



SAFEGUARDING & CHILD PROTECTION POLICY PROSPECT TRAINING SERVICES



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Mandatory User Notes

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00	Overall safeguarding policy separated into child & adult policies		04/09/2024

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1. Purpose

The purpose of this document is to set out in a clear manner The Company policy on Safeguarding & Child Protection.

At PTS we take the welfare of our learners, visitors, and staff very seriously. We are committed to safeguarding and promoting the wellbeing of young people, this is part of our ethos and is a commitment shared across our organisation. Our Safeguarding and Child Protection Policy and Procedures are there to ensure we protect and support those at risk and enable them to work towards a better future. We have a duty to ensure that children and young people in our care are protected from significant harm or abuse. The purpose of this policy is to provide clear instructions to people working within the organisation on how to effectively deal with safeguarding concerns. This policy aims to raise awareness and provide clear guidance on protecting our children and young people from significant harm and all other forms of abuse including:

- Neglect
- Emotional abuse
- Domestic violence and abuse
- Sexual violence and abuse
- Physical abuse
- Harmful sexualised behaviour (including peer-on-peer abuse)
- Child sexual exploitation
- Radicalisation and extremism
- Bullying (including cyber-bullying)
- Online dangers
- Female genital mutilation
- Honor based violence
- Modern slavery and trafficking
- Criminal exploitation
- Contextual safeguarding & extra familial harm
- Financial abuse
- Discriminative abuse (including race and homophobic)

(the above list is not exhaustive; we regularly review and update this list in line with local and national risks that arise)

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We understand our responsibility to provide a safe and nurturing environment where the wellbeing of our children, young people and staff is at the heart of all we do. We aim to treat people with respect and dignity and provide an open-door policy where concerns can be raised and dealt with confidentially and with the knowledge that they will be addressed.

2. Scope

This document applies to all operations and employees (including agency staff and volunteers) of PTS.

3. Relationship with other policies

This Safeguarding and Child Protection Policy should be read in conjunction with other policies and procedures covering Equal Opportunities and Diversity, Bullying and Harassment and including policies on Business Continuity and Crisis Response, Disciplinary Procedures, Confidentiality, Safer Recruitment, Whistle Blowing, Professional Boundaries, Allegations Management and Recruitment of Ex-offenders, Online Safety and Filtering and the Search Policy and Process.

Line managers, human resources and occupational health must ensure that personal data, including information about safeguarding matters, is handled in accordance with the organisation's Data Protection Policy / GDPR and Child Protection Protocol.

4. Definitions

For the purpose of this document:

The term "The Company" refers to the Prospect Training Services (Gloucester) Ltd group of companies.

The term "young people" or "young person" refers to anyone who is enrolled on our youth provision (under the age of 24) We also refer to these as "our learners".

The term "worker" applies to anyone engaged by the organisation to work, whether on a paid or voluntary basis.

The terms "parents" "guardians" and "carers" refer to those who have a caring responsibility for our "young people".

The term "Designated Safeguarding Lead (DSL)" refers to the nominated person who has overarching responsibility for all safeguarding concerns, this is the "Safeguarding Manager".

The term "Deputy Designated Safeguarding Lead (DDSL)" refers to the nominated person who has responsibility for safeguarding concerns in the DSL's absence.

6 Policy Principles

All young people have a right to protection from abuse of all types and to expect that adults in positions of responsibility will do everything in their power to foster these rights. A young person should have the right to live in safety, free from abuse and neglect.

All allegations of abuse will be taken seriously and understood from the viewpoint of the victim.

Our guiding principles follow the trauma-based approach, through our work we seek to empower young people by valuing their opinions, ensuring that they are aware of the choices that they can make in any given situation, and by responding to their rights to be involved in decisions about their

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future. This principle will always be exercised within a framework of protecting a young person from harm.

Because of the nature of our work, it is important to involve parents/guardians/carers where possible at every stage in safeguarding and child protection work. However, it must be borne in mind that it is the welfare of the young person that is paramount. Where the young person is our primary client, it is important that there is trust between them and The Company, however it must be clear that the interests of the young person must take precedence if there are any protection issues. Where the young person is the primary client, their interests must be considered separately from the interests of the parents/guardians/carers. The desire to work alongside the parents/guardians/carers must never be allowed to impede the young person's protection process.

The Company will work alongside the local authority and other partners, on a multidisciplinary basis to promote good practice and meet the objective of effectively protecting young people.

The Company will work in partnership with Action for ACEs Gloucestershire to promote the understanding of ACEs (Adverse Childhood Experiences) and how this can impact heavily on their learners' ability to achieve and enjoy positive mental health and well-being.

The Company will take into consideration the sensitive issues that may arise when working with people of differing race, religion, language, culture, gender, physical and mental abilities.

All workers should remember that duties to protect vulnerable groups apply to all children, young people, and vulnerable adults, not just those with whom we have a direct relationship. This should be remembered when supporting our service users. We may become aware of protection issues for vulnerable people we have never met, e.g., a service user's younger or older sibling, parent, or grandparent.

7 Guiding principles for working with children and young people

7.1 Guidance and legislation informing the policies and procedures

Our policies and procedures are set in line with the following:

- Working Together to Safeguard Children Statutory Guidance 2023
- Keeping Children Safe in Education (KCSIE) Statutory Guidance for Schools and Colleges 2023 (all workers who work directly with our youth provision are required to read and understand Part 1 of this guidance upon commencement of their employment)
- Prevent Duty Guidance 2023
- Safeguarding Vulnerable Groups Act 2018
- Equality Act 2010
- Human Rights Act 1998
- Gloucestershire Safeguarding Children Partnership Guidance
- Southwest Child Protection Procedures
- Searching, Screening and Confiscation – advice for schools

7.2 The Company's aim is to:

- Promote their general welfare; and their right to enjoy positive mental health and well-being
- Recognise their rights as individuals and treat them with dignity and respect
- Provide a safe and welcoming learning environment where they can enjoy trusting relationships with our staff and their peers
- Consistently apply safe, fair and objective methods of selecting workers
- Plan activities involving children and young people with care to minimise risks to their health and safety
- Raise awareness of the dangers to which children and young people may be susceptible

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- Develop appropriate procedures for responding to accidents, incidents and alleged or suspected harm.

7.3 The following is a quick reference guide to appropriate behaviour when working with children and young people. All workers should:

- Remember they are a role model and provide an example for those they work with to follow
- Bear in mind that some actions, no matter how well-intentioned, may be easily misinterpreted and so leave all parties vulnerable
- Be alert to any potential harm or inappropriate behaviour by children and young people
- Ensure they have adequate training if supervising sports or games (e.g., football)
- Respect individuals’ rights to privacy
- Provide a safe space for children and young people to discuss any concerns they may have
- Speak to the Designated Safeguarding Lead (DSL) if they have concerns about an individual’s safety

7.4 Workers should not:

- Be left alone for substantial periods of time with children and young people. Where one-to-one work is necessary, they should inform another worker where they are going, with whom and for how long
- Permit abusive behaviour by others or engage in it themselves (e.g., ridiculing and bullying)
- Show favouritism to or become too closely associated with an individual. Nor should they get drawn into inappropriate attention-seeking behaviour (e.g., crushes)
- Allow or engage in suggestive remarks, gestures or touching of any kind, which could be misunderstood
- Jump to conclusions about others without checking facts.
- Hesitate to share concerns on any of these matters with the Designated Safeguarding Lead (DSL)

Please refer to PTS Professional Boundaries Guidance for full information

8 Raising awareness of dangers

Guiding principle: raise awareness of the dangers to which children and young people are susceptible.

8.1 Significant harm - types

Significant harm is generally described under the following headings and is usually referred to in the context of children and young people.

8.2 Neglect

Neglect can be defined as a situation in which the child or young person suffers significant harm or impairment of development by being deprived of food, clothing, warmth, hygiene, intellectual stimulation, supervision and safety, attachment to and affection from others and medical care. The threshold of significant harm is reached when the person’s needs are neglected to the extent that their well-being and/or development are severely affected. We refer to the Quality-of-Care Profile e-tool (previously Gloucestershire Neglect Toolkit) to support our referrals in this area. We will always consider if the child or young person needs can be met through the Early Help Service.

[Quality of Care Profile e-tool \(previously the Neglect Toolkit\) - Gloucestershire Safeguarding Children Partnership](#)

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8.3 Emotional abuse

Emotional abuse occurs when a child or young person's need for affection, approval, consistency, and security are not met. Examples of emotional abuse include:

- The imposition of negative attributes on a child or young person, expressed by persistent criticism, sarcasm, hostility or blaming
- Emotional unavailability by the child or young person's parent/carer
- Unrealistic and/or inappropriate expectations of the child/young person
- Failure to show interest in or provide age-appropriate opportunities for the child or young person's cognitive and emotional development
- Unreasonable or over harsh disciplinary measures
- Exposure to domestic violence
- Exposure to coercive control where one person who is personally connected to another, repeatedly behaves in a way which makes them feel *controlled*, dependent, isolated, or scared

8.4 Domestic violence and abuse

Domestic violence and abuse are defined as an incident or pattern of incidents of controlling, coercive, threatening, degrading and violent behaviour, including sexual violence, in most cases by a partner or ex-partner, but also by a family member or carer. It is very common.

Domestic abuse can include, but is not limited to, the following:

- Coercive control (a pattern of intimidation, degradation, isolation and control with the use or threat of physical or sexual violence)
- Psychological and/or emotional abuse
- Physical abuse
- Sexual abuse
- Financial abuse
- Harassment
- Stalking
- [Online or digital abuse](#)

The Company work in close partnership with Gloucestershire Domestic Abuse Support Service (GDASS) and Multi Agency Risk Assessment Conferences (MARAC) to ensure referrals are made to support victims and their families. The DSL and DDSL are fully trained in the making referrals.

[Support for professionals - Gloucestershire Domestic Abuse Support Service \(GDASS\)](#)

8.5 Sexual violence and abuse

- Sexual abuse occurs when a child or young person is used by another person for his or her gratification or sexual arousal or for that of others. Examples of sexual abuse include:
- Exposure of the sexual organs or any sexual act intentionally performed in the presence of a child or young person
- Intentional touching or molesting of the body of a child or young person whether by a person or object for the purpose of sexual arousal or gratification
- Sexual intercourse with a child under 16 years old

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- An adult/professional in a position of trust, or a family member having intercourse with a young person 16 to 18 years old
- Sexual exploitation of a young person
- This may also include non-contact activities, such as looking at, or in the production of sexual images, watching sexual activities, encouraging children and young people to behave in sexually inappropriate ways, or grooming a child or young person in preparation for abuse (including via the internet)

8.6 Positions of trust

It is illegal for a person in a position of trust (for example teachers or care workers) to engage in sexual activity with anyone under the age of 18 who is in the care of their organisation – even if they are over 16. This includes:

- sexual activity with a child or young person
- causing or inciting a child or young person to engage in sexual activity
- sexual activity in the presence of a child or young person
- causing a child or young person to watch a sexual act

The Company will take allegations against a worker very seriously and will follow the guidance in Keeping Children Safe in Education 2023 and their own Allegations Management Policy whilst ensuring the victim is treated with dignity and respect.

Guidance can be found:

[The Role of the LADO & The Allegations Management process - Gloucestershire County Council](#)

PTS Allegations Management Policy

Professional Boundaries Guidance

Keeping Children Safe in Education (2024)

8.7 Physical abuse

Physical abuse is any form of non-accidental injury or injury which results from wilful or neglectful failure to protect a child or young person. Examples of physical injury include:

- Shaking, smacking/striking, with or without a weapon, and burning including scalding or friction burns
- Use of excessive force in handling

8.8 Harmful sexualised behaviour (HSB) (including peer on peer abuse)

Harmful sexualised behaviour (HSB) is sexual behaviour displayed by children and young people which may be harmful or abusive. It encompasses a range of behaviours displayed towards younger and older children, peers, and adults. It can be harmful to those who display it and to the victim themselves. It can happen in a range of environments including schools and colleges. It can be displayed in the following ways:

- Unwanted sexual touching
- Lack of awareness of personal boundaries
- Continuously making suggestive and leud comments
- Indecent exposure or 'flashing'
- Coercing of others to perform sexual acts
- Sending sexual online communications
- 'Sexting' sharing of nude photos and images
- Viewing and sharing pornography

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- Taking photos under a person’s clothing without their consent ‘up skirting’

It is important to remember that a young person may not recognise or understand that they have been subjected to HSB. They may also worry about telling someone, so it is important to provide a non-judgemental space for them to share their experience. The perpetrator will also require support, they may benefit from some form of intervention from specialist sexual harm practitioners.

Guidance can be found:

- NSPCC Peer-on-Peer Sexual Abuse
<https://learning.nspcc.org.uk/child-abuse-and-neglect/peer-on-peer-sexual-abuse>
- Keeping Children Safe in Education – Part 5
[Keeping children safe in education 2023 \(publishing.service.gov.uk\)](https://www.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/82144/keeping-children-safe-in-education-2023.pdf)

8.9 Child sexual exploitation

Introduction (extract from GSCP guidelines). See [gscp-working-together-to-tackle-exploitation-in-gloucestershire-2022.pdf \(proceduresonline.com\)](https://www.proceduresonline.com/gscp-working-together-to-tackle-exploitation-in-gloucestershire-2022.pdf)

Statement of intent

- Sexual exploitation of children is child abuse and is unacceptable. Tackling child sexual exploitation is one of the key priorities for the Gloucestershire Safeguarding Children’s Partnership (GSCP) and the Multi Agency Child Exploitation (MACE) team. Such exploitation can have serious long-term impact on every aspect of the child or young person’s life, as well as the lives of their families
- It is our collective multi-agency responsibility to identify those children and young people at risk of exploitation and our joint responsibility to protect them and safeguard them from further risk of harm. We shall also prevent children becoming victims of this form of abuse and reassure our communities that we can perform our duties effectively
- It is our clear intention to improve the lives of children living in Gloucestershire. We will do so by ensuring children and young people understand the risks of being exploited, enabling them to cease contact with the perpetrators of this abuse

Definition and scope

- The sexual exploitation of children and young people under 18 involves exploitative situations, contexts, and relationships where young people receive something” (e.g., food, accommodation, drugs, alcohol, cigarettes, affection, gifts, money) as a result of engaging in sexual activities. This can occur through use of technology without the child’s immediate recognition, for example the persuasion to post sexual images on the internet/mobile phones with no immediate payment or gain. In all cases those exploiting the child/young person have power over them by virtue of their age, gender, intellect, physical strength and/or economic or other resources. Violence, coercion, and intimidation are common. Also, involvement in exploitative relationships which are characterised in the main by the child or young person’s limited availability of choice, resulting from their social/economic and/or emotional vulnerability.
- In recognising child sexual exploitation as child abuse, this protocol identifies that children must be protected, and enabled to protect themselves, in all aspects of their lives and relationships. The sexual exploitation of children and young people cross boundaries of culture, community groups, disability, social class, and gender

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- Workers with designated safeguarding responsibility will regularly undertake CSE training to ensure they understand the process for detecting and reporting this abuse

The Company work closely with our partner agencies and are a part of the county Multi-Agency Child Exploitation (MACE) panel

[gscp-working-together-to-tackle-exploitation-in-gloucestershire-2022.pdf](#)

8.10 Radicalisation and extremism

The current threat from terrorism and extremism in the United Kingdom is real and severe and can involve the exploitation of vulnerable people, including children, young people and adults.

Radicalisation is defined as the process by which people come to support terrorism and extremism and, in some cases, to then participate in terrorist groups.

Extremism is vocal or active opposition to fundamental British values, including democracy, the rule of law, individual liberty and mutual respect and tolerance of different faiths and beliefs. We also include in our definition of extremism, calls for the death of members of our armed forces, whether in this country or overseas (HM Government Prevent Strategy, 2011).

Vulnerable people are at risk of becoming radicalised to become involved in acts of terrorism. **(for full guidance see Section 9 Preventing Radicalisation)**

8.11 Bullying

Bullying can be defined as repeated aggression - be it verbal, psychological, or physical which is conducted by an individual or group against others.

Examples of bullying include:

- Teasing
- Taunting
- Threatening
- Hitting
- Extortion
- Segregation, including malicious ignoring and non-involvement to belittle and undermine

Bullying may take place in any setting - in training, the home or in a work placement. Bullying can also take place online; this is known as 'Cyber-Bullying'. The more extreme forms of bullying would be regarded as physical or emotional abuse. Bullying can have a serious impact on a person's well-being and can lead to self-harm and suicide.

8.12 Online dangers

Use of ICT and the internet can pose a significant risk to children and young people. There are many dangers relating to use of mobile phones and devices, social media and other communication platforms.

This can include:

- Cyber bullying
- Grooming and exploitation
- Sexting
- Pornography

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- Privacy and security breaches
- Harmful content
- Radicalisation
- Risks from prolonged screen time
- Identity theft
- Financial exploitation / money mules

To help keep our children and young people safe from harm in the online world we offer training and education to promote and raise awareness of the dangers posed. We have an open-door policy where any concerns can be raised in a non-judgemental environment and can be dealt with sensitively and in line with company policy and procedures.

Please refer to **PTS Online Safety & Filtering Policy** for more detailed information.

8.12.1 Sexting and sharing nudes

This is defined as the sending or posting of nude or semi-nude images, videos or live streaming online by young people under the age of 18. Nudes and semi-nudes can be shared online or via social media, gaming platforms, chat apps, forums or involve sharing between devices using off-line services. The motivation for taking and sharing nude and semi-nudes are not always sexually or criminally motivated.

This does not apply to adults sharing nudes and semi-nudes of under 18-year-olds. This is a form of sexual abuse and must be referred to the police as a matter of urgency.

What to do if an incident comes to your attention

Report it to the DSL or DDSL immediately. Never view, copy, print, share, store or save the imagery yourself, or ask a child to share or download – this is illegal. In exceptional circumstances, it may be necessary for the DSL or DDSL only to view the image to safeguard the child or young person. This decision should be based on the professional judgement of the DSL or DDSL.

If you have already viewed the imagery by accident (e.g. the young person has shown it to you before you could ask them not to) report this to the DSL or DDSL and seek support. Do not delete the imagery or ask the young person to delete it. Do not ask the young person(s) who are involved in the incident to disclose the information regarding the imagery. This is the responsibility of the DSL or DDSL. Do not share information about the incident with other members of staff, the young person(s) or their parents/carers. Do not say or do anything to blame/shame any young people involved. Do explain to them that you need to report it and reassure them that they will receive support and help from the DSL or DDSL.

All staff will receive further training and advice in this area and can refer to:

[Sharing nudes and semi-nudes: how to respond to an incident \(overview\) \(updated March 2024\) - GOV.UK \(www.gov.uk\)](https://www.gov.uk/sharing-nudes-and-semi-nudes-how-to-respond-to-an-incident-overview)

8.13 Female genital mutilation

Female genital mutilation (FGM) comprises all procedures involving partial or total removal of the external female genitalia or other injury to the female genital organs. It is illegal in the UK and a form of child abuse with long-lasting harmful consequences. Professionals in all agencies, and individuals and groups in relevant communities, need to be alert to the possibility of a girl being at risk of FGM, or already having suffered FGM.

There is a range of potential indicators that a girl may be at risk of FGM. Warning signs that FGM may be about to take place, or may have already taken place, can be found on pages 16-17 of the Multi-Agency Practice Guidelines. <https://www.gov.uk/government/publications/female-genital-mutilation-guidelines>

Section 5B of the Female Genital Mutilation Act (2003) places a statutory duty upon tutors, along with social workers and healthcare professionals, to report to the police where they discover (either through disclosure by the victim or visual evidence) that FGM appears to have been carried out on

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a girl under 18. Those failing to report such cases will face disciplinary sanctions. It will be rare for tutors to see visual evidence, and they should not be examining pupils, but the same definition of what is meant by “to discover that an act of FGM appears to have been carried out” is used for all professionals to whom this mandatory reporting duty applies.

The mandatory reporting duty commenced in October 2015; tutors must report to the police cases where they discover that an act of FGM appears to have been carried out. Unless the tutor has a good reason not to, they should still consider and discuss any such case with the DSL and involve children’s services as appropriate.

7.14 Honour based violence

Honour based violence (HBV) is a term used to describe violence committed within the context of the extended family which are motivated by a perceived need to restore standing within the community, which is presumed to have been lost through the behaviour of the victim. Most victims of HBV are women or girls, although men may also be at risk.

Women and girls may lose honour through expressions of autonomy, particularly if this autonomy occurs within the area of sexuality. Men may be targeted either by the family of a woman who they are believed to have ‘dishonoured’, in which case both parties may be at risk, or by their own family if they are believed to be homosexual.

Common triggers for HBV include:

- Refusing an arranged marriage
- Having a relationship outside the approved group
- Loss of virginity
- Pregnancy
- Spending time without the supervision of a family member
- Reporting domestic violence
- Attempting to divorce
- Pushing for custody of children after divorce
- Refusing to divorce when ordered to do so by family members

However, some families may resolve to abuse or kill a member on what would appear to be very trivial grounds. It is important to take clients fears of HBV seriously, even when it seems unlikely. Victims of HBV are more likely to underestimate the risks to their safety than overstate them and even if the ‘offence’ seems trivial to you, this does not mean it is trivial to his or her family.

7.15 Modern slavery & human trafficking

Modern slavery is a serious and brutal crime in which people are treated as commodities and exploited for criminal gain, this can be devastating for victims. The true extent of modern slavery in the UK, and indeed globally, is unknown. Increased awareness and reporting support law enforcement to tackle the perpetrators of modern slavery as well as protecting victims. It is your responsibility to be vigilant and recognise the signs that a customer or learner is being exploited in this way.

Types of modern slavery

Modern slavery takes many different forms in the UK. The prevalence of different types of modern slavery in the UK will vary by region and change over time, however currently there are four broad ways in which perpetrators may seek to exploit victims, which The Home Office research has

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further broken down into 17 distinct types. Full details on the 17 types of modern slavery, including case studies, are available on the www.gov.uk website under 'typology report'.

Understanding the different types can be crucial for staff involved in developing toolkits for frontline staff or the operational response for their organisation.

The four broad categories are below – in each case the victim may or may not additionally have been moved (trafficked), either from another country, or within the UK, to be exploited.

Labour exploitation

Labour exploitation usually involves unacceptably low pay, poor working conditions, or excessive wage deductions, but is not solely about this. In order to constitute modern slavery, there will also be some form of coercion meaning that victims cannot freely leave for other employment or exercise choice over their own situation. Where the perpetrator is taking advantage of a child or vulnerable person, an offence can be committed without the element of coercion.

Domestic servitude

Domestic servitude typically involves victims working in a private family home where they are ill-treated, humiliated, subjected to unbearable conditions or working hours or made to work for little or no pay. The victim could be used in this way by their own family members or partner. Again, it is very difficult for them to leave, for example because of threats, the perpetrator holding their passport, or using a position of power over the victim.

Sexual exploitation

Victims are coerced into sex work or sexually abusive situations. This includes child sexual exploitation. Victims may be brought to the UK on the promise of legitimate employment or moved around the UK to be sexually exploited. In some cases, they may know they will be involved in sex work but are forced into a type or frequency they did not agree to. Victims are more commonly female but can also be male.

Criminal exploitation

Criminal exploitation is the exploitation of a person to commit a crime for someone else's gain. For example, victims could be coerced into shoplifting, pickpocketing, entering into a sham marriage, benefit fraud, begging or drug cultivation such as cannabis farming. Forced removal and trafficking of human organs is an additional category of modern slavery that occurs globally, however there have been no confirmed cases in the UK.

Illegal immigration offences

Where individuals agree to be brought to the UK illegally, but there is no intention to exploit or take advantage of them once they arrive, this is known as smuggling and is an immigration offence rather than modern slavery or human trafficking. These individuals are not victims, although they may be at increased risk of being exploited at a later date.

Victims of modern slavery can be men, women, or children. They can be British citizens living in the UK, EU nationals, or those from outside the EU. Victims of over 100 nationalities have been identified in the UK but the most common originating countries of potential victims are:

1. Albania
2. Vietnam
3. UK
4. Nigeria
5. China
6. Romania

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7. Poland
8. Eritrea
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10. Afghanistan

Signs to look out for

Victims of modern slavery can be found anywhere. There are certain industries where they are currently more prevalent, such as nail bars, car washes, agriculture and fishing, building sites and the sex industry. Other high-risk situations include when there is a need for a sudden injection of workers into the work force, such as seasonal staff or construction for a major event. However, victims may also pass-through transport hubs, health services and other public places or be found in private homes.

Indicators of a potential victim may include:

- Distrustful of authorities
- Expression of fear or anxiety
- Signs of psychological trauma (including post-traumatic stress disorder)
- The person acts as if instructed by another
- Injuries apparently a result of assault or controlling measures
- Evidence of control over movement, either as an individual or as a group
- Restriction of movement and confinement to the workplace or to a limited area - Passport or documents held by someone else
- Lack of access to medical care
- Limited social contact/isolation
- Limited contact with family
- Signs of ritual abuse and witchcraft (juju)
- Substance misuse
- Person forced, intimidated, or coerced into providing services
- Doesn't know home or work address
- Perception of being bonded by debt
- Money is deducted from salary for food or accommodation
- Threat of being handed over to authorities
- Threats against the individual or their family members
- Being placed in a dependency situation
- No or limited access to bathroom or hygiene facilities
- Unwanted/underage pregnancy
- Inappropriate sexual behaviour

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- Incoherent/changing account of events
- Repeating a story that you have heard elsewhere
- Unexplained eagerness to leave a safe space/to work
- Sexually transmitted diseases
- Missing episodes (especially from care – under 18s)
- Limited/sporadic school attendance (under 18s)

There are several indicators that can be signs that someone is a victim of modern slavery. Some of the key indicators are below. However, sometimes it will be a case of acting on your instinct that something is not right and using existing professional skills to talk to a potential victim and find out more information. None of these indicators in isolation or combination can give you complete certainty, however you do not need to be certain to report your concerns.

Any member of staff should report concerns of this nature through the safeguarding reporting process.

Additionally, the case should always be reported by one of the following methods:

- Phoning 999 if there is an immediate risk of harm
- Reporting to the police on 101 or the Modern Slavery Helpline on 0800 0121 700 if there is not an immediate risk of harm
- Using the National Referral Mechanism which can be found at:
<https://www.gov.uk/government/publications/human-trafficking-victims-referral-and-assessment-forms>

7.16 Criminal exploitation (dangerous drug networks/ county lines)

Dangerous drug networks (DDN's) are drug dealing gangs who target vulnerable people in order to set up drugs distribution networks. These criminals are using extreme violence to establish a presence, displacing an existing drug supply chain and intimidating rivals, witnesses, and victims; this has resulted in local murders. DDN's exploit vulnerable teenagers to become drug runners for their network. Early intervention and intelligence are key to safeguard and protect the vulnerable. Share information between agencies at the earliest possibility. The Company work closely with our partner agencies and are part of the county Multi-Agency Child Exploitation and Contextual Safeguarding (MACE) panel.

Some signs that could indicate criminal exploitation:

- New friends that have the potential to be a bad influence
- Behaving differently or out of character
- Developed a new attitude
- Unexplained injuries
- Continually late to training or forgetting to do homework
- Continually tired
- New expensive possessions such as trainers, jewelry, mobile phone or designer clothes
- Become withdrawn

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- Changes at home that might make them more vulnerable

7.17 Contextual safeguarding & extra familial harm

Contextual safeguarding is an approach to understanding and responding to a child or young person's experiences of significant harm beyond their families. Contextual safeguarding recognises the impact of public/social context on young person's lives and consequently their safety. Through our multi agency partnerships in the county we seek to identify and respond to harm posed to young people outside of their home, either from adults or their peers. Many of the risks highlighted in this policy apply especially to our young people, the main areas of risk are:

- Peer on peer and relationship abuse
- Criminal/sexual exploitation/online abuse
- Missing episodes
- Risks associated with gangs
- Risks associated with drugs
- Risks associated with radicalisation
- Safeguarding risks in public spaces
- Trafficking and modern slavery

PTS are a partner in the Multi Agency Child Exploitation (MACE) strategy for Gloucestershire, this enables us to understand the risks for our learners and enables us to offer interventions to minimise the risk. The Company have a duty of care to keep all learners free from the risk of harm whilst in our training centres. For this reason, we have a zero-tolerance approach to the carrying of prohibited items such as

- Knives or weapons
- Drugs
- Alcohol
- Pornographic or indecent images (this includes being held on electronic devices such as mobile phones and tablets)

We have a **PTS Learner Search Policy and Process** in place where if there is suspicion that a learner is carrying any of the above items, we will carry out a consented search. Please refer to our **PTS Learner Search Policy & Process**

7.18 Financial abuse

Financial abuse is another name for stealing or defrauding someone of goods and/or property. It is always a crime but is not always prosecuted. Sometimes the issue is straightforward, for example a care worker stealing from an older person's purse, but at other times it is more difficult to address. This is because very often the perpetrator can be someone's relative, or age/disability prejudice means that people assume it is not happening or that the vulnerable person is confused.

Financial abuse involves:

- Theft
- Fraud

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- Exploitation
- Pressure in connection with wills, property, financial transactions, misuse or misappropriation of property, possessions, or benefits
- Deny money for food, transport, clothes etc. to attempt to isolate and control a vulnerable person

7.19 Discriminative abuse (including race and homophobic)

Discriminatory abuse is when someone picks on or treats someone unfairly because something about them is different, for example it may be:

- Their clothes
- Their weight
- Their race or skin colour
- Their religion or culture
- Being a man or a woman
- Being a gay man or a lesbian woman
- Their age
- Their health or disability

8 Disclosure of a concern

Disclosure of a concern – See Annexe A for full reporting process

It is important to stress that no one indicator should be seen as a conclusive indication of abuse; it may indeed indicate concerns other than child abuse. A cluster or pattern of signs is more likely to be indicative of abuse.

Informing

By issuing this policy and through its mandatory core training programme, The Company is keen to ensure (without creating unnecessary anxiety) that all relevant employees:

- Know the types of harm to which children and young people are susceptible
- Are alert to behaviour, which suggests something may be wrong
- Can talk to someone if they become aware of anything, which causes them to feel uncomfortable
- Know how to deal with alleged or suspected harm

8.1 Disclosure

A disclosure is when a child or young person tells someone that they have been or are being harmed or abused in some way. Staff should:

- Believe the child or young person unless proven otherwise by a competent authority – always assume they are being truthful
- Remain calm and do not ask leading questions
- Take the disclosure seriously, never underestimate the situation
- Do not minimise the incident
- Tell the child or young person that he/she has done the right thing in telling you. **Never** promise to keep it a secret
- Reassure the child or young person that no blame or guilt is his or hers. Most children and young people feel loyalty towards those who care for them and have difficulty saying anything against them. Some may fear reprisals and will need a great deal of reassurance
- Write down exactly what was said to you using the child or young person's **OWN** words immediately after disclosure. Remember to date and to sign the account, which should

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either be uploaded to CPOMS or given to the Designated Safeguarding Lead (DSL) as soon as possible after disclosure

- Tell the child or young person what you will do with the information. They need to understand the extent and nature of their involvement and should be helped to understand the protection process
- **DO NOT** deal with the matter alone. Report it to the Designated Safeguarding Lead DSL, it is vital you tell the child or young person that you **must** do this
- Children and young people are entitled to the same duty of confidentiality as adults, provided that, in the case of those under 16 years of age, they can understand the choices and their consequences. Personal information about children and young people held by professionals is subject to a legal duty of confidence and should not normally be disclosed without consent of the subject. However, the law permits the disclosure of confidential information necessary to safeguard a child or young person in the public interest; this means; the public interest in safeguarding a child or young person may override the public interest in maintaining confidentiality
- Seek support for yourself, advice and information on support services can be accessed via the DSL or DDSL

8.2 A vulnerable person under threat

In a situation where a child or young person is at immediate risk of harm the member of staff should:

- Respond to secure the safety of the child or young person without placing themselves or others in danger
- Discuss the situation with the DSL or DDSL. If the DSL or DDSL are not available, consultation with the appropriate local authority should take place and any steps taken should be reported to DSL as soon as possible. (all local authority contact details are listed at the end of this document)
- Record all details of the incident and what action they have taken
- If the situation is immediately dangerous, and there is concern about the immediate safety of a child or young person, referral should be made to the police in the first instance
- Where a child or young person needs immediate medical assistance, this overrides all other considerations, and it must be sought immediately. In such situations doctors can provide emergency treatment to the child or young person without parental, guardian, or carer consent. The worker concerned must tell the doctor or medical staff if they have concerns over the nature of the injuries and child or young person's ongoing welfare. The Company staff should refrain from diagnosing abuse unless the child or young person has made a disclosure indicating such

8.3 A child or young person for whom there is concern

- All staff have a responsibility to consult with their DSL or the DDSL when they have concerns about the safety of a child or young person. It is better to share a concern which may prove groundless than to wait for certainty, which may result in irreparable damage to the child or young person
- Any worker who believes that they have seen possible evidence of abuse, who has concerns that a child or young person may be at risk of significant harm, or to whom a child or young person makes an allegation of abuse or possible abuse, must consult with their DSL or DDSL immediately, and as a maximum within 24 hours of the concern or allegation coming to light. If this is not possible then the worker should consult directly with the

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- appropriate local authority
- Where the concern raises questions about the immediate safety of the child or young person, consultation with the DSL, or directly with the appropriate local authority if a manager is unavailable, should be immediate
- Following consultation with the DSL a decision will be reached on how to proceed. This will include deciding whether, when and how any concerns will be discussed with the child or young person or parent, guardian or carer and whether a referral to the appropriate statutory services is necessary. Faced with possible evidence of abuse or the risk of significant harm the DSL must take responsibility for ensuring that the appropriate person in the local statutory services is contacted and that the information is passed to them, giving the full context of the incident, any previous interventions, and any relevant information regarding the child and young person’s history
- Where a person has disclosed information about abuse or the risk of significant harm to a child or young person, The DSL should ensure, as far as they are able to, that the “discloser” is kept informed about what will happen next. This will help to reassure them about what to expect
- Where there is already active involvement of the local authority in a case, and a worker has concerns about the welfare of a child or young person or where a child or young person makes an allegation of abuse or possible abuse then a referral to the local authority should still be made including details of the active social worker and any discussions that may have taken place included in the form
- Confidentiality is not absolute secrecy; The Company operates a limited confidentiality policy regarding safeguarding and child protection. All children and young people receiving services from The Company will be informed of its limited confidentiality policy and the exceptions where their safety is at risk. No worker should ever give a guarantee of confidentiality to a child or young person wishing to disclose abuse. The worker who receives such information should handle the situation sensitively and explain it is necessary to involve other agencies to protect the child or young person. Although it is best avoided, situations may arise where information must be passed on without the child or young person’s agreement.
- When an allegation involves another child the DSL should contact the local authority within the set timescales within this policy. Advice should then be followed and recorded
- All contact with the local authority must be recorded. Referrals of possible abuse to the local authority via the phone must be confirmed in writing within 24 hours. Confirmation should include full details of evidence, action taken, and designations of people contacted. Use of the Multi Agency Request Form (MARF) is required

8.4 Concern

Inappropriate or unacceptable behaviour or communication, favouritism and negligence are examples of what may constitute a concern and must be reported in line with the **PTS SVG Incident Reporting Process** (see annexe A for full process).

8.5 Confession

A confession occurs when someone discloses that they have been involved in the abuse of a child or young person. Confessions must be reported to the DSL or DDSL unless there is immediate concern for the safety of the victim in such cases the police must be informed straight away

8.6 Allegation

An allegation occurs when someone reports specific unacceptable behaviour where a child or young person has been harmed or abused in some way. Allegations must be reported to one of the designated staff. Please refer to the **PTS Allegations Management Policy and Process**

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8.7 Evidence

- There may be some cases where a child or young person presents on a single occasion with injuries that immediately arouse suspicion of abuse. In all such cases these injuries should be treated as potential evidence of abuse and should result in the case being reported to the children’s helpdesk as a referral for service
- Examples of possible evidence of abuse may include physical and behavioural signs and signals, comments made by the child or young person, or noticing a pattern from records. Reference should be made to the local authority’s guidance on the “signs and signals” of possible abuse and risk factors as listed in the The Company’s Guiding Principles for Working with Children and Young People

8.8 Abusers

- The perpetrator of abuse can be anyone who is in a position to exert power over a child or young person, including a natural parent, stepparent, relative, foster carer, a partner, respite carer, adoptive parent and teacher, member of staff, sibling, peer, friend or neighbour
- Children and young people are most often abused by those who are close to them, or who have direct care of them, that is, parents and other family members, or care givers. They may also be abused by other children, by strangers, or by professionals who may do so in the guise of ‘helping’
- When a child or young person has been abused the role of others in the household must be considered. Some parents/carers will have been totally unaware of the abuse and may need support to help come to terms with it. Others may have co-operated with the abuse or have been coerced into accepting it
- All workers should be alert to any signs that a colleague, including employees of The Company and employees of other organisations, is behaving inappropriately in relation to a child or young person. Any such suspicion should be discussed with the DSL or a senior member of staff. All workers can also follow the PTS whistle blowing policy
- All workers will be aware that to form a social relationship with any child or young person outside the boundaries of our service specifications is a breach of The Company’s Code of Conduct, this is covered in **PTS Professional Boundaries Guidance** and will be considered as gross misconduct
- Any personal relationship, sexual or otherwise, with a child or young person is considered gross misconduct under our policies and will instigate the allegations policy procedure

Please remember:

- The only professional qualified to diagnose whether a physical injury is the result of abuse, is a professionally trained medical practitioner. All workers should report their concerns but avoid diagnosing incidents as abuse
- It is your responsibility to report concerns, NOT to decide whether it is or is not abuse.
- The Company advocates a ‘no secrets’ approach to the protection of children and young people. If you are unsure about your suspicions discuss them with the DSL. It is better to report and be wrong than to stay quiet and have been right
- Never promise to keep quiet about your concerns to a victim of abuse or the perpetrator of abuse

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- The discovery or disclosure of abuse can result in the child or young person experiencing very difficult emotions and can lead to them revisiting previous trauma. It is important that any decisions and referrals made are done so with the child or young person at the centre of this process

Please remember:

- The only professional qualified to diagnose whether a physical injury is the result of abuse, is a professionally trained medical practitioner. All workers should report their concerns but avoid diagnosing incidents as abuse
- It is your responsibility to report concerns, NOT to decide whether it is or is not abuse.
- The Company advocates a 'no secrets' approach to the protection of children and young people. If you are unsure about your suspicions discuss them with the DSL. It is better to report and be wrong than to stay quiet and have been right
- Never promise to keep quiet about your concerns to a victim of abuse or the perpetrator of abuse
- The discovery or disclosure of abuse can result in the child or young person experiencing very difficult emotions and can lead to them revisiting previous trauma. It is important that any decisions and referrals made are done so with the child or young person at the centre of this process

9 Preventing radicalisation

The Company has a wider safeguarding duty to prevent children and young people from the risk of radicalisation and extremism. The Company has developed a PREVENT strategy detailed below to support the prevention of extremism and radicalisation [The Prevent Duty].

Any member of staff or learner at The Company who have any concerns regarding the issues identified within this guidance policy should report those concerns immediately and no later than the end of the working day to the DSL.

Designated Safeguarding Lead – Kate Whereat, Safeguarding Manager (Senior Mental Health, Prevent & CIC Lead)

9.1 Introduction

The current threat from terrorism and extremism in the United Kingdom is real and severe and can involve the exploitation of vulnerable people, including children, young people and adults. This policy is designed to provide a clear framework to structure and inform our response to safeguarding concerns for those people who may be vulnerable to the messages of extremism. In addition, it provides details of the local inter agency process and expectations in identifying appropriate interventions based on the threshold of need and intervention model and the channel process (see below).

Radicalisation is defined as the process by which people come to support terrorism and extremism and, in some cases, to then participate in terrorist groups.

Extremism is vocal or active opposition to fundamental British values, including democracy, the rule of law, individual liberty and mutual respect and tolerance of different faiths and beliefs. We also include in our definition of extremism calls for the death of members of our armed forces, whether in this country or overseas (HM Government Prevent Strategy, 2011).

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9.2 Equality, diversity and community cohesion

The Company aims to guide our staff and learners to understand others, to promote common values and to value diversity, to promote awareness of human rights and of the responsibility to uphold and defend them, and to develop the skills of participation and responsible action. We take extremely seriously our key role in preparing all our learners for life in modern Britain. We aim to encourage working towards a society with a common vision and sense of belonging by all. Community: a society in which the diversity of people's backgrounds and circumstances is appreciated and valued; a society in which similar life opportunities are available to all; and a society in which strong and positive relationships exist and continue to be developed in the workplace, in education and in the wider community.

9.3 National guidance and strategies

PREVENT is a key part of CONTEST, the Government's strategy to stop people becoming terrorists or supporting terrorism. Early intervention is at the heart of PREVENT in diverting people away from being drawn into terrorist activity. PREVENT happens before any criminal activity takes place. It is about recognising, supporting, and protecting people who might be susceptible to radicalisation. The PREVENT strategy objectives are:

- *Ideology*: respond to the ideological challenge of terrorism and the threat we face from those who promote it
- *Individuals*: prevent people from being drawn into terrorism and ensure that they are given appropriate advice and support
- *Institutions*: work with sectors and institutions where there are risks of Radicalisation which we need to address

All staff should have an awareness of the PREVENT agenda and the various forms of radicalisation takes in being able to recognise signs and indicators or concern and respond appropriately.

9.4 Vulnerability/risk indicators

The following lists are not exhaustive and all or none may be present in individual cases of concern. Nor does it mean that vulnerable learners experiencing these factors are automatically at risk of exploitation for the purposes of extremism. The accepted view is that a complex relationship between the various aspects of an individual's identity determines their vulnerability to extremism. There is no such thing as a 'typical extremist' and those involved in extremism come from a range of backgrounds and experiences. The following indicators may help to identify factors that suggest a learner, or their family may be vulnerable or involved with extremism:

- *Vulnerability Identity crisis*: distance from cultural/religious heritage and uncomfortable with their place in the society around them
- *Personal crisis*: family tensions; sense of isolation; adolescence; low self-esteem; disassociating from existing friendship group and becoming involved with a new and different group of friends; searching for answers to questions about identity, faith and belonging
- *Personal circumstances*: migration; local community tensions; events affecting country or region of origin; alienation from UK values; having a sense of grievance that is triggered by personal experience of racism or discrimination or aspects of Government policy
- *Unmet aspirations*: perceptions of injustice; feeling of failure; rejection of civic life.
- *Criminality*: experiences of imprisonment; poor resettlement/reintegration, previous involvement with criminal groups
- *Access to extremist influences, as follows*:
 - Reason to believe that the young person associates with those known to be involved in extremism
 - Possession or distribution of extremist literature/other media material likely to incite racial/religious hatred or acts of violence

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- Use of closed network groups via electronic media for the purpose of extremist activity experiences, behaviours, and influences
- Experience of peer, social, family or faith group rejection
- International events in areas of conflict and civil unrest had a personal impact on the young person resulting in a noticeable change in behaviour
- Verbal or written support of terrorist attacks
- First-hand experience of racial or religious hate crime
- Extended periods of travel to international locations known to be associated with extremism
- Evidence of fraudulent identity/use of documents to support this
- Experience of disadvantage, discrimination, or social exclusion
- History of criminal activity
- Pending a decision on their immigration/national status

More critical risk factors include:

- Being in contact with extremist recruiters
- Articulating support for extremist causes or leaders
- Accessing extremist websites, especially those with a social networking element.
- Possessing extremist literature
- Justifying the use of violence to solve societal issues
- Joining extremist organisations
- Significant changes to appearance/behaviour

9.5 Referral and intervention process - See Annexe D for full reporting process

Any identified concerns as the result of observed behaviour or reports of conversations to suggest that the person supports terrorism and/or extremism, must be reported to the Designated Safeguarding Lead immediately and no later than the end of the working day.

Where a child or young person is thought to be in need or at risk of significant harm, and/or where investigations need to be carried out (even though parental consent may be withheld), a MARF should be submitted in line with The **PTS Safeguarding & Child Protection Policy**. However, it should be recognised that concerns of this nature, in relation to violent extremism, are most likely to require a police investigation (as part of the channel process).

As part of the referral process, the DSL will also send an electronic referral to the local police prevent team using 101 (Ext 2802) and ask for the Counter Terrorist Security Advisor or via the Prevent Coordinator for their region (South West) this is currently: **Cheri Fayers**

cheri.fayers@education.gov.uk

Local Police contacts:

101@gloucestershire.police.uk

simon.williams@gloucestershire.police.uk

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9.6 Channel referrals process

Some concerns which are identified may have a security dimension to them, for this reason, it is important that liaison with the police forms an early part of all investigations. Gloucestershire Police will carry out an initial assessment and, if appropriate, set up a multiagency meeting to agree actions for supporting the individual. If it is deemed that there are no concerns around radicalisation, appropriate and targeted support will be considered for the person.

9.7 Training

The Company will ensure that the Designated Safeguarding Lead (DSL) is suitably competent for this role and that all employees who work with learners receive PREVENT and CHANNEL awareness training to enable early identification of radicalisation and effective referral. The Company will ensure full risk assessments are carried out and action plans are in place to mitigate any risks.

9.8 Speaker and events – See Annexe B for full risk assessment process

The Company will ensure that any external speakers engaged by The Company are suitably vetted prior to speaking and monitored throughout their engagement with PTS employees and learners. All events will be risk assessed for the potential of radicalisation risk prior to the event and monitored throughout.

9.9 Access to all centres

The Company will ensure that all staff always wear photographic ID Badges. All visitors must be signed in and out of all sites and be asked to where a visitor's badge, which must always be visible. All staff are responsible for reporting any persons who are not wearing a badge immediately.

9.10 Crisis response and lockdown

The Company have a crisis response plan which includes lockdown procedures if a terror related incident should occur. All staff have training in this and this forms part of our learner induction.

10 Working in partnership with local authorities

(See Annexe E for full list of contacts from the local authority)

The Company will have a named **Designated Safeguarding Lead (DSL)** who is responsible for developing and maintaining a formal link between the safeguarding partnership and The Company, the aim of which is to promote a clear understanding of accountability and procedures. The DSL will manage a team of safeguarding representatives.

Current named contacts:

- **Kate Whereat** – Safeguarding Manager, **Designated Safeguarding Lead (DSL)** (Senior Mental Health, Prevent & CIC Lead)
- **Jane Trehearne** – **Deputy Designated Safeguarding Lead (DDSL)**, Learner Support Supervisor
- **Zoe Price** – **Deputy Designated Safeguarding Lead (DDSL)**, High Needs Coordinator and SENCo
- **Sally Cope** – Tutor/**Safeguarding Representative**
- **Jo Mathers** – Pre-16 Coordinator/**Safeguarding Representative**

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11 Training

Safeguarding and child protection must form a part of the staff induction, training, supervision and appraisal process.

All workers who engage with our youth provision learners will read Section 1 of the Keeping Children Safe in Education Guidance as part of their induction

Safeguarding training is mandatory for all company staff.

Designated staff within the organisation will undergo relevant safeguarding and child protection training

Designated staff within the organisation will undertake mental health and attachment training

Designated staff within the organisation will undertake safer recruitment training

Designated staff within the organisation will be responsible for the cascading of information and training to the workers within The Company. All staff will be given underpinning knowledge on safeguarding and child protection. This will be refreshed every 12 to 15 months

All children and young people enrolled on a programme will be made aware of The Company's safeguarding and child protection procedures and offered relevant education in key safeguarding related areas.

12 Record keeping and sharing information

12.1 Any records must be kept accurate and factual. Paper based records relating to suspected, possible, or actual abuse must be signed and dated by the worker making the entry, then uploaded to CPOMS. When recording information workers must be sensitive to the fact it may be shared with parent/s or carers.

Where a worker has concerns about possible significant harm to a child or young person, the concerns must be clearly recorded on CPOMS and discussed with the DSL, or in their absence, with the DDSL.

The only professional qualified to diagnose whether a physical injury is the result of abuse is a professionally trained medical practitioner. The Company as an organisation and its workers should report their concerns but avoid diagnosing incidents as abuse.

It is the responsibility of professionals to report concerns, NOT to decide whether it is or is not abuse.

The Company is committed to openness in our work with children and young people, however in some instances, where sharing information with relatives may put the child or young person at risk, access will be restricted, and advice should be sought from the appropriate local authority.

Sharing of information between practitioners and partner organisation's is essential for effective identification, assessment, risk management and service provision. Fears about sharing information cannot be allowed to stand in the way of the need to safeguard and promote the welfare of children and young people at risk of abuse or neglect.

The GDPR and Data Protection Act 2018 do not prohibit the collection and sharing of personal information. They provide a framework to ensure that personal information is shared appropriately. In particular, the Data Protection Act 2018 balances the rights of the information subject (the

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individual whom the information is about) and the possible need to share information about them. Never assume sharing is prohibited – it is essential to consider this balance in every case. You should always keep a record of what you have shared.

Wherever possible, you should seek consent and be open and honest with the individual from the outset as to why, what, how and with whom, their information will be shared. You should seek consent where an individual may not expect their information to be passed on. When you gain consent to share information, it must be explicit, and freely given. There may be some circumstances where it is not appropriate to seek consent, either because the individual cannot give consent, it is not reasonable to obtain consent, or because to gain consent would put a child or young person's safety or well-being at risk. Where a decision to share information without consent is made, a record of what has been shared should be kept.

12.2 Requests for information from the children and young people's directorate, police or child protection unit.

Where The Company receives a request from the police or child protection unit for information as part of child protection enquiries, workers should follow the guidelines below

- If contacted by phone, workers will take contact details and refer the query to the DSL who will manage the disclosure of information in line with the limited confidentiality policy.
- Relevant information should be shared on a “need to know” basis, within the context that the welfare of the child or young person is paramount and overrides issues of confidentiality.
- The DSL will clarify with the requesting agency, where appropriate, whether consent of the child or young person has been given for the enquiry, and if not, agreement should be reached on whether it is appropriate to seek consent prior to sharing information.
- Information shared will be recorded. The records should indicate whether the child or young person's consent was obtained to share this information, and if not the reason for this should be recorded.
- Where The Company receives a request from children and young person's directorate for information as part of child protection enquiries under section 47 of the children act, it will follow the above procedures in addition to:
- The records should indicate whether the parents or guardians' consent was obtained to share information, if not the reason for this should be recorded.

13 **Discussing concerns with the child or young person's parents or carers**

Discussing concerns with the vulnerable persons parents, guardians or carers involved can assist in clarifying the explanation for any injuries or other possible indicators of abuse. Where the explanation is unsatisfactory an honest response, such as advising of the need to discuss this with the appropriate local authority can help prepare the child or young person's parents, guardian, or carers for any further assessment.

After discussing concerns with the child or young person's parents, guardian or carers, the worker should consult again with their DSL, and a decision will be made as to whether their remains a basis for concern and what further action, if any, needs to be taken. Where consultation with the child or young person's parents, guardian or carers alleviates concerns, this should be recorded, and it is likely that no further action will be necessary.

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However, in accordance with Department of Health advice contained in “Working together to Safeguard Children” (2023), “**while professionals should, in general, seek to discuss any concerns with the family and, where possible, seek their agreement to making referrals to children and young people's directorate this should only be done where such discussion and agreement seeking will not place a child at increased risk of significant harm**”. The Company will adopt this procedure for all children and young people.

The local authority should be contacted before contact with parents, guardians or carers and advice sought, where:

- A child or young person has made an allegation of abuse by one or both parents, guardians or carers
- There is evidence of possible violence from one or both carers
- The allegation concerns a professional or volunteer working with the child or young person

The Gloucestershire Safeguarding Childrens Partnership provides guidance on levels of intervention

[The right support at the right time - Gloucestershire County Council](#)

14 Investigation

During investigation workers must be aware that it is their role to support the local authority in this process by providing accurate information. It is our role to observe and record incidents and not to investigate or evaluate evidence. Inappropriate lines of investigation may jeopardise evidence should a case go to court.

If, following a child protection referral, the DSL is dissatisfied with the local authority proposed action, or decision not to investigate, they must discuss this with the Managing Director. The Managing Director may judge it necessary to contact a senior manager within the local authority to advocate further action, instigating where necessary the “Escalation Policy” available at [GSCP Escalation Policy \(gloucestershire.gov.uk\)](#)

15 Support for learners and staff

The Company will ensure that victims of abuse are supported at the time of crisis and on an on-going basis. Where we are unable to provide this support, ourselves we will endeavour to refer service users to appropriate support agencies.

The Company acknowledges that abuse and child protection can be traumatic and emotionally draining. It often stirs up feelings of anger, guilt and disgust for the workers involved. Support will be offered to staff through supervision with their line manager and the DSL and where appropriate the DSL will make referrals to external support agencies such as counselling and in-work mental health support.

16 Safer recruitment practice

The Company acknowledges that recruitment plays a key role in successful safeguarding arrangements.

We work in line with the safer recruitment guidance in Keeping Children Safe in Education 2023 [Keeping children safe in education 2023 \(publishing.service.gov.uk\)](#)

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The Company have a safer recruitment policy and process which is followed in the recruitment of all workers and volunteers on our youth provision and NCLP contracts.

PTS Safer Recruitment Policy and Process

17 Conduct of employees

All workers must always abide by The Company's Code of Conduct and adhere to **PTS Professional Boundaries Guidance**.

Workers should not form social relationships outside of our service specification. Workers should not take children and young people, to their homes, or give out their personal telephone numbers, or add them as 'friends' on personal social media accounts. To do so may be viewed as a disciplinary matter. Workers should only have their work mobile and email available to clients during the companies usual working hours 8.45am to 4.45pm (unless approved by a senior manager)

Workers should not have more favoured or less favoured learners. Every learner should be treated equally.

Any inappropriate behaviour towards workers by a young person should be recorded, and if this behaviour was witnessed by others this should be recorded.

Workers should avoid giving lifts to learners except to assist in the provision of support services, or as part of organised activities and should be adequately risk assessed.

Workers should not form a close relationship, physical, emotional, or sexual, with any of our learners. This will be viewed as a disciplinary matter and may be reported to the local authority via the LADO.

Workers must never threaten or physically punish a child or young person in their care. Any use of corporal punishment is not permitted. This will be viewed as a disciplinary matter and will be reported to the local authority LADO.

The term corporal punishment should be taken to include: any application of force as a punishment; slapping; throwing missiles; rough handling. The term corporal punishment should also be taken to include punching or pushing in the heat of the moment in response to violence from The Company's clients. It does not prevent a worker from taking necessary physical action where any other course of action is likely to fail to avert the immediate danger of personal injury to the child or young person, the worker or another person, or the immediate danger to property.

18 Transporting service users

Only those staff that have been subject to The Company's safer recruitment procedures should transport children and young people.

All drivers should have read **The PTS Safeguarding and Child Protection Policy**.

To transport a young person a check should be made on the 'under 18's parental consent form' being signed and returned. All journeys for children and young people should be carried out with the knowledge of the driver's line management.

Seat belts should be worn, the driver should have adequate insurance, and the vehicle should be road worthy.

Drivers should not spend unnecessary time alone in a vehicle with a child or young person. If a child or young person wants to talk to a driver about something and has waited till other passengers have

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been dropped off, the driver should explain that it is not convenient to talk. Then arrange to meet with the child or young person at a location where there can be other adults around. (remember, they may want to talk about an abusive situation).

The Company considers, having checked drivers (application form, interviews, references etc.), it is reasonable to expect that they may be left alone with a child or young person for short periods e.g., dropping off the last passenger. In all cases a discussion should take place as to the most suitable member to be dropped off last and plan routes accordingly.

The Company does not suggest two staff members in a vehicle as this itself does not guarantee protection for a child or young person – there have been incidents where staff have acted together and two adults in a vehicle with one passenger could be of less protection.

Look at instances where it may be unwise for a particular driver to transport a child or young person (e.g. where they have had a disagreement that day or where a member has a ‘crush’ on a driver) and arrange for someone else to do the transportation.

To be read in conjunction with The Company chaperoning policy and professional boundaries guidance.

19 Allegations management

Dealing with allegations made about staff/volunteers working with children and young people under eighteen.

For full details please refer to the **PTS Allegations Management Policy**.

19.1 Key Principles:

- Ensure all staff know to whom to report concerns or allegations i.e., the DSL, or senior manager.
- Ensure no action is taken that may undermine or jeopardise a police or social care investigation, particularly in the early stages of the process; under no circumstances should The Company start an investigation.
- For incidents involving children and young people under 18, liaise with the local authority designated officer (LADO) throughout the process.
- Consider the advice, guidance and training you give to The Company staff, including during recruitment and induction, about expectations of behaviour and safe practice.

19.2 If you are a company staff member working with children and young people:

- Make sure you know to whom you should report any concerns or allegations about a colleague or any other adult working with children.
- Report concerns or allegations as soon as possible, do not hold on to information however trivial or insignificant it may seem.
- Make sure you follow The Company codes of practice and always uphold professional boundaries.
- If an allegation has been made about you from someone external to your role within The Company, you must report this to the DSL immediately.

19.3 Initial Actions:

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By any person receiving an allegation or having a concern:

DO

- Treat the matter seriously and keep an open mind.
- Inform your DSL or senior manager immediately.
- Make a written record of the allegation or concern as soon as possible after receiving information or observing behaviour that causes concern, including the date, time, person/s involved and what was said or observed. Sign and date this record and forward it to your DSL or senior managers.

DO NOT

- Attempt to investigate or deal with the situation yourself.
- Make assumptions, offer alternative explanations or diminish the seriousness of the alleged incident/s
- Keep the information to yourself or promise confidentiality.
- Discuss the allegation or concerns with anyone other than those defined in The Company's allegations policy and procedures.
-

By the DSL or senior manager:

DO

- Follow the advice of the LADO and act in a timely manner and follow due process.
- Inform the person reporting the allegation or concern what action you will take, in accordance with procedures and with regard to information sharing protocols.
- Contact the appropriate authority within one working day of receipt of allegation.
- Obtain written details of the allegation from the person reporting the incident/s (see above)
- Countersign and date the written details on receipt and keep secure.
- Maintain a written record of any discussions (with whom), action taken, decisions made (with reasons), including dates, times etc and keep secure.
- Collate any information you have about (i) the child, vulnerable person, parents/carers, siblings and (ii) the person against whom the allegation has been made e.g., address, dates of birth, previous concerns etc. and (iii) any potential witnesses.
- Maintain confidentiality.
- Help all parties understand the process.
- Be prepared to attend multi-agency meetings to be an active member of the support team set up for the vulnerable person.

DO NOT

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- Act alone or disregard The Company's **Allegations Management Policy and Process**.
- Dismiss, disbelieve, or minimise the allegation or concern based on your knowledge or opinion of the member of staff/volunteer concerned or the vulnerable person.
- Investigate the incident, interview, or discuss with the member of staff, vulnerable person concerned, potential witnesses, unless advised to do so by the appropriate authority or a strategy meeting.
- Inform parents/carers of the child/ren/vulnerable adult until advised to do so by the LADO or a strategy meeting.
- Automatically suspend or dismiss the member of staff without seeking further advice.

20 Limited confidentiality policy and procedure

20.1 Introduction

Confidentiality is essential within any organisation and, due to the nature of the services we provide, The Company is, at times, privileged to some very confidential information. This guidance document has been produced in line with The Company's and Gloucestershire Safeguarding Children Partnerships (GSCP) protection policies and procedures.

The principle of this policy is to establish confidentiality as a right and set clear guidelines for The Company to ensure good practice. Where records and information relating to learners and staff are kept, The Company's will need to be clear why this information is held and who needs to have access to it.

Confidentiality can mean different things to different people, The Company has a policy of 'limited' confidentiality, where information is shared and restricted to certain people in the team, rather than kept by one individual; or where The Company's child protection procedures dictate that information will be shared with relevant statutory bodies. The disclosure of information to external agencies by The Company will be in line with local authorities' policies on sharing information for the protection of vulnerable groups

Discussion on issues of confidentiality will be encouraged in team meetings, staff training and in supervision; the purpose of this is to increase the staff team's understanding of limited confidentiality.

20.2 Breaches of policy

Breaches in confidentiality may jeopardise the wellbeing of staff and learners.

When working with children and young people it is essential to create a trusting relationship on which some forms of counselling and advisory work depend. However, children and young people should think very carefully before making certain types of disclosures and be aware that a limited confidentiality policy is operational.

Breaches in confidentiality, which are contrary to the terms of this policy, may be subject to disciplinary proceedings or in the case of learners, a withdrawal of services.

Staff will be subject to disciplinary proceedings if the following occurs:

- Confidentiality is broken inappropriately.
- Inappropriate use of data held by The Company
- Disclosure of learner or staff details to unauthorised parties

20.3 General principles

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Disclosure: The ultimate reference point for deciding who should be informed of a piece of confidential information should be the individual concerned.

Informed consent: It should be stressed that consent should be informed consent i.e., the reasons for sharing/not sharing information should all be discussed with an individual.

20.4 Personnel and administration

All staff will be given a copy of the confidentiality policy as part of their induction. The implications of the policy for their work will be explained.

Personnel files and other confidential staff records will be kept in a locked cabinet for which the HR manager is the only key holder, in line with good practice guidelines in regard to DBS procedures.

Job application forms, job interview records and job monitoring forms are confidential to The Company. The interview panel will hand in all papers at the end of interviews.

References - when references for new employees are requested, it will be made clear that the references will be available only to the staff member concerned, otherwise they will be confined to the line manager/director and members of the interview panel.

Supervision - with the exception of disciplinary action, information discussed in supervision will be confidential to the people concerned in the meeting and the supervisor's line manager.

General office - the Centre manager is responsible for ensuring that all staff keep to the office systems procedure. This entails being clear about who has access to what information, that filing cabinets and key boxes are locked when the office rooms are not staffed.

IT - The Company is registered under the Data Protection Act 2018.

Individuals have the right to:

- be informed if information is held on her/him.
- have access to such information within 40 days.
- where appropriate to have it corrected or erased
- exemptions:
- mailing lists
- pay details.
- statistics, providing persons cannot be identified.
- information acquired from statutory agencies, which may cause harm to that individual or another.
- Confidential information stored on disc will be kept in a secure and locked cabinet. Where information is erased on computer for reasons of confidentiality, it must also be erased on all back-up discs and copies.

20.5 Learners

Any information held on learners will be confidential to members of the staff team. They will have access to their own files through appointment with their tutor. All files are kept secure and destroyed after the appropriate contractual time specified.

Records Kept

- Information regarding application details, references, next of kin, previous address, contact numbers etc. and on-going correspondence between The Company and any client will be kept in the client's file.
- Age, gender, disability, racial/ethnic origin, referral source, date of departure, training offered and given, how long using The Company's services, reasons for leaving, where moved on to, criminal record and other support needs (where appropriate).

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Information should never be given out over the telephone unless: -

- You are certain that you are aware of whom you are speaking to
- You return the call so that you are aware of whom you are speaking to

Children and young people should never be discussed outside company business hours and only to authorised colleagues in connection with legitimate service user business during business hours.

Discussions with children and young people should include the following:

- The Company operates a limited confidentiality policy, and that information shared is confidential unless it is felt that either the service user themselves or anyone else is at risk.
- Do not promise that you would not disclose the information to other agencies, do explain the reporting procedure for The Company and why you may have to disclose information.

Records are kept on a database in line with the Data Protection Act 2018 and UK GDPR.

Learners are expected to respect the rights of other learners in regards personal information on each other. A breach of confidentiality by a learner about another learner may be viewed as harassment and may be seen as cause for a withdrawal of services.

Learners are expected to respect the rights of staff to confidentiality.

Learners taking part in media events must not disclose a project address or names of other learners for public information. They will be clearly informed that they are not obliged to take part in any media events if they do not wish to do so.

20.6 Contractual paperwork

All paperwork will be considered confidential. This includes all paperwork generated by The Company to aid in contractual compliance as well as paperwork completed by staff to demonstrate good practice in contract compliance.

Any member of staff distributing or lending such paperwork to external non-contractual agencies without prior approval from The Company's senior management may be subject to disciplinary proceedings.

The Company will assess when a situation necessitates breaching confidentiality. Confidentiality is rarely broken. The type of instances in which confidentiality may be breached are as follows:

If a learner poses a serious risk to themselves or others. In these instances, The Company may give information to statutory/emergency services. E.g., police, appropriate local authority departments or to a housing agency or support agency.

Information will be provided to the police and where relevant insurance companies, when crimes have been committed against staff, service users and property.

21 Monitor & Review

Breaches of this policy may be investigated and may result in the matter being treated as a disciplinary offence under the PTS disciplinary procedure.

This policy shall be reviewed on a two-year cycle or when there is any of the following.

- Change in legislation or best practice
- If required on risk review
- Comment or feedback by policy users/owners
- Changes in named personnel

Appendix A Safeguarding Incident Reporting Process (Youth)

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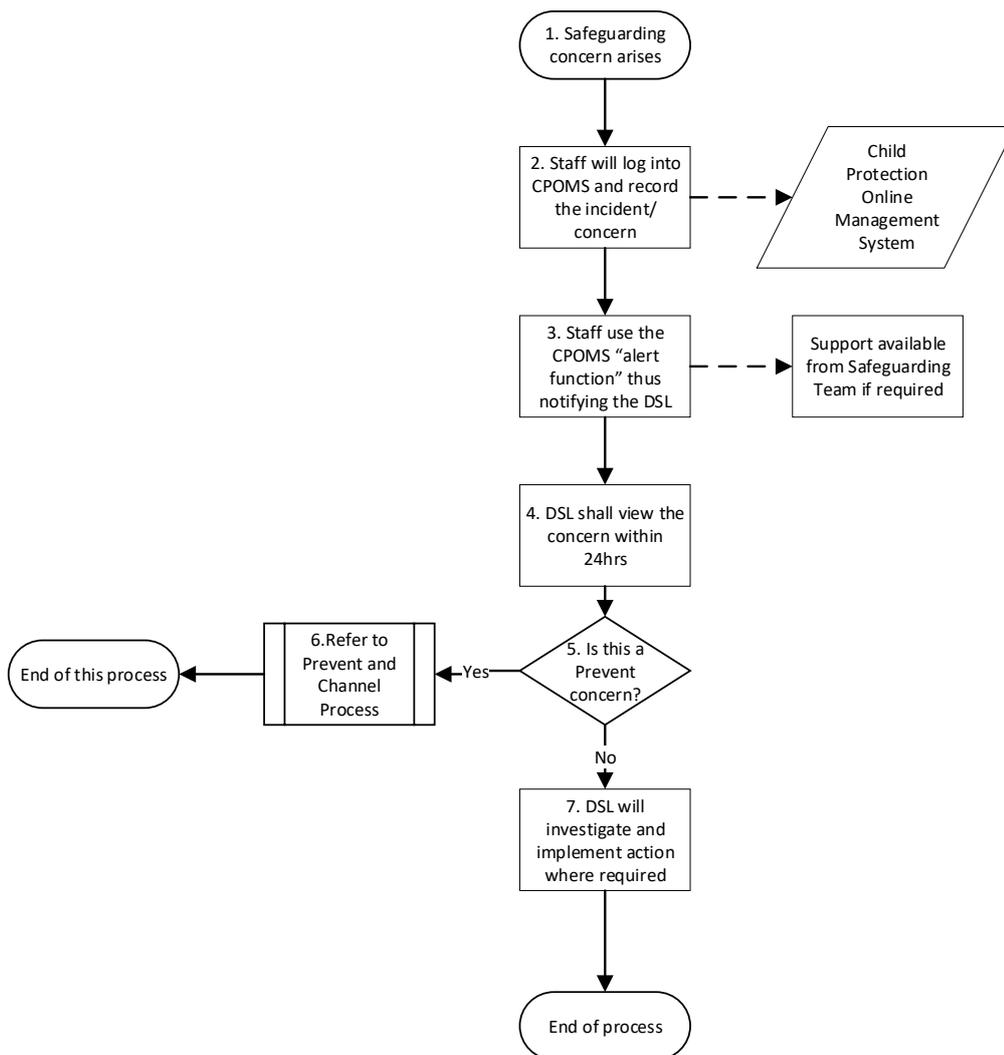
All individuals working with children and families have a duty and responsibility to report any allegations or concerns of a child protection nature. When such a concern is raised you should follow the process below.

About CPOMS:

The Child Protection Online Management System (CPOMS) is an online management system that records all safeguarding, prevent, and causes for concern for our youth provision learners. The information recorded in this system can be used to inform other agencies in-line with child protection processes. It is also a secure system for keeping records.

As part of their safeguarding induction, new staff members will undergo CPOMS training and will be issued with their own log-in and password.

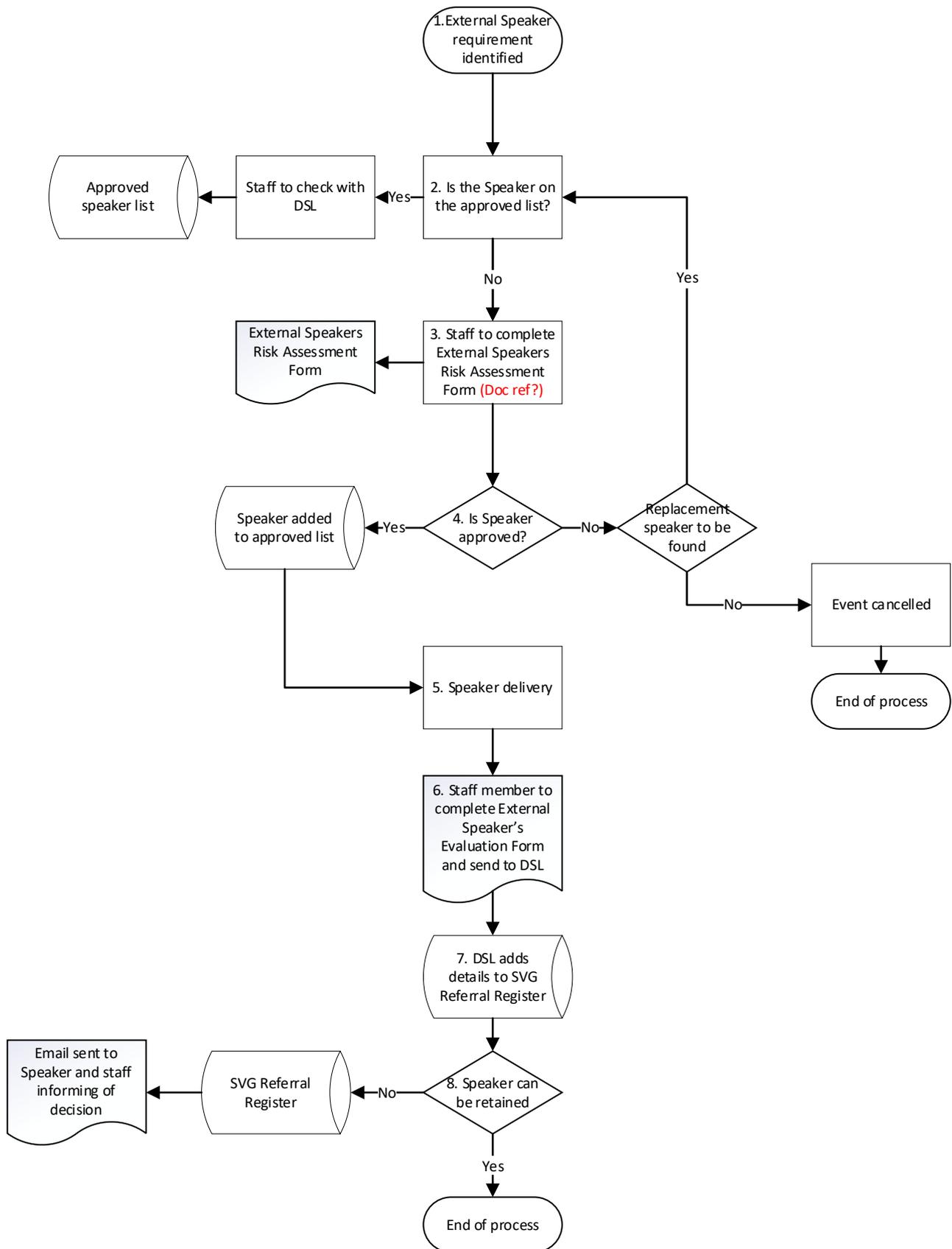
Step	Process	Responsible
1	A safeguarding/prevent concern arises, after seeking advice from a member of the Safeguarding Team	Staff
2	Staff shall log into their CPOMS account and record the incident/concern. This must be completed within 24hrs. They should ensure that the information is accurate and factual, with no missing information. They should contact a member of the safeguarding team if they require immediate support.	Staff
3	Staff member is to use the alert function on CPOMS to notify the Safeguarding Manager (DSL).	Staff
4	The DSL will view the concern within 24 hours.	DSL
5/6	In the case of the concern being a Prevent nature, the Safeguarding Manager will refer to the Prevent and Channel process.	DSL
7	If there is no Prevent concern, then the DSL will investigate and implement action where required	DSL



ANNEXE B External Speakers Process (Youth)

Step	Process	Responsible
2	When a member of staff wishes to engage an External Speaker, they should check with the DSL if the Speaker is already on the Approved Speaker List.	Staff
3	If the Speaker is not on the Approved List, then the staff member is to complete the External Risk Assessment Form	Staff
4	If the assessment allows for the Speaker to be approved details will be uploaded to the Approved List. It is the staff member's responsibility to ensure that enough time is given for the safeguarding manager (DSL) to approve the external speaker prior to the planned session. If the external speaker has previously attended a planned session the staff member must check with the DSL if they have been evaluated and approved to return. If the Speaker is approved, they will be added to the SVG Referral Register. If the Speaker is not approved the event will either be cancelled or an alternative speaker sourced, using the previous steps in this process.	DSL
5/6	Post delivery the member of staff hosting the Speaker shall complete the External Speaker's Evaluation Form and send it to the DSL.	Staff
7	The DSL shall add the details of the feedback to the SVG Referral Register.	DSL
8	If the Speaker can be retained details shall be uploaded to the Referral Register by the DSL	DSL

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ANNEXE C PTS Freshdesk

As part of our online safety policy, PTS have a filtering system in place, which restricts access to harmful content and other sites that are deemed unsuitable for use whilst in attendance at a PTS centre. At times the filters can fail to work, so we expect staff to be observant and to report any incidents where there is a breach. Please see below for our process.

- If a learner uses any PC or laptop in any of our centres, it is the responsibility of the staff member to monitor the learner activity
- If a learner is observed accessing a prohibited site (see Prohibited Sites List) or any other harmful content, the staff member should ask the learner to step away from the device and record details of what has been accessed i.e. website address
- If the learner shuts down the site before the staff member has a chance to view it, the staff member should make a note of the time, date and device no. and what they have witnessed
- The learner should then be restricted from using the PC/laptop
- The information should then be logged on Freshdesk [Sign into : Prospect Training Services \(freshdesk.com\)](https://freshdesk.com)
- This should be logged under 'safeguarding and prevent' Please give as much detail as possible

Prohibited Sites

- Any social media sites
- Any site with harmful content
- Any sites promoting alcohol, tobacco or narcotics
- Any sites containing violence, profanity or obscenity
- Any sites containing weapons, explosives, pyrotechnics
- Any gambling sites
- Pornographic material
- Any sites promoting extremist material
- Any sites promoting suicide or self-harm
- Any site encouraging hate speech or bullying
- Gaming sites
-

This list is not exhaustive. If you feel a website is not suitable and you are concerned about what you have seen, please report it.

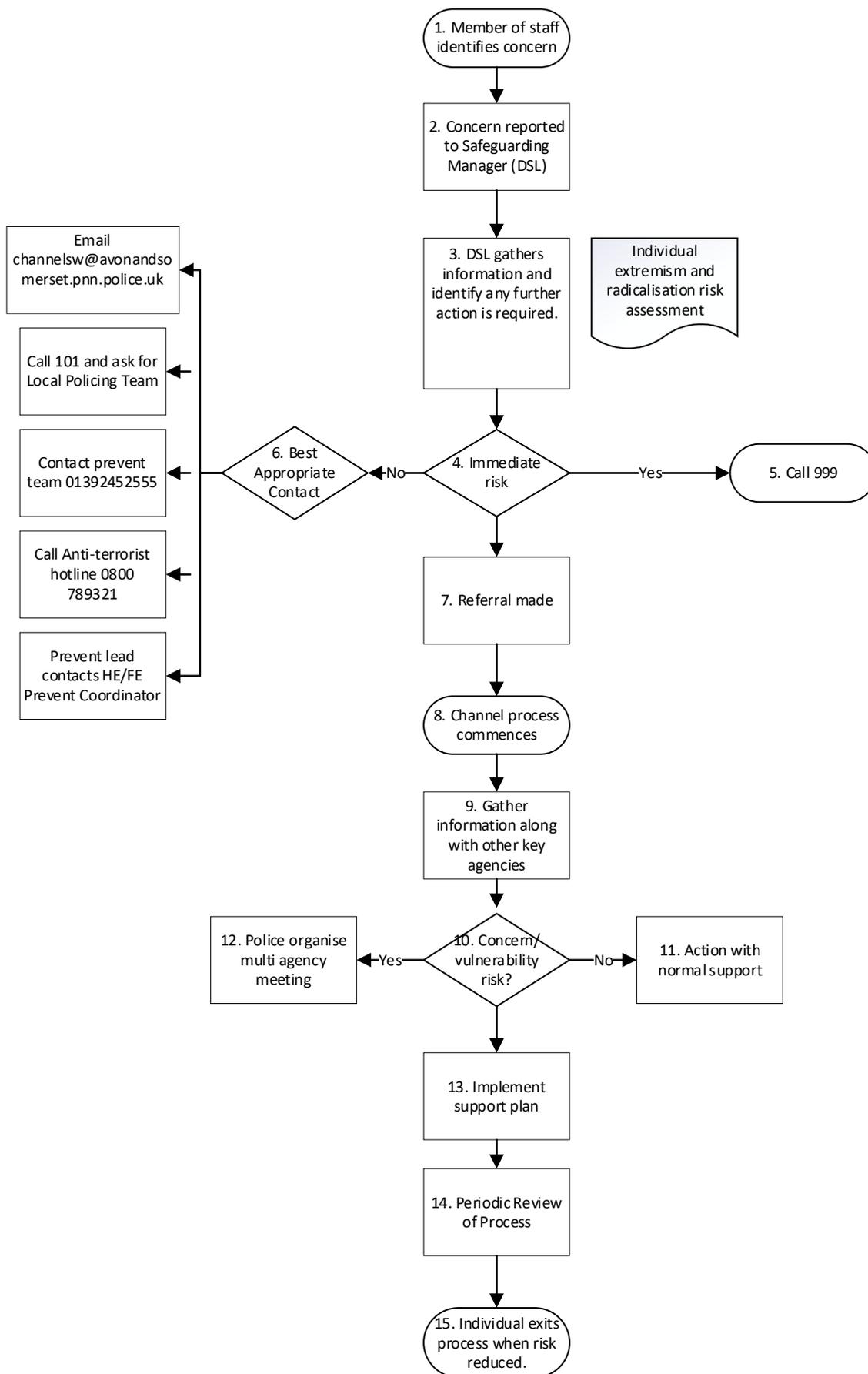
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ANNEXE D Prevent and Channel Process

This is the PTS process flow for reporting a concern of a vulnerable individual. It is important for you as a member of staff to know where to go if you have a concern that someone may be on the route to radicalisation. Below is the process which aims to show you the steps to follow. If you have any questions on this process, please contact the PTS Safeguarding Manager.

Step	Process	Responsible
1	Staff member identifies concern	Staff
2	Concern is reported to the Safeguarding Manager/DSL Via the Safeguarding Incident Reporting Process	Staff
3	DSL gathers more information where possible and identifies what further action is required. The Individual extremism and radicalisation risk assessment is to be used to assess risk. This is the document that I have attached, it is not referenced and hasn't been reviewed since Aug 23, so I will need to review it.	DSL
4	The findings of the assessment will determine if there is an immediate risk. The outcome leads you to action 5 or 6.	DSL
5	DSL will contact the Police via 999	
6	The DSL will take the most appropriate action based on the individual case	DSL
7&8	Once the referral has been made the case enters the Channel process	DSL
9/10	Further information gathering takes place with PTS and other key agencies that the individual is involved with. Consider if there are shared concerns between partners and if there is a vulnerability to radicalisation.	DSL
11	Based on no concern or vulnerability risk action continues with normal support.	DSL
12	If there is a risk, then the Police will organise a multi-channel meeting which will be made up of key partners. The meeting will be chaired by Gloucestershire County Council.	Police
13	Following the meeting and considering the findings, a bespoke support action plan shall be developed and implemented	External agencies
	Note: It is important to remember that consent is gained with the individual to be part of channel support and intervention.	Info
14	The support plan shall be regularly reviewed, and channel partner members shall work together to review progress and reduce risks	DSL and partners
15	The individual will exit the channel process when all partner agencies feel that the vulnerability to radicalisation has been significantly reduced. Once a referral has exited the process, it will be reviewed at 6 and 12-month periods. If concerns remain, the individual can be re-referred.	Info

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Annexe E Useful Contact details

Organisation	When to contact	Contact Number
Gloucestershire's LADO (Local Authority Designated Officer)	Reporting abuse allegations/concerns against professionals (members of staff and other professionals)	01452 426994 amadmin@gloucestershire.gov.uk -
Children and Families Helpdesk (Social Services)	Making a child welfare referral. Urgent referrals by phone, where a child is at risk of significant harm. For a general referral where there is a concern for the welfare of a child a MARF (Multi Agency Service Request Form) should be completed via the portal	Mon-Fri 9am to 5pm: 01452 426565 childrenhelpdesk@gloucsetershire.gov.uk Report a child protection concern Gloucestershire County Council Out of hours: 01452 614194
Child Line	IAG	0800 1111
NSPCC	IAG	0808 800 5000
Police Control Room	Non-emergencies	101

Adult Services 18 Years +

Organisation	When to contact	Contact Number	Name/post
1. Adult Helpdesk (Social Services)	Reporting welfare concerns	01452 426868 socialservicesenq@gloucestershire.gov.uk www.gloucestershire.gov.uk/gsab/	Duty Social Worker

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ANNEXE F Filtering Process

At PTS our filtering software is in place to restrict access to websites that are deemed unsafe, include harmful content or are not conducive to the learning environment. It is the responsibility of the staff member to request that a website is unblocked and allow adequate time for this to happen (3 working days) This process should be always followed.

Step	Process	Responsible
1	The staff member should be familiar with the website they would like to unblock, and have clear reasons for the request, the SVG manager will take all of this into account when assessing the suitability of the website and how safe it is for our learners. The staff member should have this evidence ready to submit	Requester
2	The requester shall access Freshdesk as follows. Sign into: Prospect Training Services (freshdesk.com) <ul style="list-style-type: none"> Select: "New Support Ticket" Subject: "Filtering" Site: Your Centre Issue: Safeguarding & Prevent Query: Safeguarding Type: Request for unblocking Description: Include the web address and reasons for unblocking. Example could be that class are undertaking a project. 	Requester
3	Assess the suitability of the website. If the safeguarding manager deems the website unsuitable it will not be unblocked, a reason for this decision will be provided to the requester. All staff should note that learners use of IT should be monitored	Safeguarding Manager
4	Request made to IT Department to unblock the web link	Safeguarding Manager
5	IT Department unblock the web link and close the ticket. A notification is sent to the requester that the action is complete, and ticket closed	IT Department
6	Action completed and requester informed (via Freshdesk)	

