



# Safeguarding Policy

## Manara Training

**Manara Training is the trading name of Manara Solutions Community Interest Company**

Version: 1.0

Date: 18 January 2026 Review date: 18 January 2027 Approved by:

Directors, Manara Solutions CIC (trading as Manara Training)

# 1. Policy Statement

Manara Training is committed to safeguarding and promoting the welfare of children, young people and adults at risk. We recognise that **safeguarding is everyone's responsibility** and are committed to creating safe, inclusive and respectful learning environments for all participants in our training activities.

We take all safeguarding concerns seriously and will act promptly and appropriately to ensure concerns are responded to and escalated in line with statutory guidance and local safeguarding procedures.

## 2. Scope of the Policy

This policy applies to:

- Directors
- Employees
- Associate trainers
- Contractors and consultants
- Anyone representing Manara Training in a professional capacity

The policy applies to all Manara Training activities, including:

- Face-to-face training
- Online or virtual training
- Workshops, seminars and events

Manara Training primarily delivers training to professionals working with vulnerable young people and marginalised communities. However, safeguarding concerns may be disclosed during training, and on occasion training may involve service users, including adults at risk or young people under the age of 18. This policy covers all such scenarios.

## 3. Our Safeguarding Approach

Manara Training is a training organisation, not a direct service provider. Our role is to:

- create safe learning environments
- set clear boundaries and expectations
- respond appropriately to safeguarding concerns
- record and escalate concerns or disclosures
- work in line with statutory guidance

Manara Training does **not** investigate safeguarding concerns. Our responsibility is to listen, record and report concerns in line with this policy.

## 4. Legal and Practice Framework

This policy is informed by relevant UK legislation and guidance, including:

- Children Act 1989 and 2004
- Working Together to Safeguard Children
- Care Act 2014

## 5. Definitions

### Safeguarding

Protecting children, young people and adults at risk from abuse, neglect and exploitation, and promoting their wellbeing.

### Child or young person

Anyone under the age of 18.

### Adult at risk

An adult who has care and support needs and may be unable to protect themselves from abuse or neglect.

## Safeguarding concern

Any situation where a participant or representative may be at risk of harm. Concerns may relate to:

- physical, emotional or sexual abuse
- neglect or self-neglect
- exploitation or coercive control
- financial abuse
- breaches of professional boundaries
- any situation where someone appears unsafe or at risk

If unsure whether something is a safeguarding concern, representatives must report it.

# 6. Roles and Responsibilities

## 6.1 Joint Safeguarding Leads

Manara Training has two Joint Safeguarding Leads, held by both Directors. They are responsible for:

- receiving safeguarding concerns
- ensuring concerns are recorded
- determining appropriate escalation
- ensuring actions are taken promptly

Either Safeguarding Lead may take immediate action in urgent situations.

## 6.2 Escalation Where Safeguarding Leads Are Implicated

- If a concern involves one Safeguarding Lead → report to the other Safeguarding Lead
- If a concern involves both Safeguarding Leads → escalate to an agreed external safeguarding advisor or the relevant local authority safeguarding team

## 6.3 Trainers, Associates and Contractors

All representatives are responsible for:

- following this policy
- maintaining professional boundaries
- creating safe training environments
- reporting safeguarding concerns promptly

## 7. Safer Recruitment

Manara Training recognises that safer recruitment is an important part of safeguarding and promoting the welfare of children, young people and adults at risk.

We take reasonable steps to ensure that those representing Manara Training are suitable for their role. This includes:

- assessing roles for safeguarding risk
- obtaining references and relevant background information
- carrying out Disclosure and Barring Service (**DBS**) checks where required
- ensuring safeguarding expectations are clearly communicated

Decisions regarding recruitment checks are proportionate to the role, the level of contact with participants, and the nature of the training being delivered.

## 8. Recognising Safeguarding Concerns

Safeguarding concerns may arise through:

- direct disclosure
- observation of behaviour or indicators of harm
- information shared during training discussions

Concerns may relate to participants, colleagues, or individuals discussed during training.

## 9. Managing Disclosures During Training

If a disclosure occurs, representatives must:

- listen calmly and without judgement
- avoid asking leading questions
- explain that confidentiality cannot be guaranteed
- reassure the individual that they have done the right thing
- record the information accurately and factually
- report the concern to a Safeguarding Lead as soon as possible

Where needed, trainers may pause or redirect discussions to maintain emotional safety within the group.

# 10. Reporting and Escalation

Safeguarding concerns must be reported to a Safeguarding Lead **as soon as possible and no later than the end of the working day.**

Manara Training does not investigate safeguarding concerns. The Safeguarding Lead will assess the information and determine appropriate next steps, which may include:

- **Contact employer** contacting the participant's employer
- **Local authority** contacting local authority safeguarding teams
- **Emergency services** contacting emergency services where there is immediate risk of harm

## 10.1 Low-Level Concerns

A low-level concern is any behaviour that does not meet the threshold for a safeguarding referral but may indicate a breach of professional boundaries or cause unease. Low-level concerns must be reported and recorded.

## 10.2 Record-Keeping

- **Prompt recording** All safeguarding concerns will be recorded promptly, factually and securely
- **Secure storage** Records will be stored in a password-protected system accessible only to the Joint Safeguarding Leads
- **Retention period** Records will be retained for a minimum of seven years, unless legal requirements specify otherwise

# 11. Confidentiality and Information Sharing

Information related to a safeguarding concern will be:

- shared on a need-to-know basis
- stored securely
- shared without consent where there is a risk of harm

Manara Training will balance confidentiality with the duty to protect individuals from harm.

## **12. Safer Working and Professional Boundaries**

Manara Training maintains clear professional boundaries and expects appropriate conduct in all training environments, including online delivery.

## **13. Allegations Against Staff or Representatives**

Any concerns involving Manara Training representatives will be taken seriously. Appropriate action may include:

- internal review
- temporary suspension from training delivery
- referral to relevant authorities or professional bodies

## **14. Training, Review and Monitoring**

Manara Training commits to:

- keeping safeguarding knowledge up to date
- ensuring all representatives are familiar with this policy
- reviewing this policy annually or following significant changes

# 15. Related Policies

This policy should be read alongside:

- Code of Conduct Policy
- Complaints Policy

## Approval and Sign-off

This Safeguarding Policy has been approved and adopted by **Manara Solutions Community Interest Community (trading as Manara Training)**.

**Name:** Bob Mugisha

**Role:** Director / Joint Safeguarding Lead

**Signature:**



**Date:** 18/01/2026

**Name:** Shereen Lawrence

**Role:** Director / Joint Safeguarding Lead

**Signature:**



**Date:** 18/01/2026