

Safeguarding Young People and Adults at Risk Policy and Procedure

Lomax Training Services Limited is committed to safeguarding and promoting the welfare of children and young people, as well as vulnerable adults, and expects all staff to share this commitment.

We will consider any request for this policy to be made available in an alternative format.

We review our policies regularly to update them and to ensure that they are accessible and fair to all. All policies are subject to equality regular review. Reviews are carried out to see whether the policy has, or is likely to have, a different impact on grounds of race, gender, disability, age, religion, sexual orientation, or human rights.

We are always keen to hear from anyone who wants to contribute to these reviews, and we welcome suggestions for improving the accessibility or fairness of the policy.

To make suggestions or to seek further information please contacts:

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1. Introduction

1.1 Lomax Training Services Limited is committed to protecting all our learners at risk. The fundamental principles of this policy and procedure are based on our legal duty under the Education Act 2011, Keeping Children Safe in Education (2022), Working Together to Safeguard Children Act (2018), Human Rights Act 1998 (HRA), Equality Act 2010, Public Sector Equality Duty (PSED), Safeguarding Vulnerable Groups Act (2006), Care Act (2014) DfE Statutory guidance and regulations as stated by the Disclosure and Barring Service (DBS).

1.2 Lomax Training Services Limited wants to ensure that children, young people, and adults at risk are protected from abuse. All complaints, allegations or suspicions will be taken seriously and in accordance with this policy and procedure, and the learners WILL be supported and kept safe. What is paramount for the Lomax is that any learners who feels unsafe is able to report any concerns at the earliest opportunity to Lomax. An overriding principle of this document is that every victim will be taken seriously, kept safe and never made to feel like they are creating a problem for reporting abuse, sexual violence, or sexual harassment.

1.3 Lomax Training Services Limited recognises that some learners may not feel ready or know how to tell someone that they are being abused, exploited, or neglected, and/or they may not recognise their experiences as harmful. For example, the learner may feel embarrassed, humiliated, or being threatened. This could be due to their vulnerability, disability and/or sexual orientation or language barriers. Indeed, making such a disclosure takes courage and is difficult, but Lomax staff are keen to listen and support such disclosures.

We have highly trained staff who will carefully allow the learner to make the disclosure at a pace they feel comfortable, and it will be their welfare which is our central focus and will remain so. Lomax will take active steps not only to support the learner during and after the disclosure, but we will work with others to ensure that they are kept safe. Often victims of safeguarding concerns just want the abuse to stop, we will work with the victim and others to ensure that we achieve this goal together. By reporting such concerns, the learners can help us to stop these inappropriate actions of others. Lomax staff will determine how best to build trusted relationships with the learner which facilitate communication and disclosure.

1.4 Through this policy and procedure, the Lomax aims to:

- Ensure the promotion of a culture of safeguarding throughout the Lomax.
- Listen to the concerns of the learner at risk with an open and supportive approach.
- Minimise the risks to health and wellbeing of a learner at risk.
- Promote safe practices and challenge poor and unsafe practice.
- Identify instances in which there are grounds for concern about the welfare of children, young people and adults at risk and take action to keep them safe.
- Enable children, young people, and adults at risk to raise concerns relating to safety and for those concerns to be actioned.
- Take appropriate action to prevent unsuitable people working with children, young people and adults at risk.
- Ensure staff receive adequate training and supervision in relation to Child Protection, Safeguarding, e-Safety (on-line) and Prevent.
- Ensure that all recruitment complies with safer recruitment practices.
- Set and communicate clear expectations of staff about personal conduct and responsibility to always promote the wellbeing of young people and adults at risk.
- Ensure that the DSL and Deputy DSL are trained to provide access to specialist advice on

child protection and the protection of adults at risk.

- Clearly define the procedures for investigating allegations of harm to young people or adults at risk by persons in positions of trust within the Lomax including independent advice and referral to the police as necessary.
- Define a process to consider 'low-level' concerns and analysis of such concerns.
- Ensure effective reporting/monitoring of safeguarding practices and processes via Lomax managers.
- Define an accessible procedure/process to allow concerns to both be raised and effectively addressed.

1.5 Safeguarding and promoting the welfare of learners at risk is defined for the purpose of this guidance as:

- Protecting children/young people/ adults at risk from maltreatment.
- Preventing the impairment of mental and physical health or development of children/young people/adults at risk.
- Ensuring that children/ young people/adults at risk develop in circumstances consistent with the provision of safe and effective care; and
- Taking action to enable all children/young people/adults at risk to have the best outcomes.

1.6 This policy relies on utilising several key definitions to underpin this policy and procedure – clarity on these is provided at:

- Appendix A – Key Definitions
- Appendix B – Indicators of abuse, neglect, and specific safeguarding issues.

Further detailed guidance can also be obtained on the Lomax Safeguarding portal. Learners are encouraged to download the Lomax safeguarding app as it gives access to a wealth of information, guidance, and support.

2. Scope and Purpose

2.1 This policy and procedure apply to all learners and is in place to ensure children, young people and adults at risk are protected from all forms of abuse, definitions which are contained in Appendix B – Indicators of abuse and neglect. The purpose of this policy and procedure is to safeguard and protect the welfare of all our learners and help to encourage all staff to achieve and maintain the highest standards of Safeguarding Children and Adults at Risk.

2.2 Safeguarding and promoting the welfare of children, young people and adults at risk is everyone's responsibility. Everyone who comes into contact with children, young people and adults at risk and their families has a role to play in safeguarding. In order to fulfil this responsibility effectively, all staff should make sure their approach is centred on the learner, taking seriously any concerns, and ensuring that the child/ adult at risk is kept safe and never made to feel like they are creating a problem for reporting abuse, sexual violence, or sexual harassment.

The central focus of staff will at all times be what is in the best interests of the child/adult at risk, and reflective of the practice in key guidance/legislation e.g. Keeping Children Safe in Education (KCSIE) 2022.

2.3 The policy and procedure should be read in conjunction with the following:

- Staff Code of Conduct
- Recruitment and Selection Procedures
- Procedure for Prevention of Bullying and Harassment
- Prevention of Bullying Policy
- Health, Safety and Welfare Policy
- Mental Health and Wellbeing Strategy (Staff)

- Mental Health and Wellbeing Strategy for Effective Learning (Learners)
- Prevention of Harassment, Bullying and Victimisation in the Workplace Policy
- Work Placement Health & Safety Policy
- First Aid Policy
- Prevention and Management of Substance Misuse Policy
- Young Persons Health and Safety Policy
- Disciplinary Procedure
- PREVENT Strategy
- Attendance Policy

3. Key Responsibilities

Safeguarding is the responsibility of everyone; however, it is recognised that some individuals have some specific roles/responsibilities to enable effective discharging of the key safeguarding obligations:

3.1 The Role and Responsibilities of the Managing Director

The Managing Director is committed to ensuring that the Lomax:

- Raises awareness of issues relating to safeguarding and promotes the welfare of all learners in the Lomax.
- Has an effective Safeguarding Children and Adults at Risk Policy and Procedure which complies with KCSIE.
- Provides a safe environment for children, young people and adults at risk.
- Identifies those who are suffering or at risk of suffering significant harm and takes appropriate action to ensure they are kept safe.
- Has procedures for reporting and dealing with allegations of abuse against members of staff.
- Operates safe recruitment procedures.
- Designates a member of staff with sufficient authority to take the lead on protection for safeguarding.
- Ensure that the Lomax has appropriate online filters and monitoring systems in place and regularly review their effectiveness
- Remedies any weaknesses and areas for improvement relating to safeguarding that are brought to the attention of the business.
- Ensure all staff members receive appropriate safeguarding protection training which is regularly updated.

Safeguarding Training for Managing Director will be updated on a regular basis.

3.3 Staff Responsibilities

All staff will always have the best interest of the learner in mind. Staff will be able to deal effectively with any safeguarding issues and to this end will:

- Maintain the currency of their knowledge on safeguarding issues and engage with the regular training provided by the Lomax to support this obligation, however, if any additional training is required staff are obliged to either raise this with their line manager or undertake independent research.
- Be aware of and comply with their obligations under the Staff Code of Conduct.
- Work together to continue to create an environment in which learners feel able to make such life changing disclosures in a safe and supportive environment.
- Maintain accurate record of any disclosure which provides:
 - o a clear and comprehensive summary of the concern.
 - o details of how the concern was followed up i.e., referral to DSL/DDSL
- Comply with the obligations in this policy and key external documents notably KCSIE.
- Promote both safeguarding and the Lomax as an environment for learning and being a safe and caring place.

3.4 Designated Safeguarding Lead and Deputies Responsibilities

- Promote positive safeguarding procedures and practices so that all learners feel safe.
- Overseeing the referral of cases of suspected abuse or allegations to the relevant investigating agencies.
- Providing advice and support to other staff on issues relating to Safeguarding Practice and procedures, notably the obligations of KCSIE 2022, e-Safety and Prevent.
- Maintaining a proper record of any safeguarding referral, complaint, or concern (even where that concern does not lead to a referral).
- Liaising with the local authority, LSCB and LADO and other appropriate agencies.
- Liaising with employers and training organisations who receive learners on long-term placements to ensure appropriate safeguards are put in place.
- Ensuring staff receive basic training in safeguarding issues (including Prevent) appropriate to their roles and are aware of the Lomax's safeguarding procedures.
- Ensuring there is liaison with employers and training organisations providing learner placements to ensure proper safeguarding arrangements are in place.
- Ensuring that all staff receive training about safeguarding matters and the Lomax procedures.
- Reporting any refinement or enhancement to the safeguarding procedure to the Corporation as soon as possible.
- To receive training in safeguarding issues and inter-agency working, as required by the Local Safeguarding Board, and to undergo refresher training at least every 2 years.
- To storing all information and recordings in a secure manner in accordance with the Data Protection Act 2018.

meetings as appropriate.

- To ensure maintenance of accurate records and record all concerns, discussions and decisions made and the reasons for these decisions, ensuring:
 - o A clear and comprehensive summary of the concern
 - o Details of how the concern was followed up and resolved
 - o A note of any action taken, decisions reached and the outcome.

In the absence of the DSL, a nominated Deputy DSL will carry out the responsibilities of the DSL.

3.5 Learner Responsibilities

It is an expectation of Lomax that learners comply with this policy and procedure and its central aims. We will not accept behaviour from any learner that falls below these expectations, so in cases where the action/behaviour of a learner falls below this (e.g., child to child abuse) we will take appropriate internal action under our prevailing procedures as well as following the external avenue detailed in this procedure.

The Lomax will teach learners about safeguarding, including online, through teaching and learning opportunities as part of providing a broad and balanced curriculum. This may include covering relevant issues through personal, social health and economic education (PSHE) and/or through sex and relationship education.

3.6 Contractors/Visitors

All contractors and visitors to Lomax Training Services Limited will be required to adhere to our safeguarding practices/process.

4. Responding to a disclosure of abuse, neglect and specific safeguarding issues

4.1 All staff should be aware of the indicators of abuse, neglect and specific safeguarding issues, definitions which are contained in Appendix B – Indicators of abuse, neglect, and specific safeguarding issues. Knowing what to look for is vital for the early identification of abuse and neglect and specific safeguarding issues, such as children/young people/ adults at

risk criminal exploitation and sexual exploitation, so staff can identify cases of children, young people and adults at risk who may need help and protection.

4.2 Safeguarding incidents and/or behaviours can be associated with factors outside the Lomax and/or can occur between children/learners /adults in these external environments.

4.3 Technology is a significant component in many safeguarding and wellbeing issues. Children/young people/ adults at risk are at risk of abuse/bullying online as well as face to face. In many cases abuse will take place concurrently via online channels and in daily life.

During the Covid-19 pandemic lockdowns, the NSPCC helpline saw a 60% increase in contacts from people worried about children/young people experiencing online sexual abuse. The Lomax has a separate policy to set out the key protection for learners to maximise online protection and further guidance is provided on the Lomax's Safeguarding Portal.

4.4 Whilst Lomax staff are not responsible for investigating abuse, exploitation or neglect, it is essential that any suspicions of significant harm or allegations of abuse are promptly recorded and acted upon and treated seriously. The following procedure provides guidance for staff who receive a disclosure or who have concerns about allegations or abuse against a child/young person (under 18) or Adult at Risk (18 or over).

4.5 Where a member of staff suspects that a child, young person or adult at risk is being abused, they must:

- ✓ Take all allegations or suspicions of abuse seriously.
- ✓ Show acceptance of what they are told – even if it seems unlikely or too awful to be true. Reassure the person that they have done the right thing in raising the matter and that you are taking the information seriously
- ✓ Respond with tact and sensitivity to anyone who confides in them and clarify that they are not creating an issue or problem.
- ✓ Reassure the learner and let them know they were right to report the matter and that their concerns will be taken seriously.
- ✓ Always ask enough questions to clarify understanding but not probe or interrogate.
- ✓ Be honest – explain that you may have to share what they say with the Lomax specialist staff (e.g. the DSL/DDSL) but this information will be shared on a 'need to know' basis only and why (i.e. the appropriate person in Lomax who will seek further advice and help). Don't delay in masking this notification
- ✓ Ensure tact and diplomacy and discretion (only the people who need to know will be told).
- ✓ Allow the learner to speak freely in her/his own way and time and at her/his own pace. Avoid interrupting when the learner is recalling significant events.
- ✓ Only clarify what the learner is trying to say and ascertain whether there are any immediate issues of safety for the learner or any other learner(s).
- ✓ Take notes as accurately as possible of what was said, use the learner's own words; what you said in response, and an explanation of how the conversation took place. Include the date, time and your signature. Keep the notes, even if not typed up, as they could be used as material evidence in court
- ✓ Seek immediate guidance from a DSL/DDSL but make sure the learner remains safe. If the concern is about what has been observed, for example bruises, marks, suspicions of neglect or sexually explicit/abusive behaviour, then it is important to write a full account of what was seen. Include:
 - ✓ Size, shape, colour, position on the body of any bruises or marks, consider taking a picture unless location of that picture is inappropriate
 - ✓ Person's appearance e.g., ragged or dirty clothing, smell, emaciated body, pain or difficulty in moving

- ✓ Description of sexually explicit or abusive behaviour
- ✓ The date and time of your report and your signature

In any instance, because of dealing with safeguarding and supporting learners, both the learner and, if required, the member of staff to whom the disclosure was made can access support from the Lomax's DSL.

4.6 Actions following a Disclosure

After making sure that the learner is safe and then immediately contacting one of the Lomax's DSL

If, at any point, there is a risk of immediate serious harm to a person ring 999. For out of hours referrals contact.

4.7 Upon disclosure of abuse, the DSL will report the matter to Children's Social Care/Adult Services or the police by phone immediately, followed up by written confirmation or email within 48 hours. Where a request for service form or an early help assessment is completed and sent via email to Local Authority social care, staff can expect a response via email within 48 hours.

A written record of the date and time of the report must be made, and the department should include the name and position of the person to whom the matter is reported. The telephone contact must be confirmed in writing using the appropriate Local Authority form within 24 hours.

The DSL should note down the detail of the discussion, including the action to be taken, to inform the parents/carers, depending on the circumstances. The process for keeping the Lomax informed of further action should also be discussed.

4.8 Where there is a safeguarding incident the Education Skills Funding Agency (ESFA) must be made aware, when an institution is itself the subject of an investigation by the local authority or the police. In such circumstances, they require the Managing Director of Lomax (or DSL) to email enquiries.EFA@education.gov.uk.

4.9 All staff are responsible for complying with this policy, reporting incidents and co-operating with any investigations or incidents in line with procedures.

5. Responding to child-on-child abuse

5.1 It is recognised that on occasions the abuse may be from children and young people, in this respect the Lomax has developed a specific response to this abuse (often referred to as child-on-child abuse). Such abuse can happen anywhere both inside and outside of Lomax and face to face or virtually online.

5.2 Child on child abuse is most likely to include, but not limited to:

- Bullying (including cyberbullying, prejudice-based and discriminatory bullying);
- Abuse in intimate personal relationships between children/young people/learners.
- Physical abuse such as hitting, kicking, shaking, biting, hair pulling, or otherwise causing physical harm (this may include an online element which facilitates, threatens and/or encourages physical abuse).
- Sexual violence, such as rape, assault by penetration and sexual assault (this may include an online element which facilitates, threatens and/or encourages sexual violence).
- Sexual harassment, such as sexual comments, remarks, jokes and online sexual harassment, which may be standalone or part of a broader pattern of abuse.
- Causing someone to engage in sexual activity without consent, such as forcing someone to strip, touch themselves sexually, or to engage in sexual activity with a third party.

- Consensual and non-consensual sharing of nude and semi-nude images and/or videos (also known as sexting or youth produced sexual imagery). It is recognised that the sharing of such images of children is illegal and abusive even in the case that such image sharing is consensual.
- Up skirting, which typically involves taking a picture under a person's clothing without their permission, with the intention of viewing their genitals or buttocks to obtain sexual gratification, or cause the victim humiliation, distress, or alarm; and
- Initiation/hazing type violence and rituals (this could include activities involving harassment, abuse or humiliation used as a way of initiating a person into a group and may also include an online element).

5.3 Lomax Training Services Limited adopts a zero-tolerance approach to all kinds of child-on-child abuse. Staff must challenge inappropriate behaviour between children/young people/learners and ensure that unacceptable behaviours are not downplayed or dismissed as 'just banter', 'part of growing up', 'just having a laugh' or 'boys being boys'.

5.4 Lomax Training Services Limited maintains an attitude that 'it could happen here' and has a whole-Lomax approach to developing a culture to recognise and address child on child abuse. Although girls are more likely to be victims and boys' perpetrators, Lomax does not tolerate any child-on-child abuse, and it will be taken seriously. Staff and learners must report all concerns of child-on-child abuse, both online and offline, including those that have happened outside of the Lomax.

5.5 The following procedure provides guidance for staff who receive a disclosure of child-on-child abuse and/or recognise signs of abuse.

- If staff have any concerns about the welfare of a child or adult at risk, they should act on these immediately.
- Reassure the victim that they are being taken seriously, regardless of how long it has taken them to come forward and that they will be supported and kept safe.
- Don't promise confidentiality as it is very likely a concern will have to be shared further
- Listen carefully, reflecting, not asking leading questions and only prompting with open questions.
- Take notes as accurately as possible what was said, use the learner's own words; do not interpret.

5.6 Actions following a Disclosure:

You must make sure the learner is safe and then contact one of the Lomax's Designated Safeguarding Leads immediately and log the report through the Lomax's. Lomax will consider every report of child-on-child abuse on a case-by-case basis and the DSL and/or DDSL will make an immediate risk and needs assessment to respond to the concern and support all learners affected.

The potential actions following a report of child-on-child abuse are:

- Manage internally using the appropriate Lomax procedure.
- Early help.
- Referrals to Local Authority social care team.
- Report to the police.

These actions are explored in more detail at Appendix 3.

The designated member of staff must notify the DSL or DDSL as soon as possible of a serious disclosure or suspicion being raised.

6. Key Safeguarding Information for Learners

6.1 Learners can report safeguarding concerns to any member of staff or directly to one of the Lomax's Designated Safeguarding Leads (DSL), each of whom has the responsibility to act as a source of support and have expertise within the Lomax to support learners to address these concerns.

6.2 The Lomax's tutorial programme strongly promotes key messages relating to all aspects of safeguarding, including online safety, during induction and throughout the academic year.

6.3 The Lomax provides for information on safeguarding to be displayed around the Lomax

7. Radicalisation and Acts of Terrorism

7.1 The Counter Terrorism & Security Act (2015) & The Prevent Duty

Prevent is 1 of the 4 elements of CONTEST, the government's counter- terrorism strategy. It aims to stop people becoming terrorists or supporting terrorism.

The Prevent strategy:

- responds to the ideological challenge we face from terrorism and aspects of extremism, and the threat we face from those who promote these views.
- provides practical help to prevent people from being drawn into terrorism and ensure they are given appropriate advice and support.
- works with a wide range of sectors (including education, criminal justice, faith, charities, online and health) where there are risks of radicalisation that we need to deal with.

The strategy covers all forms of terrorism, including far right extremism and some aspects of non- violent extremism.

The Home Office works with local authorities, a wide range of government departments, and community organisations to deliver the Prevent strategy. The police also play a significant role in Prevent, in much the same way as they do when taking a preventative approach to other crimes. The Home Office uses a range of measures to challenge extremism in the UK, including:

- where necessary, preventing apologists for terrorism and extremism from travelling to this country.
- giving guidance to local authorities and institutions to understand the threat from extremism and the statutory powers available to them to challenge extremist speakers.
- funding a specialist police unit which works to remove online content that breaches terrorist legislation.
- Supporting community-based campaigns and activity which can effectively rebut terrorist and extremist propaganda and offer alternative views to our most vulnerable target audiences - in this context they work with a range of civil society organisations.

• supporting people who are at risk of being drawn into terrorist activity through the Channel process, which involves several agencies working together to give individuals access to services such as health and education, specialist mentoring and diversionary activities.

This Act places a duty on specified authorities including Further and Higher Education, to have due regard to the need to prevent people from being drawn into terrorism (the Prevent Duty). The Lomax is committed to supporting learners at risk (or may be vulnerable) through its

safeguarding policies and procedures and recognises that this can support the Lomax's contribution to the Prevent duty.

7.2 Contact with external services

Where a member of staff has any concerns about the risk of possible or actual radicalisation of an individual, then she/he is required to report that immediately to a Designated Safeguarding Lead (DSL).

The DSL will then refer the concern via CHANNEL, which uses existing collaboration between local authorities, statutory partners, the police, and the local community to identify individuals at risk of being drawn into terrorism, assess the nature and extent of that risk and develop the most appropriate support for the individuals concerned.

8. Dealing with allegations made against/concerns raised in relation to Lomax staff/Manager/Contractor

8.1 Any member of staff who receives an allegation about another member of staff should follow the guidelines for dealing with disclosures (see para 3.3). The primary concern of the Lomax is to ensure the safety of the learners. It is essential that in all cases of suspected abuse by a member of staff, action is taken quickly and professionally.

8.2 The allegation should be reported immediately to the Managing Director or the DSL.

- Obtain written details of the allegation from the person who received it, that are signed and dated. The written details should be countersigned and dated by the DSL.

- Record information about times, dates, locations and names of potential witnesses.

8.3 Initial Assessment by the designated person

The Managing Director should make an initial assessment of the allegation, consulting with the DSL.

An allegation is information which indicates that a person who works with a child, young person or adults at risk has:

- Behaved in a way that has harmed or may have harmed a child/ young person or an adult at risk; and/or

- Possibly committed a criminal offence against or related to a child/young person or an adult at risk; and/or

- Behaved towards a child/young person or an adult at risk in a way that indicates he or she may pose a risk of harm to children/young people/adults and/or

- Behaved towards a child, young person or adults at risk in a way that indicates s/he is unsuitable to work with children, young people or adults at risks (this includes behaviour that may have happened outside of the Lomax, that might make an individual unsuitable to work with children, young people or adults at risk. (This is known as transferrable risk).

It is important that the Managing Director does not investigate. The initial assessment should be on the basis of the information received and is a decision whether or not the allegation warrants further investigation.

In the case of concerns which relate to Managing Director these concern(s) will be held by the DSL.

If the assessment of the allegation is that it requires to be investigated, then an investigation will take place in accordance with the Lomax's disciplinary policy. The Local Authority Designated Officer (LADO) will be advised, and advice sought. They will further be kept fully informed of progress and outcome.

8.4 Initial Response to an allegation

Where the Lomax identify a child/young person or an adult at risk has been harmed, that there may be an immediate risk or of the situation is an emergency, the DSL (or in his/her absence a Deputy DSL) will contact children's/ adult social care and as appropriate the police immediately.

The priority will be twofold:

- Looking after the welfare of the child/ an adult at risk
- Investigating and supporting the person subject to the allegation.

8.5 Enquiries and Investigations

Enquiries by Social Services or the police are not to be confused with internal, disciplinary enquiries by the Lomax. The Lomax may be able to use the outcome of external agency enquiries as part of its own procedures. The child/adult protection agencies, including the police, have no power to direct the Lomax to act in a particular way however, the Lomax should assist the agencies with their enquiries.

The Lomax will instigate its own internal enquiries regardless of any formal police or social services investigations but will ensure that this will not prejudice the investigation. Any internal investigation shall conform to the existing Lomax staff disciplinary procedures.

If there is an investigation by an external agency, for example the police, the DSL should normally be involved in, and contribute to, the inter- agency strategy discussions. The DSL is responsible for ensuring that the Lomax gives every assistance with the agency's enquiries. He/she will ensure that appropriate confidentiality is maintained in connection with the enquiries, in the interests of the member of staff about whom the allegation is made.

The Managing Director will consult with Social Services, the police, or the relevant DSL, particularly in relation to timing and content of the information to be provided, and shall:

- Inform the learner or parent/carer making the allegation that the investigation is taking place and what the likely process will involve.
- Ensure that the parents/carers of the learner making the allegation have been informed verbally and in writing that the allegation has been made and what the likely process will involve.
- Inform the member of staff against whom the allegation was made of the fact that the investigation is taking place and what the likely process will involve.
- Inform the member of staff making the allegation that the investigation is taking place and what the likely process will involve.
- Inform the Managing Director of the allegation and the investigation. A written record of the action taken in connection with the allegation.

8.6 Suspension

Suspension should not be automatic. In respect of staff, suspension can only be carried out by the nominated member of the senior management team.

Suspension may be considered at any stage of the investigation. It is a neutral, not a disciplinary, act and shall be on full pay.

Suspension should only occur for a good reason. For example:

- An allegation(s) or likelihood, of a risk to learners, staff or members of the public.
- An allegation(s) or likelihood of damage or loss of property belonging to learners, members of staff, public or the Lomax.
- An allegation(s) of an offence which might amount to gross misconduct.
- A perception that evidence regarding the allegation(s) may be destroyed

If suspension is being considered, this will be conducted in accordance with the existing Lomax disciplinary procedures.

8.7 External Agency/Third Party / Contracted Services Staff

Where allegations are made against individuals that are not Lomax staff and therefore, we are not the employer, the Lomax will ensure that allegations are dealt with properly; establishing the facts; liaising with the LADO to determine a suitable outcome and ensuring that the agency/third party is involved and cooperates fully.

8.8 Managing Director

Where an allegation is made against the Managing Director, the above-mentioned process will apply.

8.9 Allegations without Foundation

False allegations may be indicative of problems of abuse elsewhere. A record should be kept.

- Inform the member of staff against whom the allegation is made orally and in writing that no further disciplinary or protection action will be taken. Consideration should be given to offering counselling and support in order to rebuild the member of staff's confidence.
- Inform the parents/carers of those involved that the allegation has been made and of the outcome.
- Where the allegation was made by a learner/learner other than the alleged victim, consideration to be given to informing the parents/carers of that learner.
- Prepare a report outlining the allegation and giving reasons for the conclusion that it had no foundation and confirming that the above action had been taken.
- In some circumstances, consider the broader disclosure of details of the outcome of the investigations, for example if the matter is of general importance, has become common knowledge or the subject of general gossip. There is a need to provide accurate details for public information.

8.10 Records

It is important that documents relating to an investigation are retained in a secure place, together with a written record of the outcome and, if disciplinary action is taken, details retained on the member of staff's personal and confidential file. Where the allegation is found to be without foundation, a record of the allegation, investigation and outcome should be retained.

If a member of staff is dismissed or resigns before the disciplinary process is completed, he/she should be informed about the Lomax's statutory duty to notify the Disclosure and Barring Service.

8.11 Low Level Concerns

Occasionally, some concerns may be viewed in isolation as "low-level" concerns, or an allegation may not meet the harm threshold. It is still important that such concerns are reported, and data collected to form a potential pattern/picture.

A low-level concern is any concern that an adult has acted in a way that:

- Is inconsistent with the staff code of conduct, including inappropriate conduct outside of work.
- Does not meet the allegations threshold or is not considered serious enough to refer to the local authority designated officer (LADO).

Examples of low-level concerns could include:

- Being overly friendly with learners.
- Having favourites.
- Taking photographs of learners on their mobile phone (or other devices).
- Using inappropriate sexualised, intimidating, or offensive language.

Low-level concerns must be reported to the DSL or a deputy. If there are concerns about a DSL, these should be reported to the Managing Director. The Lomax seeks to create an environment where staff are encouraged and feel confident to self-refer if they have found themselves in a situation which might be misinterpreted, or they have behaved in a way that falls below professional standards.

The DSL or DDSL will record all low-level concerns. Records should include the details of the concern, how the concern arose, and the actions taken.

Records will be reviewed by the DSL/DDSLS so that patterns of concerning "low-level" behaviour can be recognised and appropriate action can be taken. The Lomax has a detailed policy on addressing low level concerns, which provides for sharing confidentially such concerns, which is clear, easy to understand and implement.

Low-level concerns which are shared about external supply staff and contractors will be notified to their employers so that any potential patterns of inappropriate behaviour can be identified.

9. Training

9.1 The Designated Safeguarding Lead and Deputy Safeguarding Leads, as indicated in this policy, will undertake Designated Safeguarding Lead training, including refresher training every two years.

9.2 All Lomax staff, including supply staff, who work with learners and/or adults at risk, must undertake appropriate training to equip them to carry out their responsibilities effectively. This is kept up to date by mandatory safeguarding training, on a 3-year basis and ensuring they read and understand their obligations under Keeping Children Safe in Education Part 1

annually. In addition, Governors will be required to read and understand their obligations under both Part 1 and Part 2 of KCSIE.

9.3 Safeguarding, including online safety training, is covered at both staff and learner induction.

10. GDPR

This guidance has been updated to reflect the General Data Protection Regulation (GDPR) and Data Protection Act 2018, and it supersedes the HM Government Information sharing: guidance for practitioners and managers published in March 2015.

- Remember that the General Data Protection Regulation (GDPR), Data Protection Act 2018 and human rights law are not barriers to justified information sharing but provide a framework to ensure that personal information about living individuals is shared appropriately.
- Be open and honest with the individual (and/or their family where appropriate) from the outset about why, what, how and with whom information will, or could be shared, and seek their agreement, unless it is unsafe or inappropriate to do so.
- Seek advice from other practitioners, or your information governance lead, if you are in any doubt about sharing the information concerned, without disclosing the identity of the individual where possible.
- Where possible, share information with consent, and where possible, respect the wishes of those who do not consent to having their information shared. Under the GDPR and Data Protection Act 2018 you may share information without consent if, in your judgement, there is a lawful basis to do so, such as where safety may be at risk. You will need to base your judgement on the facts of the case. When you are sharing or requesting personal information from someone, be clear of the basis upon which you are doing so. Where you do not have consent, be mindful that an individual might not expect information to be shared.
- Consider safety and well-being: base your information sharing decisions on considerations of the safety and well-being of the individual and others who may be affected by their actions.
- Necessary, proportionate, relevant, adequate, accurate, timely and secure: ensure that the information you share is necessary for the purpose for which you are sharing it, is shared only with those individuals who need to have it, is accurate and up-to-date, is shared in a timely fashion, and is shared securely (see principles).
- Keep a record of your decision and the reasons for it – whether it is to share information or not. If you decide to share, then record what you have shared, with whom and for what purpose.

11. Safeguarding in Partner Organisations

11.1 Lomax Training Services Limited expects all partner organisations to have the following in place:

- A safeguarding policy including PREVENT or two separate policies which fully complies with the relevant guidance.
- A member of staff who has completed the respective Local Authority Safeguarding Training who can act as named Designated Safeguarding Lead for their organisation.
- A robust procedure for dealing with and recording allegations.

12. Communication

12.1 As part of Lomax Training Services Limited's commitment to safeguarding, sessions and posters are used.

12.3 The DSL/DDSLs will ensure that:

- The policy is reviewed annually.
- The procedures and implementation will be updated and reviewed regularly.
- The policy is publicised, and parents will be made aware of the fact that referrals about suspected abuse or neglect may be made to external parties by the Lomax.
- Staff are aware of safeguarding training opportunities and the latest local policies on safeguarding.

13. Review

The effectiveness of this Policy will be judged annually and reviewed each year in light of experience and best practice.

Appendix 1 Key Definitions

a) Children

Within the context of this policy a 'child' is defined as anyone under the age of 18 (the Children Act 1989, Education Act 2002).

b) Adults at Risk (formerly known as Vulnerable Adults)

It is recognised within this policy that any adult may be vulnerable or become a victim of abuse. Specifically, an 'adult at risk' is defined as any person who is 18 years of age or over and has a reduced capacity to give consent to disclosure of abuse allegations or suspicions. As defined by the Law Commission (1995) the following definitions for the purpose of this policy have been used:

An individual:

- a. is or may be in need of community care services by reason of mental or other disability, age or illness.
- b. is or may be unable to take care of themselves.

c. is unable to protect themselves against significant harm or serious exploitation. Whilst not definitive, the main categories of people covered by the definition of "Adult at risk" for the purpose of this policy include those who;

d. have a learning disability.

e. have a physical or sensory impairment.

f. have a mental illness.

g. are considered vulnerable and who may experience abuse due to problems with alcohol or drugs (or be vulnerable due to other circumstances such as being an asylum seekers.

c) Looked after Children

The Lomax has a separate policy for Looked after Children and is reviewed within the guidelines of this policy and our safeguarding procedures.

d) Preventing Radicalisation and Terrorism (PREVENT)

Prevent is 1 of the 4 elements of CONTEST, the UK Government's counter-terrorism strategy, defined as:

"Stopping people becoming or supporting terrorists or violent extremism. Violent extremism in the name of ideology or belief is defined as violence, incitement to violence, terrorism, incitement to terrorism, or other activities that may result in violent behaviour or terrorist activity in the name of an ideology or a set of beliefs."

An integral element of the Lomax's Safeguarding ethos is encouraging learners to respect the Fundamental British Values of:

a. democracy;

b. the rule of law;

c. individual liberty and mutual respect;

d. tolerance of those with different faiths and beliefs.

The Lomax works with the Local Authority and partners, including our Regional Prevent Lead to ensure that we are kept informed of any potential risks to our locality and to ensure that our staff and learners have the most up to date information that is available.

e) Contextual Safeguarding

Safeguarding incidents and/or behaviours can be associated with factors outside the Lomax and/or can occur between children/young people/learners outside the Lomax. All staff, but especially the Designated Safeguarding Lead (or Deputy) should be considering the context within which such incidents and/or behaviours occur.

This is known as contextual safeguarding, which simply means assessments of children, young people or adults at risk should consider whether wider environmental factors are present in a learner's life that are a threat to their safety and/or welfare.

These threats can take a variety of different forms and children, young people or adults at risk can be exposed to multiple threats, including: exploitation by criminal gangs and organised crime groups such as county lines; trafficking, online abuse; sexual exploitation and the influences of extremism leading to radicalisation.

f) Learners who are lesbian, gay, bi, or trans (LGBT)

The fact that a child or a young person may be LGBT is not in itself inherent.

risk factor for harm. However, children/young people who are LGBT can be targeted by other children/young people. In some cases, a child/young person who is perceived by other children/young people to be LGBT (whether they are or not) can be just as vulnerable as children/young people who identify as LGBT.

These risks can be compounded where children/young people who are LGBT lack a trusted adult with whom they can be open. Lomax staff will seek to reduce the additional barriers faced and provide a safe space for LGBT learners to speak out or share their concerns with members of staff.

h) Early Help

Early help is providing support as soon as a problem emerges, at any point in a child's life, from the foundation years through to the teenage years. Early help can also prevent further problems arising; for example, if it is provided as part of a support plan where a child has returned home to their family from care, or in families where there are emerging parental mental health issues or drug and alcohol misuse.

Appendix 2

Indicators of abuse, neglect and specific safeguarding issues

In respect of this policy, the Lomax recognises the following as definitions of abuse, neglect and specific safeguarding issues:

- **Physical abuse:** a form of abuse which may involve hitting, shaking, throwing, poisoning, burning or scalding, drowning, suffocating or otherwise causing physical harm to a child/young person or an adult at risk. Physical harm may also be caused when a parent or carer fabricates the symptoms of, or deliberately induces, illness in a child, young person, or an adult at risk.
- **Emotional abuse:** the persistent emotional maltreatment of a child or an adult at risk such as to cause severe and adverse effects on the child's, young person's, or an adult at risk emotional development
- **Sexual abuse:** involves forcing or enticing a child, young person, or an adult at risk to take part in sexual activities, not necessarily involving violence, whether or not the individual is aware of what is happening. The activities may involve physical contact, including assault by penetration (for example rape or oral sex) or non-penetrative acts such as masturbation, kissing, rubbing, and touching outside of clothing. They may also include non-contact activities, such as involving a child/young person/adult at risk in looking at, or in the production of, sexual images, watching sexual activities, encouraging the child/young person/adult at risk to behave in sexually inappropriate ways, or grooming a child/young person/adult at risk in preparation for abuse.
- **Neglect:** the persistent failure to meet a child/young person/adult at risk basic physical and/or psychological needs, likely to result in the serious impairment of the child/young person/adult at risk health or development

• **Child Criminal Exploitation (CCE)** and Child Sexual Exploitation (CSE)

Both CSE and CCE are forms of abuse that occur where an individual or group takes advantage of an imbalance in power to coerce, manipulate or deceive a child/young person into taking part in sexual or criminal activity, in exchange for something the victim needs or wants, and/or for the financial advantage or increased status of the perpetrator or facilitator and/or through violence or the threat of violence. CSE and CCE can affect children, young people or adults at risk, both male and female and can include children/young people/ adults at risk who have been moved (commonly referred to as trafficking) for the purpose of exploitation.

Child Criminal Exploitation (CCE)

Some specific forms of CCE can include children/young people being forced or manipulated into transporting drugs or money through county lines, working in cannabis factories, shoplifting or pickpocketing. They can also be forced or manipulated into committing vehicle crime or threatening/committing serious violence to others.

Children/young people can become trapped by this type of exploitation as perpetrators can threaten victims (and their families) with violence or entrap and coerce them into debt. They may be coerced into carrying weapons such as knives or begin to carry a knife for a sense of protection from harm from others.

As children/young people involved in criminal exploitation often commit crimes themselves, their vulnerability as victims is not always recognised by adults and professionals and they are not treated as victims despite the harm they have experienced. They may still have been criminally exploited even if the activity appears to be something they have agreed or consented to.

It is important to note that the experience of girls who are criminally exploited can be very different to that of boys. The indicators may not be the same, however professionals should be aware that girls are at risk of criminal exploitation too. It is also important to note that both boys and girls being criminally exploited may be at higher risk of sexual exploitation.

Although, the generally accepted terminology refers to "child" exploitation the Lomax will extend similar consideration to adult(s) at risk. Indicators of such behaviour are detailed on the Lomax Safeguarding Portal.

• **Child Sexual Exploitation (CSE)**

Child Sexual Exploitation involves a victim being targeted and groomed by adults, with the intention of sexually assaulting and/or raping them. The children/young people are targeted because they are vulnerable, due to their age.

Grooming can take place in many forms - e.g. online via social media, via mobile phones, or in person. The child/young person will not always realise that (s)he is being groomed. Often the grooming starts with friendship or a relationship, where the offender may supply gifts such as clothes, money, mobile phones, which may progress to the supply of alcohol and drugs. Further information on grooming is detailed on the Lomax Safeguarding Portal.

The offenders are very organised and deliberate in their actions, in some cases working together within a group. They are predatory sex offenders, targeting specifically vulnerable children/young person.

Sometimes the children/young people are given lifts and transported around. The offender will usually encourage the child/young person to distance themselves further from their usual family and friends. Soon into this friendship/relationship, sexual assaults and rapes may occur upon the child.

Although, the generally accepted terminology refers to “child” exploitation the Lomax will extend similar consideration to adult(s) at risk Indicators of such behaviour are detailed on the Lomax Safeguarding Portal.

• **Female Genital Mutilation (FGM)**

Whilst all staff should speak to the designated safeguarding lead (or deputy) with regard to any concerns about female genital mutilation (FGM), there is a specific legal duty on teachers. If a teacher, in the course of their work in the profession, discovers that an act of FGM appears to have been carried out on a girl under the age of 18, the teacher must report this to the police.

• **Mental Health**

All staff should be aware that mental health problems can, in some cases, be an indicator that a child/young person/adult at risk has suffered or is at risk of suffering abuse, neglect or exploitation. The Lomax has a Mental Health Strategy for staff and a separate one for learners both can be accessed on the Lomax internet.

• **Serious Violence**

There are indicators, which may signal that children/young people/adults at risk are at risk from or involved with serious violent crime. These may include increased absence from school, a change in friendships or relationships with older individuals or groups, a significant decline in performance, signs of self-harm or a significant change in wellbeing, or signs of assault or unexplained injuries. Unexplained gifts or new possessions could also indicate that children/young people/ adults at risk have been approached by, or are involved with, individuals associated with criminal networks or gangs and may be at risk of criminal exploitation.

Recent guidance suggests that risk factors that might increase the likelihood of involvement in serious violence are:

- being male.
- having frequent absences or permanently excluded from provision.
- having experienced maltreatment in early life.
- having been involved in offending, such as theft or robbery.

• **County Lines**

County lines is a term used to describe gangs and organised criminal networks involved in exporting illegal drugs using dedicated mobile phone lines or other form of “deal line”. This activity can happen locally as well as across the UK - no specified distance of travel is required. Children, young people and adults at risk are exploited to move, store and sell drugs and money. Offenders will often use coercion, intimidation, violence (including sexual violence) and weapons to ensure compliance of victims. Children/young people/adults at risk can be

targeted and recruited into county lines in a number of locations including schools (mainstream and special), further and higher educational institutions, pupil referral units, children's homes and care homes.

• **Domestic Abuse**

The Domestic Abuse Act 2021 received Royal Assent on 29 April 2021. The Act introduces the first ever statutory definition of domestic abuse and recognises the impact of domestic abuse on children/ young people/adults at risk, as victims in their own right, if they see, hear or experience the effects of abuse.

Domestic abuse can encompass a wide range of behaviours and may be a single incident or a pattern of incidents. That abuse can be, but is not limited to, psychological, physical, sexual, financial or emotional. Children, young people and adults at risk can be victims of domestic abuse. They may see, hear, or experience the effects of abuse at home and/or suffer domestic abuse in their own intimate relationships (teenage relationship abuse). All of which can have a detrimental and long-term impact on their health, well-being, development, and ability to learn.

• **Modern Slavery**

Modern slavery encompasses human trafficking and slavery, servitude and forced or compulsory labour. Exploitation can take many forms, including sexual exploitation, forced labour, slavery, servitude, forced criminality and the removal of organs.

• **Cybercrime**

Cybercrime is criminal activity committed using computers and/or the internet. It is broadly categorised as either 'cyber-enabled' (crimes that can happen off-line but are enabled at scale and at speed on-line) or 'cyber dependent' (crimes that can be committed only by using a computer).

• **Homelessness**

Being homeless or being at risk of becoming homeless presents a real risk to a child's/ an adult at risk welfare. The designated safeguarding lead (and any deputies) should be aware of contact details and referral routes into the Local Housing Authority so they can raise/progress concerns at the earliest opportunity.

• **Forced Marriage**

Forcing a person into a marriage is a crime in England and Wales. A forced marriage is one entered into without the full and free consent of one or both parties and where violence, threats or any other form of coercion is used to cause a person to enter into a marriage. Threats can be physical or emotional and psychological.

• **Extremism**

Is the vocal or active opposition to our fundamental values, including democracy, the rule of law, individual liberty and the mutual respect and tolerance of different faiths and beliefs. This also includes calling for the death of members of the armed forces.

- **Radicalisation**

Refers to the process by which a person comes to support terrorism and extremist ideologies associated with terrorist groups.

- **Terrorism**

Is an action that endangers or causes serious violence to a person/people; causes serious damage to property; or seriously interferes or disrupts an electronic system. The use or threat must be designed to influence the government or to intimidate the public and is made for the purpose of advancing a political, religious or ideological cause.

- **Sexual violence and sexual harassment**

Sexual violence and sexual harassment can occur between two or more individuals at any point of their lives. It can occur also through a group of children/young people/adults sexually assaulting or sexually harassing a single child/young person/adult or group of children/young people/adults.

Sexual violence and sexual harassment exist on a continuum and may overlap; they can occur online and face-to-face (both physically and verbally). At Lomax Training Services Limited there is a zero-tolerance approach to sexual violence and sexual harassment. It will not be passed off as “banter”, “just having a laugh”, “a part of growing up” or “boys being boys”.

Staff will recognise that learners who are victims of sexual violence and sexual harassment wherever it happens, may find the experience stressful and distressing, and may adversely affect their educational attainment and will be exacerbated if the alleged perpetrator(s) attends the same school or Lomax.

Occasionally this abuse may result in intra familial harms and the Lomax working with appropriate authorities will ensure that any necessary support for siblings is provided/sourced following such incidents.

All staff working with learners at the Lomax will always maintain an attitude of ‘it could happen here’. Any report of sexual violence or sexual harassment will be taken seriously, staff should be aware it is more likely that girls will be the victims of sexual violence and sexual harassment and more likely it will be perpetrated by boys. Children/young people/adults with special educational needs and disabilities (SEND) are also three times more likely to be abused than their peers.

Ultimately, it is essential that all victims are reassured that they are being taken seriously and that they will be supported and kept safe. The assurance will extend to relaying to the child/young/adult the importance of ensuring that they understand the law on abuse is there to protect them rather than criminalise them.

- **Child on child Abuse**

Young people can abuse other young people. This is generally referred to as child-on-child abuse and can take many forms and it can happen both inside and outside of Lomax and online. This can include (but is not limited to):

- **bullying** (including cyberbullying, prejudice-based and discriminatory abuse in intimate personal relationships between children/young people/learners.

- **physical abuse** such as hitting, kicking, shaking, biting, hair pulling, or otherwise causing physical harm (this may include an online element which facilitates, threatens and/or encourages physical abuse).

- **sexual violence**

Such as rape, assault by penetration and sexual assault;(this may include an online element which facilitates, threatens and/or encourages sexual violence).

It is essential that inappropriate behaviours between children/young people/learners is challenged, downplaying certain behaviours, for example dismissing sexual harassment as “just banter”, “just having a laugh”, “part of growing up” or “boys being boys” can lead to a culture of acceptance of unacceptable behaviour - inappropriate behaviour must be challenged.

- **Online Safety**

Online Safety – In simple terms, online safety refers to the act of staying safe online. It is also commonly known as internet safety, e-safety and cyber safety. It encompasses all technological devices which have access to the internet from PCs and laptops to smartphones and tablets. Being safe online means individuals are protecting themselves and others from online harms and risks which may jeopardise their personal information, lead to unsafe communications or even effect their mental health and wellbeing.

Learners are more engaged online than they’ve ever been in online activities. Ownership of smart devices is increasing and the range of content they are viewing is expanding. In an ever-changing world, ensuring learners’ safety online has never been more important and where a learner needs to engage in remote learning the Lomax will speak with parents/carers/learners to reinforce the importance of children/young people being safe online and what systems Lomax use to filter and monitor online use.

The Lomax may also use online approaches to deliver training or support. Staff will be aware of the signs and signals of cyberbullying and other risks online and apply the same child-centred safeguarding practices as when learners are learning at the Lomax.

The Lomax continues to ensure appropriate filters and monitors are in place. The Lomax has taken on board the guidance from the UK Safer Internet Centre on safe remote learning and guidance for safer working practice from the Safer Recruitment Consortium. The Lomax provide specific guidance on on-line safety on it Safeguarding Portal.

- **Children Missing in Education**

Children missing in education is often an indicator for other potential safeguarding concerns. The Lomax has measures, though its attendance reporting and follow up procedures, to ensure it is following up on learners, who could potentially be “missing in education” – need to look at attendance policy.

- **Upskirting**

The Voyeurism (Offences) Act 2019, which is commonly known as the Upskirting Act, came into force on 12 April 2019. ‘Upskirting’ is where someone takes a picture under a person’s clothing (not necessarily a skirt) without their permission and or knowledge, with the intention of viewing their genitals or buttocks (with or without underwear) to obtain sexual gratification, or cause the victim humiliation, distress, or alarm. It is a criminal offence.

Anyone of any sex, can be a victim.

Appendix 3

Actions following a disclosure (child on child abuse)

- **Manage Internally** – In some cases of child on child abuse, for example, one-off incidents, the Lomax may take the view that the children/ young people/adults at risk concerned are not in need of early help or that referrals need to be made to statutory services, and that it would be appropriate to handle the incident internally, through utilising their behaviour policy and by providing pastoral support.

- **Early Help** – The Lomax may decide that the children/ young people/ adults at risk involved do not require referral to statutory services but may benefit from early help. Early help means providing support as soon as a problem emerges, at any point in a learner's life. Providing early help is more effective in promoting the welfare of children/ young people/adults at risk than reacting later.

- **Referrals to children's (or adult) social care** - Where a learner has been harmed, is at risk of harm, or is in immediate danger, the Lomax will make a referral to local children's (or adult) social care. At the point of referral to children's (or adult) social care, the Lomax will generally inform parents or carers, unless there are compelling reasons not to (if informing a parent or carer is going to put the child/ an adult at risk at additional risk).

Any such decision should be made with the support of children's (or adult) social care. If a referral is made, children/adult social care will then make enquiries to determine whether any of the learners at risk involved are in need of protection or other services.

- **Where statutory assessments are appropriate**, the Lomax (especially the designated safeguarding lead or a deputy) will work alongside, and cooperate with, the relevant lead social worker. The Lomax will be mindful that early information sharing is vital for the effective identification, assessment, and allocation of appropriate service provision, whether this is when problems first emerge, or where a learner is already known to local authority children's/adult social care (such as a child in need, a child with a protection plan, Look after Children).

- **Providing Safeguarding Services to Children, Young People, Parents and Carers** supports staff who must make decisions about sharing information. For further information see:

<https://www.gov.uk/government/publications/safeguarding-practitioners-information-sharing-advice>

Considerations with regard to the Data Protection Act 2018 (DPA) and UK General Data Protection Regulation (UK GDPR). DPA and UK GDPR do not prevent the

sharing of information for the purposes of keeping learners at risk safe and promoting their welfare. Fears about sharing information will not be allowed to stand in the way of the need to safeguard and promote the welfare of children/young people/ adults at risk. The Lomax recognises that Collaborative working will help ensure the best possible package of coordinated support is implemented for the victim and, where appropriate, the alleged perpetrator(s) and any other learner at risk that requires support.

- **Reporting to the Police** - Any report to the police will generally be in parallel with a referral to children's/ adult social care (as above). Where a report has been made to the police, the Lomax will consult the police and agree what information can be disclosed to staff and others,

in particular, the alleged perpetrator(s) and their parents or carers. The Lomax will also discuss the best way to protect the victim and their anonymity. In some cases, it may become clear very quickly that the police (for whatever reason) will not take further action. In such circumstances, the Lomax continue to engage with specialist support for the victim and alleged perpetrator(s) as required

Signed



Colin Arkley
Quality Manager

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