



---

## SAFEGUARDING POLICY

---

### Index

Page 1: Induction

Page 2: Purpose and Scope

Page 3: Prevent Duty Statement

Page 4-5: Designated Roles and Responsibilities

Page 6-8: What is Safeguarding

Page 9: What is abuse and our commitment

Page 10-11: Recruitment and selection

Page 12: Anti Radicalisation and Extremism

Page 13: Online Safety statement

Page 14: Communication

Page 15-17: Reporting and dealing with allegations of abuse by members of staff

Page 18-19: Artificial Intelligence (AI) and Digital Safeguarding

Page 20: Misinformation, Disinformation and Conspiracy Content

Page 21-22: Dealing with concerns

Page 23 Appendix 1

Page 24: Appendix 2

Page 25-32: Appendix 3

Page 33-36: Appendix 4



## Apprenticeships Introduction

Lavender International has safeguarding statutory duties and responsibilities concerning its apprenticeships to protect them from any potential harm.

We believe that it is always unacceptable for a child, young person, or adult to experience abuse of any kind and recognise our responsibilities to safeguard and promote the welfare of children, young people, and adults at risk, by a commitment to practice that protects them.

The Safeguarding and Prevent Policy reflect the importance of our responsibility to safeguard and promote the welfare of all our apprentices and staff by protecting them from physical, sexual, or emotional abuse, neglect, and bullying. We are committed to providing a caring, friendly, and safe environment for all our apprentices so that they can learn in a relaxed and secure atmosphere. We believe every apprentice should be able to participate in all learning and social activities in an enjoyable and safe environment and be protected from harm.

This policy outlines appropriate behaviour and procedures for employees and tutors to follow when working with apprentices. Should a vulnerable person be suspected of being in danger, this must be reported to the Designated Safeguarding Lead as soon as possible.

The Designated Safeguarding Lead oversees safeguarding concerns and is responsible for passing on relevant information to the Local Authority should the incident need immediate action.

This policy is underpinned by current safeguarding legislation and statutory guidance, including but not limited to:

- Children Act 1989 and 2004
- Care Act 2014
- Keeping Children Safe in Education (latest version)
- Working Together to Safeguard Children (latest version)
- Prevent Duty Guidance (2023)
- Counter-Terrorism and Security Act 2015
- Safeguarding Vulnerable Groups Act 2006
- Protection of Freedoms Act 2012
- Equality Act 2010
- Data Protection Act 2018 and UK GDPR
- Online Safety Act 2023
- Sexual Offences Act 2003 (as amended)
- Voyeurism (Offences) Act 2019
- Apprenticeship Funding Rules (latest version)
- Ofsted Education Inspection Framework (EIF)
- Department for Education Safeguarding Guidance (latest version)

Lavender International will update this policy when legislation or guidance changes.



## Apprenticeships

"This safeguarding policy is reviewed annually and updated in line with the latest statutory guidance and legislation, including Keeping Children Safe in Education (LATEST VERSION), Working Together to Safeguard Children (2023), and the Online Safety Act (2023)."

## Purpose

The purpose of this policy is to:

- Provide a clear statement of Lavender International's safeguarding commitment
- Protect apprentices, learners, and staff from harm
- Clarify roles and responsibilities for safeguarding
- Ensure compliance with statutory safeguarding and Prevent duties
- Provide clear reporting procedures
- Promote a culture of safety, respect, and inclusion
- Support learners who may be vulnerable or at risk

Safeguarding includes protection from:

- Abuse and neglect
- Bullying and harassment
- Radicalisation and extremism
- Online harm and exploitation
- Criminal exploitation/county lines
- Sexual exploitation and harassment
- Discrimination and hate crime
- Mental health risk
- Substance misuse risks
- Domestic abuse
- Artificial Intelligence (AI)

## Scope

This policy applies to:

- All apprentices
- All commercial learners
- All staff and tutors
- Employers involved in apprenticeship training
- Visitors and contractors
- Apprentices under 18
- Adults at risk (as defined by the Care Act 2014)

**A child is defined as anyone under the age of 18.**

**An adult at risk is defined as a person aged 18 or over who:**

- has needs for care and support,
- is experiencing, or at risk of, abuse or neglect.
- is unable to protect themselves from harm.



### Apprenticeships

Lavender International recognises that apprentices may be vulnerable due to:

- age
- disability
- learning difficulty
- mental health
- social or economic circumstances
- workplace environment
- online activity
- employer relationships

Safeguarding responsibilities always apply, including:

- training centres
- employer premises
- online learning
- remote sessions
- off-site activities

### Prevent Duty Statement

Lavender International fully recognises its duty under the Counterterrorism and Security Act 2015 to prevent people from being drawn into terrorism.

We will:

- Provide Prevent training for staff
- Promote British Values
- Monitor risks within our provision
- Support apprentices at risk of radicalisation
- Refer concerns using safeguarding procedures
- Work with external agencies where required
- We will carry out an annual Prevent risk assessment.

### Monitoring and Review

This policy will be reviewed:

- annually
- when legislation changes
- after safeguarding incidents
- following Ofsted or DFE updates
- when organisational changes occur

The Designated Safeguarding Lead is responsible for ensuring the policy is implemented and reviewed.



## **Designated Safeguarding Team**

Lavender International has a Designated Safeguarding Lead (DSL) and Deputy Designated Safeguarding Lead (DDSL) to oversee safeguarding and Prevent duties.

All staff, apprentices, and employers must report safeguarding concerns to the DSL or DDSL.

## **Designated Safeguarding Lead (DSL)**

The DSL is responsible for:

- Being a member of the Senior Management Team
- Implementing, monitoring, and reviewing the Safeguarding & Prevent Policy
- Leading case management and safeguarding investigations
- Making referrals to Local Authorities, Police, or other relevant agencies
- Supporting apprentices and staff with safeguarding concerns
- Conducting annual risk assessments, including Prevent and online safety risks
- Ensuring safeguarding training is delivered and up to date
- Keeping accurate and confidential records in line with GDPR

## **Key Contacts**

Designated Safeguarding Lead: Julie Goodfellow -07842432919

[julie.goodfello@lavenderndt.com](mailto:julie.goodfello@lavenderndt.com) [safeguarding@lavender-ndt.com](mailto:safeguarding@lavender-ndt.com)

## **Additional Safeguarding Members are listed below –**

Deputy Designated Safeguarding Lead

Apprenticeship Operations Manager

Madeleine Best - 07718235842 [Madeleine@lavender-ndt.com](mailto:Madeleine@lavender-ndt.com)

Ashley Wood- Executive Manager 01226765769 [ashley.wood@lavender-ndt.com](mailto:ashley.wood@lavender-ndt.com)

Operations Director – Nicola Dodsley - [Nic@lavender-ndt.com](mailto:Nic@lavender-ndt.com)

Managing Director Tim Armitt - [tim@lavender-ndt.com](mailto:tim@lavender-ndt.com)

Safeguarding inbox – [safeguarding@lavender-ndt.com](mailto:safeguarding@lavender-ndt.com)

## **Senior Management Team**

The Senior Management Team is responsible for:

- Ensuring safeguarding policies and procedures are effectively implemented
- Supporting the DSL with resources and oversight
- Taking strategic accountability for learner safety
- Ensuring all staff receive mandatory safeguarding and Prevent training annually



Apprenticeships  
**All Staff, Tutors,**

Every employee, tutor, and contractor has a duty to:

- Follow this Safeguarding & Prevent Policy at all times
- Report concerns immediately to the DSL or DDSL
- Complete mandatory safeguarding and Prevent training annually
- Act to protect apprentices from harm, abuse, neglect, exploitation, or radicalisation
- Maintain professional boundaries and operate in a position of trust
- Respect confidentiality while ensuring the safety of learners
- Record safeguarding concerns accurately and factually using the Safeguarding Cause for Concern Form

### Apprentices

Apprentices are encouraged to:

- Report any concerns about their safety or the safety of others
- Be aware of safeguarding, online safety, Prevent, and related policies
- Participate in safeguarding awareness and online safety training
- Seek help from a member of staff, the DSL, or DDSL when at risk or concerned

### Employers

Employers hosting apprentices have a responsibility to:

- Support the safeguarding of apprentices in their workplace
- Ensure staff working with apprentices have appropriate checks (DBS if applicable)
- Report safeguarding concerns to the DSL immediately
- Cooperate with investigations and safeguarding procedures



## What is Safeguarding?

Safeguarding is the promotion of the well-being of children, young people and vulnerable adults and the detection, referral, and prevention of abuse.

In our company, safeguarding means creating a safe environment where apprentices: are protected from harm;

- feel safe and supported;
- can learn and develop effectively;
- know who to speak to if they have concerns.

Under Keeping Children Safe in Education, safeguarding includes:

- protecting children from maltreatment;
- preventing impairment of mental and physical health or development;
- ensuring children grow up in safe and effective care;
- taking action to enable children to have the best outcomes.

Safeguarding covers a wide range of areas, including:

- physical abuse;
- emotional abuse;
- sexual abuse and harassment;
- neglect;
- bullying and cyberbullying;
- online safety;
- exploitation and grooming;
- domestic abuse;
- radicalisation and extremism;
- mental health and wellbeing;
- attendance and welfare concerns.

Safeguarding is everyone's responsibility. All staff must be able to:

- recognise signs of concern;
- respond appropriately;
- record and report concerns;
- follow the organisation's safeguarding procedures.

## Safeguarding Children

We believe every child, regardless of gender, ethnicity, disability, sexuality, or religion, deserves to be comfortable and secure in their activities. Their carer, family or friends also need to feel sure that the people in charge of these activities are trustworthy, responsible and will do everything they can to keep the child safe from harm.

Concerning Apprentices under the age of 18 years old, and classed as a child in law, the company has a statutory duty, as set out in the Education Act 2002, and Children Act 2004,



### Apprenticeships

to promote and safeguard the welfare of children and have due regard to guidance always issued by the Secretary of State.

The Company adopts the definition used in the statutory guidance: Working Together to Safeguard Children 2015, issued by the Department for Education (DfE), Keeping Children Safe in Education 01/09/23 Part 1, which applies to all children and defines safeguarding and promoting children and young people's welfare as:

- Protecting children from potential harm and maltreatment.
- Preventing impairment of children's health or development.
- Ensuring that children are growing up in circumstances consistent with the provision of safe and effective care.
- Taking action to enable children to have the best outcomes.

The above statutory guidance defines child protection as part of safeguarding and promoting welfare. Child protection is the activity undertaken to protect children who are suffering, or are likely to suffer, significant harm.

Cases involving children under the age of 18 should always involve a Child Social Care worker.

### Safeguarding Vulnerable Adults

A child is defined as anyone under the age of 18.

An adult at risk is defined as any person over the age of 18 and at risk of abuse or neglect because of their need for support or personal circumstances.

Alongside the Safeguarding Agenda risks above, this could be due to, and not limited to, any of the following:

- Living in sheltered housing.
- Receiving any form of healthcare.
- Receiving a welfare service to support their need to live independently.
- Receiving a service due to their age or disability.
- Living in residential accommodation such as a care home.
- Receiving domiciliary care in their own home.
- Poor numeracy and literacy skills, or specific learning needs.
- English is not a first language.
- Unsupportive employer.
- Under-represented group.
- Acting as a carer for another family member.
- Background in offending or is showing signs of being drawn into anti-social or criminal behaviour, including gang involvement and association with organised crime groups.
- Has a disability or social need?
- Has special educational needs.
- Lives 'In Care' or has recently transitioned out of Care.
- Is a young carer.



#### Apprenticeships

- Is frequently missing/goes missing from care or home.
- Is within a family circumstance presenting challenges for the child, such as drug and alcohol misuse, adult mental health issues, and domestic abuse.

Concerning Apprentices 18 years and over, and classed as an adult in law, the Company has a statutory safeguarding duty, as set out in the Care Act 2014, which must be seen in conjunction with the Mental Capacity Act 2005 and the Human Rights Act 1998.

The Company must have regard to guidance always issued by the Secretary of State. The adult safeguarding duties under the Care Act 2014 apply to an adult, aged 18 or over, who:

- Has needs for care and support (whether or not the Local Authority is meeting any of those needs).
- Is experiencing, or at risk of abuse or neglect.
- As a result, those care and support needs are unable to protect themselves from either the risk of or the experience of abuse or neglect.

The Care Act 2014 defines safeguarding as “protecting an adult’s right to live in safety, free from abuse and neglect.” The above duties apply to any person who is aged 18 or over and at risk of abuse or neglect because of their need for care and support. Such concerns will be referred to the appropriate authorities, such as the Adult Social Care team



## What is Abuse?

There are many different types of abuse, and they all result in behaviour towards a person that deliberately or unintentionally causes harm. It is a violation of an individual's human and civil rights and, in the worst cases, can result in death.

### Types of abuse:

- Physical
- Neglect
- Institutional
- Sexual
- Discriminatory
- Psychological
- Financial

We believe that it is always unacceptable for any child or adult at risk of harm, abuse, and neglect to experience abuse of any kind, and we recognise our responsibility to safeguard the welfare of all children and adults, by a commitment to practice which protects them.

**Please see Appendix 2: Safeguarding – Types of Abuse (in this policy) for further guidance**

For the context of this policy, when we refer to “adult”, they may also be more commonly known to us as Apprentices.

## Our Commitment

All our employees who work with Apprentices have a crucial role to play in shaping their lives and have a unique opportunity to interact in ways that are both affirming and inspiring.

This policy has been produced to help you to establish safe and responsive environments which safeguard all and reduce the risk of you being unjustly accused of improper or unprofessional conduct.

We all have a duty of care to safeguard and promote welfare, and to enhance awareness of the broader welfare spectrum, specifically the issues facing young people in society.

To be considered trustworthy and responsible in keeping children and adults at risk of harm, safe from harm, abuse and neglect, we will:

- Avoid putting our employees in positions where abuse might be alleged and ensure that all employees know exactly what to do should abuse be suspected.
- Enable all our employees to make informed and confident decisions regarding safeguarding issues and take all suspicions and allegations of abuse seriously.
- Recognise that anyone may become vulnerable at some stage in their life and that they may require extra support in the face of difficult situations such as ill health, bereavement, divorce, loss of income, or other challenges.
- Ensure all staff understand that when working with children or adults at risk, they are operating in a position of trust.



## Recruitment and Selection

To ensure that Apprentices are protected while they are with us, we will ensure that our Tutors are carefully selected, screened, trained, and supervised.

We accept our responsibility to follow the guidance set out in the most up-to-date version of the statutory guidance 'Keeping Children Safe in Education'. We will ensure that the following checks are satisfactorily completed before a person takes up a position in the Company:

- Identity checks to establish that applicants are who they claim to be, including having sight of an applicant's birth certificate, passport, and/or driving licence.
- Checking academic qualifications to ensure that qualifications are genuine.
- Two references are secured before confirming the offer of employment.
- Previous employment history will be examined, and any gaps accounted for.
- Appropriate Enhanced Disclosure and Barring Service checks are completed.

All members of staff and Tutors must hold a current enhanced DBS and are required to produce the original certificate to the designated administrator coordinator to check and record serial numbers/dates, which then will be checked and verified by two directors.

The Safeguarding Children and Safer Recruitment in Education guidance, January 2011, recommends that, in addition to the various staff records that are kept as part of normal business, a single central record of recruitment and vetting checks.

We will apply principles of Safer Recruitment to all staff working with Apprentices, it will be the employer/ workplace's responsibility to ensure that their staff and volunteers have the relevant DBS disclosures if applicable. We will not undertake DBS checks for apprentices.

Whilst it is a criminal offence to knowingly employ someone who is barred from working with children or adults at risk of harm in regulated activity, it is possible to allow such a person to work in controlled activity, subject to specific safeguards being in place.

The decision whether to employ in controlled activity someone who is barred from working with children or adults at risk of harm in regulated activity will be made by the Directors of Lavender International.

## Induction, Training, and Teaching:

In line with the Online Safety Act 2023, this policy recognises online risks such as grooming, exploitation, cyberbullying, harmful content, and inappropriate contact.

All staff are trained to identify and report online safeguarding concerns, including through digital learning platforms and social media. Filters, monitoring systems, and learner education are in place to reduce exposure to risk.

All new employees will receive an induction that covers their responsibilities as employees, as part of their job roles, the company's responsibilities to them with respect to all aspects of their employment, training, development, equal treatment, health and safety, and their responsibility to others, including safeguarding.



Safeguarding training is mandatory for all staff and takes place annually. It forms part of our formal training programme, which is evaluated, monitored, and kept under review.

In line with the revised Prevent Duty Guidance (2023), all staff receive training on recognising signs of radicalisation and understand how to make a Channel referral. A local risk assessment is carried out annually to ensure Prevent is contextualised to our community.

All staff will complete regular Prevent training. Concerns about radicalisation or extremist views must be referred to the DSL and may result in a Channel referral.

Staff must not enter into any inappropriate relationship with apprentices/students under the age of 18 or vulnerable adults, including those in a position of trust (e.g., tutors). Breaches may result in disciplinary action and safeguarding referrals.

Apprentices will be taught Safeguarding within the sessions to prevent potential harm and help them identify and deal with risks through skills and knowledge gained on the course. Information will also be distributed during Induction, on:

- Safeguarding
- Health and Safety
- Equality and Diversity
- Health relationships
- Prevent Radicalisation
- Drug/alcohol dependency

The curriculum incorporates digital resilience, online safety, healthy relationships, and awareness of exploitation. Apprentices are encouraged to report concerns and are supported in doing so.

Apprentices will be informed of the importance of these policies and are encouraged to let a member of staff, or the Safeguarding Team, know if they have any concerns, as well as being reminded through posters featuring the Designated Safeguarding Lead contact information.



## Anti-Radicalisation and Extremism: Adhering to the Prevent Duty

We are committed to safeguarding the welfare of all our staff. We recognise that, as part of this process, safeguarding against radicalisation is important; we will work alongside other professional bodies and agencies to ensure that our staff are safe from harm.

**Extremism and Radicalisation:** Since 2010, when the Government published the Prevent Strategy, there has been an awareness of the specific need to safeguard children, young people, and families from violent extremism. There is a recognised threat from extremist groups attempting to radicalise vulnerable children and young people 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.

We value freedom of speech and the expression of beliefs/ideology as fundamental rights underpinning our society's values. Individuals have the right to speak freely and voice their opinions. However, freedom comes with responsibility, and free speech that is designed to manipulate the vulnerable or that leads to violence and harm to others goes against the moral principles in which freedom of speech is valued. Free speech is not an unqualified privilege; it is subject to laws and policies governing equality, human rights, community safety, and community cohesion.

### Signs and Symptoms of Extremism or Radicalisation can include:

- Being in contact with extremist recruiters.
- 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.
- Significant changes to appearance and/or behaviour.
- Experiencing a high level of social isolation, resulting in issues of identity crisis and/or personal crisis.

We track key developments externally and use these to ensure that Prevent training is delivered to staff and Apprentices, and that systems are in place to ensure policies reflect national, regional, local, and organisational priorities.

### Actions to Take

If a member of staff is concerned about an apprentice being subject to, or affected by, extremism or radicalisation, then the Apprenticeship Safeguarding Process must be followed and a Safeguarding Cause for Concern raised.



## Online Safety Statement

Lavender International recognises that technology and the internet play a significant role in the lives of children and young people and is committed to promoting safe, responsible, and appropriate use of digital technologies.

Online safety is an essential part of safeguarding and is approached as a whole organisational responsibility.

The organisation aims to protect apprentices from harmful online content and risks, including:

- cyberbullying and online harassment;
- grooming, exploitation, and abuse;
- radicalisation and extremist material;
- misinformation, disinformation, and conspiracy content;
- inappropriate or harmful content;
- online scams and fraud;
- sharing of indecent images;
- unsafe use of social media, gaming, messaging, and AI technologies.

Staff are expected to remain vigilant to online safety concerns and report any safeguarding issues in accordance with the organisation's safeguarding procedures. Apprentices will be supported to develop digital resilience, critical thinking, and safe online behaviours through guidance, education, and ongoing support.

The organisation will take appropriate action where online behaviour presents a safeguarding risk to apprentices, staff, or others. This may include monitoring, intervention, referrals to safeguarding leads, involvement of parents/carers or employers where appropriate, and referrals to external agencies.

The organisation is committed to maintaining appropriate filtering, monitoring, and security measures on organisational devices and systems, where applicable, to help safeguard learners and staff from online harm.



## Apprenticeships Communication

We take a whole organisation approach to safeguarding. This policy and associated documents are available to all Apprentices and Employers, and they are communicated at the induction stage of their engagement with Lavender International.

All stakeholders are made aware of the procedure for reporting safeguarding concerns during induction through the literature and information provided.

### Attendance, Absence and Safeguarding Monitoring

Lavender International recognises that regular missed sessions, unexplained absence, poor attendance, or disengagement may be indicators of safeguarding concerns, wellbeing issues, exploitation, or other vulnerabilities.

All unexplained or repeated absences will be followed up, escalated where appropriate, and investigated in line with the organisation's safeguarding and attendance procedures.

Attendance and apprentices' engagement are monitored regularly by staff, with concerns recorded and acted upon promptly. Persistent absence or patterns of non-engagement will result in additional contact with the apprentice and, where appropriate, employers, parents/carers, or external agencies.

The Senior Leadership Team (SLT) reviews attendance, absence, and safeguarding-related concerns monthly to identify trends, monitor actions taken, and ensure appropriate interventions and support are in place.



## Reporting and dealing with all allegations of abuse by members of staff.

The procedures apply to all staff, and tutors, whether teaching, administrative, management or support. Allegations of abuse by a member of staff can be defined as when a person has:

- Behaved in a way that has harmed or may have harmed a child, young person, or adult at risk of harm.
- Possibly committed a criminal offence against or related to a child, young person or adult at risk of harm.
- Behaved towards a child, young person, or adult at risk of harm in a way that indicates she/he is unsuitable to work with children, young people or adults at risk of harm.

Following an allegation of abuse by a member of staff, the DSL will inform the appropriate authority (Local Authority Designated Officer, Police, etc). The member of staff will be suspended until the allegation has been investigated. Following the investigation, if the allegation is found to be true, disciplinary action will be taken in accordance with the Disciplinary Procedure. If the allegation is unfounded, the member of staff will be able to resume their duties.

Lavender International understands its obligations under the Safeguarding Vulnerable Groups Act (2006) and Protection of Freedoms Act (2012) to refer information to the DBS in cases where a person is dismissed or removed from working with children or adults at risk of harm, abuse, and neglect (or would have been if the person had not left the business or resigned).

### Once a referral is made to the Designated Safeguarding Lead

The DSL will make an initial assessment of the allegation and consult with the staff involved and other designated staff as appropriate. This will usually involve speaking to the Apprentice at the earliest opportunity. The priority is to ensure that the Apprentice is not in any immediate danger. Designated staff will seek medical attention if the Apprentice is suffering from a serious injury.

The Apprentice may be asked to repeat the disclosure they have made. Every effort will be made to communicate with the Apprentice in a way that is appropriate to their age, understanding, and preference. This is especially important for apprentices with a disability or those whose preferred language is not English.

The Apprentice will be asked if there are younger children or any other adults who might also be at risk. However, the DSL will avoid asking leading questions and will not attempt to investigate the allegations. A written account will be made of the disclosure, the context, and the Apprentice may be asked to sign it.

If the Apprentice wishes to take the allegation forward, the DSL will support the apprentice in contacting Social Services, the Police, or the NSPCC. When an Apprentice is not sure about taking the allegation forward, the DSL can, without necessarily identifying the person



### Apprenticeships

in question, discuss concerns with Social Services or the Police, so that an informed decision can be reached.

Following consultation, the DSL will ask for the Apprentice's views and check they understand the significance and consequences of a referral to Social Services or the Police (or Forced Marriage Unit or Counter-Terrorism Team).

It remains the responsibility of the Safeguarding Team to take whatever action is necessary to ensure the Apprentice's safety and that of any other children or adults who may be at risk. This may, on occasion, involve a referral against the wishes of the apprentice involved.

Where practicable, concerns will be discussed with a parent or guardian unless this may, either by delay or the behavioural response it may prompt, place the Apprentice at risk of harm. The Apprentice's view will also be considered in deciding whether to contact their parent/guardian. A written record will be made of any discussion with parents/carers or guardians.

In the event of a decision to report, a member of the Safeguarding Team should inform the Apprentice of the proposed action and the reasons for the decision. Ideally, this should happen before the appropriate agency is informed unless doing so would place the young person/adult at greater risk.

The DSL will contact the Social Services Department of the appropriate local authority by telephone in the first instance and record the date and time that this took place. The DSL will agree with the recipient of the referral on what the Apprentice and parents/carers will be told, by whom, and when. The DSL will make a confirmation of the referral in writing within 48 hours.

All concerns, discussions, decisions made, and reasons for those decisions will be recorded. Written records will be kept confidential in a securely locked location and under the Data Protection Act/GDPR; however, where the police are involved, then such records may need to be disclosed.

There may be instances where more than one member of the designated team will be involved in a particular disclosure. On occasion, they may work collaboratively to deal with a case.

### Confidentiality

The legal principle that the "welfare of the child is paramount" means that taking action to safeguard the child, or young person, is most important. Privacy and confidentiality should be respected, but if doing nothing leaves a child at risk of harm, the child's safety must come first. So legally, it is fine to share information if someone is worried about the safety of a child/adult.

When a concern or worry is raised, not everyone needs to know about it; this respects the child/adult's, family, and or staff's rights to privacy.



### Apprenticeships

The Company and all employees will ensure that all data about apprentices is handled under the requirements of the law and any national and local guidance concerning data protection, confidentiality, and information sharing. Any employee who has access to sensitive information about an apprentice or their family must take all reasonable steps to ensure that such information is only disclosed to those people who need to know when there is a legal duty to share information.

Regardless of the duty of confidentiality, working within the remit of our safeguarding duties, if any employee has reason to believe that an apprentice may be suffering harm, or be at risk of harm, they must forward this information without delay to the DSL.

### Photographing Apprentices

We will not allow images of apprentices to be used on Company websites, publicity, or press releases, without express permission from the Apprentice (or their parent if the Apprentice is under 18). From March 2019, apprentices will be asked to sign a written consent form (QD 740). If the Company does obtain such permission, we will not identify individual apprentices by name without gaining further permission to do so.

Using images of children for publicity purposes will require the age-appropriate consent of the individual concerned and their legal guardians. Images should not be displayed on websites, in publications or in a public place without such consent. It is recommended that when using a photograph, the following guidance should be followed:

- Ensure appropriate explicit consent has been granted (using the QD740 Consent form)
- If the photograph is used, avoid naming the child
- If the child is named, avoid using their photograph
- Establish whether the image needs to be retained for further use,
- Ensure appropriate measures are in place to securely store images and are only used by those authorised to do so.



## Artificial Intelligence (AI) and Digital Safeguarding

Our organisation recognises that Artificial Intelligence (AI) technologies are increasingly being used within education, training, and the workplace. Whilst AI can provide valuable support for learning, administration, and communication, it also presents potential safeguarding, data protection, and online safety risks.

This policy applies to all staff, apprentices, employers, and visitors using AI systems or AI-generated content in connection with the organisation.

### Acceptable Use of AI

AI tools may be used appropriately to support:

- Learning and revision activities
- Research and idea generation
- Administrative tasks
- Grammar, spelling, and formatting support
- Accessibility support for apprentices with additional needs

AI must support learning and development and must not replace an apprentice's own knowledge, skills, understanding, or professional judgement.

### Unacceptable Use of AI

The following uses of AI are prohibited:

- Uploading confidential, personal, safeguarding, or employer-sensitive information into public AI systems
- Using AI to produce abusive, harmful, extremist, or inappropriate content
- Creating fake images, recordings, or impersonations of staff or apprentices
- Using AI to bully, harass, intimidate, or manipulate others
- Submitting fully AI-generated work as original learner evidence
- Using AI to bypass assessment requirements or commit malpractice

Any misuse of AI may result in disciplinary action and safeguarding intervention where appropriate.

### Safeguarding Risks Associated with AI

Our organisation acknowledges that AI technologies may expose apprentices and staff to risks, including:

- Inappropriate or harmful online content
- Misinformation or inaccurate advice
- Online exploitation, grooming, or manipulation
- Cyberbullying and harassment



### Apprenticeships

- Deepfake imagery or voice cloning
- Radicalisation or extremist material
- Data breaches and privacy concerns
- Emotional distress or overreliance on AI chat systems

All safeguarding concerns involving AI must be reported immediately using the safeguarding reporting procedures.

### Data Protection and Confidentiality

Staff and apprentices must not input:

- Personal learner information
- Safeguarding disclosures
- Employer-sensitive information
- Confidential organisational data

into publicly available AI platforms unless approved and compliant with data protection requirements.

All use of AI must comply with:

- UK GDPR
- Data Protection Act 2018
- Organisational ICT and data protection policies
- Staff Responsibilities

### Tutors are responsible for:

- Modelling safe and appropriate AI use
- Monitoring apprentices' use where appropriate
- Verifying the accuracy of AI-generated information
- Maintaining professional boundaries online
- Reporting safeguarding concerns linked to AI use
- Promoting digital literacy and online safety

### Apprentices Responsibilities

Apprentices are expected to:

- Use AI safely, responsibly, and ethically
- Protect personal and confidential information
- Produce authentic work and declare AI use where required
- Report harmful or concerning AI content or interactions
- Monitoring and Review

We will continue to monitor developments in AI technology and will review this policy regularly to ensure safeguarding practices remain effective, lawful, and appropriate.



## Misinformation, Disinformation and Conspiracy Content

Lavender International recognises that children and young people may be exposed to misinformation, disinformation and conspiracy content online and through social media platforms. Exposure to this type of content may negatively affect an apprentice's wellbeing, behaviour, relationships, critical thinking, and understanding of risk and safety.

**Misinformation** refers to false or inaccurate information shared without intent to cause harm.

**Disinformation** refers to deliberately false or misleading information intended to manipulate, deceive, or cause harm.

**Conspiracy** content refers to theories or claims that suggest events or situations are secretly controlled or manipulated without credible evidence.

The organisation acknowledges that such content can contribute to:

- anxiety, fear, or distress;
- distrust of professionals, organisations, or authorities;
- harmful or extremist beliefs;
- radicalisation risks;
- bullying, discrimination, or hate-related behaviour;
- unsafe online activity and exploitation.

Staff must remain vigilant to signs that an apprentice may be negatively influenced by harmful online content and should report any safeguarding concerns in line with the organisation's safeguarding procedures.

Concerns may include significant changes in behaviour, repeated sharing of harmful or extremist content, social isolation, or expressions of fear, anger, or distrust linked to online narratives.

Lavender International is committed to promoting:

- online safety and digital resilience;
- critical thinking and respectful discussion;
- appropriate use of technology and social media;
- Apprentices' awareness of reliable and trustworthy sources of information.

Where appropriate, support and intervention may include safeguarding monitoring, wellbeing support, online safety education, Prevent referrals, or external agency involvement



It is the responsibility of those working with children and young adults to be vigilant in recognising abuse. A safeguarding Cause for Concern is an action, observation, disclosure, or discussion that makes an employee feel anxious about the safety or wellbeing of an apprentice.

It is important to note that, should an individual disclose information of abuse about themselves, the receiving party will be supportive but not ask any leading questions; only those that clarify. They should be clear that the information/incident will be reported to the DSL, who will forward the information to the relevant authorities and inform them that further interviews may need to occur. Anything disclosed should be recorded by a member of staff, preferably the DSL, and anything recorded should be a verbatim record of the victim with nothing added or altered due to interpretation.

It is not the responsibility of any employee to investigate any suspicions or concerns that an apprentice is at risk of or is suffering significant harm. All suspicions should be reported to the DSL, who will follow the escalation process in place for any safeguarding concerns.

### How to respond to signs or suspicions of abuse

All staff should report their concerns to a member of the Lavender International Safeguarding Team. There will always be a member of the designated safeguarding team available to respond to any allegations/suspicions/concerns of abuse.

All members of the team will receive training to carry out these roles, and this will be reviewed and updated regularly.

Sometimes concerns about a child/adult may not be about abuse. You may be concerned that a child or family may need some help in making sure all a child/adult's needs are met or to address a particular problem. Examples of this might be where a child is suffering because of poverty, getting into trouble in the community, or has a disability and needs extra help. In these instances, staff would still be expected to ask for advice from a member of the Safeguarding Team.

### How to respond to a child/young person or adult telling you about abuse

#### What to do:

- stay calm.
- listen, hear, and believe.
- ask open-ended questions for clarification only.
- give the child/young person/adult time to say what they want.
- reassure and explain that they have done the right thing in telling. Explain that only those people who need to know will be informed.
- act immediately following the procedure in this policy.
- record in writing as verbatim as possible what was said as soon as possible.
- report to a member of the safeguarding team.
- consider their immediate safety.



**What not to do:**

- Do not over-react. It is extremely unlikely that the child/young person/adult is in immediate danger.
- Do not probe for more information; questioning the child/young person/adult may affect how their disclosure is received later.
- Do not make assumptions, paraphrase, and do not offer alternative explanations.
- Do not promise to keep confidentiality.
- Do not make negative comments about the alleged abuser.
- Do not 'gossip' or disclose any information with colleagues about what has been said to you.
- Do not make the child/young person/adult repeat the story unnecessarily.

It is the duty of anyone who works with children/young people/ adults to report and record disclosure of abuse. A Safeguarding Cause for Concern Form must be completed. It is not for staff to decide whether a suspicion or allegation is true.

All suspicions or allegations must be taken seriously and dealt with according to this procedure. If the disclosure is made by a parent/guardian/carers, you should follow the same procedure and refer them to the DSL.

Individual staff should never deal with abuse disclosures in isolation and should always refer to a DSL with responsibility for child/adult protection.

The decision whether to report suspected abuse to Social Services or the Police will be made collectively by the Safeguarding Team.

No member of staff should give an apprentice their personal phone number, email address, or home address or have a 'Facebook' link with an apprentice.

**What happens if the Safeguarding Policy is not adhered to?**

We will not tolerate behaviour that breaches the Safeguarding Policy and will initiate disciplinary or other action, if circumstances warrant, against those who contravene the guidance contained in it.

For related policies and procedures, please see Lavender International NDT Ltd.'s Prevent policy AQD 93, Equality and Diversity Policy QD 998, and IT acceptable use policy QD 992.

**Policy Review Log**

This policy is to be reviewed annually, with additional updates should new legislation be provided.

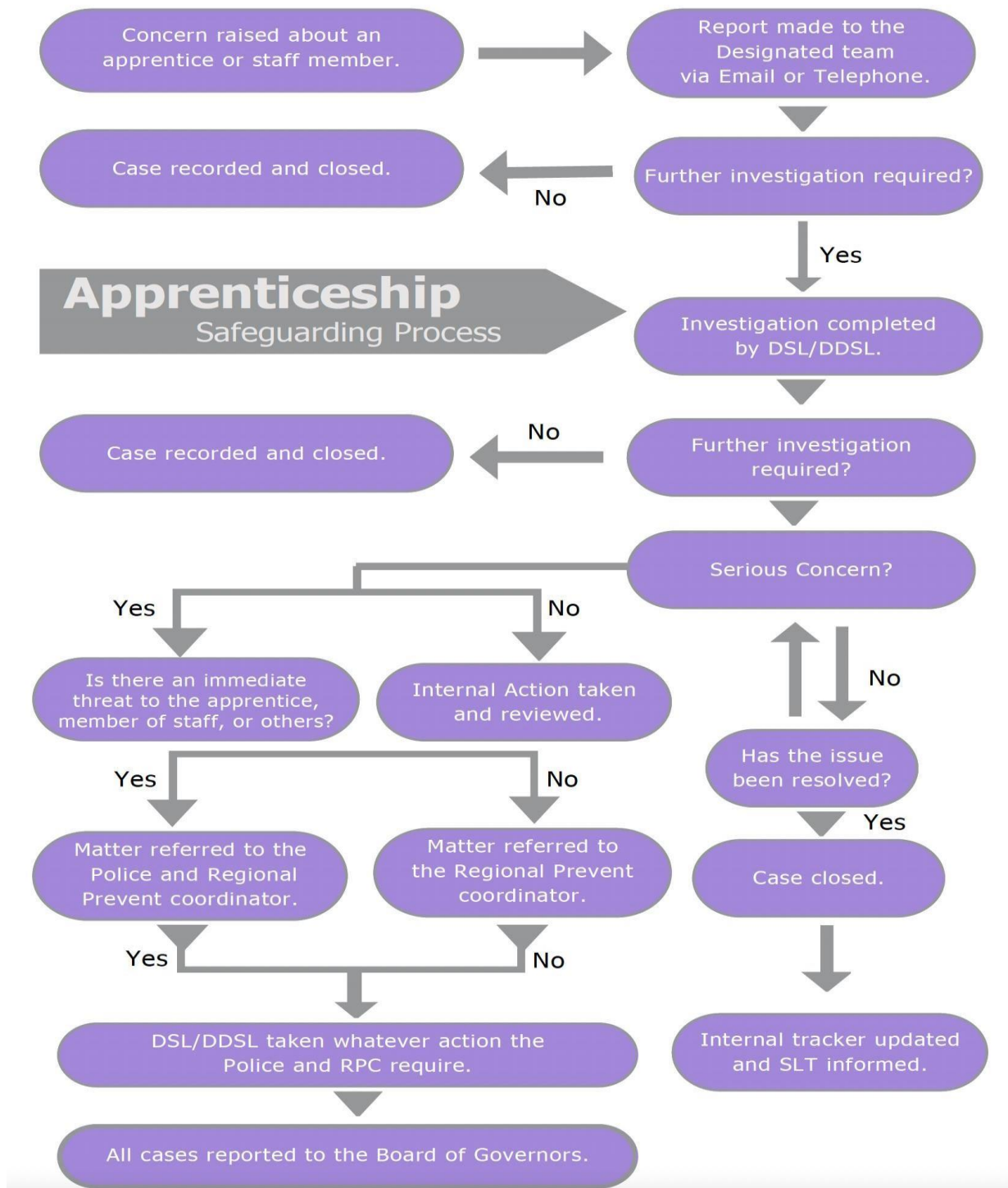


## Apprenticeships

## Appendix 1 Safeguarding Process Flow

All Safeguarding and Prevent referrals should be processed according to the flow chart below.

All referrals should be sent to the safeguarding inbox: [safeguarding@Lavender-ndt.com](mailto:safeguarding@Lavender-ndt.com) or the Designated Safeguarding Lead should be contacted at 07842 432919 (Julie Goodfellow)



**ALL FIELDS MARKED WITH AN ASTERISK '\*' MUST BE COMPLETED BEFORE SUBMISSION**

|                                                                                                                                                                                                                                                                                      |                                        |
|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|----------------------------------------|
| 1. Details of the person completing the form                                                                                                                                                                                                                                         |                                        |
| <b>Your Name *</b>                                                                                                                                                                                                                                                                   | <b>Role *</b>                          |
| <b>Email *</b>                                                                                                                                                                                                                                                                       | <b>Contact telephone number *</b>      |
| <b>Contract:</b> (Apprenticeship, commercial) *                                                                                                                                                                                                                                      | <b>DP reported to*</b>                 |
| <b>Date Reported*</b>                                                                                                                                                                                                                                                                | <b>Time Reported*</b>                  |
| Has the learner been advised that this information has been on? Yes <input type="checkbox"/> No <input type="checkbox"/>                                                                                                                                                             |                                        |
| 2. Details about the person you have concerns about                                                                                                                                                                                                                                  |                                        |
| <b>Name *</b>                                                                                                                                                                                                                                                                        | <b>ULN*</b>                            |
| <b>Employer Details*</b>                                                                                                                                                                                                                                                             |                                        |
| <b>Date Incident occurred*</b>                                                                                                                                                                                                                                                       | <b>Where did the incident occur? *</b> |
| <b>3. Outline of concern</b> <ul style="list-style-type: none"><li>• <b>Be Curious, Who? Why? Where? When?</b></li><li>• <b>Never promise to keep secrets.</b></li><li>• <b>Be factual.</b></li><li>• <b>Use the learner's words.</b></li><li>• <b>Don't pass judgment</b></li></ul> |                                        |
|                                                                                                                                                                                                                                                                                      |                                        |



## Appendix 3 Safeguarding – Types of Abuse:

This appendix aims to guide on the types of abuse; it is not an exhaustive list.

### **Discriminatory Abuse:**

Discriminatory abuse includes psychological abuse, harassment and discrimination which is motivated by a person's age, gender, disability, sexual orientation, race, cultural background, or religion.

Discrimination may be a motivating factor in other forms of abuse such as domestic violence or hate crime. Where the abuse or neglect is motivated by age, gender, sexual orientation, immigration status, race, religion, or disability; or occurs in a domestic violence situation; or is perceived as a Hate Crime: the abuse will be aggravated by these factors.

Discriminatory abuse can be in the form of personal or institutional discrimination. Personal Discrimination is the prejudice of the individual, whereas Institutional discrimination is where systems and structures directly discriminate against potential or actual users of a service.

Signs and symptoms of Discriminatory Abuse can include:

- fearfulness expressed in the eyes, a person avoids looking at the potential abuser, flinching on approach
- emotional withdrawal
- sleep disturbance
- low self-esteem
- unexplained fear or defensiveness
- isolation / shunning by others
- threats or intimidation, bullying or shouting
- unexplained attacks on property or possessions
- continual favouritism to other people in preference to the individual
- internalising the discrimination to the extent that they express similar discriminatory views about others

**Hate Crimes:** any incident which constitutes a criminal offence which is perceived by the victim or any other person as being motivated by prejudice and hate.

**Ageism:** discrimination based on age, especially against the elderly.

**Gender Discrimination:** is a belief that one sex is superior to the other and that the superior sex has endowments, rights, prerogatives, and status greater than those of the inferior sex.

**Homophobia:** discrimination against (fear or dislike of) homosexual people and homosexuality

**Transgender Discrimination:** discrimination against people who are transgender.

**Religious Intolerance:** is either intolerance motivated by one's own religious beliefs or intolerance against another's religious beliefs or practices.



**Racism:** the belief that all members of each race possess characteristics or abilities specific to that race, especially to distinguish it as inferior or superior to another race or races.

**Disablism:** discriminatory, oppressive, or abusive behaviour arising from the belief that disabled people are inferior to others.

**Physical abuse:** a form of abuse that may involve hitting, shaking, throwing, poisoning, burning or scalding, drowning, suffocating or otherwise causing physical harm. Physical harm may also be caused when a parent or carer fabricates the symptoms of, or deliberately induces illness.

**Emotional abuse:** Emotional abuse is the persistent emotional maltreatment of a child or adult at risk of harm, such as to cause severe and persistent adverse effects on their emotional development. It may involve conveying to them that they are worthless or unloved, inadequate, or valued only as long as they meet the needs of another person. It may include not giving them opportunities to express their views, deliberately silencing them or 'making fun' of what they say or how they communicate. It may feature age or developmentally inappropriate expectations being imposed. These may include interactions that are beyond the developmental capability, as well as overprotection and limitation of exploration and learning, or preventing participation in normal social interaction. It may involve seeing or hearing the ill-treatment of another. It may involve serious bullying (including cyberbullying), causing victims to frequently feel frightened or in danger, or the exploitation or corruption of others. Additionally, 'revenge porn' has been identified as a specific criminal offence (Criminal Justice and Courts Act 2015).

The Act creates a new criminal offence of disclosing private sexual photographs and films without the consent of an individual who appears in them and with the intent to cause that individual distress. Some level of emotional abuse is involved in all types of maltreatment, though it may occur alone.

**Domestic Violence:** any incident, or pattern of incidents of controlling, coercive or threatening behaviour, violence, or abuse between those aged 16 or over who are, or have been, intimate partners, or family members, regardless of gender or sexuality.

**Controlling behaviour** is a range of acts designed to make a person subordinate and/or dependent by isolating them from sources of support, exploiting their resources and capacities for personal gain, depriving them of the means needed for independence, resistance, and escape, and regulating their everyday behaviour. Controlling behaviour is an act or a pattern of acts of assault, threats, humiliation, intimidation, or other abuse that is used to harm, punish, or frighten the victim. Children who live in households where domestic violence is taking place are seen to be highly vulnerable.

**Forced Marriage:** a marriage conducted without the valid consent of one or both parties, where duress is a factor. Forced Marriage is a violation of internationally recognised human rights and contrary to the Matrimonial Causes Act 1973



## Apprenticeships

**Honour-Based Violence:** is an incident or crime carried out to protect or defend the honour or 'izzat' of the family or community. This type of violence can be distinguished from other forms of violence as it is often committed with some degree and/or collusion from the family and/or community. Honour-based violence includes acts of harassment, assault, imprisonment, unexplained death (suicide), forced pregnancy/abortion, and, in some cases, murder. The family may perceive that the person has acted inappropriately and dishonoured the family and community. Consequently, the violence carried out is to punish them for this. For more information, visit [Karma Nirvana](#)

**Sexual abuse and harassment:** Sexual abuse involves forcing or enticing a child, young person, or adult at risk of harm to take part in sexual activities. It may not necessarily involve a high level of violence, and the child or adult may not be aware of what is happening. The activities may involve physical contact, including assault by penetration (for example, rape or oral sex) or non-penetrative acts such as masturbation, kissing, rubbing, and touching outside of clothing. They may also include non-contact activities, such as involving children in looking at, or in the production of, sexual images, watching sexual activities, encouraging children to behave in sexually inappropriate ways, or grooming a child in preparation for abuse (including via the Internet). Sexual abuse is not solely perpetrated by adult males. Women can also commit acts of sexual abuse, as can other children.

**Sexual Exploitation:** Sexual exploitation of young people and vulnerable adults involves exploitative situations, contexts, and relationships where the vulnerable person receives 'something' (e.g., food, accommodation, drugs, alcohol, SIM cards and mobile phones, cigarettes, affection, gifts, money) or perceived friendship/boyfriend as a result of them performing, and/or others performing on them, sexual activities.

**Peer-on-Peer/Child on Child Abuse:** Peer-on-peer abuse includes but is not limited to physical and sexual abuse, sexual harassment and violence, and emotional harm, on and offline.

Peer-on-peer and child-on-child abuse can be motivated by perceived differences, e.g. on grounds of race, religion, gender, sexual orientation, disability, or other differences. It can result in significant, long-lasting, and traumatic isolation, intimidation, or violence to the victim.

**Female Genital Mutilation (FGM)** In the UK, FGM was deemed a criminal offence in 1985, and it became illegal in 2003 to take a child abroad to have such a procedure done if you are a UK national or full-time resident. Section 5B of the FGM Act 2003 introduces a mandatory reporting duty that requires regulated health and social care professionals and teachers in England and Wales to report 'known' cases of FGM in those under 18s whom they identify in the course of their work to the police, where they are either:

- informed by a girl under 18 that an act of FGM has been carried out on her; or
- 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 purposes connected with labour or birth.



### Apprenticeships

The intended victim of such an offence may not know the plan. Therefore, it is necessary to take note of anything unusual in her life that she might mention, such as:

- A family member or 'cutter' staying with them from abroad.
- Their family is planning a 'ceremony' for them to 'become a woman' or to 'prepare for marriage'.
- Having a history of girls being cut in their family, mother, aunt, sister, etc.
- Surprise plans to go abroad, or 'home' to visit relatives.

Indicators that FGM may have already taken place are if the girl:

- Is uncomfortable or shows difficulty sitting, walking, or standing.
- Requires more time to go to the bathroom.
- Displays changed behaviour, such as depression or anxiety, after an absence.
- Becomes withdrawn within the class and from their peers.
- Is reticent to have normal medical examinations.
- May try to speak to someone about it but be embarrassed or too scared to explain fully.

If FGM is suspected, this will be reported to the Designated Safeguarding Lead who will liaise with the Directors /Operations manager before involving the police and social services.

<https://www.gov.uk/government/publications/mandatory-reporting-of-female-genital-mutilation-procedural-information>

### Psychological / Emotional Abuse:

Psychological or emotional abuse is an action or neglect by a person which impairs the psychological well-being of another person. This results from being repeatedly made to feel unhappy, anxious, afraid, humiliated or devalued by the actions or inactions and/or attitudes of others and includes emotional abuse, threats of harm or abandonment, deprivation of contact, blaming, controlling, intimidation, coercion, harassment, verbal abuse, isolation or withdrawal from services or supportive networks. People who use social media can be at risk of being humiliated or abused 'online'.

Signs and symptoms of Psychological/Emotional abuse can include:

- Fearfulness expressed in the eyes, avoids looking at the caregiver, flinching on approach
- Ambivalence to carer
- Emotional withdrawal
- Sleep disturbance
- Low self-esteem
- Unexplained fear or defensiveness
- Threats or intimidation, bullying or shouting
- Significant pressure on a person to commit criminal acts
- Threat to abandon a person or put them "away"
- Promises which are not kept
- Few visitors, phone calls or outings
- Locking the person in at home, or in a car
- Significant community pressure for example, anti-social behaviour
- Withdrawing from online or reality social groups (see Cyber Abuse)



## Apprenticeships

**Anti-social behaviour:** acting in a manner that caused or was likely to cause harassment, alarm or distress to one or more persons not of the same household as the defendant.

**Online Abuse:** the use of technology and social networking sites to threaten, bully, harass, groom for exploitation, stalk, pose risks to personal safety and well-being or discriminate against an adult at risk. This could be through the use of a PC, laptop, tablet, mobile phone, gaming console or television with internet access. Threats can come through content, contact, and conduct. This includes text messages, phone calls, pictures, video clips, emails, chat room messages, instant messaging, and websites. Signs and symptoms can include spending long periods online, secrecy about a mobile phone and/or computer, withdrawal from social contact, depression, mood swings, unexplained gifts, sleep disturbance and self-harming.

**Financial or Material Abuse:** This applies largely to adults at risk of harm and relates to circumstances where trust in relation to financial matters is abused. Includes theft, fraud, exploitation, pressure in connection with wills, property or inheritance or financial transactions, or the misuse or misappropriation of property, possessions, or benefits.

**Domestic Violence:** The Home Office defines domestic violence as, "Any incident or pattern of incidents of controlling, coercive or threatening behaviour, violence or abuse between those aged 16 years old or over who are or have been intimate partners or family members, regardless of gender or sexuality. This can encompass, but is not limited to, the following types of abuse:

- Psychological
- Physical
- Sexual
- Financial
- Emotional

**Financially motivated sexual extortion:** Children and young people are being forced into paying money or meeting another financial demand (such as purchasing a pre-paid gift card) after an offender has threatened to release nudes or semi-nudes of them. This is financially motivated sexual extortion, a type of online blackmail often referred to in the media as 'sextortion'.

In rare cases, financially motivated sexual extortion has been linked to self-harm and suicide. Be aware of changes in behaviour that may suggest a child or young person is at risk of developing or experiencing poor mental health.

**Substance abuse:** Substance abuse refers to the harmful or hazardous use of psychoactive substances such as alcohol, drugs, and other addictive substances that can lead to physical, mental, and social problems for the individual using them, as well as potentially causing harm to others.

**Child trafficking:** Child trafficking is the recruitment, transportation, transfer, harbouring or receipt of children for exploitation. This may involve the use of force, coercion, deception, or other forms of exploitation, such as sexual exploitation, forced labour, or removal of organs. emotional distress, social isolation, and even physical harm.



**Gang Violence:** Gang violence can pose significant risks to the safety and well-being of young people who are involved in or affected by it. Young people who are involved in gangs may be at risk of harm from rival gangs, as well as from their gang members who may use violence to maintain their power and control. Gang involvement can also lead to criminal activity, exploitation, and abuse, including sexual exploitation, drug trafficking, and human trafficking.

**Gang Culture/County Lines:** County lines is a term used to describe the involvement of gangs and criminal networks in the transportation and sale of illegal drugs from urban areas to smaller towns and rural areas in the UK. The term "county lines" refers to the dedicated mobile phone lines that are used by the gangs to facilitate drug trafficking and exploitation. Young people, including children and vulnerable adults, are often recruited and coerced into trafficking drugs across county lines, and they may also be subject to other forms of exploitation, such as sexual exploitation, modern slavery, or involvement in other criminal activities.

County lines are a serious issue from a safeguarding perspective because it can expose young people to risks of harm and exploitation, including physical violence, emotional and psychological abuse, and neglect. If an apprentice is suspected of becoming a victim of County lines, then a Safeguarding Cause of Concern form (AQP 103) must be submitted and should include any information discovered about the person or regions mentioned in the referral.

Should the situation be deemed to be a risk to the vulnerable individual, then the Police will be notified immediately.

**Some of the signs of county lines involvement and exploitation are:**

- A person meeting unfamiliar adults or a change to their behaviour.
- The use of drugs and alcohol.
- Acquiring money or expensive gifts they can't account for.
- Lone children from outside of the area.
- Individuals with multiple mobile phones, tablets, or 'SIM cards.
- Young people with more money, expensive clothing, or accessories than they can account for.
- Unknown or suspicious-looking characters coming and going from a neighbour's house.
- Relationships with controlling or older individuals or associations with gangs.

**Sexting:** Sexting is the act of sending or receiving sexually explicit messages, images, or videos via digital devices, such as smartphones, computers, or tablets. Sexting can involve consensual exchanges between adults, but it can also involve minors who may not fully understand the potential consequences of sharing such content. Sexting involving minors can be a form of child sexual abuse and is considered a safeguarding issue, as it can expose young people to risks such as cyberbullying, harassment, exploitation, and online grooming. Moreover, sharing explicit images of minors is illegal and can result in criminal charges.

**Online Grooming:** Online grooming refers to the process by which an adult builds a relationship of trust and emotional connection with a child or young person online, intending to sexually abuse them. Adults may use social media platforms, chat rooms, or online



### Apprenticeships

gaming to communicate with the child and gradually gain their trust, often by pretending to be someone else or by offering them attention, gifts, or other forms of positive reinforcement.

The process can involve the sharing of sexual images or explicit messages and may eventually lead to offline sexual contact. Online grooming is a serious form of child sexual exploitation and is considered a criminal offence in many countries, including the UK. emerging risks including AI, deepfakes, online manipulation, and digital exploitation

**Bullying:** Bullying can take many forms and includes:

- Emotional: Being excluded, tormented (e.g. hiding things, threatening gestures)
- Physical: Pushing, kicking, punching or any use of aggression and intimidation
- Racial: Racial taunts, use of racial symbols, graffiti, gestures
- Sexual: Unwanted physical contact, sexually abusive comments, including homophobic comments and graffiti
- Verbal: Name-calling, spreading rumours, teasing
- Cyber: All areas on the internet, such as email and internet, chat room misuse. Mobile threats by text message and calls. Misuse of associated technology, i.e. camera and video facilities, sexting.
- Online: Online abuse is any type of abuse that happens on the web, whether through social networks, playing online games or using mobile phones. Children, young people and adults may experience cyberbullying, grooming, sexual abuse, sexual exploitation, emotional abuse, financial abuse, or identity fraud.

**Cyberbullying** involves the use of electronic communication devices to bully people. These include mobile phones, tablets, iPods, laptops and PCs. Social media platforms such as Facebook, Instagram, X and WhatsApp are used by cyberbullies to put out their communications. Who is most at risk? Children using social media unsupervised. Vulnerable adults are particularly at risk if they are using social media, as they may be more emotionally and mentally susceptible to abuse.

Examples of Cyberbullying include:

- Filming online fights usually through emails, instant messaging, or chat rooms, where angry and rude comments are exchanged.
- Denigration via online messages through email, instant messaging, chat rooms, or websites set up to make fun of someone.
- Exclusion intentionally leaving someone out of a group, such as instant messaging, friend sites, or other online group activities.
- Outing sharing secrets about someone online, including private information, pictures, and videos.
- Impersonation tricking someone into revealing personal information, then sharing it with others.
- Harassment is repeatedly sending malicious messages to someone online.

emerging risks including AI, deepfakes, online manipulation, and digital exploitation

**Cyberstalking:** Cyber-flashing consists of offenders sending an unwanted sexual image to their victims, often via dating apps or social media. With Bluetooth and Airdrop, previews of the image often appear on the victim's device, meaning they are forced to see the picture before being able to reject it.



### Apprenticeships

It has now become a crime under the Online Safety Bill, which passed through the government in October 2023 and came into effect on 31 January 2024.

This will cover unwanted pictures sent over platforms such as Hinge or Tinder, as well as Snapchat, WhatsApp, Facebook Messenger, and those which are Airdropped.

As well as covering other digital offences such as sharing sexual footage without consent and intimate images, tougher punishments for cyber-flashers were also included in the law, with the CPS issuing new guidance.

To reiterate, we operate a zero-tolerance policy against all types of abuse. Please see the Bullying and Harassment Policy (AQD20) for more information.

Emerging risks, including AI, deepfakes, online manipulation, and digital exploitation

**Consensual Sharing:** Any images shared consensually and with no ulterior motive, be it in a joking or romantic context, can be addressed directly with no need to involve the authorities. One-on-one mentoring will be provided in support of the individuals and to inform them of the dangers of sharing such content.

**Un-consensual Sharing:** if a person intentionally shares a photograph or film which shows, or appears to show, another person in an intimate state, without the consent, or a reasonable belief in the consent of that person, with the intent to cause alarm, distress, or humiliation for the purpose of obtaining sexual gratification for the person doing the sharing, or another person.

Where a person threatens to share an intimate photograph or film which shows or appears to show another person, and where the perpetrator intended that or someone who knows will fear the threat will be carried out or was reckless as to that result. The threat offence can be made out even if the photograph or film does not exist, or where the photograph or film does exist, that it is not, in fact, a photograph or film which shows or appears to show a person in an intimate state.

All non-consensual sharing incidents must be referred to the Police and/or Children's social care by the DSL.

Such acts have become a crime under the Online Safety Bill, which passed through the government in October 2023 and came into effect on 31 January 2024.

**Up-skirting:** Up-skirting is a specific criminal offence under the Voyeurism (Offences) Act 2019. It typically involves taking a photograph under a person's clothing without them knowing, with the intention of viewing their genitals or buttocks for sexual gratification or causing humiliation, distress, or alarm. The revised version of Keeping Children Safe in Education lists upskirting as one example of peer-on-peer abuse.

## Appendix 4 Safeguarding – Relevant Legislation Explained

### Safeguarding Vulnerable Groups Act 2006 & Protection of Freedoms Act 2012

In response to recommendation 19 of the Bichard Inquiry Report into child protection procedures following the Soham murders, new arrangements for people whose jobs and voluntary work bring them into contact with children and vulnerable adults (previously referred to as the Vetting and Barring Scheme) were phased in from October 2009 under the Safeguarding Vulnerable Groups Act.

In 2011, the Vetting and Barring Scheme was reviewed, and one of the key recommendations of the review was to abolish the registration scheme as recommended under the SVGA and to form a new body combining the criminal record checking services and the barring services together. Other key recommendations were to scale back eligibility-enhanced criminal records checks. Following on from that, in 2012, the ISA and CRB merged under the provisions of the Protection of Freedoms Act (2012) to form a new body called the Disclosure and Barring Service (DBS).

The DBS are responsible for:

- processing requests for criminal records checks
- deciding whether it is appropriate for a person to be placed on or removed from a barred list.
- placing or removing people from the DBS children's barred list and adults' barred list for England, Wales, and Northern Ireland

The Disclosure and Barring Service (DBS) issues criminal record certificates for specific positions, professions, employment, offices, work, and licenses included in the Rehabilitation of Offenders Act 1974 (Exceptions) Order 1975.

### Types of DBS checks available.

**Standard checks** – To be eligible for a standard-level DBS check, the position must be included in the Rehabilitation of Offenders Act (ROA) 1974 (Exceptions) Order 1975.

**Enhanced checks** – To be eligible for an enhanced level DBS check, the position must be included in both the ROA Exceptions Order and in the Police Act 1997 (Criminal Records) Regulations.

**Enhanced checks with children's and/or adults' barred list check(s)** – To be eligible to request a check of the children's or adults' barred lists, the position must be eligible for an



#### Apprenticeships

enhanced level DBS check as above and be specifically listed in the Police Act 1997 (Criminal Records) Regulations as able to check the barred list(s).

#### Children's Act 2004

The Children's Act 2004 aims to improve and integrate children's services, promote early intervention, safeguard, and promote children's well-being, provide strong leadership, and bring together different professionals in multi-disciplinary teams to achieve positive outcomes for children and their families. Local authorities are given a lead role in securing the co-operation of partners in setting up children's trust arrangements and the Act allows some flexibility in how these are structured and organised.

The Act takes a child-centred approach and includes universal as well as targeted and specialist services. Part of the aim of integration of services, plans and information is to enable children's needs to be identified early to allow timely and appropriate intervention before needs become more acute.

Local authorities are now specifically required to establish cooperative partnership working arrangements to improve the well-being of children. Partnerships will range from joint commissioning to single-service partnerships to the full integration of social care, education, and some health services. County councils and single-tier authorities are the designated Children's Services Authority (CSA) with responsibility for ensuring that the Act is implemented locally.

The main relevant measures of the Act include:

#### **Section 10 - A duty to cooperate to improve the well-being of children.**

This Section of the Act gives local children's services authorities a lead role in securing the cooperation of partners in setting up arrangements to improve the well-being of children in the authority's area in relation to the five outcomes as indicated in the introduction.

The relevant partners specified in the Act have a duty to cooperate with the children's services authority in the making of any such arrangements to improve children's well-being. These partners include the police, strategic health authorities and PCTs for the area and district and borough councils. The concept of well-being covers physical and mental health and emotional well-being, protection from harm and neglect, education training and recreation, contribution to society and social and economic well-being. Arrangements for cooperation must consider the importance of parents and carers in improving the well-being of children.

#### **Section 11 - A duty to safeguard and promote the welfare of children and young adults.**

This duty requires all agencies with responsibilities towards children and young adults and their functions with regard to the need to safeguard and promote the welfare of children. They must also ensure that anybody providing services on their behalf must do the same. The purpose of this duty is that agencies give appropriate priority to safeguarding children and share concerns at an early stage to encourage preventative action.



### Apprenticeships

The organisations are, in England: children's services authorities, district councils, Strategic Health Authorities, PCTs, NHS trusts, police, probation, youth offending teams, governors of prisons or secure training centres.

### The Protection of Children Act 1999

Under this act, childcare organisations (defined as those that are 'concerned with the provision of accommodation, social services or health care services to children or the supervision of children') must make use of the Disclosure Service in their recruitment and reporting processes and urge other organisations working with children to also do so.

### The Children Act 1989

The Children Act 1989 introduced the concept of significant harm as the threshold that justifies compulsory intervention in family life in the best interests of children.

There are no absolute criteria on which to rely when judging what constitutes significant harm, but consideration should be given to the following:

- The severity of ill-treatment, which may include the degree and extent of physical harm, including, for example, impairment suffered from seeing or hearing ill-treatment of another
- The duration and frequency of abuse and neglect.
- The extent of premeditation.

Child abuse and neglect is a generic term encompassing all ill-treatment of children, including serious physical and sexual assaults, as well as cases where the standard of care does not adequately support the child's health or development. Children may be abused or neglected. through the infliction of harm, or through the failure to act to prevent harm. Abuse can occur in a family, an institutional, or a community setting by those known to them or, more rarely, by a stranger.

To understand and establish significant harm, it is necessary to consider:

- the family context
- the child's development within the context of their family and wider social and Cultural environment
- any special needs, such as a medical condition, communication difficulty or disability that may affect the child's development and care within the family
- the nature of harm, in terms of ill-treatment or failure to provide adequate care
- the impact on the child's health and development
- the adequacy of parental care

### Working Together to Safeguard Children, 2015

This applies to England only. Working Together sets out how organisations and individuals should work together to safeguard and promote the welfare of children in accordance with the Children Act 1989 and the Children Act 2004. All practitioners working to safeguard children must understand fully their responsibilities and duties as set out in primary legislation, associated regulations and guidance.



Apprenticeships

**Keeping Children Safe in Education, 2025**

This guidance replaces Safeguarding Children and Safer Recruitment in Education (December 2006). This is statutory guidance from the Department for Education issued under Section 175, Education Act 2002, the Education (Independent School Standards) (England) Regulations 2010, as amended by SI 2012/2962 and the Education (Non-Maintained Special Schools) (England) Regulations 2011. Schools and colleges must have regard for it when carrying out their duties to safeguard and promote the welfare of children. The procedures for Managing Allegations against staff are also contained within this guidance.

**Online Safety Act 2023 –**

Requires education and training providers to have clear procedures in place to identify and respond to online harms, including grooming, bullying, and exposure to harmful content. Online abuse, exploitation, and grooming

Completed by Julie Goodfellow, Quality Manager

**Approved/Authorised by:**

Tim Armitt  
**Managing Director**

Nicola Dodsley  
**Operations Director**