Safeguarding Vulnerable Adults

Policy Review Record

This Revision Number and Effectiveness Date	Issue 10 Dated December 2025
Department(s)	Safeguarding and HR
Policy Author and Owner	Megan Ince
Date of Last Review	December 2025
Next Review Date	December 2026
This Version is Reviewed and Issued by	Harvey Parsons
Signature	
Position within GLP	Chief Quality Officer

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GLP TRAINING

1. Introduction

GLP Training recognises its statutory and moral duty to safeguard the welfare of all learners, including children (under 18 years) and adults at risk, across all of its learning programmes, inclusive of apprenticeships, commercial training, Skills Bootcamps, and SWAPs.

Safeguarding and promoting the welfare of learners is everyone's responsibility: all staff, employers, volunteers, and partners must ensure that learners are protected from abuse, neglect, exploitation, radicalisation, and other forms of harm.

The policy complies with Keeping Children Safe in Education (KCSIE) 2025, Working Together to Safeguard Children 2023, the Care Act 2014, and all associated legislation and government guidance.

2. Purpose and Commitment

GLP Training is committed to safeguarding and promoting the welfare of all learners, staff, volunteers, visitors, contractors, and partners. Throughout this policy:

- References to "child," "young person," or "learner" apply to all individuals under 18 years of age
- References to "adult at risk" apply to individuals aged 18 or over who may require community services and/or are unable to protect themselves from significant harm or exploitation

We have developed procedures aligned with guidance from the Department for Education, safeguarding partnerships, and relevant regulatory bodies. GLP Training works with local authority safeguarding partnership's to operate within their local arrangements.

Vulnerability is not a fixed state and GLP Training recognises that individuals may move in and out of vulnerability at different times in their lives due to changing personal, social, or environmental circumstances. As an organisation we are committed to maintaining an inclusive and responsive safeguarding approach that recognises and supports individuals during periods of increased vulnerability.

While overall safeguarding responsibility rests with the Chief Executive Officer, GLP Training has appointed a Designated Safeguarding Lead (DSL), Deputy Designated Safeguarding Leads (DDSL's), and Designated Safeguarding Officers (DSO's) responsible for ensuring policy compliance. Their roles, responsibilities, and contact details are detailed in Section 5.

3. Scope

This policy applies to:

- All learners, particularly children, young people, and adults requiring support
- All staff members, volunteers, and partners
- Families and visitors to our centres
- External facilities and workplace settings
- Distance learning environments

- Partner organisations and contractors who may be working on-site.

To ensure protection from abuse, all complaints, allegations, or suspicions will be taken seriously and managed according to the procedures outlined herein.

GLP Training has integrated child protection into our comprehensive safeguarding approach, and the term "safeguarding" encompasses child protection across all policies and procedures.

4. Legal and Regulatory Framework

4.1 Education Act 2002 (Sections 157 & 175) Last updated: 2002, with amendments in 2006

Requires local authorities and further education governing bodies to ensure their functions safeguard and promote the welfare of children, young people, and adults at risk, having regard to Secretary of State guidance.

4.2 Keeping Children Safe in Education (KCSIE) 2025. Last updated: September 2025

Sets out statutory safeguarding responsibilities for schools and colleges. The September 2025 version came into force on 1 September 2025, replacing previous versions. The changes this year are mainly technical in nature, including updated links and resources.

Key areas covered include:

- Relevant legislation and responsibilities
- Governing body and leadership duties
- Safer recruitment practices
- Vetting and DBS checks
- Managing allegations against staff
- Thematic safeguarding topics

Key Updates in KCSIE 2025:

- Updated definition of 'safeguarding and promoting the welfare of children' in line with Working Together to Safeguard Children 2023.
- Additional information around when children may require early help, in accordance with Working Together guidance.
- Clarification that schools continue to be responsible for the safeguarding of pupils they place with an alternative provision provider.
- Clarification that being absent, as well as missing, from education can be a warning sign of safeguarding concerns including sexual abuse, sexual exploitation or child criminal exploitation.
- Changes to the list of content risks under online safety, adding disinformation, misinformation and conspiracy theories.
- More information on DfE guidance on generative artificial intelligence (AI).
- Virtual school heads now expected to promote educational outcomes for looked-after children, those with a social worker, and those in kinship care.

- Term "autism spectrum disorder" replaced with "autism", aligning with current SEND guidance.

Thematic Topics Covered:

- Female Genital Mutilation (FGM)
- Child Sexual Exploitation (CSE)
- County Lines exploitation
- Forced Marriage
- Honour-Based Abuse (HBA)
- Serious violence
- Domestic abuse
- Mental health concerns
- Online safety (including at home)
- Transferable risk in allegations

4.3 Working Together to Safeguard Children (2023). Last updated: December 2023, with minor amendments in June 2025

Provides statutory guidance on inter-agency cooperation to safeguard children. The 2023 edition replaces Working Together to Safeguard Children 2018.

Key areas covered include:

- Safeguarding Children Partnership frameworks
- Allegation management processes
- Coordinated early help services
- Inter-agency child protection plans
- Section 17 and Section 47 assessments

2023 Updates Include:

- Principles for building positive relationships with parents and carers
- Multi-agency working expectations across all roles
- National multi-agency child protection standards
- Actions and behaviours for improved practice and outcomes
- Enhanced focus on help and protection for children, including a new chapter on 'A Shared Responsibility'.

4.4 Safeguarding Vulnerable Groups Act 2006. Last updated: 2006, with amendments in 2012

Established the Disclosure and Barring Service (DBS) to help employers make safer recruitment decisions and prevent unsuitable individuals from working with vulnerable groups.

4.5 Protection of Freedoms Act 2012 (Part 5). Last updated: 2012

Covers:

- Reduced scope of regulated activity definitions

- DBS service provisions
- Disregarding convictions for consensual same-sex activity

4.6 Children Act 2004. Last updated: 2004, with amendments in 2017

Extends the Children Act 1989, emphasising that all individuals and organisations working with children share responsibility for safeguarding and promoting their welfare.

4.7 Mental Capacity Act 2005. Last updated: 2005, with amendments in 2019

Provides a framework for decision-making support for individuals who may need assistance. The Act:

- Applies fully to those aged 18 and over
- Applies to 16-17 year-olds except regarding Powers of Attorney and Wills
- Applies to under-16s only in limited circumstances determined by courts

4.8 Marriage and Civil Partnership (Minimum Age) Act 2022. Last updated: came into force February 27 2023

Prohibits 16-17 year-olds from marrying or entering civil partnerships, even with parental consent.

4.9 Counter-Terrorism and Security Act 2015 - The Prevent Duty. Last updated: Act 2015, with revised statutory guidance December 2023

Places a statutory duty on specified authorities, including training providers, to prevent individuals from being drawn into terrorism. The revised Prevent duty guidance for England and Wales was issued on 7 September 2023 and came into force on 31 December 2023, replacing the 2015 guidance.

The Prevent strategy:

- Addresses ideological challenges of terrorism and broader radicalising influences, including 'Reducing Permissive Environments' as a key theme
- Provides practical support to prevent radicalisation
- Works across multiple sectors (education, criminal justice, faith organisations, online platforms, healthcare)
- Covers all terrorism forms, including far-right extremism and Islamist extremism
- Operates through Channel panels for at-risk individual

5. Roles and Responsibilities

5.1 The Designated Senior Person (Chief Executive Officer- CEO)

The CEO ensures that GLP Training:

- Raises awareness of safeguarding issues and promotes welfare
- Provides a safe environment for all individuals
- Identifies those suffering or at risk of significant harm and takes appropriate action

- Has procedures for reporting and managing allegations against staff and volunteers
- Operates safe recruitment procedures
- Designates appropriately trained staff with authority for safeguarding leadership
- Addresses weaknesses and implements improvements promptly
- Ensures all staff receive appropriate, regularly updated safeguarding training
- Reports on safeguarding at a senior leadership and governance level

5.2 Designated Safeguarding Lead (DSL)

The DSL is responsible for:

- Overseeing referrals of suspected abuse or allegations
- Providing advice and support to staff on safeguarding matters
- Maintaining proper records of safeguarding referrals, complaints, and concerns
- Ensuring aware of safeguarding policies
- Liaising with external agencies as necessary
- Coordinating with schools, employers, and placement providers regarding safeguarding arrangements, as applicable.
- Ensuring all staff receive safeguarding training
- Providing quarterly reports to the Safeguarding and Risk Committee and Senior Leadership Team.
- Reporting procedural flaws immediately to the Safeguarding and Risk Committee and Senior Leadership Team.
- Maintaining rigorous documentation in accordance with Data Protection Act 2018 (GDPR)
- Attending case conferences and review meetings as appropriate
- Receiving appropriate safeguarding training, with refresher training at least every two years

In the DSL's absence, one of GLP Training's 3 Deputy DSL's will assume these responsibilities.

5.3 Deputy Designated Safeguarding Leads (DDSLs)

The Deputy DSLs support the Designated Safeguarding Lead in carrying out their statutory duties and ensure continuity of safeguarding practice in the DSL's absence. Their responsibilities include:

- Acting as the first point of contact for safeguarding concerns when the DSL is unavailable
- Assisting with the management and oversight of safeguarding referrals and record keeping
- Supporting staff in recognising, recording, and reporting safeguarding concerns
- Contributing to safeguarding audits, case reviews, and reports to both the Safeguarding and Risk Committee and Senior Leadership Team.
- Ensuring the implementation of GLP Training's safeguarding policies and procedures across all departments and delivery settings
- Participating in regular supervision and ongoing safeguarding training to remain up to date with current legislation and best practice.

5.4 Designated Safeguarding Officers (DSOs)

Designated Safeguarding Officers operate within specific departments or delivery areas and act as local safeguarding points of contact. They work under the direction of the DSL and DDSLs to promote a safe learning and working environment. Their responsibilities include:

- Receiving and recording safeguarding concerns raised by staff, learners, or employers
- Providing immediate advice and support to colleagues on safeguarding matters
- Ensuring timely escalation of safeguarding issues to the DSL or DDSL
- Maintaining accurate, confidential records of all safeguarding incidents in line with the Data Protection Act 2018 (GDPR)
- Supporting the implementation of safeguarding training and awareness-raising initiatives
- Monitoring safeguarding arrangements during training, site visits, and off-site activities
- Promoting a culture of vigilance and safeguarding throughout the organisation

All Deputy DSLs and DSOs are required to complete accredited safeguarding training at Level 3 and undertake refresher training at least every two years, ensuring compliance with current UK safeguarding legislation and statutory guidance.

5.5 All Staff Members

The CEO, Senior Management Team, Safeguarding and Risk Committee, and all staff will:

- Receive training on safeguarding issues, policy, and procedures
- Receive refresher training at least every two years
- Understand that sexual violence and harassment is unacceptable and will never be tolerated
- Challenge behaviours that may be criminal in nature (grabbing, inappropriate touching, up-skirting as per KCSIE 2025)
- Recognise that dismissing such behaviours as "banter" or "part of growing up" or "becoming a part of the team" normalises them.

6. Definitions and Key Concepts

6.1 Child

A "child" is anyone under 18 years of age (Children Act 1989, Education Act 2002). This includes learners aged 14-16 from local schools accessing our provision, should this arise as a part of GLP Training's operations.

6.2 Adult at Risk

An "adult at risk" is any person aged 18 or over who:

- Requires or may require community care services due to mental or physical disability, age, or illness

- Is or may be unable to care for themselves
- Is unable to protect themselves against significant harm or serious exploitation

This includes individuals who:

- Have learning disabilities
- Have physical or sensory impairments
- Have mental illness, including dementia
- Are elderly and frail
- Are detained in custody or under probation orders
- Experience vulnerability due to substance misuse
- Face vulnerability as asylum seekers or refugees

GLP Training also recognises that individuals experiencing vulnerability due to socioeconomic deprivation may face increased safeguarding risks. For the purposes of promoting safeguarding and inclusion, such individuals may also be considered within GLP Training's definition of an adult at risk.

6.3 Children in Need of Protection and Early Help

Some children require intervention because they are suffering or likely to suffer "significant harm." Local authorities have a duty under the Children Act 1989 to investigate and determine appropriate action, including early help team involvement to identify family needs.

6.4 Children in Need

Children defined as "in need" under Section 17 of the Children Act 1989 are those whose vulnerability means they are unlikely to achieve or maintain satisfactory health or development without service provision. Children with disabilities are automatically considered children in need.

6.5 Looked After Children

Most looked-after children enter care due to abuse and/or neglect. will ensure staff have appropriate skills, knowledge, and understanding to keep looked-after children safe. Appropriate staff will have information regarding:

- Legal status (voluntary arrangements or care orders)
- Contact arrangements with birth parents or those with parental responsibility
- Care arrangements and levels of authority delegated to carers
- Social worker details and virtual school head contact information

6.6 Significant Harm

"Significant harm" is the threshold justifying compulsory intervention into family life (Section 47, Children Act 1989). It gives local authorities the duty to investigate whether action is needed to safeguard or promote a child's welfare. Police have emergency powers to protect children from significant harm.

6.7 Abuse

"Abuse" refers to mistreatment of human and civil rights by any person(s), consisting of single or repeated acts. Abuse may be deliberate or result from negligence, ignorance, or lack of training and understanding. It involves inflicting harm or failing to prevent harm.

7. Recognising Abuse and Harmful Behaviours

Abuse and harmful behaviours are categorised as follows:

7.1 Physical Abuse

Involves hitting, slapping, pushing, kicking, shaking, throwing, poisoning, burning, scalding, drowning, suffocating, medication misuse, inappropriate physical sanctions, or otherwise causing physical harm, including fabricating symptoms or deliberately inducing illness.

7.2 Emotional/Psychological Abuse

Persistent emotional ill-treatment causing severe and persistent adverse effects on emotional development. This includes:

- Age or developmentally inappropriate expectations
- Inducing fear, exploitation, or corruption
- Interactions beyond developmental capability
- Overprotection limiting exploration and learning
- Preventing normal social interaction
- Witnessing ill-treatment of others
- Conveying worthlessness or lack of value
- Threats, humiliation, blaming, intimidation, coercion
- Harassment, verbal abuse, bullying (including cyberbullying)
- Preventing access to services or support

Some emotional abuse is present in all maltreatment types, though it may occur independently.

7.3 Sexual Abuse

Includes rape, sexual assault, or sexual acts through force, enticement, or pressure where valid consent was impossible. Activities may involve:

- Physical contact (penetrative or non-penetrative acts)
- Non-contact activities (involving children in viewing or producing pornographic material, watching sexual activities, encouraging sexually inappropriate behaviour, online grooming)

Sexual abuse is not solely perpetrated by adult males; women and other children can also commit such acts.

7.4 Neglect or Acts of Omission

Persistent failure to meet basic physical and/or psycho-social needs, likely to seriously impair health or development. This includes:

- Failing to provide adequate food, shelter, clothing
- Failing to provide educational services
- Neglecting or being unresponsive to basic emotional needs

7.5 Financial or Material Abuse

Includes theft, fraud, exploitation, and pressure regarding money or possessions, such as:

- Loss of jewellery or personal property
- Loss of money from wallets or purses

7.6 Discriminatory Abuse

Abuse, bullying, and harassment based on age, sex, disability, religion, race, or sexual orientation.

7.7 Specific Safeguarding Issues

Abuse of Trust

Under the Sexual Offenders Act 2003, it is an offence for someone over 18 to have a sexual relationship with someone under 18 when in a position of trust, even if consensual. This includes teaching and support staff roles.

Radicalisation

The process by which individuals come to support terrorism and forms of extremism leading to terrorism (Prevent Strategy- See Prevent policy and action plan).

Online Abuse

Any abuse occurring online, through social networks, gaming, or mobile devices. (See Online Safety section and related policy.)

Child Sexual Exploitation (CSE)

Abuse where children are sexually exploited for money, power, or status.

Female Genital Mutilation (FGM)

Total or partial removal of external female genitalia for non-medical reasons.

Domestic Abuse

Witnessing domestic abuse constitutes child abuse. Teenagers can also suffer domestic abuse in their own relationships.

Child/ Human Trafficking

Recruitment, movement, or transportation of children followed by exploitation, forced work, or sale.

Harmful Sexual Behaviour

Developing sexual behaviours that harm themselves or others.

Serious Violent Crime

All staff should recognise indicators that children, young people and adults may be at risk from or involved with serious violent crime, including:

- Increased absence
- Changes in friendships or relationships with older individuals/groups
- Significant performance decline
- Signs of self-harm or wellbeing changes
- Signs of assault or unexplained injuries
- Unexplained gifts or possessions

These may indicate involvement with criminal networks or gangs. Staff should be aware of associated risks and management measures, consulting Home Office guidance on *Preventing Youth Violence and Gang Involvement* and *Criminal Exploitation of Children and Vulnerable Adults: County Lines*.

Although some of the above definitions refer specifically to children, GLP Training recognises that vulnerable young people and adults may also be affected by these forms of abuse. Therefore, the safeguarding principles outlined in this policy apply universally to all learners and individuals associated with GLP Training.

8. Radicalisation and Extremism

GLP Training is committed to supporting vulnerable learners through safeguarding policies and procedures, contributing to the Prevent duty.

The Prevent strategy addresses terrorism and extremism through:

- Responding to ideological challenges
- Providing practical help to prevent radicalisation
- Working across education, criminal justice, faith, charity, online, and health sectors
- Covering all terrorism forms, including far-right extremism

Home Office measures include:

- Preventing extremist apologists from entering the UK
- Providing guidance to institutions on challenging extremist speakers
- Funding specialist police units to remove illegal online content
- Supporting community campaigns countering extremist propaganda
- Supporting at-risk individuals through the Channel process with multi-agency services

Please refer to GLP Training's Prevent policy and action plan for full details.

9. Safeguarding Procedures

9.1 Dealing with Concerns and Disclosures

9.1.1 Significant Concerns

If a staff member has concerns about a learner but does not believe immediate harm is occurring, they should:

- Speak with the learner/person about concerns
- Consult a Designated Safeguarding Lead who will advise whether to register the concern

If a person is believed to be at immediate risk of harm then the Police and appropriate emergency services should be contacted immediately and the DSO contacted as soon as reasonably possible thereafter.

9.1.2 Disclosure of Abuse

If abuse is disclosed or suspected, staff should:

- Listen carefully and remain calm
- Ask clarifying questions without pressure
- Reassure the individual they have done the right thing
- Explain that information must be shared with those who need to know
- Identify who will receive the information
- Note main points carefully, including what was said/done and questions asked
- Record date, time, and place
- Complete a Safeguarding Report Form

Staff Must Not:

- Ask leading questions or suggest answers
- Investigate concerns/allegations independently
- Promise confidentiality

9.1.3 Reporting to Designated Staff

Staff should report concerns, suspicions, or disclosures immediately to the DSL. If unavailable, report to the Deputy DSL.

9.1.4 Reporting to the DSL

The DSL must notify the CEO as soon as possible, always within 24 hours of a serious disclosure or suspicion.

9.1.5 Contact with External Services

The DSL (DDSL in DSL absence) or CEO must report matters to children's social care, adult services, or police immediately by phone, followed by written confirmation within 48 hours. When completing request for service forms or early help assessments sent to children's social care, expect email responses within 48 hours.

A written record must document the date, time, report details, and the name and position of the person receiving the report. Telephone contact must be confirmed in writing using appropriate local authority forms within 24 hours.

The DSL should record discussions about informing parents/carers (depending on circumstances) and the process for keeping GLP Training informed of further action.

9.1.6 Confidential Reporting

Whistleblowing and safeguarding reporting schemes are available to all GLP Training staff.

10. Managing Allegations Against Staff

GLP Training complies with local Safeguarding Partnership and legislative procedures for managing allegations against staff. These procedures apply to all staff (teaching, administrative, management, support), volunteers, and align with our Staff and Learner Handbooks and Policy Manual.

10.1 Introduction

Staff may have allegations made against them for various reasons; allegations may or may not be true. We maintain an open mind and ensure fair, thorough, and timely investigations.

GLP Training recognises that child welfare is paramount (Children Act 1989) while acknowledging that hasty or ill-informed decisions can irreparably damage reputations, confidence, and careers. We handle allegations sensitively, carefully, and deliberately.

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10.2 Receiving an Allegation

Staff receiving allegations about colleagues should follow disclosure guidelines and report immediately to HR (also DDSL for staff) and CEO. If the allegation concerns HR, report to the CEO.

HR and the CEO will:

- Obtain written, signed, and dated details from the person receiving the allegation
- Countersign and date the written details
- Record information about times, dates, locations, and potential witnesses.

10.3 Initial Assessment

The CEO will make an initial assessment consulting with the HR DDSL and relevant local authority safeguarding teams as appropriate.

An allegation is information indicating that a person working with children or vulnerable adults has:

- Behaved in a way that has harmed or may have harmed someone
- Possibly committed a criminal offence against or related to a child or vulnerable adult
- Behaved in a way indicating unsuitability to work with children or vulnerable adults

The CEO and HR will not investigate the allegation. The initial assessment determines whether the allegation warrants further investigation.

If investigation is warranted, it will proceed according to GLP Training's disciplinary policy. The Local Authority Designated Officer (LADO) will be advised and kept fully informed of progress and outcomes.

Regarding Contractors and agency staff (where used and applicable): Per KCSIE 2025, GLP Training will take the lead on allegations against supply staff, as agencies lack direct access to children and other staff needed to collect facts or provide LADO referral information. GLP Training will serve as lead professional, communicating regularly with the LADO and supply agency. Contractors and supply agencies will be informed of our allegation management process.

10.4 Enquiries and Investigations

Child protection enquiries by Social Services or police are distinct from internal disciplinary enquiries. GLP Training may use external agency enquiry outcomes as part of internal procedures. While child protection agencies (including police) cannot direct GLP Training to act in specific ways, we will assist their enquiries fully.

GLP Training will conduct internal enquiries regardless of formal police or social services investigations, ensuring these do not prejudice official investigations. Internal enquiries will conform to existing staff disciplinary procedures.

If external agencies investigate, the CEO and HR DDSL should normally participate in and contribute to inter-agency strategy discussions. The CEO will ensure GLP Training provides full assistance with agency enquiries.

They will maintain appropriate confidentiality in the interests of the staff member concerned. The CEO/ HR DDSL will advise the staff member to consult with a representative (e.g., trade union).

The CEO will consult with Social Services, police, or Safeguarding Teams regarding timing and content of information provision, and will:

- Inform the learner or parent/carer making the allegation that an investigation is underway and explain the likely process
- Ensure parents/carers receive verbal and written notification that an allegation has been made and explain the likely process
- Inform the staff member against whom the allegation was made that an investigation is underway and explain the likely process
- Inform any staff member making an allegation that an investigation is underway and explain the likely process
- Inform the GLP Training Safeguarding and Risk Committee and Senior Leadership Team of the allegation and investigation

The HR DDSL will maintain written records of all action taken.

10.5 Suspension

Suspension should not be automatic. For staff other than the CEO or senior post holders, suspension can only be carried out by nominated senior management team members. For senior post holders, only the CEO can suspend.

Suspension may be considered at any investigation stage. It is neutral, not disciplinary, and on full pay. Consider alternatives such as paid leave, agreement to refrain from attending work, or duty changes/withdrawals.

Suspension should only occur for good reason, such as:

- Where a learner is at risk
- Where allegations are potentially sufficiently serious to justify dismissal for gross misconduct
- Where necessary for effective investigation

Any suspension consideration will follow existing GLP Training disciplinary procedures.

10.6 The Disciplinary Investigation

Disciplinary investigations will follow existing GLP Training disciplinary procedures.

10.7 Allegations Without Foundation

False allegations may indicate abuse problems elsewhere and should be recorded. In consultation with the HR DDSL, the CEO shall:

- Inform the staff member orally and in writing that no further action will be taken
- Consider offering counselling and support to rebuild confidence
- Inform parents/carers of those involved of the allegation and outcome
- Where another learner made the allegation, consider informing that learner's parents/carers
- Prepare a report outlining the allegation, reasons for the unfounded conclusion, and confirming actions taken

In some circumstances, consider broader disclosure of investigation outcomes, particularly if the matter has become common knowledge or subject of gossip, to provide accurate public information.

11. Record Keeping and Confidentiality

11.1 Records

Documents relating to investigations must be retained securely, with written records of outcomes. If disciplinary action is taken, details are retained on the staff member's personal and confidential file. Where allegations are unfounded, records of the allegation, investigation, and outcome should still be retained.

If a staff member is dismissed or resigns before disciplinary process completion, they should be informed of GLP Training's statutory duty to notify the Disclosure and Barring Service.

11.2 Confidentiality

GLP Training will maintain confidentiality and guard against unwanted publicity during allegation investigations. The Education Act 2011 introduced reporting restrictions preventing publication of material that may identify teachers accused by learners from the same institution.

Reporting restrictions apply until the accused is charged with an offence, or until the Secretary of State or General Teaching Council for Wales publishes information about an investigation or disciplinary decision. Restrictions cease if the individual waives their anonymity by going public or providing written consent for others to do so, or if a judge lifts restrictions upon request.

12. Safer Recruitment Practices

(Underpinned by Safeguarding and Safer Recruitment in Education 2012)

GLP Training maintains robust recruitment procedures protecting young and vulnerable learners. Procedures apply to all staff and volunteers and are reviewed regularly according to these principles:

- Posts or roles are clearly defined
- Key selection criteria are identified
- Vacancies are advertised widely to ensure diverse applicants
- Documentary evidence of academic and vocational qualifications is required
- Professional and character references are obtained

- Previous employment history is verified, including explanations of gaps
- Enhanced DBS checks are conducted where appropriate
- Online searches may be conducted as part of pre-recruitment checks
- All shortlisted candidates are informed that online searches may form part of recruitment

13. Learner Education and Awareness

GLP Training teaches learners about safeguarding, including online risks, through teaching and learning opportunities as part of our broad and balanced curriculum.

During induction learners cover:

- What safeguarding is
- Who the safeguarding team are
- How to report concerns

The following are embedded and contextualised into all of our curriculums to ensure learners develop understanding and awareness:

- Safeguarding
- Prevent and radicalisation
- British Values
- Consent and Healthy Relationships

GLP Training publish monthly 'Hot Topics' to our website that focus on topical matters within these areas. Hot topics are used within sessions and progress reviews to further embed and develop learner knowledge and understanding.

14. Online Safety

14.1 Policy Statement

All online safeguarding concerns will be managed according to this policy, particularly referral and recording procedures.

All staff members will be advised of GLP Training's IT Acceptable Use Policy and will agree to adhere to it.

14.2 Online Risks

Online access presents significant safeguarding risks. All staff should be aware of the key risk categories identified in KCSIE 2025:

- **Content** – exposure to illegal, inappropriate or harmful material (including non-age-appropriate content, self-harm/suicide material, pornography, extremist or hateful ideology, and mis-/disinformation or conspiracy theories)
- **Contact** – being subjected to harmful online interaction with others (for example grooming, exploitation, peer-to-peer pressure, online radicalisation)

- **Conduct** – personal online behaviour that increases the likelihood or causes harm (for example sharing or receiving explicit images, sexting, cyber-bullying, gaming behaviours)
- **Commerce** – risks arising from the online transactional environment (for example gambling, phishing or financial fraud/scams, exploitative in-game purchases)

This scope includes use of online platforms at home, during remote learning, or via mobile devices beyond organisational premises.

In line with KCSIE 2025, GLP Training maintain and review effective filtering and monitoring systems, embed online safety in staff training, governance, policy and curriculum, and ensure awareness of emerging risks such as generative AI and new technologies.

14.3 Filtering and Monitoring

Updated guidance requires all staff to receive training on filtering and monitoring expectations, roles, and responsibilities. The Chief Quality Officer takes lead responsibility for understanding filtering and monitoring systems and processes.

Information on safeguarding policies should include details on appropriate filtering and monitoring of devices and networks. GLP Training considers itself as meeting DfE Filtering and Monitoring Standards and Cyber Security Standards, through successfully maintaining our Cyber Security Essentials and Cyber Essentials Plus accreditations.

14.4 Concerns About Learners

Staff may become concerned if children, young people, or adults at risk are:

- Accessing illegal or inappropriate websites or content
- Receiving unwanted or upsetting messages or images
- Being "groomed" by adults for illegal purposes (sex, drugs, radicalisation, criminal activity)
- Viewing or receiving socially unacceptable material (inciting hatred or violence)
- Sending or receiving bullying messages or posting malicious content about others
- Engaging in financial scams
- Ignoring copyright law by downloading music/videos
- Becoming secretive about destinations or meetings
- Secretive about online activities
- Using devices in closed areas away from others
- Accessing the web or using devices for long periods at all hours
- Constantly clearing browsing history
- Receiving unexpected money or gifts from people met online
- Sending sexually inappropriate images ("sexting"), which for under-18s is an offence under the Sexual Offences Act 2003

14.5 Concerns About Staff

Staff may become concerned about colleagues who:

- Befriend or communicate with learners via personal phone, messaging, or social media
- Are secretive about activities and meetings
- Take images of activities with personal devices without line manager permission
- Do not seek parental permission for images of under-18s
- Constantly clear browser history
- View pornography at work
- View child sexual abuse images at any time
- Promote discrimination, illegal acts, or racial/religious hatred
- Share confidential or sensitive information
- Circulate or message offensive information

15. Policy Implementation and Review

15.1 Dissemination

The DSL will ensure this policy is known and appropriately used:

- The policy will be reviewed annually
- Procedures and implementation will be regularly updated and reviewed
- The policy will be publicly available
- Parents will be informed that referrals about suspected abuse or neglect may be made and of GLP Training's role
- Links with local safeguarding partnerships will ensure staff awareness of training opportunities and latest local policies
- When learners leave GLP Training, child protection files will be copied for new institutions as soon as possible but transferred separately from main learner files

15.2 Monitoring Compliance - Disclosures and Concerns

Termly: The Safeguarding and Risk Committee will compile and review a report on safeguarding incidents and reports, which is then presented to the Senior Leadership Team and Board.

Annually: The DSL as a part of the Safeguarding and Risk Committee review the safeguarding policy, completing updates as applicable, and produce an end-of-year report presented to the Senior Leadership Team and CEO. The outcomes of the report are used to inform the GLP Training SAR and QIP.

15.3 Monitoring Compliance - Allegations Against Staff

When allegations have been made against staff, the DSL and Safeguarding and Risk Committee, upon investigation and disciplinary procedure conclusion, will consider whether matters arising could improve procedures and/or policies. Staff training needs are also considered.

16. Associated Policies

1) Equality and Diversity Policy
2) Grievance Policy
3) Disciplinary Policy
4) Social Media Policy
5) Prevent Policy
6) Anti - Bribery Policy
7) Code of Conduct
8) Whistleblowing Policy
9) Health and Safety
10) Peer on Peer Abuse

17. Appendices

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Appendix A: Safeguarding Statement

GLP Training Safeguarding Statement

GLP Training is committed to protecting children, young people and adults at risk from harm.

As a Safe Organisation:

We ensure all employees are aware of their responsibilities to safeguard children, young people and adults at risk.

We Achieve This By:

- Adopting safer recruitment practices for staff working with young people and adults at risk
- Establishing clear expectations about personal conduct and responsibility to promote wellbeing at all times
- Providing comprehensive induction systems and ongoing training/updates on safeguarding
- Ensuring all staff have access to information and guidance on protection procedures
- Maintaining a trained Safeguarding Team, providing specialist advice on safeguarding
- Implementing robust data protection, information sharing, and referral procedures
- Promoting a culture of safeguarding throughout the organisation
- Listening to concerns of young people and vulnerable adults with an open mind
- Maintaining clear procedures for investigating allegations of harm, including independent advice and police referral when necessary
- Regularly reporting safeguarding incidents to the Senior Leadership Team
- Maintaining a clear and accessible complaints procedure

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Appendix B: Designated Safeguarding Team

The Safeguarding and Risk Committee

Designated Senior Person (DSP)	Designated Safeguarding Lead (DSL)	
Gemma Parsons g.parsons@glptraining.co.uk 07803749461	Megan Ince Megan.i@glptraining.co.uk 07375695948	
Deputy Designated Safeguarding Leads (DDSL's)		
Louise Lowe Louise.l@glptraining.co.uk 01905 670884	Cheryl Dunn Cheryl.d@glptraining.co.uk 07983301954	Ronnie Morris (HR DDSL) Ronnie.m@glptraining.co.uk / 07539069642

Safeguarding Team Email: Safeguarding@glptraining.co.uk

Office Hours

Our office hours are 09:00-17:00 Monday to Friday.

Out of Hours Support

Out of hours, please contact:

NSPCC - 24 hours, 7 days per week Telephone: 0808 800 5000 Website:
www.nspcc.org.uk

Childline - 24 hours, 7 days per week Telephone: 0800 1111 Website:
www.childline.org.uk

Appendix C: Safeguarding Report Form

Access to the Safeguarding Report Form is available via GLP Trainings website by searching for Safeguarding and selecting the Report Concern option. The form can also be accessed directly via the QR code provided below and is compatible with computers, laptops, tablets and mobile devices.
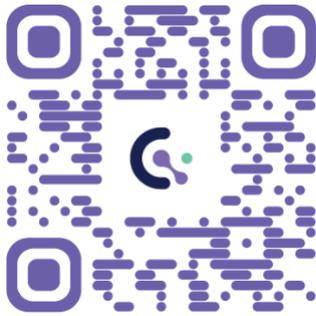
In the event that this QR code or accessing the online report from is unavailable, please print out, complete and submit the below paper copy of our Safeguarding Report Form to safeguarding@glptraining.co.uk

Copy of Safeguarding Report Form

This form has been designed to capture information relating to a **Safeguarding or Prevent disclosure or concern**.

It is intended for use by **anyone connected with GLP Training** - including **learners, staff members, employers, or affiliates** - to raise concerns about the safety or wellbeing of individuals who may be at risk.

Please complete as much of the form as possible, doing so will help us assess the level of risk and identify the most appropriate response.

All information shared will be **treated confidentially** and handled in accordance with **GLP Training's Safeguarding Policy and Procedures** and the requirements of **UK GDPR**.

1) Immediate Safety Check

Is anyone in immediate danger or at serious risk of harm right now?

YES	NO

If "Yes", please call 999 immediately before submitting this form.

2) What is the name of the Adult/ Child at risk?

Please provide the full name of the individual the concern relates to.

3) Location of the individual at risk

Please provide the geographical region or area where the individual at risk is based or currently located, e.g., West Midlands.

4) Date and Time Concern Reported

5) Date of Incident

Enter the date of when the concern, disclosure, or incident occurred or was observed.

6) Details of the Concern / Disclosure / Incident

Please describe your concern, or share the disclosure or incident details as clearly and factually as possible.

If you are reporting on behalf of someone else, please include their own words where appropriate.

You may wish to include:

- What happened, including when and where (approximate details are fine).
- Who was involved or present.
- Anything else you feel is important to highlight.

*If reporting via off-line submission please provide as much detail as possible by continuing on additional pages and attaching these to this form, if required.

7) **Preferred method of contact**

Please provide details of how you would prefer the Safeguarding Team to contact you if follow up is required

8) **Please provide contact details for the individual at risk**

Please provide at least one method of communication for the individual. These details will only be used by the Safeguarding Team for essential follow-up, where required, to support the individuals safety and wellbeing.

9) **If you have any supporting evidence (like screenshots, documents, or notes), you can reference it here.**

This step is **optional**: please don't delay submitting your concern if you don't have files to attach to this form.

*Any uploads will be handled **confidentially** and only reviewed by the Designated Safeguarding Lead.*

10) Additional Information

Please provide any other details that should be considered or that the Safeguarding Team should be aware of.

(This could include relevant background information, any changes in behaviour, previous or ongoing concerns, or any other details that you feel would help the Safeguarding Team to understand the situation fully).

Thank you for taking the time to share your concern - your information will be handled confidentially and on a need-to-know basis.

Our team operates Monday to Friday, 8:30 am – 5:30 pm, and will aim to action your submission within 0–48 hours.

If your concern arises outside of these hours, please use the following link to access local and national support options:

If you need to contact the Safeguarding Team directly or would like to follow up on your submission, please email safeguarding@glptraining.co.uk or call 01905 670884

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Appendix D: Safeguarding Flow Chart

STEP 1: RECOGNISE

Someone has disclosed a concern, or you have observed possible signs of abuse or neglect

STEP 2: RESPOND

Where needed, listen to the person and reassure them that their concerns will be taken seriously. Do let them know you will be referring it to the safeguarding team and reassure them.

STEP 3: RECORD

Document the concern immediately using our Safeguarding Report Form.

STEP 4: REPORT

Email your completed form through to the Safeguarding Team at: safeguarding@glptraining.co.uk . Or alternatively the DSL or one of the DDSL's in their absence if your concern is urgent.

STEP 5: REFER

The Safeguarding Team will acknowledge receipt of your concern, review the information you have provided and take the appropriate action

KEY PRINCIPLES: - Act immediately - Safeguarding is everyone's responsibility - When in doubt, report - It is better to be safe - Welfare is paramount - Keep information confidential - Only share on a need-to-know basis - Document everything specifically and factually.

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Appendix E: Protocol for Reporting Missing Learners

Protocol for Reporting Missing Learners

Rationale

This protocol provides an effective response when a learner goes missing, fulfilling our responsibility to:

- Safeguard learners
- Ensure no barriers to punctuality and attendance exist

Definition of 'Missing'

"Anyone whose whereabouts is unknown whatever the circumstances of disappearance; they will be considered missing until located and their wellbeing established." (Association of Chief Police Officers - ACPO)

When Discovering a Learner is Missing

First step: Inform your line manager immediately.

The line manager should:

- Locate learner contact details and contact directly if possible
- Locate learner and arrange safe return to centre or home
- Liaise with DSL to identify any safeguarding concerns and ensure appropriate contact is made

If contact cannot be made, the manager should:

- Ascertain when the learner was last seen (keep notes of witness statements including names and course details)
- Ascertain the learner's course and timetable for that day
- Establish if anyone knows where the learner intended to go
- Conduct searches of relevant areas where appropriate
- Contact parent/carer as appropriate without long delay (parents/carers should not learn their relative has been missing for several hours)

Provide the following facts:

- When the learner was last seen
- How it was discovered they were missing
- Actions taken so far

If there is cause for concern and in consultation with parent/carer:

- Report to police or relevant authority immediately (collect and record incident number)
- Ask parent/carer to stay in touch if they hear anything
- Maintain contact with parent/carer until learner is found

- Report incident to CEO

Investigation and Report Records

Identifying why a learner went missing is key to reducing recurrence and safeguarding that learner. The learner should be spoken to about their actions, rationale, and any risks they faced. This conversation may reveal the need for ongoing additional support.

When the situation is resolved, the DSL should:

- Carry out a full investigation
- Establish why the situation occurred
- Work with course tutor and parent/carer/learner support team as appropriate to establish safe supervision systems for the future
- Provide a written report for the learner file (maintaining confidentiality and data protection compliance)
- Ensure a letter is sent to parent/carer confirming any new arrangements, including external party responsibilities

Information Sharing

If there are concerns about a learner's safety or wellbeing, information sharing with other agencies may be necessary. The learner's safety and wellbeing must be the primary consideration.

Information sharing must comply with confidentiality, data protection, and human rights legislation. Shared information must be carefully recorded. Normally, consent from parent/carer/learner is required; however, sharing without consent is justified when:

- There is evidence or reasonable cause to believe a child/ young person is suffering or at risk of significant harm
- There is evidence or reasonable cause to believe an adult is suffering or at risk of serious harm
- It is necessary to prevent, detect, or support prosecution of serious crime

Police Response

When a missing person report is made, police are obligated to take action to safeguard at-risk individuals. Those under 18 will not be considered 'low risk'. Where a missing person is identified as high or medium risk, positive action becomes obligatory at every investigation stage.

If you believe a learner is at immediate risk, report without delay to police: 999

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Appendix F: Safeguarding Away from GLP Training Premises

Safeguarding Outside of GLP Training Premises

Introduction

Any learner under 18 is legally considered a child and protected by child protection laws and guidance (*Working Together to Safeguard Children 2023*). While child abuse incidents are not common, any child aged 0-18 must be considered vulnerable to abuse in any setting: home, educational institution, workplace, or elsewhere.

Child abuse takes many forms but is categorised under four main themes:

- Physical abuse
- Sexual abuse
- Emotional abuse
- Neglect

It is essential that children and young people are protected from all forms of harm.

Guidance

Educational institutions organising work placements and other activities must ensure policies and procedures protect children and young people from harm, with greatest emphasis on settings where children may be most at risk (e.g., long periods in one-to-one situations with adults).

Enhanced safeguarding measures should be considered where placement is:

- For more than one day per week
- For longer than one term per academic year
- Aimed at potentially vulnerable children (e.g., under 16 or with special needs)
- Where workplace supervisors or colleagues will have substantial unsupervised access to the child
- Long-term extended placements requiring DBS Disclosures (e.g., Young Apprentices)

The key supervisor of the learner, if not under direct GLP Training staff responsibility, must be aware of their child protection responsibilities.

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Appendix G: Safeguarding On-Site at GLP Training Premises

Safeguarding for Mixed Age Training Environments

Introduction
GLP Training recognises that on-site training may involve learners of different ages, including under-18s (children), vulnerable adults, and adult learners. These settings require enhanced safeguarding to protect all participants, in line with *Working Together to Safeguard Children (2023)* and *Keeping Children Safe in Education (2024)*.

Rationale
Mixed-age delivery can present risks such as inappropriate relationships, exposure to unsuitable content, bullying, or power imbalances. GLP Training is committed to creating safe, respectful, and inclusive learning environments for all.

1. Risk Assessment

A specific risk assessment will be completed for all mixed-age training, considering:

- Learner age ranges and vulnerabilities
- Course content suitability
- Physical environment and supervision levels
- Potential for unsupervised interaction
- Online activity, social spaces, and course duration

Assessments are reviewed regularly and updated as needed.

2. Safeguarding Measures

Course Design

- Ensure content and activities are age-appropriate.
- Adapt or separate sessions if unsuitable for under-18s.
- Group learners to promote inclusion and respect.

Physical Environment

- Provide supervised, clearly visible learning and social spaces.
- Maintain sightlines and CCTV coverage where lawful.
- Display safeguarding information and DSL contact details.

Grouping & Supervision

- Avoid unsupervised one-to-one contact between adults and under-18s.
- Monitor group dynamics continuously and intervene when needed.

3. Learner Code of Conduct

All learners must sign and follow GLP's Code of Conduct, covering:

Respectful Behaviour: No bullying, harassment, or discriminatory behaviour.

Age-Appropriate Conduct:

- No romantic/sexual relationships with under-18s.
- No alcohol, tobacco, or substance sharing.
- No sharing of personal contact details with under-18s.

Online Conduct:

- No private messaging or social media contact with under-18s.
- Report concerning contact immediately.
  Breaches may lead to disciplinary action or course removal.

4. Induction and Awareness

All learners receive induction on safeguarding, reporting concerns, and expected behaviour.

6. Supervision During Breaks

As informed by the completed risk assessments, staff supervise all communal on-site areas during breaks, either through direct supervision and/ or through the use of the on-site CCTV. Separate or structured social spaces may be provided to ensure safety and inclusion, where appropriate.

7. Preventing Inappropriate Relationships

Staff will monitor for signs such as exclusive friendships, secrecy, or gift-giving between adults and under-18s. Any concerns are recorded and reported immediately to the DSL, with appropriate action taken.

8. Online Safety

- Internet filtering and monitoring on all GLP systems.
- Clear Acceptable Use Policy.
- Device access is logged with learners allocated to specific laptops, where usage is monitored.
- Social media access restricted unless part of curriculum.

9. Responding to Concerns

Concerns must be reported immediately to the DSL following the 5 Rs: Recognise, Respond, Report, Refer, Record.
Actions may include increased supervision, separation of learners, or referral to external agencies (LADO, MASH, Police, etc.).

10. Staff Training

All staff working with mixed-age groups receive annual training on:

- Mixed-age safeguarding and supervision
- Recognising grooming and exploitation
- Managing group dynamics
- Communication and de-escalation techniques
- Legal frameworks (e.g. Sexual Offences Act 2003)

11. Vulnerable Adults

Individual risk assessments and person-centred support plans will be in place. Extra supervision or advocacy will be arranged where needed, ensuring accessibility and ongoing monitoring.

12. Monitoring and Review

Safeguarding practices will be reviewed through:

- Observations, feedback, and incident analysis
- Staff debriefs and safeguarding risk meetings
- Updates to risk assessments and procedures following any incident

13. Key Principles

Vigilance – Active supervision
Prevention – Proactive risk management
Culture – Promote safety, respect, and inclusion
Responsiveness – Immediate action on concerns
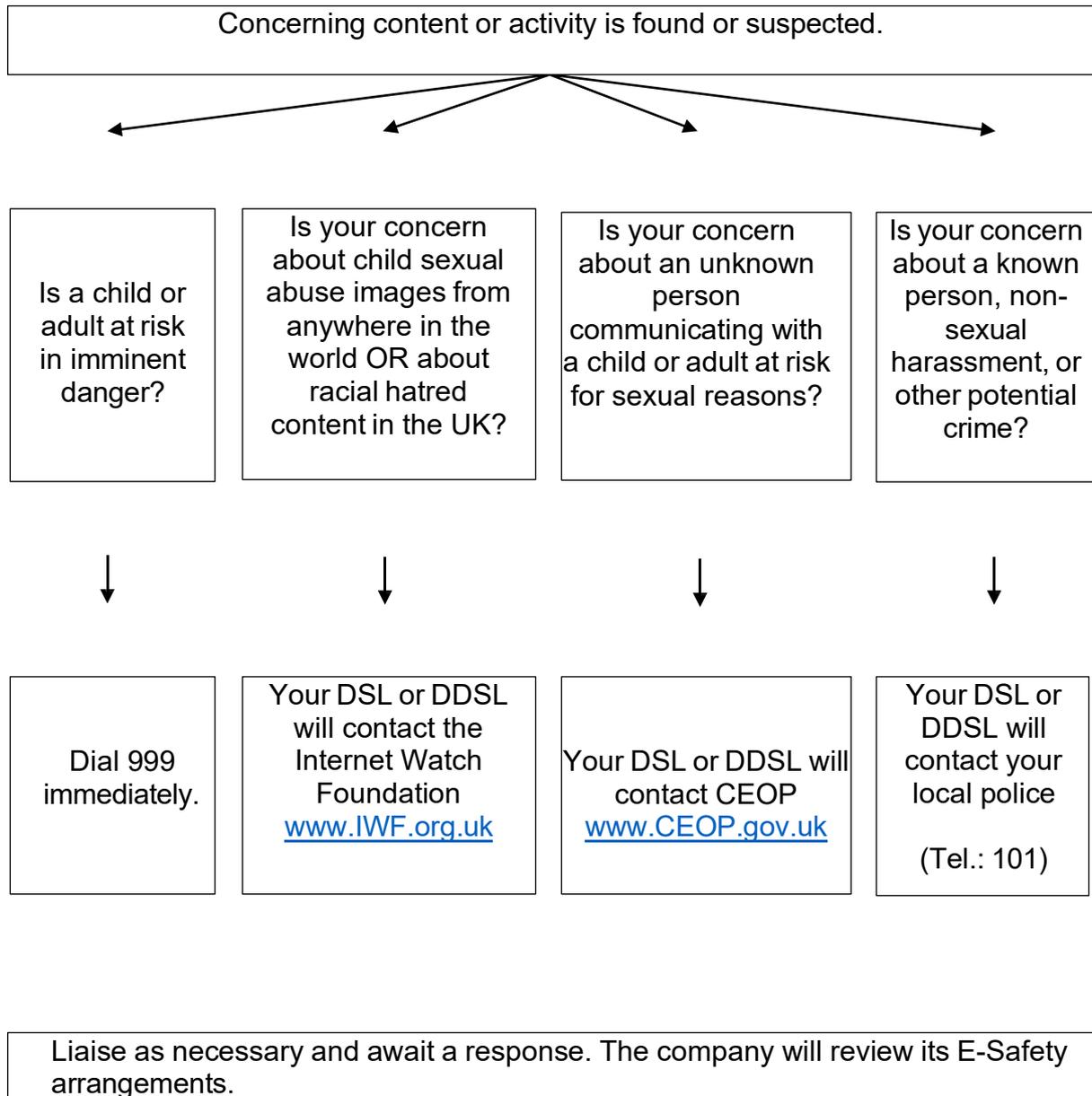**Partnership –** Work with parents, employers, agencies, and learners
Accountability – Clear standards and consequences

14. Record Keeping

Secure records will include: risk assessments, induction, schedules, incident reports, staff training logs, and communications with employers, parents or external agencies, maintained per GDPR requirements.

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Appendix H: Online Safety Referral Flowchart

E-Safety Referral Flowchart

Concerning content or activity is found or suspected.

Is a child or adult at risk in imminent danger?	Is your concern about child sexual abuse images from anywhere in the world OR about racial hatred content in the UK?	Is your concern about an unknown person communicating with a child or adult at risk for sexual reasons?	Is your concern about a known person, non-sexual harassment, or other potential crime?

Dial 999 immediately.	Your DSL or DDSL will contact the Internet Watch Foundation www.IWF.org.uk	Your DSL or DDSL will contact CEOP www.CEOP.gov.uk	Your DSL or DDSL will contact your local police (Tel.: 101)

Liaise as necessary and await a response. The company will review its E-Safety arrangements.

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Appendix I: Additional Expert and Professional Guidance

Additional Expert and Professional Guidance

Further expert and professional guidance and practical support on specific safeguarding issues can be accessed via www.gov.uk as follows:

- Child sexual exploitation (CSE)
- Bullying including cyberbullying
- Domestic violence and abuse
- Drugs and substance misuse
- Fabricated or induced illness
- Faith-based abuse
- Female genital mutilation (FGM)
- Forced marriage
- Gangs and youth violence
- Gender-based violence/violence against women and girls (VAWG)
- Mental health
- Private fostering
- Radicalisation and extremism
- Sexting (youth produced sexual imagery)
- Teenage relationship abuse
- Trafficking and modern slavery
- Child criminal exploitation (including county lines)
- Serious violent crime

Additional information is available on the NSPCC website: www.nspcc.org.uk

For immediate risk, call 999 and ask for police. They will connect you with safeguarding professionals in the area where the incident occurred.

If a Safeguarding team member cannot be contacted (e.g., out of hours), NSPCC, Childline, or your local Safeguarding team provide advice and support services.

NSPCC - 24 hours, 7 days per week Telephone: 0808 800 5000 Website: www.nspcc.org.uk

Childline - 24 hours, 7 days per week Telephone: 0800 1111 Website: www.childline.org.uk

Additional and Localised Support Services can be found via the:

Hub of Hope: https://hubofhope.co.uk

Safeguarding section of the GLP Training Website: www.glptraining.co.uk/safeguarding/