



Safeguarding and Prevent, Child Protection Policy V8

Applicability

This policy/procedure/process applies to all divisions, subsidiaries, departments, and associated organisations within Twin Group. It is binding on all employees, contractors, and stakeholders engaged in activities on behalf of the Group, regardless of business unit or location. All members of the Group are expected to adhere to the principles, standards, and requirements set out herein.

There are areas within this Policy that refer to regulations and statements for the UK only or ROI only.

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Where this occurs, there will be a clear indication which territory they refer to.



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Twin Group Safeguarding and Prevent Statement and Policy

This Policy has been developed to bring together the key principles of Safeguarding, Child protection, The Prevent Duty, Equality Diversity & Inclusion, Bullying and Health and Safety.

Twin Group is fully committed to safeguarding the welfare of all by taking all reasonable steps to protect them from harm and accepts its corporate responsibility for the well-being and safety for its stakeholders including children, young people and vulnerable groups. Twin Group recognises its responsibility and acknowledges that it is the duty of the workforce in its entirety to uphold British and Irish Fundamental Values and to safeguard the welfare of all stakeholders by creating an environment that protects them from harm and reduces any potential risks of being exposed to violence, extremism, exploitation, or victimisation. Therefore colleagues, volunteers, delivery partners and contractors will always show respect and understanding for the rights, safety and welfare of all parties and conduct themselves in a way that reflects the principles, values and culture of our organisation and be aware and follow current legislation regarding the safeguarding of all stakeholders.

Our policy sets out, in detail, the roles and responsibilities of all parties in providing a safe working and learning environment whereby everyone is protected from abuse of any kind. This policy has been agreed and is sponsored by the Twin Group Executive Management Team as of November 2021.

This statement and policy can be found on Twin Group’s SharePoint. Each function of the business has their own user-friendly summary of the policy and procedures to be followed.

Statement of intent

It is Twin Group’s intention to:

Twin Group is committed to safeguarding and promoting the welfare, both physical and emotional, of every child, young person, and vulnerable adult both inside and outside of the learning environment. We implement a whole organisational preventative approach to managing safeguarding concerns, ensuring that the wellbeing of children, young people and vulnerable adults is at the forefront of all action taken.

This policy sets out a clear and consistent framework for delivering this promise, in line with safeguarding legislation and statutory guidance.

- Creating a culture of safer face to face and online recruitment by adopting procedures that help deter, reject or identify people who might pose a risk to children, young people and adults who may be vulnerable.
- Ensure that relevant employment and security checks are undertaken, as required and that staff and any new staff members and volunteers are only appointed when all the appropriate checks have been satisfactorily completed and where required, risk assessments are in place.
- Ensure that appropriate supervision is given where required.
- Teaching children, young people and vulnerable adults how to keep safe and recognise behaviour that is unacceptable.
- Identifying and making provision for any child, young person and vulnerable adult that has been subject to abuse.
- Take the necessary steps to inform all stakeholders of relevant policies and procedures and Code of Conduct
- Ensuring that members of the board and staff members understand their responsibilities under safeguarding legislation and statutory guidance, are alert to the signs of child/adult abuse and know how to refer concerns to the Head of Safeguarding or safeguarding lead and members of the safeguarding team.
- Ensure that colleagues are appropriately trained in safeguarding and to understand the risk of radicalisation, their role in implementing the Prevent Duty, and the impact this has on their job role and how to refer an individual who they feel is at risk.
- Ensure that all stakeholders are protected from abuse regardless of sex, race, disability, age, sexual orientation, religion or belief, gender reassignment, maternity or because someone is married or in a civil partnership. Following the Cass review, organisations are advised to exercise caution regarding social transitioning due to the potential unknown impacts. Collaboration with parents is encouraged unless there is a significant risk of harm to the child.
- Regularly review and monitor Twin Group policies and procedures to ensure our legal, moral and social responsibilities are met.
- Take all suspicions and allegations of abuse including risks of radicalisation extremely seriously and to respond to concerns in a timely manner and with consideration.
- Work in partnership with and in accordance with organisations' procedures where required, including Designated Local Authority Person, Local Safeguarding Children's Partnership, Local Safeguarding Adults Partnership, and the Channel multi-agency panel.
- Comply with and maintain knowledge of all relevant legislation, codes of practice and

appropriate guidance to any amendments to such.

- Have Designated Safeguarding Leads (DSL's) and Designated Liaison Persons (ROI only) in place to advise on and manage any concerns and referrals made that have access to up-to-date training and current information/legislation.
- Ensure that all personal data will be processed in accordance with the requirements of the GDPR 2018.
- Ensure that personal information is confidential and should only be shared with the

permission of the individual concerned (and or those with parental responsibility) unless the disclosure of confidential information is necessary to support a child, young person or vulnerable adult from serious harm or promote their welfare. In all circumstances, information must be confined to those people directly involved in the professional work of each individual child, young person or vulnerable adult and on a strict "need to know" basis and guidance is readily available through the Information Sharing guidance document for practitioners and also through the Head of Safeguarding or safeguarding lead and the safeguarding team.

Definitions

Children are defined in the Children Act 1989 and 2004, as a person under the age of 18 years. An adult at risk is 'any person who is aged 18 years or over and at risk of abuse or neglect because of their needs for care and support' (Care Act 2014 [England]).

A child, young person or adult at risk may be a person who:

- Is a teenager
- Children and young people missing from education
- Those at risk of FGM (Female Genital Mutilation)
- Those at risk of Forced Marriage
- Those at risk of Honour Based Violence
- Trafficked children and young people
- Those in the 'Looked after system'
- Those with a refugee status and/or classified as an Asylum Seeker
- Children, young people, and vulnerable adults living away from home
- Children, young people, and vulnerable adults from some minority ethnic groups
- Those with abuse & trauma in their past
- Those living in sheltered accommodation
- Detained in custody or under probation order
- Those living with domestic violence, parental substance misuse and/or parental mental ill health, receiving a service or participating in an activity targeted at older people, people with disabilities or

- with physical or mental health conditions
- Has a physical or sensory disability
- Is physically frail or has a chronic illness
- Has a mental illness or dementia
- Has a learning difficulty
- Misuses drugs and or alcohol
- Has social and or emotional issues
- Exhibits challenging behaviours

For the purposes of this policy, “safeguarding and protecting the welfare of children” is defined as:

- Protecting children and young people from maltreatment.
- Preventing the impairment of children and young peoples’ health or development.
- Ensuring that children and young people grow up in circumstances consistent with the provision of safe and effective care.
- Taking action to enable all children and young people to have the best outcomes.

For the purposes of this policy, the term “harmful sexual behaviour” includes, but is not limited to, the following actions:

- Using sexually explicit words and phrases
- Inappropriate touching
- Sexual violence or threats
- Full penetrative sex with other children or adults
- Upskirting

In accordance with the DfE’s guidance, ‘Sexual violence and sexual harassment between children in schools and colleges’ (September 2021), and for the purposes of this policy, the term “sexual harassment” is used within this policy to describe any unwanted conduct of a sexual nature, both online or offline, which violates a child’s, young person’s or vulnerable adult’s dignity and makes them feel intimidated, degraded or humiliated, and can create a hostile, sexualised or offensive environment.

For the purpose of this policy, the term “sexual violence” encompasses the definitions provided in the Sexual Offences Act 2003 and the Criminal Law (Sexual Offences) Act 2017 (ROI only), including those pertaining to rape, assault by penetration and sexual assault.



Introduction

Twin Group believes that it is always unacceptable for a child, young person or vulnerable adult to experience abuse or discrimination of any kind and recognises its responsibility to safeguard the welfare of all children, young people and vulnerable adults by a commitment to practice which protects them. Twin Group have a commitment that no child, young person or vulnerable adult will be treated less favourably than others in being able to access services which meet their specific individual need, and this is linked to our Equality, Diversity and Inclusion Policy and social inclusion strategies.

This policy has been developed to describe the responsibilities of colleagues, volunteers, delivery partners and contractors for the recognition and prevention of abuse and to clarify the actions to take when abuse is suspected or identified. Therefore, the aim of this Policy is to ensure that Twin Group fulfils

its responsibilities towards the protection, welfare and safety of children, young people and vulnerable adults.

This policy is reviewed annually and updated in line with the most recent Department for Education statutory guidance, Keeping Children Safe in Education (KCSIE). All staff are required to read and understand Part one and Annex B of the current KCSIE guidance, sign a declaration to confirm this at start of each academic year.

Abuse is the violation of an individual's human rights. It can be a single act or repeated acts. It can be physical, sexual or emotional. It also includes acts of neglect or an omission to act. Abuse can take many forms and is not acceptable in any way.

Twin Group will endeavour to safeguard children, young people and vulnerable adults by:

- Valuing, listening to and respecting them.
- Adopting Policies, guidelines and a Code of Conduct and behaviour for young people, participants, parents, colleagues, volunteers, delivery partners and contractors.
- Sharing information about concerns with agencies which need to know, and involving parents/carers and children, young people and vulnerable adults appropriately.
- Ensuring that the DBS (Enhanced) or National Vetting Bureau (ROI only), in accordance with their guidelines, checks all colleagues, volunteers, delivery partners and contractors with responsibilities for children, young people and vulnerable groups. This information is regularly checked and monitored via the Single Central Register which contains all colleague details.
- Recruiting colleagues and volunteers safely, ensuring all necessary checks are made in line with Safer Recruitment Policies and Procedures.

- Making all new colleagues, volunteers, delivery partners and contractors aware of our safeguarding policy and procedures.
- Providing all colleagues, volunteers, delivery partners and contractors with safeguarding training which is updated regularly.
- Ensuring that all children, young people, vulnerable groups, their parents and carers, host and host employers are aware of our Safeguarding policy and procedures.
- Ensuring all colleagues and stakeholders are aware of their role and responsibilities in relation to safeguarding.

Twin Group is committed to reviewing its policies and good practice annually unless there is a change to legislation or there has been a significant change within the organisation. This review has been made upon receipt of the DfE publishing Keeping Children Safe in Education 2025.

The Head of Safeguarding/safeguarding lead is responsible for updating the policy with support from the DSLs, Senior Management Team/ Board.

Twin Group operates a culture of openness and transparency and embeds the Principles of 'The 5R's' across all our services and ensure all colleagues, volunteers, delivery partners and contractors understand their responsibilities regarding Safeguarding.

The 5 R's:

Recognise - the signs and indications of abuse

Respond - as soon as possible

Record - everything you have heard, was said or any actions seen

Report - ensure you report the concern/incident

Refer - to the Designated Safeguarding Lead (DSL)

Legal Framework

The Children Act 1989 placed a duty on local authorities to investigate situations where a child or young person is at risk of significant harm. Schools, Colleges and Training Providers have a legal obligation to work with investigating agencies acting on behalf of children or young people in need. Guidance was published in 'Safeguarding Children in Education' (2004). It set out the requirements to provide a safe learning environment, identify young people suffering, or likely to suffer, significant harm and take

appropriate action in full partnership with other local agencies. It encompassed wider issues such as health, safety, drug/substance abuse and bullying as well as the contribution made to safeguarding in relation to individual children and young people and underpinned our common law duty of care.

This was replaced and extended in January 2007 by 'Safeguarding Children and Safer Recruitment in Education', and more recently through the July 2025 KCSIE focus on online recruitment, which includes more specific guidance (including some statutory requirements) relating to the recruitment and vetting of colleagues. The responsibility for making sure appropriate arrangements are in place, lies with Twin Group. Colleagues are responsible for carrying out their duties in compliance with the arrangements set out by Twin Group, we are not the investigating agency.

This function is carried out by local authority Children's Services, or other agencies with statutory powers. The Children Act 1989, and subsequent legislation and guidance, are concerned with the emotional, physical or sexual abuse or neglect of children or young people defined as under the age of 18. However, it is recognised that children acquire degrees of legal capacity (for example, the ability to give informed consent) and maturity prior to their 18th birthday, and that there are adults over 18 who continue to be vulnerable due to a learning difficulty and/or disability.

This policy has been created with due regard to all relevant legislation including, but not limited to, the following:

Legislation:

- Children Act 1989
- Children Act 2004
- Safeguarding Vulnerable Groups Act 2006
- The Education (School Teachers' Appraisal) (England) Regulations 2012 (as amended)
- Sexual Offences Act 2003
- General Data Protection Regulation (GDPR)
- Data Protection Act 2018
- The Care Act 2014
- The Mental Capacity Act 2005
- Equality Act 2010
- Protection of Freedoms Act 2012
- UN Convention on the Rights of the Child 1991

ROI (Only)

- Child Care Act 1991

- Protection for Persons Reporting Child Abuse Act 1998
- Criminal Justice Act 2006
- Criminal Justice (Withholding of Information on Offences against Children and Vulnerable Person's) Act 2012
- National Vetting Bureau (Children and Vulnerable Persons) Acts 2012-2016
- Children First Act 2015
- Criminal Law (Sexual Offences) Act 2017

Statutory Guidance

- HM Government (2013) 'Multi-agency practice guidelines: Handling cases of Forced Marriage'
- DfE (2020) 'Working Together to Safeguard Children'
- DfE (2015) 'The Prevent duty'
- DfE (2025) 'Keeping children safe in education'
- DfE (2018) 'Disqualification under the Childcare Act 2006'
- The Working Together to safeguard Attendance guidance
- Children First (2015) National Guidance (ROI only)

Non-statutory Guidance

- DfE (2015) 'What to do if you're worried a child is being abused'
- DfE (2018) 'Information sharing'
- DfE (2017) 'Child sexual exploitation'

- DfE (2018) 'Sexual violence and sexual harassment between children in schools and colleges'
- Advice for practitioners providing safeguarding services to children, young people, parents, and carers 2015
- The "No Secrets" guidance which sets out a code of practice for the protection of vulnerable adults

Our commitment

- We believe that a child, young person, or vulnerable adult should never experience abuse of any kind.
- We promote the welfare of all children, young people, and vulnerable adults and to keep them safe.
- We are committed to practice in a way that protects them.
- We will protect children, young people and vulnerable adults from radicalisation and extremism, by responding swiftly where children, young people and vulnerable adults are vulnerable to these issues.
- We protect children, young people and vulnerable adults who receive our services. This includes the children of adults who use our services and any siblings of children, young people and vulnerable adults.
- We will provide colleagues, volunteers, host, host employers and sub-contractors with regular updates and annual training on Safeguarding and Prevent using the resources provided by the



Education and Training Foundation, Mentor Live, Home Office.

- We will record and check the details of all visitors to all our premises.

Aims

Our aims are to:

- Promote British and Irish Fundamental values, including freedom of speech, rights to be safe and listened to, by creating an environment that encourages children, young people, and vulnerable adults to raise any concerns.
- Encourage children, young people, and vulnerable adults to develop a sense of autonomy and independence in their learning and development.
- Enable children, young people, and vulnerable adults to have the self- confidence and the vocabulary to resist inappropriate approaches.
- Work with host employers, host families and sub-contractors to build their understanding of and commitment to the principles of safeguarding and prevent duty.
- Liaise with other statutory agencies to ensure legislative procedures are current.

Safeguarding at Twin Group is:

- Protecting children, young people, and vulnerable adults from maltreatment.
- Preventing impairment of children's, young people's and vulnerable adults' health or development.
- Ensuring that children, young people, and vulnerable adults are growing up in circumstances
 - consistent with the provision of safe and effective care.
 - Acting to enable all children, young people, and vulnerable adults to have the best life-chances. Twin Group operates on a 3-tier threshold when defining a safeguarding risk from **red**, **amber** to **green** when recording concerns on the Central Safeguarding Register, this risk is constantly reviewed.

Significant Harm

- Harm means ill treatment or the impairment of health or development, including impairment suffered from seeing or hearing the ill treatment of another.
- Development means physical, intellectual, emotional, social, or behavioural development.
- Health means physical or mental health.
- Ill treatment includes physical & sexual abuse and forms of ill treatment which are not physical.
- (s.31 (9) Children Act 1989 as amended by the Adoption and Children Act 2002)



Welfare

Welfare is defined as a child, young person, or vulnerable adult in need of universal help from those already involved or from a single or multiple agency response.

Absent from Education

Children, young people, and vulnerable adults who are absent from education for prolonged periods and/or repeat occasions can act as a vital warning to a range of safeguarding issues. They are at a greater risk of physical harm, self-inflicted or inflicted by others, being sexually exploited, and becoming involved in crime – particularly county lines. And anti-social behaviour, being employed illegally, or abusing drugs and alcohol. In line with the duty under section 10 of the Children Act 2004. Twin Group must take reasonable steps to monitor children and young people's persistently absent and children missing from education through a daily register, to support identifying such abuse, and in the case of absent individuals, helps prevent the risk of them becoming a child missing education in the future. This is also completed for vulnerable adults. Attendance should be monitored closely, and poor or irregular attendance should be addressed. Please see Twin Group's Missing from Education Policy for more information.

Definitions and Indicators of Abuse, Neglect and Exploitation

Abuse, including neglect, is a form of maltreatment of a child, young person, or adult at risk (often called a vulnerable adult). In relation to adults the terminology 'serious harm' is frequently used within the guidance rather than 'significant harm' which is a term from the Children Act 1989. Someone may abuse a child, young person, or vulnerable adult by inflicting harm, or by failing to act to prevent harm.

Children, young people, and vulnerable adults may be abused in a family or in an institutional or community setting, by those known to them or, more rarely, by a stranger for example via the internet. They may also be abused by an adult or adults, or by another child or children known as Peer-on-Peer abuse.

Working Together to Safeguard Children 2020 defines four types of abuse: physical, emotional, sexual and neglect. Vulnerable groups may also be subjected to these forms of abuse therefore the wording from Working Together to Safeguard Children 2020 has been slightly altered to reflect this fact. Adults may also be subjected to financial, discriminatory, and institutional abuse and colleagues should be familiar with indicators for all forms of abuse.

Physical Abuse

Physical Abuse: this may involve	Signs: this may include
<ul style="list-style-type: none"> • Hitting • Shaking • Throwing • Poisoning • Burning or Scalding • Drowning <ul style="list-style-type: none"> • Suffocating or otherwise causing Physical Harm <p>Physical harm may also be caused when a parent or carer fabricates the symptoms of, or deliberately indicates illness in a child, young person, or vulnerable adult</p>	<ul style="list-style-type: none"> • Unexplained bruises, marks or injuries on any part of the body • Frequent visits to the GP or A&E • An injury inconsistent with the explanation offered • Fear of parents or carers being approached for an explanation • Aggressive behaviour or severe temper outbursts • Flinching when approached • Reluctance to get changed or wearing long sleeves in hot weather • Depression • Withdrawal behaviour or other behaviour change • Running away from home/residential care • Distrust of adults, particularly those with whom a close relationship would normally be expected

Emotional Abuse

Emotional abuse is the persistent maltreatment of a child, young person or vulnerable adult such as to cause severe and persistent adverse effects on the child's, young person's or vulnerable adult's emotional development.

Emotional Abuse:	Signs: this may include
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<ul style="list-style-type: none"> • Conveying to the child, young person or vulnerable adult that they are worthless and unloved • That they are inadequate, or valued only insofar as they meet the needs of another person • Not giving the child, young person or vulnerable adult opportunities to express their views • Deliberately silencing them • Making fun of what they say or how they communicate • Age or developmentally inappropriate expectations being imposed on the child, young person or vulnerable adult • Interactions that are beyond the developmental capability • Overprotection and limitation of exploration and learning • Preventing the child, young person or vulnerable adult participating in normal social interaction • Seeing or hearing the ill-treatment of another child or vulnerable adult • Serious bullying (including cyber bullying) • Causing children, young people or vulnerable adults frequently to feel frightened or in danger • Exploitation or corruption of children, young people or vulnerable adults • Coercive control 	<ul style="list-style-type: none"> • A failure to thrive or grow • Sudden speech or language therapy • Developmental delay, either in terms of physical or emotional progresses • Behavioural change • Being unable to play or socialise with others • Fear of making mistakes • Self-harm • Fear of parent or carer being approached regarding their behaviour • Confusion • Use of inappropriate language, possession of violent, extremist literature, behavioural changes, the expression of extremist views, advocating violent actions and means, association with known extremists, seeking to recruit others • Acts of assault, threats, humiliation and intimidation or other abuse that is used to harm, punish or frighten their victim
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Some level of emotional abuse is involved in all types of maltreatment of a child, young person or vulnerable adult though it may occur alone.

Sexual Abuse

Sexual Abuse: this may involve	Signs: this may include
<ul style="list-style-type: none"> • Forcing or enticing a child, young person or vulnerable adult/s to take part in sexual activities, not necessarily involving a high level of violence, whether the child, young person or vulnerable adult is aware of what is happening • Physical contact including assault by penetration (for example rape or oral sex) • Non-penetrative acts such as masturbation • Kissing • Rubbing or touching outside of clothing • They may also include non-contact activities, such as involving children, young people or vulnerable adults in looking at, or in the production of, pornographic material or watching sexual activities • Encouraging children, young people or vulnerable adults to behave in sexually inappropriate ways • Grooming a child, young person or vulnerable adult in preparation for abuse (including via the internet) • Upskirting' is now a criminal offence. <p>A definition has been included which describes upskirting as, "taking a picture under a person's clothing without them knowing, with the intention of viewing their genitals or buttocks to obtain sexual gratification, or cause the victim humiliation, distress or alarm" (DfE, 2019a)</p>	<ul style="list-style-type: none"> • Pain or itching in the genital/anal areas • Bruising or bleeding near genital/anal areas • Sexually transmitted diseases • Vaginal discharge or infection • Stomach pains • Discomfort when walking or sitting down • Pregnancy • Sudden or unexplained changes in behaviour e.g., becoming aggressive or withdrawn • Fear of being left with a specific person or group of people • Nightmares • Leaving home • Sexual knowledge which is beyond their age or developmental age • Sexual drawings or language • Bedwetting • Saying they have secrets they cannot tell anyone about • Self-harm or mutilation, sometimes leading to suicide attempts • Eating problems such as overeating or anorexia

Sexual abuse is not solely perpetrated by adult males. Women can also commit acts of sexual abuse, as can other children.

Neglect

This is the persistent failure to meet a child, young person’s, or vulnerable adults basic physical and or psychological needs, likely to result in the serious impairment of the child, young person’s or vulnerable adult’s health or development.

Abuse by Neglect: this may involve	Signs: this may include
<ul style="list-style-type: none"> • Neglect may occur during pregnancy because of material substance abuse • A parent or carer failing to provide adequate food, clothing and shelter • Exclusion from home or abandonment • Failure to protect a child, young person or vulnerable adult from physical harm or danger failure • Failure to provide adequate supervision • Failure to use adequate care takers • Failure to ensure access to appropriate medical care or treatment <p>Neglect of, or unresponsiveness to a child, young person’s or vulnerable adult’s basic emotional need.</p>	<ul style="list-style-type: none"> • A constant hunger, sometimes stealing food from others • Dirty or smelly • Loss of weight, or being constantly underweight • Inappropriate dress for the weather • Complaining of being tired all the time • Not requesting medical assistance and failing to attend appointments • Having few friends • Worsening health conditions • Pressure sores • Mentioning their being left alone or unsupervised • Sore or extreme nappy rash • Skin infections • Lack of response to stimuli or contact • Poor skin condition(s) • Frozen watchfulness • Anxiety • Distressed • Child moves away from parent under stress • Little or no distress when separated from primary carer • Inappropriate emotional responses • language delay



Financial Abuse

Financial Abuse: this may involve	Signs: this may involve
<ul style="list-style-type: none">• Being overcharged for services• Being tricked into receiving goods or services that they do not want or need• Inappropriate use, exploitation, or misappropriation of property and or utilities• Theft• Deception• Fraud• Explanation or pressure relating to wills	<ul style="list-style-type: none">• Lack of basic requirements e.g., food, clothes, or shelter• Inability to pay bills• Unexplained withdrawals from accounts• Inconsistency between standard of living and income• Reluctance to take up assistance which is needed• Unusual interest by family or other people in the persons assets• Recent changes in deeds• Power of Attorney obtained when person lacks capacity to make the decision.

Institutional Abuse

Institutional Abuse: this may involve	Signs: this may include
<ul style="list-style-type: none"> • Service users required to fit in excessively to the routine of the service • More than one individual is neglected • Everyone is treated in the same way • Other forms of abuse on an institutional scale. 	<ul style="list-style-type: none"> • Inflexible daily routines, e.g., set bedtimes and or deliberate waking • Dirty clothing and bed linen • Lack of personal clothing and possessions • Inappropriate use of nursing and medical procedures • Lack of individualised care plans and failure to comply with care plans • Inappropriate use of power, control, restriction, and confinement • Failure to access health care, dentistry services, etc. • Inappropriate use of medication • Misuse of residents' finances or communal finances • Dangerous moving or handling practices • Failure to record incidents or concerns

Recognition of Abuse, including Neglect or Bullying, and Exploitation

Recognising abuse is not easy, and it is not the responsibility of colleagues, volunteers, delivery partners and contractors to decide whether abuse has taken place or if there is significant risk. We do however have a responsibility to act if we think it may be happening.

Abuse, including neglect, includes forms of maltreatment of a child, young person, or vulnerable adult. Somebody may abuse a child, young person, or vulnerable adult by inflicting harm, by failing to act to prevent harm. Children, young people, and vulnerable adults may be abused in a family or in an institutional or community setting; by those known to them or, more rarely, by a stranger for example via the internet. They may also be abused by an adult or adults, or by another child or children known as peer-on-peer abuse.

- All colleagues will be aware of the indicators of peer-on-peer abuse, such as those in relation to bullying, gender-based violence, sexual assaults, and sexting.
- All colleagues will be aware of the necessary procedures to follow to prevent peer-on-peer abuse, as outlined in Twin Group's Anti-Bullying Policy.
- All colleagues will be aware of the behaviours linked to drug taking, alcohol abuse, truancy, and sexting, and will understand that these put a child, young person and vulnerable adult in danger.
- Colleagues will be aware of the effects of a child, young person or vulnerable adult's witnessing of an incident of abuse, such as witnessing domestic violence at home.

Bullying and Harassment - Bullying can include a variety of behaviours from one individual/ group to another individual/ group such as name calling, offensive language, coercion, hitting, pushing, theft or damage to belongings, cyber, spreading harmful messages, hate crime or mate crime which is befriending someone with the intent to exploit them in some way. Please refer to Twin Group's Anti-Bullying Policy for further detail.

Online Safety - The safe and responsible use of technology, is sometimes presented as primarily a child, young person, or vulnerable adult protection issue. Children, young people, and vulnerable adults do need support to keep themselves safe online and to be aware of the risks associated with the use of technology. Examples include the mismanagement of personal data, risks of financial scams, misinformation, disinformation and conspiracy theories, reflecting growing risks in the digital space, identity theft, cyber bullying, grooming, and radicalisation. Please refer to Twin Group's Online Safety Policy for further detail.

Use of equipment – Twin Group's IT equipment (including computers, laptops, mobile phones, notebooks, etc.) must not be used to view, download, create or share (with colleagues or children, young people, or vulnerable adults) illegal content including abusive images of children or young people or vulnerable adults).

Risk to self and/or others - This may include but is not exclusive to self-harm, suicidal tendencies or potential risk of harming others, which may or may not include children. This may be because of an individual experiencing a significant level of personal, emotional trauma and/or stress.

Domestic Violence - can be physical, emotional, sexual, neglect. This category also covers Forced Marriages and honour-based violence. Some children, young people and vulnerable adults may experience issues with drugs or alcohol to self-medicate or via dependence.

Female Genital Mutilation (FGM) - Victims of FGM are likely to come from a community that is known to practice FGM. Professionals should note that girls at risk of FGM may not yet be aware of the practice

or that it may be conducted on them, so sensitivity should always be shown when approaching the subject.

The FGM mandatory reporting duty is a legal duty provided for in the FGM Act 2003 (as amended by the Serious Crime Act 2015). The legislation requires colleagues to report where, during their professional duties, they either are informed by a girl under 18 that an act of FGM has been carried out on her, observe physical signs which appear to show that an act of FGM has been carried out on a girl under 18 and they have no reason to believe that the act was necessary for the girl's physical or mental health or for purpose with labour or birth. For the purposes of the duty, the relevant age is the girl's age at the time of disclosure/identification of FGM (i.e., it does not apply where a woman aged 18 or over discloses, she had FGM when she was under 18). Women over the age of 18 may still require medical support and emotional support if they have suffered FGM when they were younger.

Forced Marriage - One or both spouses do not consent to the marriage or consent is extracted under duress. Duress includes both physical and emotional pressure. A clear distinction must be made between a forced marriage and an arranged marriage. In arranged marriages, the families of both spouses take a leading role in choosing the marriage partner but the choice whether to accept the arrangement remains with the young people.

Any indications that children, young people, or vulnerable adults may be subjected to FGM or Forced Marriage, or that this may have already taken place, will be dealt with under the procedures outlined in this policy. In support of this provision Twin Group will do everything that it can to ensure that:

- The Head of Safeguarding/safeguarding lead, DSLs and DLPs are aware of the issues surrounding FGM and Forced Marriage.
- Advice and signposts are available for accessing additional support e.g., the NSPCC's helpline, ChildLine services, Forced Marriage Unit and An Garda Siochana (ROI only).
- Awareness raising about FGM and Forced Marriage is incorporated in Twin Group's safeguarding training.

Where there are concerns about FGM or Forced Marriage, a referral must be made as a matter of urgency. It is also extremely important that if a child, young person, or vulnerable adult has disclosed that they are at risk of FGM or Forced Marriage, the case is referred to Social Care or the police even if it

is against that person's wishes. Twin Group colleagues must NOT consult or discuss these concerns with the child, young person's or vulnerable adult's parents or family or others within the community. If there

is an imminent risk e.g., the child, young person or vulnerable adult being taken out of the country, police must be informed (999) and the safety of the child, young person or vulnerable adult whilst awaiting the police response must be the prime consideration.

Modern slavery - Encompasses slavery, human trafficking, forced labour and domestic servitude. Traffickers and slave masters use whatever means they have at their disposal to coerce, deceive, and force individuals into a life of abuse, servitude, and inhumane treatment.

Risks/ abuse related to family/cultural belief/ faith - It is important to remember that many children, young people, and vulnerable adults are a part of a family. Some families have certain values and beliefs that can cause harm to a child, young person, or vulnerable adult. An example of this can include strong beliefs or a sense of honour or shame that can prevent people from seeking or accepting the help they need. A strong cultural or religious belief in the sanctity of marriage may dissuade people from leaving their partners, even if they are violent. In addition, many religions and cultures have strong beliefs around sex outside marriage, making it very hard for young, unmarried, pregnant women to get the help they need. Differences in culture or religion between partners, or between parents and children, may also make it more difficult for individuals to understand and support each other. Where one partner perceives their faith and heritage to be superior to, or more important than, their partner's it can lead to a power imbalance and an erosion of the other partner's self-esteem. In extreme cases children and young people who are perceived as "disobedient" or "different" are believed to be possessed by a spirit controlling their behaviour. The child or young person can be physically and emotionally abused to exorcise the spirit.

Parental Impacts - The issues of parents and carers can have a significant impact upon a child, young persons, or vulnerable adult's wellbeing. Some issues can include Substance Misuse, Mental Health and Domestic Abuse. It is also important to note that some children, young people, and vulnerable adults also misuse drugs or alcohol when experiencing trauma in their own lives and they may require support around both factors. It is fundamental that wherever a concern is held for a child, young person, or vulnerable adult that confidentiality is respected however if the concern must involve the parent or carer for safeguarding reasons then it is good practice to work together and inform parents or carers of any referrals that may have to be made to support services.

Homelessness - The Head of Safeguarding/safeguarding lead and deputy(s) will be aware of the contact details and referral routes into the Local Housing Authority so that concerns over homelessness can

be raised as early as possible. Indicators that a family may be at risk of homelessness include the following:

- Household debt
- Rent arrears
- Domestic abuse
- Anti-social behaviour
- Any mention of a family moving home because “they have to”

Referrals to the Local Housing Authority do not replace referrals to MASH where a child or young person is being harmed or at risk of harm. For 16- and 17-year-olds, homelessness may not be family-based, and referrals will be made as necessary where concerns are raised.

County lines criminal activity - For this policy, “County lines criminal activity” refers to drug networks or gangs grooming and exploiting children and young people to carry drugs and money from urban areas to suburban areas, rural areas and market and seaside towns. Colleagues should be aware that vulnerable adults may also be forced to carry drugs and money within county lines criminal, activity.

Colleagues will be made aware of children and young people with missing episodes who may have been trafficked for the purpose of transporting drugs. Colleagues who suspect a child, young person or vulnerable adult may be vulnerable to, or involved in, this activity will immediately report all concerns to the Head of Quality and Safeguarding or a DSL/DLP.

The Head of Quality and Safeguarding or DSL/DLP will consider referral to the National Referral Mechanism on a case-by-case basis. Indicators that a child, young person or vulnerable adult may be involved in county lines active include the following:

- Persistently going missing or being found out of their usual area
- Unexplained acquisition of money, clothes, or mobile phones
- Excessive receipt of texts or phone calls
- Relationships with controlling or older individuals or groups
- Leaving home without explanation
- Evidence of physical injury or assault that cannot be explained
- Carrying weapons
- Sudden decline in progress or achievement results
- Becoming isolated from peers or social networks
- Self-harm or significant changes in mental state.

- Parental reports of concern.

Children, young people and vulnerable adults with family members in prison – Child, young person and vulnerable adults with a family member in prison will be offered pastoral support as necessary. They will receive a copy of [‘Are you a young person with a family member in prison’](#) from Action for

Prisoners’ Families where appropriate and allowed the opportunity to discuss questions and concerns.

Child, young person, and vulnerable adults required to give evidence in court – Children, young people and vulnerable adults required to give evidence in criminal courts, either for crimes committed against them or crimes they have witnessed, will be offered appropriate pastoral support. Children, young people and vulnerable adults will also be provided with the booklet [‘Going to Court’](#) from HM Courts and Tribunals Service (HMCTS) where appropriate and allowed the opportunity to discuss questions and concerns.

Contextual safeguarding - Safeguarding incidents can occur outside of Twin Group and can be associated with outside factors. All colleagues, particularly the Head of Quality and Safeguarding and DSLs/DLPs, will always consider the context of incidents – this is known as contextual safeguarding. Assessment of a child, young person’s and vulnerable adult’s behaviour will consider whether there are wider environmental factors that are a threat to their safety and/or welfare. Twin Group will provide as much contextual information as possible when making referrals to MASH (Not available in ROI).

Children, young people and vulnerable adults with SEND

Twin Group recognises that children, young people and vulnerable adults with SEND can face additional safeguarding challenges and understands that further barriers may exist when determining abuse and neglect in this group of children, young people and vulnerable adults.

Colleagues will be aware of the following:

- Certain indicators of abuse, such as behaviour, mood and injury, may relate to the child, young person and vulnerable adult disability without further exploration; however, it should never be assumed that indicators relate only to their disability

- Children, young people and vulnerable adults with SEND can be disproportionately impacted by things like bullying, without outwardly showing any signs
 - Communication barriers may exist, as well as difficulties in overcoming these barriers
 - When reporting concerns or making referrals for a child, young person and vulnerable adult with SEND, the above factors will always be taken into consideration.
-
- When managing a safeguarding issue relating to a child, young person or vulnerable adult with SEND, the DSL will liaise with the child, young person or vulnerable adult's family where appropriate, to ensure that the child, young person and vulnerable adults needs are effectively met.

Private fostering - Where Twin Group becomes aware of a child or young person being privately fostered or a child, young person and vulnerable adult privately fostering, they will notify the LA as soon as possible to allow the LA to conduct any necessary checks.

Serious crime - The guidance sets out what school, college and training provider colleagues should look out for:

"All colleagues should be aware of indicators, which may signal that a child, young person or vulnerable adult is at risk from, or are involved with serious violent crime.

These may include increased absence, 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 or vulnerable adults have been approached by, or are involved with individuals associated with criminal networks or gangs" (DfE, 2020)

All colleagues will be made aware of the associated risks and understand the measures in place to mitigate these. Advice for schools and colleges is provided in the Home Office's Preventing youth violence and gang involvement and its criminal exploitation of children, young people and vulnerable adults: county lines guidance." (DfE, 2020).

Allegations of abuse, Neglect or Exploitation against other children, young people or vulnerable adults (peer-on-peer abuse)

Sexual harassment - Sexual harassment refers to unwanted conduct of a sexual nature that occurs online or offline. Sexual harassment violates a child, young person or vulnerable adult's dignity and makes them feel intimidated, degraded or humiliated, and can create a hostile, sexualised or offensive environment. If left unchallenged, sexual harassment can create an atmosphere that normalises inappropriate behaviour and may lead to sexual violence.

Sexual harassment includes:

- Sexual comments.
- Sexual "jokes" and taunting.
- Physical behaviour, such as deliberately brushing against another pupil.
- Online sexual harassment, including non-consensual sharing of images and videos and consensual sharing of sexual images and videos (often known as sexting), inappropriate comments on social media, exploitation, coercion and threats – online sexual harassment may be isolated or part of a wider pattern.

Sexual violence - Sexual violence refers to the three following offences:

- Rape: A person (A) commits an offence of rape if he intentionally penetrates the vagina, anus or mouth of another person (B) with his penis, B does not consent to the penetration and A does not reasonably believe that B consents.
- Assault by Penetration: A person (A) commits an offence if s/he intentionally penetrates the vagina or anus of another person (B) with a part of her/his body or anything else, the penetration is sexual, B does not consent to the penetration and A does not reasonably believe that B consents.
- Sexual Assault: A person (A) commits an offence of sexual assault if s/he intentionally touches another person (B), the touching is sexual, B does not consent to the touching and A does not reasonably believe that B consents.

Harmful sexual behaviours - The term is used to describe behaviour that is problematic, abusive and violent, and that may cause developmental damage. Harmful sexual behaviour may include:

- Using sexually explicit words and phrases.
- Inappropriate touching.
- Sexual violence or threats.
- Full penetrative sex with other children or adults.

- Sexual interest in adults or children of very different ages to their own.
- Forceful or aggressive sexual behaviour.
- Compulsive habits.
- Sexual behaviour affecting progress and achievement.
- Using sexually explicit words and phrases.
- Inappropriate touching.
- Sexual violence or threats.

Sexual behaviour can also be harmful if one of the children is much older (especially where there is two years or more difference, or where one child is pre-pubescent and the other is not) and where the child, young person or vulnerable adult may have SEND.

Upskirting - is now a criminal offence. A definition has been included which describes upskirting as, "taking a picture under a person's clothing without them knowing, with the intention of viewing their genitals or buttocks to obtain sexual gratification, or cause the victim humiliation, distress or alarm" (DfE, 2019a). Where Twin Group becomes aware of a child, young person or vulnerable adult either being a perpetrator or victim of 'upskirting' this will be reported to the police.

A preventative approach

In order to prevent peer-on-peer abuse and address the wider societal factors that can influence behaviour, the Twin Group will educate children, young people and vulnerable adults about abuse, its forms and the importance of discussing any concerns.

Twin Group will also ensure that children, young people and vulnerable adults are taught about safeguarding, including online safety, as part of a broad and balanced curriculum. Such content will be age and stage of development specific, and tackle issues such as the following:

- Healthy relationships
- Respectful behaviour
- Gender roles, stereotyping and equality
- Body confidence and self-esteem
- Prejudiced behaviour
- That sexual violence and sexual harassment is always wrong

- Addressing cultures of sexual harassment

Awareness

All colleagues will be aware that children, young people and vulnerable adults of any age and sex are capable of abusing their peers and will never tolerate abuse as “banter” or “part of growing up”.

- All colleagues will be aware that peer-on-peer abuse can be manifested in many different ways, including sexting and gender issues, such as girls being sexually touched or assaulted, and boys being subjected to hazing/initiation type of violence which aims to cause physical, emotional, or psychological harm.
- All colleagues will be made aware of the heightened vulnerability of children, young people or vulnerable adults with SEND, who are three times more likely to be abused than their peers. Colleagues will not assume that possible indicators of abuse relate to the child, young person’s or vulnerable adult’s SEND and will always explore indicators further.
- LGBTQ+ children, young people or vulnerable adults can be targeted by their peers. In some cases, children, young people or vulnerable adults who are perceived to be LGBTQ+, whether they are or not, can be just as vulnerable to abuse as LGBTQ+ children, young people or vulnerable adults.
- Twin Group’s response to boy-on-boy and girl-on-girl sexual violence and sexual harassment will be equally as robust as it is for incidents between children, young people or vulnerable adults of the opposite sex.
- Children, young people and vulnerable adults will be made aware of how to raise concerns or make a report and how any reports will be handled. This includes the process for reporting concerns about friends or peers.
- Following the Cass review, organisations are advised to exercise caution regarding social transitioning due to the potential unknown impacts. Collaboration with parents is encouraged unless there is a significant risk of harm to the child.

Support available if reports include online behaviour

- Online concerns can be especially complicated. Twin Training recognises that there is potential for an online incident to extend further than the local community and for a victim, or the alleged perpetrator, to become marginalised and excluded both online and offline. There is also strong potential for repeat victimisation if the content continues to exist.

- If the incident involves sexual images or videos held online, the [Internet Watch Foundation](#) will be consulted to have the material removed.
- Colleagues will not view or forward illegal images of a child, young person or vulnerable adult. If they are made aware of such an image, they will contact the Head of Safeguarding/safeguarding lead or a DSL/DLP.

The Prevent Duty – UK Only

In 2010, the Government published the Prevent Strategy. This raised an awareness of the specific need to safeguard children, young people and families from violent extremism. Please refer to Twin Group's Prevent Duty Statement. In the ROI there are no clear references to the Prevent Duty but the Children First National Guidance does recognise the term radicalisation.

Extremist groups have attempted to radicalise vulnerable children, young people and vulnerable adults to hold extreme views including views justifying political, religious, sexist or racist violence, or to steer them into a rigid and narrow ideology that is intolerant of diversity and leaves them vulnerable to future radicalisation.

Prevent is about Safeguarding our children, young people and vulnerable adults to keep them both safe and within the law. The Prevent Duty is not about preventing children, young people, and vulnerable adults from having political and religious views and concerns but about supporting them to use those concerns or act on them in non-extremist ways.

Our Prevent Duty processes are regularly reviewed in line with local and national risk assessments. Staff training is refreshed annually, and we monitor local and national risks to ensure our approach remains current and effective. We are committed to continuous improvement in this area and input from subject experts.

Radicalisation & Extremism - The holding of extreme political or religious views e.g., animal welfare rights, environmentalists, EDL / white supremacy groups, anti-gay groups, Islam / Christian ideology. The Counter Terrorism and Security Act, places a duty on specified authorities, including local authorities and childcare, education and other children's services providers, in the exercise of their functions, to have due regard to the need to prevent people from being drawn into terrorism. ("The Prevent duty")

The current threat from terrorism in the United Kingdom may include the exploitation of vulnerable people, to involve them in terrorism or in activity in support of terrorism. The normalisation of

extreme views may also make children, young people and vulnerable adults, vulnerable to future manipulation and exploitation.

Twin Group is clear that this exploitation and radicalisation should be viewed as a safeguarding concern and that protecting children, young people and vulnerable adults from the risk of radicalisation is part of the company's safeguarding duty.

Radicalisation refers to the process by which a person comes to support terrorism and forms of extremism leading to terrorism. Children, young people, and vulnerable adults may become susceptible to radicalisation through a range of social, personal and environmental factors - it is known that violent extremists exploit vulnerabilities in individuals to drive a wedge between them and their families and communities. It is vital that colleagues can recognise those vulnerabilities.

Extremism is defined by the UK Government in the Prevent Strategy as:

Vocal or active opposition to British and Irish Fundamental values, including democracy, the rule of law, individual liberty and mutual respect and tolerance of different faiths and beliefs. We also include in our definition of extremism calls for the death of members of our armed forces, whether in this country or overseas.

Responding to suspicions of radicalisation and extremism

We are alert to changes in a child, young person or vulnerable adult's behaviour or attitude which could indicate that they need help or protection.

- When any colleague has concerns that a child, young person or vulnerable adult may be at risk of radicalisation or involvement in terrorism, they should speak with the Head of Quality and Safeguarding or DSL/DLP for investigation and action.
- Disclosure records are held by the Head of Safeguarding/DSL/DLP and stored on a secure server.
- Colleagues take care not to influence the outcome either through the way they speak to or question children, young people or vulnerable adults.
- We will continue to welcome the child, young person, and vulnerable adult whilst investigations are being made. The child, young person or vulnerable adult may choose to withdraw from learning activities whilst investigations take place.
- We follow the procedures as set by the Local Safeguarding Partnership in relation to the delivery of services and designated roles and tasks in supporting the child, young person or vulnerable adult, family, host, host employer and sub-contractor after any investigation.



- All suspicions and investigations are kept confidential and shared only with those who need to know. Any information is shared under the guidance of the Local BIS Prevent Coordinator.

Numerous factors can contribute to and influence the range of behaviours that are defined as violent extremism, but most children, young people and vulnerable adults do not become involved in extremist action. For this reason, the appropriate interventions in any case may not have any specific connection to the threat of radicalisation, for example they may address mental health, relationship, or drug/alcohol issues.

Channel (Not currently available in the ROI)

Channel is a multi-agency approach to provide support to individuals who are at risk of being drawn into terrorist related activity. It is led by the regional Police Counter-Terrorism Unit, and it aims to:

- Establish an effective multi-agency referral and intervention process to identify vulnerable individuals.
- Safeguard individuals who might be vulnerable to being radicalised, so that they are not at risk of being drawn into terrorist-related activity.
- Provide early intervention to protect and divert people away from the risks they face and reduce vulnerability.

The Channel programme focuses on providing support at an early stage to people who are identified as being vulnerable to being drawn into terrorism. It provides a mechanism to make referrals if they are concerned that an individual might be vulnerable to radicalisation. An

individual's participation in the programme is entirely voluntary at all stages.

Independent Training Providers have a duty to cooperate with the Channel programme in the carrying out of its functions, and with the Police in providing information about an individual who is referred to Channel (Section 38, Counter Terrorism and Security Act 2015).

Further guidance about duties relating to the risk of radicalisation is available in the Prevent Duty Guidance for FE. Please also refer to our Prevent Duty Statement.

Recognition of vulnerability factors can include:

- Identity Crisis – the child, young person or vulnerable adult is distanced from their cultural / religious heritage and experiences discomfort about their place in society.
- Personal Crisis – the child, young person or vulnerable adult may be experiencing family tensions; a sense of isolation; and low self- esteem; they may have dissociated from their existing friendship group and become involved with a new and different group of friends; they may be searching for answers to questions about identity, faith and belonging.
- Personal Circumstances – migration; local community tensions; and events affecting the child, young person or vulnerable adult 's country or region of origin may contribute to a sense of grievance that is triggered by personal experience of racism or discrimination or aspects of Government policy.
- Unmet Aspirations – the child, young person or vulnerable adult may have perceptions of injustice, a feeling of failure.
- Rejection of civic life.
- Experiences of Criminality – which may include involvement with criminal groups, imprisonment, and poor resettlement / reintegration.
- Special Educational Need – children, young people and vulnerable adults may experience difficulties with social interaction, empathy with others, understanding the consequences of their actions and awareness of the motivations of others.

However, this list is not exhaustive, nor does it mean that all children, young people or vulnerable adults experiencing the above are at risk of radicalisation for the purposes of violent extremism.

More critical risk factors could include:

- Being in contact with extremist recruiters.
- Accessing violent extremist websites, especially those with a social networking element.
- Possessing or accessing violent extremist literature.
- Using extremist narratives and a global ideology to explain personal disadvantage.
- Justifying the use of violence to solve societal issues.
- Joining or seeking to join extremist organisations.
- Significant changes to appearance and / or behaviour.
- Experiencing a high level of social isolation resulting in issues of identity crisis and / or personal crisis.

Building the resilience of children, young people and vulnerable adults'

Twin Group will:

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- Provide a safe environment for debating controversial issues.
- Promote fundamental British and Irish values, alongside pupils' spiritual, moral, social and cultural development.
- Allow children, young people and vulnerable adults time to explore sensitive and controversial issues.
- Provide children, young people and vulnerable adults with the knowledge and skills to understand and manage potentially difficult situations, recognise risk, make safe choices, and recognise where pressure from others threatens their personal safety and wellbeing.
- Equip children, young people and vulnerable adults to explore political and social issues critically, weigh evidence, debate, and make reasoned arguments.
- Teach children, young people and vulnerable adults about how democracy, government and law making/enforcement occur.
- Teach children, young people and vulnerable adults about mutual respect and understanding for the diverse national, regional, religious, and ethnic identities of Great Britain.

Twin Group will utilise the following resources when preventing radicalisation:

- Student handbooks and induction resources
- Local Safeguarding Partnership arrangements
- Local police (contacted via 101 for non-emergencies)
- The DfE's dedicated helpline (020 7340 7264)
- The Channel awareness programme
- The Educate Against Hate website
- The Child and Family Agency (Tusla – ROI only)

Allegations Against Colleagues

Twin Group recognises that whilst most colleagues and volunteers who work with children, young people and vulnerable adults are committed to their wellbeing and care there exists a range of abuse perpetrated by workers that despite the best efforts and interventions can still take place.

- An allegation may relate to a colleague including a volunteer who works with children, young people or vulnerable adults who has behaved in way that has harmed a child, young person or vulnerable adult or may have harmed a child, young person or vulnerable adult, possibly committed a criminal offence against or related to a child, young person or vulnerable adult or behaved towards a child, young person or vulnerable adult in a way that indicates they may pose a risk of harm to children, young people or vulnerable adults.

- We ensure that all children, young people and vulnerable adults, host, host employers and sub-contractors know how to complain about colleagues, which may include an allegation of abuse or neglect of statutory duties.
- We follow the guidance of the Local Safeguarding Partnerships or Tusla (ROI only) when responding to any complaint that a colleague or other stakeholder has abused a child, young person or vulnerable adult.
- Each Manager knows that the Head of Safeguarding and DSL/DLPs is to be made aware immediately of any allegation or complaint against a colleague or stakeholder.
- We respond to any disclosure by children, young people and vulnerable adults or other

stakeholder that abuse by a colleague may have taken, or is taking place, by first recording the details of any such alleged incident on an incident form.

- We refer any such complaint immediately to the Designated Local Authority's Person/Tusla to investigate.
- We co-operate entirely with any investigation carried out by the local authority and police.
- Disclosure and Barring Service liaison (DBS) or the National Vetting Bureau (NVB ROI only).

Abuse of a position of trust

Twin Group recognises that our colleagues, volunteers, delivery partners and contractors are in a position of trust with our children, young people and vulnerable adults in our care whether children, young people or vulnerable adults and acknowledge that it could be considered a criminal offence to abuse that trust. Broadly speaking, a relationship of trust can be described as one in which one party is in a position of power or influence over the other by virtue of their work or the nature of their activity. It is vital that for all of those in positions of trust to understand the power this can give them over those they care for and the responsibility.

Twin Group acknowledge the principle of equality embedded into the legislation of the Sexual Offenders Act 2003 applies irrespective of sexual orientation, neither homosexual or heterosexual relationships are acceptable within a position of trust.

We recognise that the legislation is intended to protect young people who are over the age of consent but under the age of 18 years

Twin Group recognises the importance that its colleagues, volunteers, delivery partners and contractors protect the rights and needs of all children, young people and vulnerable adults on our programmes and in our care.

Support for Colleagues



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Twin Group recognises the intrinsic link between strong safeguarding culture and staff wellbeing. We foster a safe, open environment where staff feel confident to raise concerns, and where wellbeing is actively promoted. This reflects Ofsted's focus on creating safe and open environments for all.

Where a colleague finds a disclosure particularly distressing, they may wish to access the additional services or contact HR Department for support.

Twin Group adopt an open-door policy for any colleagues who wish to discuss their concerns, colleagues will need to be mindful that Twin Group cannot as with children, young people and vulnerable adults give absolute confidentiality to any disclosures.



All children, young people and vulnerable adults receive programme inductions and are given a Handbook which includes raising awareness of commitment towards Safeguarding, details of the support services that can be offered and contact details for the Safeguarding team. The understanding of all aspects of Safeguarding and safe working practices is checked at each review and the opportunity to discuss any issues is given.

Assessments are made to ensure that the child, young person and vulnerable adults wellbeing is safeguarded by the work placement, host family, host employer, sub-contractor or other stakeholder and their teams to ensure arrangements are in place to, prior to work related activity commencing:

- Pre-placement Health and Safety checks of host employer's premises and health and safety management arrangements are complete, including insurance details, young person risk assessments, lone working policies etc.
- Host employers are made aware of relevant Twin Group policies
- The requirements for DBS/NVB checks are assessed and the relevant processes undertaken where required.

The Twin Group Whistleblowing Policy enables staff to raise concerns about any financial, or other, malpractice in Twin Group (Twin) without fear of being subject to victimisation or discrimination. Such concerns may include the following:

- conduct which is an offence or a breach of law
- disclosures related to miscarriages of justice
- health and safety risks, including risks to the public as well as other employees
- damage to the environment
- the unauthorised use of Twin monies
- possible fraud and/or corruption
- sexual or physical abuse; or
- other unethical conduct

Roles and responsibilities

Safeguarding is monitored and reported at both senior leadership and Board level. The Head of Safeguarding provides regular (at least quarterly) reports to the Board, including analysis of trends and emerging risks. These reports inform continuous improvements and strategic planning.

The Board has a duty to:

- Ensure that Twin Group complies with its duties under the above child protection and safeguarding legislation.
- Guarantee that the policies, procedures and training opportunities in Twin Group are effective and always comply with the law.
- Guarantee that the Twin Group contributes to inter-agency working in line with the statutory guidance 'Working Together to Safeguard Children' (2020 England and Wales), 'The Working Together to Safeguard Attendance guidance' and or Children First national guidance (ROI only).
- Confirm that the safeguarding arrangements take into account the procedures and practices of the LA as part of the inter-agency safeguarding procedures.
- Comply with its obligations under section 14B of the Children Act 2004 to supply the local safeguarding arrangements with information to fulfil its functions.
- Ensure that a member of the board is nominated to liaise with the LA and/or partner agencies on issues of child protection and in the event of allegations of abuse made against another governor/Board member.
- Guarantee that there are effective safeguarding and child protection policies and procedures in place together with a colleague code of conduct.
- Ensure that there is a senior board level lead responsible for safeguarding arrangements.
- Appoint a colleague from the SLT to the role of DSL/DLP as an explicit part of the role-holder's job description.
- Ensure that the DSL has lead authority for safeguarding, including online safety and understanding the filtering and monitoring systems and processes in place
- Appoint one or more deputy DSL(s)/DLP(s) to provide support to the Head of Safeguarding and ensure that they are trained to the same standard as the Head Safeguarding and that the role has an explicit job description(s).
- Make sure that children, young people, and vulnerable adults are taught about safeguarding, including protection against dangers online, through teaching and learning opportunities, as part of providing a broad and balanced curriculum.
- Adhere to statutory responsibilities by conducting pre-employment checks on colleagues who work with children, young people and/or vulnerable adults taking proportionate decisions on whether to ask for any checks beyond what is required.

- Ensure that colleagues are appropriately trained to support children, young people and vulnerable adults to be themselves at Twin Training e.g., if they are LGBTQ+.
- Guarantee that volunteers are appropriately supervised.
- Make sure that at least one person on any appointment panel has undertaken safer recruitment training.
- Ensure that all colleagues receive safeguarding and child protection training updates, such as e-bulletins, emails and colleague meetings, as required, but at least annually.
- Certify that there are procedures in place to handle allegations against colleagues or volunteers.
- Confirm that there are procedures in place to make a referral to the DBS/NVB and the GOV.UK, where appropriate, if a person in regulated activity has been dismissed or removed due to safeguarding concerns or would have been had they not resigned.
- Guarantee that there are procedures in place to handle a child, young person or vulnerable adult's allegations against other children, young people or adults vulnerable or.
- Ensure that appropriate disciplinary procedures are in place, as well as policies pertaining to the behaviour of children, young people and vulnerable adults and colleagues.
- Ensure that procedures are in place to eliminate unlawful discrimination, harassment and victimisation, including those in relation to peer-on-peer abuse.
- Make sure that children, young people and vulnerable adults' wishes and feelings are taken into account when determining what action to take and what services to provide to protect individual children, young people and vulnerable adults.
- Guarantee that there are systems in place for children, young people and vulnerable adults to express their views and give feedback.
- Establish an early help procedure and ensure all staff understand the procedure and their role in it.
- Appoint a designated teacher to promote the educational achievement of LAC and ensure that this person has undergone appropriate training.
- Introduce mechanisms to assist staff in understanding and discharging their roles and responsibilities.
- Make sure that staff members have the skills, knowledge and understanding necessary to keep LAC safe, particularly with regards to the child, young person and vulnerable adult's legal status, contact details and care arrangements.
- Put in place appropriate safeguarding responses for children, young people and vulnerable adults who go missing from education, particularly on repeat occasions, to help identify any risk of abuse and neglect, including sexual abuse or exploitation, and prevent the risk of their disappearance in future.
- Ensure that all members of the board have been subject to the appropriate level of DBS/NVB

check

1. Ensure that Twin Group has appropriate filtering and monitoring systems in place and review their effectiveness. This includes:
2. Making sure that the SLT and staff are aware of the provisions in place, and that they understand their expectations, roles and responsibilities around filtering and monitoring as part of safeguarding training
3. Reviewing the DfE's filtering and monitoring standards, and discussing with IT staff and service providers what needs to be done to support the school in meeting these standards

Role of Designated Safeguarding Lead

Twin Group had appointed a Head of Safeguarding to have overall responsibility for issues related to safeguarding children, young people, and vulnerable adults. The Head of Safeguarding was responsible for acting as a source of advice on child, young people, and vulnerable adult safeguarding matters, for coordinating action within the organisation and for liaising with health, children's services, adult services, and other agencies about suspected or actual cases of abuse.

The Head of Safeguarding had been assisted by other DSLs/DLPs drawn from senior management and suitably experienced colleagues. Designated colleagues have a key responsibility for raising awareness, with colleagues, of issues relating to the welfare of children, young people and vulnerable adults and the promotion of a safe environment for children, young people, and vulnerable adults within Twin Group. Designated Leads receive training in Safeguarding children and vulnerable adults and interagency working as required by the LSPs and for our DLPs in ROI they hold a Child Protection Certificate and have undertaken the Children First E-Learning and receive refresher training annually as required by Twin Group. The team are required to keep up to date with developments in safeguarding children, young people and vulnerable adults as required.

The Head of Safeguarding has governance over safeguarding matters across Twin Group, the Board representative, Chief Peoples officer has overall responsibility for safeguarding at Board level. The board representative will ensure that resources, support, and all relevant training are available and in place for colleagues. The CPO as the safeguarding sponsor at board level, will support the Safeguarding team in meeting their responsibilities and ensuring that Twin Group meets its commitments and takes it seriously, reporting monthly at Board meetings.

There is a clear and robust job description for all Safeguarding roles within Twin Group which can be accessed on the system. The Head of Safeguarding is responsible for reviewing the Safeguarding and Prevent Policy annually along with any policies linked to the safeguarding policy and processes and procedures that support the embedding and working practices of this policy, supported by the relevant Twin Group departments.

- The Head of Safeguarding and relevant contract manager is responsible for ensuring the Safeguarding and Prevent Policy is available publicly and to parents and carers and that parents and carers are aware that suspected abuse referrals may be made and Twin Group's role in this. The Head of Safeguarding or Head of H.R. will alert the DBS where a person has been dismissed or left due to risk to or harm that they presented or may have presented to a child, young person or vulnerable adult.
- The Head of Safeguarding is responsible for ensuring all staff read Part One and Annex B of the Department for Education's statutory safeguarding guidance, [Keeping Children Safe in Education](#), (July 2025) and review this guidance at least annually
- The Head of Safeguarding is to ensure with support from the Head of HR that all staff sign a declaration at the beginning of each academic year to say that they have reviewed the above guidance and understand their role
- The Head of Safeguarding or DSL/DLP will alert the Police or in ROI the An Garda Síochána – where a crime may have been committed.
- The Head of Safeguarding and DSLs/DLPs foster strong links with the LSPs, Designated Local Authority Person and Tusla.
- Refer all cases of suspected abuse to the local authority children's social care agency or in the case of a vulnerable adult to the local authority adult's social care or to Tusla or An Garda Síochána (ROI only).
- Liaise with senior management to inform them of issues especially on-going enquiries and police investigations.
- DSLs/DLPs will maintain a proper record of any safeguarding referral, complaint, or concern – even where that concern does not lead to a referral.
- DSLs/DLPs act as a source of advice, support, and expertise to colleagues on matters of safety and safeguarding.
- Liaise with relevant agencies following a referral to ensure it has been dealt with effectively and identify whether a resolution has been achieved. DSLs/DLPs ensures that Twin Group works with employers and other training organisations that provide work placements, internships or other activities for children, young people, or vulnerable adults from Twin Group to ensure that appropriate safeguards are in place.



- The individual responsible for HR and Training with support from the CPO ensures that all colleagues, host families, host employers, sub-contractors and delivery partners receive training in safeguarding children, young people and vulnerable adults, are aware of Twin Group's procedures for safeguarding children, young people and vulnerable adults and that refresher training takes place annually.
- The Head of Safeguarding provides information on a monthly basis to the CPO and SMT setting out how Twin Group has discharged its duties with the support of the Safeguarding Board Sponsor. The Head of Safeguarding is also responsible for reporting deficiencies in procedure or policy identified by the LSPs at the earliest opportunity.
- If the Head of Safeguarding is absent from the business the Deputy DSL/DLP will be responsible for undertaking Head of Safeguarding duties.

Under no circumstances should a colleague, host, host employers or contractor undertake any investigative activities of alleged or actual abuse, nor should they contact any of the external agencies that will deal with a referral. It is the responsibility of the DSLs/DLPs with support from the senior management team to decide whether a referral should be made and to which agency or agencies. It is the role of the relevant Safeguarding and Police Services agencies to decide if abuse has taken place.

SCPs may make their own referrals but must inform their Twin Group's supply chain manager immediately.

If Twin Group's colleagues are working on external sites, then they would need to be aware of the safeguarding process for that external specific site/company. The DSL/DLP would liaise with the corresponding DSL/DLP during the process as necessary. For example, if there was a concern about a colleague of the external site then the Twin Group DSL/DLP would speak with the DSL/DLP of the external site. If there was a safeguarding concern about any Twin Group child, young person or vulnerable adult or colleague, then the DSL/DLP would deal with this but may, depending on the circumstances, need to inform the DSL/DLP on the external site.

If Twin Group is working in schools or colleges then any concerns about children or young people or vulnerable adults or school or college colleagues must be reported to the designated safeguarding lead in the school or college. The Twin Group DSL/DLP also needs to be informed.

The DSL/DLP has responsibility for:



Managing referrals

- Refer cases of suspected abuse to Local Authority.
- Support colleagues who make referrals to Local Authority.
- Refer cases to Chanel programme where there is a radicalisation concern.
- Refer cases where a person has been dismissed or left due to risk/harm to a child, young person or vulnerable person to DBS or NVB (ROI only).
- Refer cases where a crime has been committed to the Police.

Working with others

- As required liaise with “case manager” and the Designated Safeguarding Lead at the Local Authority for child protection concerns on all cases which concern a colleague.
- Liaise with senior management team /board to inform of issues / ongoing enquires related to section 47 of the Children's Act 1989.
- Liaise with colleagues on matters of safety and safeguarding when deciding whether to make a referral by liaising with relevant external agencies.
- Act as a source of support, advice, and expertise for colleagues.
- Link with Local Children's and Adults Safeguarding Partnerships.
- Child /Vulnerable Adult Protection Files are transferred to new College, Training Provider, or other support services.
- Availability: telephone, skype or in person to deal with any incidents.

Ongoing Development and raising awareness

- Understand the assessment process for providing early help and intervention, through locally agreed common and shared assessment process (Local Safeguarding Partnerships) (Tusla and/or An Gard Siochana ROI only).
- Have working knowledge of each LSP children's and adults.
- Develop colleague awareness of policies and processes.
- Alert to specific children, young people or vulnerable adults in need, SEND, Young Carers and "Looked after." (This is currently in the process of being referred to as Children in Care but has not been fully adopted by all LAs across the country).
- Keep detailed, accurate, secure written records of concerns and referrals.
- Ensure open and listening culture.
- Understand Prevent Duty, providing advice and support to colleagues.
- Ensure Policies & Procedures are known.
- Designated Safeguarding Lead roles are shared with all colleagues.

Other colleagues have a responsibility to:

- Read Part One and Annex B of the Department for Education's statutory safeguarding guidance, [Keeping Children Safe in Education](#), and review this guidance at least annually.
- Sign a declaration at the beginning of each academic year to say that they have reviewed the above guidance and understand their role
- Safeguard children, young people and vulnerable adults' wellbeing and maintain public trust in the teaching profession as part of their professional duties.
- Provide a safe environment in which learning can take place.
- Reinforce the importance of online safety when communicating with parents, carers employers, and hosts. This includes making them aware of what we ask children to do online (e.g. sites they need to visit or who they'll be interacting with online
- Act in accordance with Twin Group procedures with the aim of eliminating unlawful discrimination, harassment and victimisation, including those in relation to peer-on-peer abuse.
- Maintain an attitude of 'it could happen here' where safeguarding is concerned.
- Be aware of the signs of abuse and neglect.
- Be aware of the early help process and understand their role in it.
- Act as the lead professional in undertaking an early help assessment, where necessary.
- Be aware of, and understand, the process for making referrals to MASH, as well as for making statutory assessments under the Children Act 1989 and their role in these assessments.
- Make a referral to MASH and/or the police immediately, if at any point there is a risk of

immediate serious harm to a child, young person, or vulnerable adult.

- Be aware of and understand the procedure to follow in the event that a child, young person or vulnerable adult confides they are being abused or neglected.
- Support social workers in making decisions about individual children, young people, or vulnerable adults in collaboration with the DSL/DLP.
- Maintain appropriate levels of confidentiality when dealing with individual cases and always act in the best interest of the child, young person, and vulnerable adult.
- Follow Twin Group's procedure for, and approach to, preventing radicalisation as outlined in this policy.

Specific to English Centres (London & Eastbourne) and Summer Centres

Receptionists:

- All visitors are required to report to reception when they enter the school. Should they need to enter another part of the school, they will be escorted by a member of Twin staff.
- All visitors and staff must sign in and out at reception.
- All staff must wear their ID badge at all times.

Under 14s are not allowed to leave the school unaccompanied.

Under 18 involvement: Students under the age of 18 are encouraged to play an active part in their own safeguarding, both by looking out for each other and by raising concerns with adults.

Specific to English Centres (London & Eastbourne) and Summer Centres – Parental Consent

A signed parental consent form must be received for all U18s either before or on arrival at the school (Appendix 2)

It is the responsibility of the Admissions Team to ensure that these are received, and the section

“For students under the age of 16” has been completed where appropriate.

Specific to English Centres (London & Eastbourne) and Summer Centres - Hosts & Accommodation

U18 students travelling alone or with a group will be placed into Homestay accommodation with DBS checked hosts and a clear curfew policy. All hosts are provided with a safeguarding policy upon inspection and are required to undertake safeguarding training. Groups may request residential type accommodation; in which case we use preferred providers whose policies and practices pertaining to student welfare and safeguarding align with ours. These would include - but not limited to – ensuring all students from the group are situated on the same floor and block, ages and genders aren't

mixed, and staff are DBS checked. Leaders of the group must also be accommodated in the same residence as well as the same section and floor as the students and provide the first level of safeguarding. Independent students over 16 and under 18 may also request student residence

accommodation. Twin will use only those residences for U18s that adheres to Twin's standards for U18 student welfare including ensuring only DBS checked staff are in contact with the student, having in place appropriate curfew times and ensuring the non- mixing of genders and U18s with over 18s. We continually review and assess residences for their suitability for hosting students under 18.

- Homestays are organised through either the Twin Accommodation department or a Local Organiser (LO).
- LOs must have satisfactory safeguarding policies and practices in place, including safer recruitment for hosts
- Students under 16 will not be accommodated with students over 18 years old
- A responsible adult will be present overnight when hosting students under 18
- Students under 18 will not be mixed with other genders
- The curfew times are as follows
 - 14-15 years 7 pm
 - 16 -17 years 10 pm
- Hosts are required to pick up under 14-year-olds in the evenings and also drop them off in the morning at a designated place assigned by the school
- Students aged 14 + are allowed to make their own way to school and this has been thoroughly risk-assessed. All homestays are revisited at least every 2 years to ensure standards are maintained
- Homestay accommodation that is alleged to fall below the British Council required standard, or fails to adhere to Twin's policies, will be reported to the relevant LO, and "blacklisted" by Twin
- All complaints relating to homestay are investigated immediately. In the case of a serious complaint, or if information is passed to the school giving cause for concern, it will be reported to the relevant authorities immediately
- In case of any emergency, both students and homestays are provided with the accommodation emergency number
- Any residential accommodation used must have satisfactory safeguarding policies and practices in place

Specific to English Centres – London & Eastbourne – Private Fostering



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If a student aged under 16 (under 18 if disabled) stays with a homestay host for more than 27 nights, it is considered as private fostering. It must be reported to the local authority at least six weeks before the arrangement starts.

Specific to English Centres - (London & Eastbourne) and Summer Centres – Transport & Airport transfers

Twin requires written confirmation from all taxi/ coach companies used that all drivers are DBS checked.

Twin works with designated companies to provide transfers to and from airports on arrival and departure of students; these companies must be licenced to operate by the local council, and drivers are required to have a DBS check. Individual students under the age of 18 travelling without a parent or guardian are strongly encouraged to book an airport transfer with Twin. A booking reference number is provided for the transfer, as well as the company's contact details. On dropping off the student at the homestay, the driver is instructed to wait until the student enters the house. The host will be at home when the student first arrives. If the student is under 16, the driver will accompany the student into the house. Similarly, on departure, the host must be present when the driver collects the student. In the case of the student's flight being cancelled, Twin will place the student into appropriate accommodation and book a transfer from the airport to their accommodation.

Twin can facilitate a transfer and a meet and greet service for every group from the airport to the meeting point if the client books this service. The agent is provided with the Twin representative's contact number in advance

Specific to English Centres – London & Eastbourne - Adult student - U18 interaction

Twin recognises its responsibility to educate adult students regarding the safeguarding of children. There is guidance in the student handbook and Twin E-Learning Online Account regarding appropriate behaviour and protecting oneself from allegations. It is highlighted in the adult student induction that it is illegal for an adult to have a sexual relationship with a person under the age of 16.

Twin English Centre London/Eastbourne shares its premises with Twin Employment and Training (TET). TET uses the facilities to provide training and services for jobseekers and young people aged 16+. There are procedures in place to ensure that under 18s on programmes at ECL and ECE are safeguarded from any potential risks posed by TET young people and participants (Appendix 13).

Specific to English Centres (London & Eastbourne) and Summer Centres - Use of risk assessments



There is a general risk assessment for the premises and another for lessons and breaks. Risk assessments are also produced for all social or educational activities that take place on or off site.

Groups may have a social programme provided by Twin, which may or may not include a Twin Activity Leader. If they do not book a Twin social programme, this is organised independently by the Group Leaders, in which case they are required to provide the Twin Operations team with the programme, who will then create and share corresponding risk assessments.

Individual students aged 16/17 may choose to take part in the Twin adult social programme. All events on this programme are accompanied by a Twin Activity Leader. All are risk assessed and any necessary information is shared with the participants.

In summer, a separate social programme is run for individual junior students, including those on the Parent and Junior programme. The parents may opt to take part, and their participation forms part of the risk assessment. Junior groups may also opt to take part. All junior events are accompanied by a Twin Activity Leader.

Any student may be taken on a class outing by their teacher as part of their tuition programme.

The person leading any of the activities mentioned above is responsible for adding any additional risks to the assessment and sharing the information with all participants. Special attention must be paid to any extra risks for under 18s. All risk assessments must include major incidents.

The risk assessment should then be signed, dated, and filed.

Specific to English Centres (London & Eastbourne) and Summer Centres - Supervision ratios

There must be at least one adult per fifteen students under 16. During lessons this ratio is made up by Twin teachers. During break times, free time, excursions and airport transfers, Group Leaders may be asked to make up the supervision ratios or supervise their own students. For offsite activities with students under 14, there should always be a minimum of 2 adults present in case of emergency.

Group leaders are provided with guidelines regarding supervision of students during induction and through the Group Leader Handbook. The adults responsible for supervising the students at any given time must familiarise themselves with the relevant risk assessments.



Students aged 14-15 are allowed to make their own way to school and this has been thoroughly risk-assessed. They can also leave the school during their breaks, but not the premises. They are allowed up to one hour of free time during excursions. Parental consent is required for each of the above.

Specific to English Centres (London & Eastbourne) and Summer Centres – Missing Students

In class: Under 18s are highlighted on the registers, and teachers are instructed to report their absence to the Head of Student Services after 15 minutes. The Head of Student Services will try to contact the student, the group leader, the homestay host, and/ or the parent/ guardian to ascertain the reason for absence. If they cannot be accounted for, the police are contacted immediately.

During excursions: The group's activity leader is responsible for regularly checking that all students are present. If a student goes missing, the activity leader should try to contact the missing student directly. If unsuccessful, they must call the school, or out of hours the Twin emergency phone. The person responding to the call will try to contact the homestay host, and/ or the parent/ guardian to check if they have any news of the student. If appropriate, the group's activity leader will leave the group with the group leader in order to search the surrounding area. If unsuccessful, the police will be contacted.

Homestay: The host is responsible for checking the students are home by curfew. If a student is late, or at any point goes missing, they are instructed to ring the emergency phone immediately to inform the school. The person responding to the call will try to contact the student or next of kin. If unsuccessful, the police will be contacted. In all cases, the police should be informed within half an hour of the student's disappearance if no contact has been made with them.

Specific to English Centres (London & Eastbourne) and Summer Centres – Welfare Provision

Twin English Centres employ a Head of Student Services who is responsible for student welfare. The following extra provision is made for the welfare of under 18s:

Students in groups

- Group leader induction on arrival, including:
 - Provision of group leader handbook
 - Provision of safeguarding policy
 - Signing of Group Leader declaration
 - Student induction

Individual Students

- Separate student induction
- Weekly welfare tutorials
- All individual U16s must sign in every morning

Under 14s

- Supervision before class and during breaks
- Students wear different coloured lanyards depending on their age as follows:
 - 10 – 13 red lanyards
 - 14 – 15 purple lanyards
 - 16+ white lanyards

This enables staff to quickly identify students requiring a higher level of supervision.

There is a separate document detailing all procedures for Under 18s in Appendix O .

Specific to English Centres – London & Eastbourne – Behaviour and Discipline

Students are provided with the [Student code of conduct](#) at the time of booking and reminded of this again in the induction. It is also displayed in the classrooms. Cases where a student fails to comply with the code of conduct must be reported to the Student Services Manager, who will decide an appropriate punishment. In some cases, this may be termination of the student's course.

Staff must set a good example by conforming to the staff code of conduct.

Specific to English Centres – London & Eastbourne – Online face to face teaching & Tutorials

Twin English Centres also offer online teaching and tutorials for students. This is similar to staff working one-to-one in a closed room with students; therefore, sensible safety measures, including guidance on appropriate staff online behaviour, are in place as follows:

- All sessions take place on Ms Teams using school accounts.
- All sessions should be timetabled officially by the school and not the teacher. If the student needs to change times, that is done via the school and not direct with the teacher.
- Sessions not to be held in bedroom of teacher, and ideally also not of student.
- Teacher to ensure that everything a student will see in the background is appropriate, e.g., no personal items, obscene or indecent pictures/sculptures.
- Random 15-minute safeguarding checks to take place:
 - During first online lesson for all teachers

Monthly for every teacher

The following guidelines apply to both teacher and student:

- Switch off mobile phone
- Always have professional appearance
- Keep hands in view on table
- Stick to lesson content (avoid discussing teacher's home or personal life)
- Should the student begin to display inappropriate behaviour, teacher to end session quickly and inform line-manager what has happened and why

Parents are involved as follows:

- parents sent schedule of online lessons
- parents sent online code of conduct
- parents invited to 'meet the teacher' in first lesson
- parents told who to contact if they have any concerns about online lessons

All staff involved in online work, e.g., teachers, technicians, and welfare:

- to be DBS checked
- to be properly trained in safeguarding online

Individual U18s have a welfare tutorial every week. A record is kept, and any problems must be addressed immediately.

Specific to English Centres (London & Eastbourne) - Holidays / nights away

In order to spend the night somewhere else, students under the age of 18 need permission from Twin English Centre Eastbourne and their parent/guardian. If necessary, a risk assessment will be completed.

The following must be provided/adhered to

A Written request from the student's parent/guardian. This should detail;

- Student details.
- Dates, times and reason for travel.
- Contact details of the person/s who will be taking responsibility for the student whilst they are



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away from Twin English Centre Eastbourne, and their relationship to the student. As well as proof of ID. Passport etc.

- Address and contact details for the place they will be staying.
- The student must be collected by the responsible person/s from Twin English Centre Eastbourne, and original ID's to be check with Centre Manager.
- On return to the centre the student must be met by the Centre Manager.

Please understand that, Twin English Centre Eastbourne reserve the right to refuse a request based on our assessment of the arrangement plans provided by parent/guardians, and any other relevant contributing factors.

Specific to English Centres and Summer Centres – Dublin

All host families hosting minors in Ireland are Garda Vetted as per national regulations.

Safe Environment:

All Twin English Centre Dublin personnel hired to work directly with Minors are Garda Vetted prior to commencing employment; hold a Child Protection certificate and have received training as part of their

induction. - All Twin Young Learners personnel wear a Twin English Centre Dublin badge including their name and title as long as they are on campus.

Twin Young Learners personnel are aware of the Visitor's Policy and ensure the Visitors Sign-in Sheet is kept up-to-date. Any visitor to the Twin Young Learners sites is encouraged and required to sign in at the Twin office.

Interaction:

Maintain professional physical and relationship boundaries, and act in a way appropriate to your Duty of Care;

Do not make suggestive or inappropriate remarks to or about any adult or Minor. Inappropriate remarks include innuendo, swearing and discussing their or your own intimate relationships.

Other than in exceptional circumstances do not communicate directly with Minors via email or text messages and only then with prior consent from the child's parent or guardian.



Do not engage in behaviour that may be construed as “grooming” a Minor for example giving money, presents or favours or talking or behaving in an inappropriate manner.

Avoid putting yourself in a situation where you are on your own with a Minor as far as possible. - Conduct all interactions in a calm manner and avoid shouting at Minors wherever this is possible unless there is a Health & Safety risk.

Ensure physical contact within clear boundaries to avoid any allegations of inappropriate touching.

- If you are required to be in a one-to-one setting with a Minor, consider how this can be managed effectively, i.e. considering if the one-to-one setting is really necessary, leaving a door open, using a room that has a window in the door and positioning yourself within sight of the door.

Do not socialise with Minors outside of school organised events.

Appropriate Appearance:

Adults should present an appearance which:

- Promotes a positive and professional image;
- Is appropriate to their role
- Is not likely to be viewed as offensive, revealing or sexually provocative;
- Does not distract, cause embarrassment or give rise to misunderstanding.
- Is absent of any political or otherwise contentious slogans;
- Is not considered to be discriminatory.

Alcohol, Drugs and Smoking:

- Do not consume, or allow a Minor to consume any alcohol, drugs, cigarettes or intoxicating substances on school premises.
- Do not provide alcohol, drugs, cigarettes or intoxicating substances to Minors.
- Do not work or be present on school premises while under the influence of any intoxicants or drugs.

IT and Social Networks:

- Do not share your personal social media details with any minor.
- Do not accept a connection by a Minor through social media
- Do not take any images or videos of Minors on your personal recording equipment.



Accommodation:

- Abide by the accommodation rules and guidelines in your local centre. For details please refer to your staff handbook and your induction.
- Do not enter private areas without first gaining the student's permission, or in the case of needing to search property, without informing them first and doing so in their presence.

Transport:

- All transport providers, whether staff or contractors, to have appropriate suitability checks.

Inter-agency working

Twin Group works in partnership with local safeguarding partners, police and external agencies to ensure a coordinated approach to safeguarding. These partnerships enable us to access specialist support and share best practice, strengthening our safeguarding provision.

- Twin Group contributes to inter-agency working as part of its statutory duty.
- Twin Group will work with MASH, the police, health services and other services to protect the welfare of its children, young people, and vulnerable adults, through the early help process and by contributing to inter-agency plans to provide additional support.
- Twin Group recognises the importance of information sharing between professionals and local agencies to effectively meet the child's, young persons and vulnerable adults' needs.
- Colleagues are aware that whilst the GDPR and the Data Protection Act 2018 places a duty on Twin

Group to process personal information fairly and lawfully, it is not a barrier to sharing information where failure to do so would result in the child, young person or vulnerable adult being placed at risk of harm.

- Colleagues will ensure that fear of sharing information does not stand in the way of their responsibility to promote the welfare and safety of children, young people and vulnerable adults.
- Twin Group also recognises the particular importance of inter-agency working in identifying and preventing Child Sexual Exploitation (CSE).

Talking to Parents/ Carers

In most cases, it is good practice to be open and honest at the outset with parents/carers about concerns and any action that Twin Group intends to take. Twin Group's Safeguarding and Prevent Policy will be presented to parents/carers online to inform them of our commitments and responsibilities, including the mechanism for communication of this. Where a referral is to be made, the Twin Group Head of Quality and Safeguarding or DSL/DLP will make all reasonable efforts to ensure parents and or carers are informed. However, an inability to inform parents and parents and or carers should not

prevent a referral being made. Consideration will be given to not informing them when a child, young person or vulnerable adult expresses a wish that their parents and or carer are not informed at this stage.

There are cases where it would not be good practice for the Head of Quality and Safeguarding or DSL/DLP to discuss concerns with parents and or carers before referral.

In these cases, arrangements for discussing concerns with the parents/carers should be agreed in advance with Social Care and or the Police. Concerns must not usually be discussed with parents and or carers before referral where:

Discussion would put a child, young person or vulnerable adult at risk of significant harm

- Discussion would impede a police investigation or social work enquiry e.g., FGM or forced marriage.
- Sexual abuse is suspected
- Organised or multiple abuse is suspected
- The fabrication of an illness is suspected
- To contact parents and or carers would place you or others at risk
- It is not possible to contact parents and or carers without causing undue delay in making the referral.

In each case the Head of Safeguarding or DSL/DLP must make a reasoned judgement and record the decision s/he reaches. Where further guidance is needed, contact should be made with the

Designated Local Authority Person or relevant social care department or Police/Tusla or An Garda Siochana (ROI only).

Safer Recruitment Processes

Twin Groups Safer recruitment procedures are fully aligned with KCSIE and Ofsted expectations. At least one member of every recruitment panel has completed safer recruitment training, all recruitment, vetting and induction processes are regularly reviewed to ensure compliance with the latest statutory guidance and Ofsted's emphasis on robust safeguarding recruitment.

When recruiting new members of colleagues Twin Group follows the government guidance

"Safeguarding Children: Safer Recruitment in Education and Safer Recruitment principles and Children First National Guidance and has due regard to the Safeguarding Vulnerable Groups Act 2006



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and the Protection of Freedoms Act 2012. Twin Group adapts the guidelines within the Baseline Security Standard (BPSS) for all appointments and ensures that Twin Group uses the DBS/NVB checking services to assess applicants' suitability for positions of trust, the Company complies fully with the Code of Practice and undertakes to treat all applicants for positions fairly. Two appropriate references that cover a 3-year period or more are obtained and to ensure qualifications are verified. Safer Recruitment training has been undertaken by senior members of colleagues who conduct recruitment activities in accordance with statutory guidance. The 2024 KCSIE update emphasises that at least one member of every recruitment panel should have completed safer recruitment training. This ensures that those involved in hiring decisions are aware of the risks and responsibilities related to safeguarding. Applicants will also have to complete a Declaration Form in line with Twin Group's Safer Recruitment Policy (Appendix H).

KCSIE update emphasises that at least one member of every recruitment panel should have completed safer recruitment training. This ensures that those involved in hiring decisions are aware of the risks and responsibilities related to safeguarding. Applicants will also have to complete a Declaration Form in line with Twin Group's Safer Recruitment Policy (Appendix H).

Newly appointed colleagues will undertake the Twin onboarding process in line with the Twin Group probation procedures. A robust induction into the child, young person and vulnerable adult groups safeguarding procedures will also be provided when they join the organisation. Probation is a period of both professional development and review. It provides a fair opportunity for a colleague to understand the organisation, the standard of performance required and to be given the guidance and support to be effective in his or her new role.

Probation allows the manager of the newly appointed colleagues to assess objectively whether the recruit is suitable for the role, considering the individual's overall capability, skills, performance, and general conduct in relation to the job in question.

Twin Group shall ensure that all colleagues are made aware of the standards expected of them and will put in place the appropriate support, training, and feedback to achieve these standards.

For the organisation, Probation allows the assessment of the Employee's contribution, potential and suitability for the role to which they have been appointed.

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We provide adequate and appropriate colleague resources and training to meet the needs of children, young people and vulnerable adults.

All colleagues, volunteers who work with children, young people and vulnerable adults are informed by HR that their job falls under the DBS requirements for an enhanced check under section 128 of the Education Skills Act 2008 those in management roles need to have an additional check to ensure they are not prohibited from teaching. This is in addition to the DBS/NVB check.

We will provide the applicant with more information about the level of check required.

(Criminal record check applicants must be 16 or over). There are 3 types of check: (Not ROI)

- **Standard** (This checks for spent and unspent convictions, cautions, reprimands, and final warnings.)
- **Enhanced** (This includes the same as the standard check plus any additional information held by local police that's reasonably considered relevant to the workforce being applied for (adult, child, or other workforce.)
- **Enhanced with list checks** (This is like the enhanced check but includes a check of the DBS barred lists.)

Checks will be made using Civil & Corporate Ltd – a database that can be used prior to appointing a colleague to check for Prohibitions, sanctions and restrictions that might prevent the individual from taking part on certain activities or working in specific positions.

All colleagues will be issued with a copy of Keeping Children Safe in Education 2025 part 1; to be signed and dated upon issue.

Applicants awaiting DBS

1. Twin staff may only commence employment without receiving criminal clearance in exceptional and justifiable circumstances. A record of the decision is kept and signed off by the relevant senior manager.
2. If a new starter does commence employment prior to clearance being received, they must sign a self-declaration. A record of what alternative risk mitigation has been put in place to cover this period must be kept.
3. A new starter must never commence employment prior to the submission of their



completed application or paperwork to obtain criminal clearance.

4. The barred list must also be checked - it is against the law to allow somebody to start regulated activity with under 18s without doing a Barred List check.
5. Hosts may never commence employment without receiving criminal clearance.

External Speakers

At Twin Group we ensure that any external speakers are appropriately vetted before any public speaking or events are arranged. We ensure that all stakeholders remain free from any extremist or inappropriate material to avoid influence or exposure. Liaison takes place with the BIS Prevent Coordinator to pass on any concerns regarding speakers and to access details for vetted, reputable speakers. In the event of any concerns raised regarding external speakers, this will be passed on immediately to the BIS Prevent Coordinator to ensure this does not continue in other agencies.

Information Sharing and Record Keeping

There may be some circumstances where the welfare or safety of an individual may take precedence over confidentiality. When sharing information there are Seven Golden Rules that Twin Group will adhere to;

- The Data Protection Act is not a barrier to sharing information.
- Be open and honest.
- Seek advice.
- Share with consent where appropriate. (There may be some circumstances where seeking consent including parental consent is not required)
- Consider safety and well-being.
- Ensure that information sharing is appropriate and secure.
- Keep a record.

The colleague who receives the allegation or disclosure should make an immediate written record of the conversation, including the following information: -

- Date and time of report.
- Name of Individual.
- DOB of individual of concern.
- Nature of allegation.



- Any other information given, including siblings if relevant. (Their full names and DOB if possible)
- Confirmation that the Child, young person, vulnerable adult or colleague has been advised of the next steps.

Disclosure records are held by the Chief Peoples officer and stored on a secure server. Colleagues take care not to influence the outcome either through the way they speak to or question children, young people or vulnerable adults.

Twin Group continues to welcome the child, young person or vulnerable adult whilst investigations are being made in relation to any alleged abuse. The child, young person or vulnerable adult may choose to withdraw from learning activities whilst investigations take place.

We follow the procedures as set by the Local Safeguarding Partnerships or Tusla (ROI only) in relation to the delivery of services and designated roles and tasks in supporting the child, young person or vulnerable adult, family, host family or host employer subsequent to any investigation.

All suspicions and investigations are kept confidential and shared only with those who need to know. Any information is shared under the guidance of the Local Safeguarding Partnerships and Designated Local Authority Person and Tusla (ROI only).

Recording - When recording an incident, a Safeguarding Concern Form (Appendix A, available on SharePoint) must be completed. All concerns/disclosures in our ROI centres must be recorded on the Tusla Form. Whilst you can record observations, do not interpret or give opinion as this may bias the information provided and jeopardise any future investigation into the allegation. The Safeguarding Concern Form or Tusla Form will be kept securely with determined access only.

Report - Any issues or concerns, allegations or suspicions relating to Safeguarding must be taken seriously and reported to a Head of Quality and Safeguarding or DSL/DLP via the Safeguarding Concern Form (Appendix A). Remember to follow TED - Tell, Explain, Describe.

Refer - Where required, the Safeguarding Representative will refer or support you with guidance on next steps and or signposting the relevant external agency.

We abide by the DBS/NVB regulatory requirements in respect of requesting references and DBS/NVB checks for colleagues and volunteers.



New colleagues and volunteers are not given unsupervised access to children, young people or vulnerable adults pending return of a satisfactory DBS/NVB check at the appropriate level.

We will meet the DBS/NVB reporting requirements in respect of any person who is dismissed from our employment or resigns in circumstances that would otherwise have led to dismissal for reasons of child, young person or vulnerable adult protection concern. This may include sharing appropriate information with another employer's DSL/DLP.

Where colleagues or volunteers are working with Job Centre Plus (Department of Work and Pensions funded), additional checks are undertaken to meet our contractual obligations.

Disclosure

Twin Group strongly supports the principle of working in partnership with children, young people parents and or carers and adults. This means seeking clear, explicit and informed consent from the individual(s) concerned for information about them to be shared with specified other individuals or agencies where consistent with the individual(s) best interests.

It is possible, however, to identify some circumstances in which sharing confidential information without consent will normally be justified in the public interest. These are:

- When there is evidence that the child, young person or vulnerable adult is suffering or is at risk of suffering significant harm.
- Where there is reasonable cause to believe that a child, young person or vulnerable adult may be suffering or at risk of significant harm.
- To prevent significant harm arising to children and young people or serious harm to adults, including through the prevention, detection and prosecution of serious crime.
- For this purpose, serious crime means any crime which causes or is likely to cause significant harm to a child or young person or serious harm to a vulnerable adult.

Promotion of Safeguarding through teaching, learning and assessment

We are committed to promoting awareness of child, young person and vulnerable adults abuse issues and prevent throughout our training and learning programmes for children, young people and vulnerable adults.



We seek out additional development opportunities for all colleagues involved in the delivery of services to ensure that they can recognise the signs and symptoms of possible physical abuse, emotional abuse, sexual abuse and neglect and are aware of the local authority guidelines for making referrals.

We seek out additional development opportunities for all colleagues involved in the delivery of services to ensure that they can recognise the signs of radicalisation and extremism and are aware of the local authority guidelines for making referrals.

We ensure that any relevant history of the child, young person or vulnerable adult, particularly in relation to potential indicators of abuse or neglect is recorded confidentially within their records.

This includes children, young people and vulnerable adults that are participating in any programmes delivered by Twin Group at all of our offices, centres and sites and off-site activities. We work closely and collaboratively with all contractors, host families and host employers to ensure that they have appropriate and effective safeguarding and prevent policies and procedures in place, and these are audited on a regular basis by the relevant departmental leads and the Head of Safeguarding.

We actively capture learners voice through surveys, feedback and engagement activities to evidence that learners understand safeguarding and feel confident raising concerns. Data from these activities is used to inform policy and practice and demonstrates the impact of our safeguarding culture.

Online Safety and Filtering

We recognise the importance of safeguarding children from potentially harmful and inappropriate online material, and we understand that technology is a significant component in many safeguarding and wellbeing issues.

Our approach to online safety includes explicit education for learners on cyberbullying, radicalisation risks and digital resilience. Learners are taught how to stay safe online through curriculum content and handbooks, with clear reporting routes from online concern. Staff receive annual training on online safety, including the latest risks and best practice.

To address this, Twin Group aims to:

- Have robust processes (including filtering and monitoring systems) in place to ensure the online safety of pupils, staff, volunteers and governors
- Protect and educate Twin Group community in its safe and responsible use of technology,

including mobile and smart technology (which we refer to as 'mobile phones')

- Set clear guidelines for the use of mobile phones for Twin Group
- Establish clear mechanisms to identify, intervene in and escalate any incidents or concerns, where appropriate.

Our approach to online safety is based on addressing the following 4 categories of risk as identified in Keeping Children Safe in Education 2025:

Content – being exposed to illegal, inappropriate or harmful content, such as pornography, fake news, racism, misogyny, self-harm, suicide, antisemitism, radicalisation and extremism

Contact – being subjected to harmful online interaction with other users, such as pressure from another child(ren), commercial advertising and adults posing as children or young adults with the intention to groom or exploit them for sexual, criminal, financial or other purposes

Conduct – personal online behaviour that increases the likelihood of, or causes harm, such as making, sending and receiving explicit images (e.g. consensual and non-consensual sharing of nudes and semi-nudes and/or pornography), sharing other explicit images and online bullying; and

Commerce – risks such as online gambling, inappropriate advertising, phishing and/or financial scams.

To meet our aims and address the risks above, we will educate children, young people and vulnerable adults about online safety as part of our curriculum. For example:

- The safe use of social media, the internet and technology
- Keeping personal information private
- How to recognise unacceptable behaviour online
- How to report any incidents of cyber-bullying, ensuring pupils are encouraged to do so, including where they're a witness rather than a victim

We will also:

- Train staff, as part of their induction, on safe internet use and online safeguarding issues including cyber-bullying, the risks of online radicalisation, and the expectations, roles and responsibilities around filtering and monitoring. All staff members will receive refresher training as required at least once each academic year
- Educate parents/ carers about online safety via our website, communications sent directly to them

and during parents' evenings. We will also share clear procedures with them so they know how to raise concerns about online safety

- Make sure staff are aware of any restrictions placed on them with regards to the use of their mobile phone and cameras, for example that:
 - Staff will not take pictures or recordings of pupils on their personal phones or cameras.
 - Make all children, young people of vulnerable adults, parents/ carers, staff, volunteers and governors aware that they are expected to sign an agreement regarding the acceptable use of the internet, use of Twin Groups ICT systems and use of their mobile and smart technology
- Explain the sanctions we will use if a child, young person, vulnerable adult is in breach of our policies on the acceptable use of the internet and mobile phones
- Make sure all staff, children, young people and vulnerable adults and parents/ carers are aware that staff have the power to search individual's phones, as set out in the DfE's guidance on searching, screening and confiscation
- Put in place robust filtering and monitoring systems to limit individual's exposure to the 4 key categories of risk (described above) from Twinn Groups IT systems.
- Carry out an annual review of our approach to online safety, supported by an annual risk assessment that considers and reflects the risks faced by Twin Group communities.
- Provide regular safeguarding and children protection updates including online safety to all staff, at least annually, in order to continue to provide them with the relevant skills and knowledge to safeguard effectively.

This section summarises our approach to online safety and mobile phone use. For full details about our school's policies in these areas, please refer to our online safety policy and mobile phone policies.

Responding to suspicions

Twin Group is committed to responding promptly and appropriately to all incidents or concerns that may occur and to work with statutory agencies in accordance with the procedures that are set down in 'What to do if you are worried a child is being abused.' (DfE 2015) or, the Children First National Guidance (ROI only).

We acknowledge that abuse or neglect of basic safety and welfare procedures for child, young person and participant s can take place and that this can take different forms- physical, emotional, and sexual as well as employer's neglect of legal responsibilities and neglect of parental or statutory



responsibilities (including where children, young people and vulnerable adults are in care of social services).

We also acknowledge that this can take the form of 'virtual' or internet-based abuse or neglect.

We recognise that when children, young people or vulnerable adults are suffering from physical, sexual or emotional abuse, or may be experiencing neglect, this may be demonstrated through the things they say (direct or indirect disclosure) or through changes in their appearance, their behaviour, or their play.

Where any member of colleague who has knowledge of, or a suspicion that, a child, young person or vulnerable adult is or has been suffering significant harm, they must refer their concern to the Head of Safeguarding, or DSL/DLP as soon as possible but within 24 hours at the latest. The colleague must make a dated record of the details of the concern on the Safeguarding Concern Form (Appendix A) or the Tusla Form (ROI only) and emailed to the designated safeguarding email inbox for assessment and signposting, the person raising the concern must not retain any written information.

All allegations or suspicions must be taken seriously. The child, young person and vulnerable adult or colleague must be advised that this information cannot be kept confidential and will be passed on to the Head of Safeguarding or Designated Safeguarding Lead or Designated Liaison Person (ROI only) in Twin Group in the first instance.

Early help

Early help means providing support as soon as a problem emerges, at any point. Any child, young person or vulnerable adult may benefit from early help, but in particular colleagues will be alert to the potential need for early help for children, young people or vulnerable adults who:

- Have SEND (whether or not they have a statutory EHC plan).
- Are young carers.
- Show signs of being drawn into anti-social or criminal behaviour, including gang involvement and association with organised crime groups.
- Are frequently missing/going missing from care or from home.
- Misuse drugs or alcohol.
- Are at risk of modern slavery, trafficking or exploitation.
- Are in a family circumstance presenting challenges such as substance abuse, adult mental health problems or domestic abuse.

- Are returned home to their family from care.
- Show early signs of abuse and/or neglect.
- Are at risk of being radicalised or exploited.
- Are privately fostered.

Safeguarding Procedures Flowcharts

These are available in the SGP Teams area on the Sharepoint.

Training Intervention

Individual/Group	Training	Frequency
Head of Safeguarding and DSLs	Level 3 accredited – face to face	2 years based on the accreditation
DLPs	Children First Certificate via the Children First E-Learning Programme	2 years
	Level 1 – Mentor Live Online	Annually
DSO's	Level 2 in house training	2 years
	Level 1 – Mentor Live Online	Annually
Trainers, Teachers, Assessors, Advisors, Employment Consultants	Level 2 in house training	2 years
	Level 1 – Mentor Live Online	Annually
All other staff (includes the Board and Chair)	Level 2 in house training	2 years
	Level 1 – Mentor Live Online	Annually
Host's	Level 1 – British Council Online	3 Years
Activity Leaders/Mentors	Level 1 – British Council Online	3 Years



Supply Chain Partners	Depends on requirements requested from partner or is identified as a need at DD stage.	Annually
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Safeguarding Code of Conduct:

All colleagues are required to abide with the Twin Group Code of Conduct (Appendix C) alongside the Safeguarding Code of Conduct below, which applies to behaviour of all colleagues and volunteers in direct contact with children, young people, vulnerable adults and on-line.

This Safeguarding Code of Conduct also details how individuals can also protect themselves against allegations of abuse.

How to Protect Yourself against Allegations of Abuse:

Avoid personal and social contact with children, young people or vulnerable adults and seek to minimise the risk of any situation arising in which misunderstandings can occur.

You Should NOT:

- Engage in flirting, innuendo or make suggestive terms or gestures, or indicate favouritism for a child, young person or vulnerable adult.
- Issue or threaten any form of physical punishment.
- Initiate or engage in sexually provocative games, conversations or activity involving or observed by children, young people or vulnerable adults whether based on talking or touching.
- Make sexually suggestive remarks or discriminatory comments to or in front of a child, young person, vulnerable adult or discuss colleague's own sexual relationships in front of them.
- Engage in any sort of sexual relationship with a child, young person or vulnerable adult even where the young person is aged 16 or over and therefore legally able to consent.
- Use any type of physical punishment to discipline. Shouting at children, young people or vulnerable adults should be avoided whenever possible and only if alternative forms of

discipline have failed.

- Photograph or film children, young people or vulnerable adults for which no prior consent has been sought.
 - Broadcast or view any audio and/or visual material (CDs, DVDs, videos, computer or games etc.) that has inappropriate content for children, young people or vulnerable adults.
 - Invite, or allow, a child, young person or vulnerable adult who you have met through your work to your home or another location where the purpose is one of friendship or an intimate relationship.
-
- Engage in, or tolerate, any inappropriate physical activity involving children, young people or vulnerable adults.
 - Allow the use of inappropriate language to go unchallenged.
 - Do things of a personal nature for children, young people or vulnerable adults that they can do for themselves.
 - Dismiss an allegation of any sort relating to a customer's welfare or delay the reporting of an allegation.
 - Discourage anyone from reporting concerns or ask individuals to keep secrets.
 - Make promises to keep secrets, keep any disclosure confidential or overreact or be judgemental should they suspect abuse.
 - Spend excessive amounts of time alone with children, young people or vulnerable adults, away from others.
 - Make unnecessary physical contact with children, young people or vulnerable adults, however, there may be occasions where physical contact is unavoidable, such as providing comfort at times of distress or physical support in contact sports or similar. In all cases, contact should only take place with consent of the child, young person or vulnerable adult.
 - Do not arrange to meet a child, young person or vulnerable adult or their families with whom you work, outside of working hours unless it is with consent of the parents and or carer and person in charge of the activity.
 - Give or receive gifts and/or substances such as drugs, alcohol, cigarettes, e- cigarettes from or to a child, young person, vulnerable adult or their family.
 - Consume alcohol, take illegal drugs or legal highs, during the working day/evening or at events, including during any breaks or when in the presence of children, young people or vulnerable adults
 - Smoke/vape with, or in front of, children, young people or vulnerable adults.
 - Steal, or condone someone else's stealing, regardless of the value of the stolen item.

You Should:

- Work in a room where you can be visibly seen, leave the door open and make sure other adults visit the room regularly whilst respecting children, young people and vulnerable adults' rights to privacy and encourage children, young people or vulnerable adults to feel comfortable enough to report attitudes or behaviours they do not like.
- Plan activities that involve more than one other person being present, or at least within sight and hearing of others. If it is unavoidable always ensure your line manager knows where you are, with whom and why.
- All colleagues, volunteers, delivery partners and contractors at organised activities will be expected to act with discretion regarding their personal relationships. This should ensure their personal relationships do not affect their leadership role within the organisation. All pre-existing relationships between colleagues, volunteers, delivery partners, contractors and or adults of the organised activities must be declared.
- Avoid working in isolation with Children, young people and vulnerable adults, follow the recommended adult-to young people ratios for meetings and activities and ensure there is separate sleeping accommodation for children, young people, vulnerable adults and Young Leaders.
- Never give out a personal mobile number or private email address and ensure working hours of contract are stated, unless in specific roles such as a host or Activity Leader and where this is clearly used a means of communication with the individual.
- Everyone should be aware of the procedures for reporting concerns or incidents and be familiar with the contact details of the DSLs.
- Treat all children, young people and vulnerable adults equally and listen to them; avoid favouritism and gossiping.
- Ensure allegations or disclosures by a child, young person or vulnerable adult are taken seriously and reported, including any made against you. Follow the procedures for reporting concerns.
- Never befriend or chat to children, young people or vulnerable adults on social network sites. Always use professional language when writing, phoning, emailing or using the social media to communicate with children, young people or vulnerable adults.
- Be aware that young people and vulnerable adults can develop heterosexual and homosexual infatuations (crushes) towards adults working with them. If this is happening, tell your line manager and then respond to the situation in a way that maintains the dignity of all concerned.
- If colleagues, volunteers, delivery partners and contractors have concerns relating to the welfare of a child, young person or vulnerable adult in their care, be it concerns about

actions/behaviours of another colleague or concerns based on any conversation with the child, young person or vulnerable adult, particularly where they make an allegation, they should report this immediately.

- Act as a role model.
 - Set and monitor appropriate boundaries and relationships when working with children, young people and vulnerable adults based on openness, honesty and respect for the child, young person or vulnerable adult. Ensure that the focus of your relationship with a child, young person or vulnerable adult that you have met through any programmes remains professional always. The aim should never be to develop the relationship into a friendship or intimate relationship.
 - Respect a child, young person's or vulnerable adult's right to personal privacy but never agree to keep any information relating to the harm of a child, young person or vulnerable adult confidential. Provide support to a child, young person or vulnerable adult making a complaint.
-
- Remain calm and ensure that no one is in immediate danger if they suspect abuse. Report any concerns to the DSLs without delay and record all the facts.
 - Ensure that if a child, young person or vulnerable adult who has become distressed needs comfort that this is done in a way that is both age appropriate and respectful of their personal space. Never act in a way which may be perceived as threatening or intrusive. Always ask a child, young person or vulnerable adult before you act. Hugging should be limited and never initiated by colleagues/volunteers. Any hugging should be done by the side of the child, young person or vulnerable adult with an arm placed around the shoulders side by side.
 - Ensure that if any kind of physical support is required during any activities, it is provided only, when necessary, in relation to the activity and that this is done in a way that other colleagues can observe you.

Upon induction to the programme the child, young person or vulnerable adult will be given a copy of the code of conduct and the Twin Group colleagues will go through this document with them to ensure they understand their responsibilities.

If a child, young person or vulnerable adult feels that there has been a breach of the code of conduct they should report this breach by utilising the Twin Group complaints process. The complaint will be fully investigated as per the policy/process and actions taken to ensure the individual making the complaint is fully supported. If the complaint is about another child, young person or vulnerable adult there may be a need for immediate actions to be implemented to ensure the safety of both the individual making the complaint and the person the complaint has been made against.



The breach of code of conduct may need the intervention of the Safeguarding Team and the Twin Group safeguarding procedures should be followed.

All complaints are recorded and followed up to a satisfactory conclusion. The SCP/ contract Managers for the relevant contract would conduct the investigation with support from the Twin Group complaints manager. Colleagues/volunteers who breach this code of behaviour may be subject to Twin Group disciplinary procedures whilst volunteers who do so may not be able to continue in their volunteering role. Serious breaches may result in a referral being made to a statutory authority.

All children, young people and vulnerable adults should be treated with respect and the code of conduct has been written with respect, dignity, and safety for every individual in mind, however colleagues understand that children, young people and vulnerable adults can abuse their peers. Peer abuse can take many forms such as sexting, bullying, physical and emotional abuse, and inappropriate banter.

Glossary

CSR – Central Safeguarding Register

DSL - Designated Safeguarding Lead

DLP – Designated Liaison Person (ROI only)

DSO - Designated Safeguarding Officer

FGM – Female Genital Mutilation

MASH – Multi-Agency Safeguarding Hub



NCS – National Citizen Service

SEND – Special Educational Needs and Disabilities

SCP - Supply Chain Partner

YP – Young Person

Stakeholders and contracts considered when reviewing this Policy

Commissioner	Contract Name - Prime Name
Department for Education	Bootcamps Apprenticeships Non Devolved ASF
Home Office	Refugee Employability Programme
Education and Skills Funding Agency (ESFA)	National Careers Service – CXK National Careers Service – Ingeus



Multiply Combines Authorities	West Sussex Multiply - West Sussex Council Kent Multiply – Kent County Council
Greater London Authority (GLA)	GLA AEB Jobs and Skills for Londoners Merton Multiply – Merton Adult Learning
Ministry of Justice	Neurodiverse coaching
UKSPF (UK shared prosperity Fund)	Funding for local investment
Department for Working Pensions (DWP)	SME Workforce CAEHRS

List of Relevant Agencies and Contact Details for Children and Young People



Childline	Tel: 0800 1111
Child Exploitation and Online Protection Centre (CEOP)	http://www.thinkuknow.co.uk/ TEL: 0870 000 3344
Child and Family Consultation Service	http://www.there4u.info/index.html
NSPCC Helpline	Tel: 0808 800 5000 https://www.nspcc.org.uk/
NSPCC Whistleblowing helpline	Tel: 0800 028 0285 help@nspcc.org.uk
Internet Watch Foundation	https://www.iwf.org.uk/
Social Care link for Safeguarding concerns	https://www.gov.uk/report-child-abuse-to-local-council

Referral Agencies

The need to refer allegations or concerns about possible risk posed by colleagues, volunteers, delivery partners or contractors to the Designated Local Authority Person is a requirement as detailed in the government guidance *Working Together to Safeguard Children (2021)*

Website: www.samaritans.org Telephone: 020 8394 8300 Email: jo@samaritans.org UK Helpline: 08457 90 90 90	Local GP Finder: www.nhs.uk/ServiceDirectories/pages/serviceSearch.aspx
Website: www.bacp.co.uk British Association for Counselling and Psychotherapy Email: bacp@bacp.co.uk	Website: www.nspcc.org.uk Telephone: 0808 800 5000 TEXTPHONE: 0800 056 0566 Email: help@nspcc.org.uk
Website: www.kidscape.org.uk Helpline: 08451 205 204	Website: www.aest.org.uk
Website: www.ChildLine.org.uk ChildLine: 0800 1111	Website: www.relate.org.uk Telephone: 0845 456 1310 or 01788 573241 Email: enquiries@relate.org.uk
Website: www.relate.org.uk Telephone: 0845 456 1310 or 01788 573241 Email: enquiries@relate.org.uk	Website: www.talktofrank.com Tel: 0800 77 66 00 (in 120 languages) TEXTPHONE: 0800 917 8765
Website: www.thesite.org	Website: www.bullying.co.uk/ Email: help@bullying.co.uk
Website: www.mind.org.uk Telephone: 020 8519 2122 or 0845 766 0163 Email: contact@mind.org.uk	Website: www.carers.org Email: info@carers.org
www.elderabuse.org.uk	Website: www.stonewall.org.uk
Website: www.thinkuknow.co.uk Telephone: +44 (0)870 000 3344 Email: enquiries@ceop.gov.uk	Website: www.cruse.org.uk Telephone: 0844 477 9400 (helpline) Email: info@cruse.org.uk or



	helpline@cruse.org.uk Young Person's Free Helpline: 08088081677
Website: www.youngminds.org.uk/ Telephone: 0808 802 5544 or 0207 089 5050 Email: ymenquiries@youngminds.org.uk	Website: www.dyslexiaaction.org.uk/ Telephone: 0300 303 8840 Email: supportus@dyslexiaaction.org.uk
Website: www.asmentoring.co.uk/ Email: enquiries@asmentoring.co.uk	www.suzylamplugh.org Telephone: 020 7091 0014 Email: info@suzylamplugh.org
Website: www.ncdv.org.uk/ Telephone: 0800 970 2070 Email: office@ncdv.org.uk	www.respond.org.uk/easy_read.html Helpline: 0808 808 0700
www.gov.uk/access-to-work/overview Telephone: 0345 268 8489 Email: atwsu.london@dpw.gsi.gov.uk	Website: www.autism.org.uk/ Telephone: 0207 833 2299 or 0808 800 4104 Email: nas@nas.org.uk
www.patoss-dyslexia.org/ Telephone: 01386 712 650	www.renardassociates.co.uk Telephone: 07825686851
www.nationaldomesticviolencehelpline.org.uk/ Telephone: 0808 200 0247	rapecrisis.org.uk/ Email: rcewinfo@rapecrisis.org.uk
staysafeonline.org	www.crisis.org.uk/ Telephone: 0300 636 1967 Email: enquiries@crisis.org.uk
england.shelter.org.uk/ Telephone: 0808 800 4444 Email: info@shelter.org.uk	www.citizensadvice.org.uk/
www.stepchange.org/ Telephone: 08001381000	ceop.police.uk/safety-centre/ Telephone: 0870 000 3344
www.bpas.org/ Telephone: 03457 304030 Email: clientservices@bpas.org	www.suitedbootedcentre.org.uk/ Telephone: 07808 531654 Email: info@suitedbootedcentre.org.uk
www.drinkaware.co.uk/ Telephone: 0207 766 9900 Email: contact@drinkaware.co.uk	www.actiononaddiction.org.uk Telephone: 0300 330 0659
Single Point of Access (SPA) Mental Health phoneline Telephone: 0800 6444 101	DfE counter extremism dedicated telephone helpline, 020 7340 7264 Email: counter.extremism@education.gov.uk In an emergency, call 999 or the confidential anti-terrorist hotline on 0800 789 321.