person or vulnerable adult.

4.2.1 What is a “welfare concern”?

Concerns may arise in one or more of the following areas:

- 4.2.1.1 The student’s behaviour
- 4.2.1.2 The student has a physical injury
- 4.2.1.3 The student makes a disclosure or allegation
- 4.2.1.4 The student’s physical presentation
- 4.2.1.5 Information received from, or the behaviour of a parent/carer

4.2.2 What do I record?

- 4.2.2.1 The incident, event or observation of concern, described clearly and concisely
- 4.2.2.2 If recording a disclosure, the student’s own words are recorded and any questions you may have asked are included
- 4.2.2.3 Physical marks and injuries are recorded on a body map where appropriate
- 4.2.2.4 Straightforward language is used, and fact and opinion are differentiated
- 4.2.2.5 Any action you have taken is recorded
- 4.2.2.6 The form is dated, signed and your details are legible

4.3 Responding to a disclosure or suspicion of abuse

Any member of staff who has knowledge of, or a suspicion that, a child / vulnerable adult is or has been suffering significant harm or is in immediate danger must refer their concern to the Designated Safeguarding Lead immediately, but within 24 hours at the latest. In exceptional circumstances such as out of hours or if the DSL is unavailable, please refer to the Designated Safeguarding Officers: The Head of Centre (Anthony Salter) and Curriculum Director (Paul Glidewell). If there is an allegation against a member of staff, the procedure detailed in section 9 must be followed.

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All allegations or suspicions must be taken seriously. The student must be advised that this information cannot be kept confidential and will be passed on to the Safeguarding Team in the first instance. It is not the responsibility of STL staff to investigate welfare

concerns or determine the truth of any disclosure or allegation. All staff, however, have a duty to recognise and deal with concerns appropriately and refer them to a Designated Safeguarding Officer.

Staff who receive an allegation or disclosure of abuse should make an immediate written record of the conversation and refer the matter to a Designated Safeguarding Officer or the DSL. The following information must be noted:

- date and time of report
- date, time and place of alleged abuse
- your name and name of complainant
- name of child or vulnerable adult alleged to have been abused, if different from above
- nature of alleged abuse including perpetrator if known
- description of any injuries observed, if any
- any other information given, including siblings if relevant
- distinguish between observation, fact and opinion
- confirmation that the student has been advised of the next steps

If a disclosure is made or abuse is suspected, staff should:

- Listen carefully and stay calm
- Write down what they have said verbatim, i.e. exactly the words they have used
- Question without pressure to be sure that what is being said is properly understood by the member of staff
- Reassure the individual concerned that s/he has done the right thing
- Explain to the individual who has disclosed that the information must be passed on but only to those who need to know about it. Say who will receive the information.
- Note the main points carefully.
- Make a note of the date, time and place. What the individual said /did, the questions asked by the member of staff

Staff must not:

- Ask leading questions or put words into the mouth of the disclosing individual
- Investigate concerns or allegations
- Promise confidentiality

It may also be appropriate to remind the student about the availability of Counselling Services or external help lines. At all times, staff will ensure that the person making a disclosure is treated with dignity and respect. Staff should be aware that when making a safeguarding referral, they may be asked to contribute towards assessments by external agencies.

4.4 Contact with external services

The Safeguarding Officer or DSL must report the matter to Children's/ Adult Services, Social Care or the police by 'phone immediately, followed up by written confirmation within 48 hours.

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A written record of the date and time of the report must be made and the document should include the name and position of the person to whom the matter is reported.

The Safeguarding Officer should note down the detail of the discussion about action to be taken to inform the parents/carers. The process for keeping STL informed of further action should also be discussed.

4.5 Procedure for dealing with child on child abuse

Staff have a significant role in setting standards and actively tackling any behaviours which could be construed as sexual harassment, and which could ultimately lead to sexual violence or other forms of child on child abuse.

Disclosures of sexual violence and sexual harassment are challenging to manage but must be taken seriously and fully investigated in all instances. Students who are victims of sexual violence and sexual harassment will have had a stressful and distressing experience. Students must be offered appropriate support and referred to support agencies where necessary. It is also important that other students and STL staff are supported and protected as appropriate.

Where the student is under 18 parents or parents/guardians/carers will normally be informed by the Safeguarding Officer or DSL (unless this would put the student at greater risk).

If a child is at risk of harm, is in immediate danger, or has been harmed, a referral will be made to Children's Social Care and/or Police

Following a disclosure, the Safeguarding Officer/DSL will make an immediate risk and needs assessment on a case-by-case basis. The Risk assessment will consider:

- The victim, especially their protection and support.
- The alleged perpetrator, their support needs and any discipline action.
- All other students at the school.
- The victim and the alleged perpetrator sharing classes and space at school.

The risk assessment will be recorded and kept under review.

Where there has been other professional intervention and/or other specialist risk assessments, these professional assessments will be used to inform STL's approach to supporting and protecting pupils.

The Safeguarding Officer/DSL will consider:

- The wishes of the victim.
- The nature of the incident including whether a crime has been committed and the harm caused.
- Ages of the children involved.
- Developmental stages of the children.
- Any power imbalance between the students.
- Any previous incidents.

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- Ongoing risks.
- Other related issues or wider context.

The Safeguarding Officer/DSL will manage the report with the following options:

- Manage internally
- Early Help
- Refer to Children's Social Care
- Report to the police (generally in parallel with a referral to Social Care)

The Safeguarding Officer/DSL will manage each disclosure on a case by case basis and will keep the risk assessment under review.

Where there is a criminal investigation into a rape, assault by penetration or sexual assault, the alleged perpetrator should be removed from any classes they share with the victim. Where this is not possible, i.e. only one class for a particular course, other options should be considered, dependent on circumstances, that will enable both parties to continue in their studies.

The Safeguarding Officer/DSL and relevant managers of curriculum will consider how best to keep the victim and perpetrator a reasonable distance apart on STL premises and on transport where appropriate.

Where a criminal investigation into a rape or assault by penetration leads to a conviction or caution, STL will take suitable action. In all but the most exceptional of circumstances, the rape or assault is likely to constitute a serious breach of discipline and lead to the view that allowing the perpetrator to remain on STL premises would seriously harm the education or welfare of the victim (and potentially other students).

Where a criminal investigation into sexual assault leads to a conviction or caution, STL will, if it has not already, consider any suitable sanctions in light of the Student Code of Conduct and Disciplinary Procedure including consideration of permanent exclusion. Where the perpetrator is going to remain at STL, the Managing Director would continue keeping the victim and perpetrator in separate classes and continue to consider the most appropriate way to manage potential contact on STL premises and transport. The nature of the conviction or caution and wishes of the victim will be especially important in determining how to proceed in such cases.

The victim, alleged perpetrator and other witnesses (children & adults) will receive appropriate support and safeguards on a case-by-case basis.

4.6 Procedure for dealing with Nude Image Sharing, Sexting and Upskirting Nude Image Sharing, Sexting and Upskirting disclosures should follow the normal safeguarding practices and protocols. A student is likely to be very distressed especially if the image has been circulated widely and if they do not know who has shared it, seen it or where it has ended up. Staff should immediately contact a member of the Safeguarding Team. The safeguarding team will then carry out interviews to determine what has likely happened and then assess what will be the best course of action to follow from there.

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4.6.1 Searching a device – what are the rules?

The revised Education Act 2011 brought to bear significant new powers and freedoms for teachers and schools. Essentially, the Act gives schools and/or teachers the power to seize and search an electronic device if they think there is good reason for doing so.

This search can only be conducted in the presence of a member of the Safeguarding Team.

A device can be examined, confiscated and securely stored if there is reason to believe it contains indecent images, including extreme pornography. When searching a mobile device the following conditions should apply:

- 4.6.1.1 The action is in accordance with the school's child protection and safeguarding policies
- 4.6.1.2 A member of the safeguarding team is present
- 4.6.1.3 The search is conducted by a member of the same sex
- 4.6.1.4 If any illegal images of a child are found you should inform the police who will deal with the incident
- 4.6.1.5 Always put the child first
- 4.6.1.6 Do not search the device if this will cause additional stress to the student or person whose image has been distributed

Never

- 4.6.1.7 Search a mobile device even in response to an allegation or disclosure if this is likely to cause additional stress to the student/young person UNLESS there is clear evidence to suggest that there is an immediate problem
- 4.6.1.8 Print out any material for evidence
- 4.6.1.9 Move any material from one storage device to another

Always

- 4.6.1.10 Refer to a member of the Safeguarding Team
- 4.6.1.11 Record the incident
- 4.6.1.12 Act in accordance with STL's safeguarding policies and procedures

If there is an indecent image of a child on a website or a social networking site the Safeguarding Officer/DSL will report directly to CEOP <https://www.ceop.police.uk/safety-centre/> so that law enforcement can make an assessment, expedite the case with the relevant provider and ensure that appropriate action is taken to safeguard the child.

4.6.2 What to do and not do with the image

If the image has been shared across a personal mobile device:

Always

- 4.6.2.1 Confiscate and secure the device(s)

Never

- 4.6.2.2 View the image unless there is a clear reason to do so
- 4.6.2.3 Send, share or save the image anywhere
- 4.6.2.4 Allow students to do any of the above

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If the image has been shared across the STL network, a website or a social network:

Always

- 4.6.2.5 Block the network to all users and isolate the image

Never

- 4.6.2.6 Send or print the image
- 4.6.2.7 Move the material from one place to another
- 4.6.2.8 View the image outside of the protocols in your safeguarding and child protection policies and procedures.

4.6.3 What the law says

It is important to be aware that young people involved in sharing sexual videos and pictures may be committing a criminal offence. Upskirting is considered a criminal offence. Specifically, crimes involving indecent photographs (including pseudo images) of a person of less than 18 years of age fall under Section 1 of the Protection of Children Act 1978 and Section 160 Criminal Justice Act 1988. Under this legislation it is a crime to:

- 4.6.3.1 Take an indecent photograph or allow an indecent photograph to be taken,
- 4.6.3.2 Make an indecent photograph (this includes downloading or opening an image that has been sent via email),
- 4.6.3.3 Distribute or show such an image,
- 4.6.3.4 Possess with the intention of distributing images,
- 4.6.3.5 Advertise, and
- 4.6.3.6 Possess such images.

The following flow chart “Sexting in Schools” adapted from the ‘Medway Local Authority Response Process for Professionals’, will help Safeguarding Officers and the STL DSL to make a decision about the actions they may need to take.

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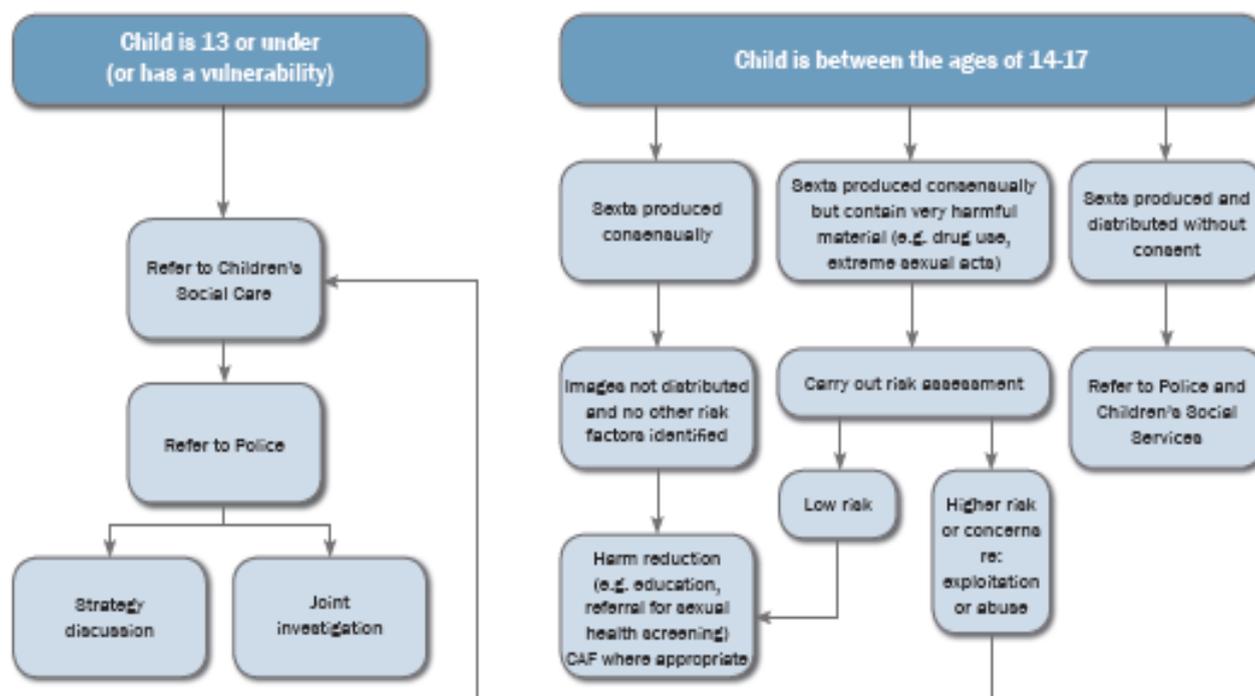
SALT TRAINING LIMITED SAFEGUARDING PROCESS

Sexting in schools

Annex 1

Sexting – Response process for professionals

This flowchart (adapted from 'Medway Local Authority Response Process for Professionals') will help you to make a decision about the actions you need to take.



4.7 Procedure for dealing with forced marriage

Normal safeguarding procedures apply in actual or suspected cases of forced marriage. However, staff must be aware there may be only one opportunity to speak to a potential victim of forced marriage, so an appropriate initial response is vital. The victim's family, friends or members of the community MUST NOT be informed. The victim has sought help and this is likely increase the risk to the victim significantly.

All those involved will need to bear in mind that mediation as a response to forced marriage can be extremely dangerous. There have been cases of victims being murdered by their families during mediation. Mediation can also place someone at risk of further emotional and physical abuse.

Victims should be reminded of their rights – they have the right to choose who they marry and the right to make decisions about their lives. The Designated Safeguarding Lead will contact the Forced Marriage Unit; they have a public helpline that provides confidential advice and support to victims, and to practitioners handling cases of forced marriage.

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4.8 Procedure for dealing with radicalisation or extremism

Intelligence about students who may be subject to radicalisation or extremism may come from a number of different sources. Staff should be looking out for any signs which may indicate that a student may have been targeted (as detailed in section 8 of the Safeguarding Policy).

Safeguarding Officers must follow up any concerns and discuss these with the student (where appropriate) and seek advice from Channel/Prevent external links where necessary. In some cases, Safeguarding Officers may attend Channel panels to determine courses of action for particular students.

4.9 Procedure for missing education

STL understands that missing from education particularly on repeat occasions is a potential indicator of abuse or neglect including sexual exploitation.

- Staff will report any students where attendance is erratic or cause for concern to the Designated Safeguarding Officers or DSL so appropriate support can be put in place to help prevent the risks of their going missing
- Staff will inform a Safeguarding Officer or DSL immediately of any student who is missing without notification and is on the Vulnerable risk register
- Staff will inform a Safeguarding Officer immediately of any students that are missing for 5 consecutive days without contact with STL
- STL will inform the local authority after 28 days of any student under 18 who is to be removed from STL's enrolment register

4.9.1 When a child is missing or their whereabouts are unknown

All students under 18 or who are vulnerable adults who go missing or their whereabouts are unknown will be reported to the Police immediately. If the student is deemed to be at immediate risk a DSO or the DSL will ring 999 on the day of referral. If not at immediate risk they will report to the police by ringing 101 within 24 hours. Any relevant information that might help to find or support the child will be shared.

If the student is a looked After Child, a Care Leaver or an Unaccompanied Young Person the STL will immediately contact the Police and Social Services (particularly in the case of Vulnerable Adults - see Absconding Procedure) and the parents will be notified by Social Services.

It is essential that all staff are alert to signs to look out for and the individual triggers to be aware of when considering the risks of potential safeguarding concerns such as travelling to conflict zones, Female Genital Mutilation (FGM) and forced marriage.

4.10 Procedure for dealing with students who are privately fostered

Private fostering occurs when a child under the age of 16 (under 18, if disabled) is provided with care and accommodation by a person who is not a parent, person with parental responsibility for them or a relative in their own home. A child is not privately fostered if the person caring for and accommodating them has done so for less than 28 days and does not intend to do so for longer. Such arrangements may come to the attention of staff through the normal course of their interaction, and promotion of learning activities, with children.

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SLT must notify the local authority if they are made aware that a child is being privately fostered to allow the local authority to check the arrangement is suitable and safe for the child.

5 DESIGNATED SAFEGUARDING OFFICER AND DSL RESPONSIBILITIES

5.1 How to record actions taken in response to staff concerns

When a welfare concern, a disclosure or suspicion of abuse is passed to you it is important that you make a record of the action that you have taken on CPOMS. A check should firstly be made that the report is sufficiently detailed and has been properly submitted. If a body map has been completed or there are any other documents referred to in the record, ensure these are attached and also dated and signed.

The level of detail of this record will clearly depend on the nature and seriousness of the concern but may include:

- Requests to staff for monitoring specific aspects of the young person's/vulnerable adult's presentation, behaviour, attendance etc.
- Discussions and telephone calls (with colleagues, parents and young people / vulnerable adults and other agencies or services)
- Professional consultations
- Letters sent and received
- Referral forms

5.2 When and how to start safeguarding records

Once a welfare concern has been raised on CPOMS and you have made a record of the action you have taken in response to this, these documents will be securely stored on CPOMS. **All entries made on CPOMS must be considered in their broader context (with older reports etc) by the DSLs reviewing them.**

All information relating to safeguarding must be stored on CPOMS as much as is feasible. This way all of the safeguarding reports and information are kept in one electronic system and as such can be easily colated by the DSLs to notice patterns or other information. Additionally this reduces the risk of information being overlooked because it is stored in a variety of places.

All staff must be sure to record all relevant details for anything relating to safeguarding on CPOMS.

- Concerns for the student and, consequently, records of these and actions
- If the student has been referred to external agencies
- You have been made aware of the involvement of any external agencies with the young person / family and are contributing to multi agency assessments

Where concerns relate to more than one young person or vulnerable adults from the same family these must all be recorded on CPOMS and cross referenced.

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Safeguarding Officers and the DSL must review the Safeguarding entries on CPOMS on a daily basis.

6 DATA PROTECTION AND INFORMATION SHARING

Information sharing is vital in identifying and tackling all forms of abuse.

Although data protection legislation places duties on organisations to process personal information fairly and lawfully and to keep the information they hold safe and secure, this must not be seen as a barrier to sharing information where to do otherwise would result in a child being at risk of harm.

Neither the parent nor the student has an automatic right of access to a young person or vulnerable adult's protection records. It is however best practice to share information written by STL staff unless there is a valid reason to withhold it.

Consideration should always be given to the risks of sharing versus not sharing the information.

Cases of alleged abuse that result in court proceedings may require STL to disclose their records, either through the police or social services. In such cases, staff will follow the Data Subject Access Request Procedure.

7 RECORD KEEPING

Records should be factually accurate, relevant, up to date and auditable. They should support monitoring, risk-assessment and planning for young people and vulnerable adults, and facilitate informed and timely referrals when necessary.

All written records must be passed to the Safeguarding Team and must not be retained by any other members of staff in paper or electronic format.

Safeguarding records are retained separately from all other records relating to that student at STL using a lockable filing cabinet, in a lockable office/room with restricted access for staff only. Online records are kept in a secure, password protected folder on a STL shared drive in the STL's Leadership team online co-working area.

Records will be kept securely, and held until the student's 25th birthday (or, for vulnerable adults, for 2 years after the end of the academic year in which the referral was made). When records have reached their retention expiry period, they will be deleted completely from electronic recovery and any paper documents will be destroyed via the confidential waste service.

8 SAFER RECRUITMENT OF STAFF

STL has robust recruitment procedures in place, in line with the latest procedures detailed in KCSIE, which ensure that care is taken to protect young or vulnerable learners. The procedures apply to all staff and volunteers within the company, and they are reviewed regularly to take account of following principles:

- The post or role will be clearly defined
- The key selection criteria for the post or role will be identified
- Vacancies will be advertised widely in such a way as to ensure a diversity of applicants
- Requirement of documentary evidence of academic and vocational qualifications
- Verification of previous employment history
- All staff in contact with our learners are DBS checked and details monitored and updated as

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necessary

- At least one member of each interview panel will be formally trained in fair and safe recruitment practices
- Use of a variety of selection techniques (e.g. qualifications, previous experience, interview, reference checks)

9 ALLEGATIONS OF ABUSE AGAINST STAFF

An allegation made against a member of staff might indicate:

- The possibility that a criminal act against or relating to a young/vulnerable person has been committed
- That there is reasonable cause to believe that a young or vulnerable person is suffering or may suffer significant harm
- That the alleged perpetrator is unsuitable to work with young /vulnerable people

The response to the procedure will be that the child making an allegation or who is the possible victim of abuse will be interviewed in order to get a verbatim statement from them. At that time, LADO will be contacted for guidance as to what steps should be followed next.

Allegations of abuse might lead to:

- A police investigation of a possible criminal offence
- Enquiries by Children's or Adult Services about whether there is a need for protection or some other action
- The possibility of disciplinary action by the employer

9.1 Reporting an allegation against a member of staff

If staff have concerns or suspicions that another member of staff has abused a student, they should immediately report it to the Designated Safeguarding Lead, the Managing Director for Salt Training. If the allegation is against the Designated Safeguarding Lead, the report should be made to the independent Safeguarding Consultant. It is essential that staff maintain confidentiality and do not discuss the allegation with anyone else.

The person who receives the allegation should firstly consult with the LADO to determine a course of action.

9.2 Support

Parents/carers should be informed of any allegation at the earliest opportunity if they are not already aware of it, unless reporting would be to the detriment of the student. They should be kept informed of progress throughout and told the outcome of any process where there is not a criminal prosecution.

Where there has been significant harm or a criminal process has been instigated, Children's/Adults Services or the police should assess and provide for the support needs of the victim.

The subject of the allegation should also be kept informed and offered support while the case progresses. They should be advised to contact their union or professional association if appropriate. If the person has been suspended they should be kept informed about any workplace developments.

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9.3 Confidentiality

It is important to maintain confidentiality during the time an allegation is being investigated, and it is important to protect the individual against the circulation of inaccurate or misleading information.

9.4 Pursuing an Allegation

It is important that every effort is made to reach a conclusion in all allegations relating to the safety or welfare of a young/ vulnerable person.

This applies even where the person concerned chooses not to co-operate with the process. The subject of an allegation should be allowed to answer the allegation and present a case. Even if they refuse to co-operate it is necessary to record and investigate the allegation as far as possible and to arrive at and record a conclusion.

No arrangement (e.g. resignation or a compromise agreement) can override the completion of a police investigation if necessary, or the statutory duty to make a referral to the Disclosure and Barring Service if appropriate.

9.5 Timescales

Allegations must be investigated fully, fairly and impartially. The aim should be to resolve the case with minimal delay, while taking full account of the seriousness and complexity of the allegation(s) in question.

9.6 Monitoring

The Managing Director will oversee the process of dealing with allegations in line with Safeguarding Board protocols and in accordance with statutory requirements.

9.7 Action following an allegation against a member of staff

As a matter of good practice any allegation raised with the employer should trigger contact with the relevant Children's/Adult Services team for initial advice and assessment. It will need to be established that the allegation falls within the remit of safeguarding procedures and may have some foundation.

Contact with parents/carers may be needed in an emergency situation or if they are unaware of the allegation. The process for informing them will need consideration.

The individual against whom the allegation has been made should be informed of the situation as soon as possible after advice has been sought from the Local Authority Designated Officer (LADO), and subject to the involvement of any other agencies. If there is a risk of significant harm, a strategy meeting may be convened.

If a strategy meeting is not required because significant harm is unlikely, consultation between STL and any other agencies involved should take place to determine the best course of action for the young/vulnerable person. If there is any possibility that a criminal offence may have taken place the police must be consulted.

The purpose of this joint evaluation is to share all available information and determine the most effective way to co-ordinate and manage any processes necessary to arrive at a resolution of the situation.

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If no other agencies need to be involved, the next course of action will be discussed with the STL Leadership Team. Depending on the circumstances and the nature of the allegation, the options may include summary dismissal, the decision not to employ the individual in future, or no action to be taken.

If further investigation is needed, a decision will be made about how and by whom it will be carried out. Although the investigation will usually be conducted by the employer, there are circumstances in which an independent investigation would be more appropriate, and this will be agreed through consultation with the independent Safeguarding Consultant.

9.8 Suspension

The issue of possible suspension requires careful consideration by STL. The assessment of risk concerning a young/vulnerable person has to be managed to ensure the safety and wellbeing of that individual and possibly of others in their home or community. In certain serious situations where significant harm is likely or a police investigation is involved, suspension may be the appropriate outcome. The power to suspend remains exclusively with STL and cannot be influenced by other agencies.

9.9 Information Sharing and Monitoring

To ensure prompt and effective case management, relevant information about the subject of the allegation and the person making the allegation should be shared at the earliest opportunity by all the agencies involved in the course of an investigation. Ongoing cases should be regularly reviewed and managed in a timely fashion.

9.10 Outcomes

STL should be kept informed by the police of the progress of any proposed criminal investigation or resulting trial. This is to allow for any further action to be considered and, if appropriate, undertaken. In the case of teaching staff and if considered necessary, STL may ask the Teaching Regulation Agency to undertake a case review to assess whether the member of staff should have a prohibition order served.

If the allegation is not substantiated following investigation, and the person who has been suspended can return to work, it will be necessary to put a support plan in place to ease the transition following what can only have been a deeply stressful experience. Communications in the workplace will need to be carefully managed, as will any potential contact with the individual who made the allegation. A transition plan to enable the employee to return to work must be put in place. This should include consideration of measures to protect and support the employee as far as is reasonably practicable e.g. offering them an alternative role if this is deemed feasible and is the preferred option of the employee.

At the end of a case in which an allegation is substantiated, the Managing Director and Independent Safeguarding Consultant should review events to identify possible improvements to procedures.

The guardians of the person who made the allegation should be given full information about the outcome of the case.

10 SUPPORT FOR STAFF

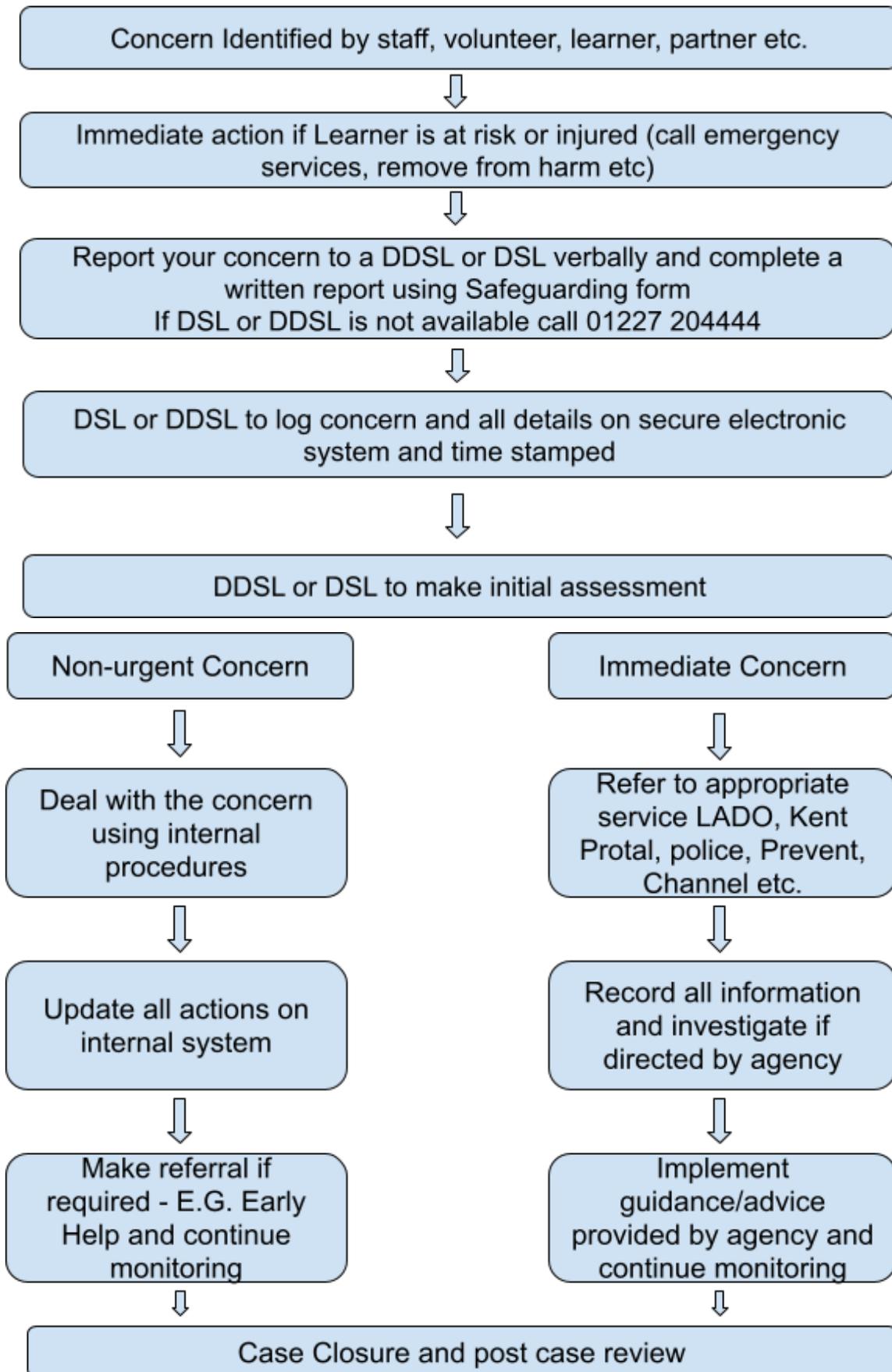
Dealing with safeguarding matters can be distressing for staff. STL will actively promote external Counselling services available and will enable accessibility for staff to use these to discuss any particular matters in a confidential and supportive environment. Details of external Counselling services available will be provided by a Designated Safeguarding Officer or the DSL, as well as the opportunity to talk through concerns.

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STL Safeguarding Reporting Process

Safeguarding Incident Workflow Overview

1. Incident Occurs

- Incident observed or disclosed by:
 - A member of staff
 - A student

2. Immediate Action by Staff

- Staff member:
 - Records/logs the concern promptly on the Safeguarding System CPOMS
 - Take immediate safety actions if required
- Concerns are escalated **without delay** where risk is identified

3. Daily Safeguarding Touchpoint

Daily Drop-in Session (15 minutes | 4:15pm – 4:30pm)

Open to all staff

Used for:

- Raising new or emerging concerns
- Seeking advice or clarification
- Staff wellbeing and professional support

4. Half-Term Operational Safeguarding Meeting

Operational Safeguarding Meeting

Members: Safeguarding Officers - Anne Minett & Greg Higman

Focus:

- Operational safeguarding issues
- Quality and consistency of safeguarding practice
- Policy adherence and implementation
- Review and improvement of systems and processes

Policy Owner: Managing Director

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6. Quarterly Safeguarding Board

Safeguarding Committee (Quarterly)

Members: Kurt Salter, Anne Minett, Nicola Kelly & Greg Higman

Focus:

- Strategic safeguarding oversight
- Scrutiny of safeguarding data and trends
- Review of serious or complex cases
- Evaluation of training impact and staff safeguarding culture
- Challenge and support to safeguarding leadership

7. Quarterly Board of Governors

Board of Governors (Quarterly)

Focus:

- Formal accountability for safeguarding
- Assurance that safeguarding duties are fulfilled
- Review of safeguarding reports and committee findings
- Confirmation of:
 - Policy compliance
 - Resource allocation
 - Risk management
- Holding senior leaders to account for safeguarding effectiveness

Owner: Kurt Salter, Managing Director

Approving Body: Safeguarding Board – STL Managing Director

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Date of next review: January 2027

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