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 OPERATIONAL POLICY

# Safeguarding

**Document Control:**

<b>Owner</b>	Safeguarding Policy & Practice Specialist Lead
<b>Approved by</b>	CITB Board
<b>Review responsibility</b>	Executive, Apprenticeships & Industry Training
<b>Last review</b>	01/09/2024
<b>Next review</b>	01/09/2025

Version	Effective Date	Author	Author Job Title	Change
1	01/05/2018	Chris Humphrey	Safeguarding Champion	New Policy
2	21/05/2019	Chris Humphrey	Safeguarding Champion	Section 3 Updates to contact details
3	05/08/2019	Chris Humphrey	Safeguarding Champion	Added Document Control Matrix Section 3 – Updated Responsibilities and Accountabilities
4	30/09/2020	Chris Humphrey	Wellbeing Advisor	Updated link Updates to the Roles and Responsibilities Section Updates to DDSL Contacts Added Safer Recruitment Information
5	01/04/2021	Chris Humphrey	Safeguarding and Wellbeing Adviser	Included the name of the SRP and contact details for Key Safeguarding Team Members
6	08/10/2021	Chris Humphrey	Safeguarding and Wellbeing Adviser	Updates to roles, legislation and general formatting
7	24/08/2022	Chris Humphrey	Safeguarding Lead	Annual Review and amendments
8	24/08/2023	Angela McKenna	Safeguarding Consultant	Annual Review and formatting amendments. Aligned to Scottish legislation and KCSIE 23.
9	24/08/2024	James Pollard	Safeguarding Policy & Practice Specialist Lead	Annual Review to align with KCSIE 2024 and relevant Scottish legislation.



## Section 1- What to do if you have a Welfare, Safeguarding or Prevent Duty Concern – Flowchart

### Why are you concerned?

The Learner has made a disclosure.  
Learner's appearance or behaviour  
Witnessed concerning behaviour or incident

### Safeguarding Board Lead

Michael Green

### Immediately Inform the Designated Safeguarding Lead (DSL)

[Diane.Thompson@citb.co.uk](mailto:Diane.Thompson@citb.co.uk)

[James.Pollard@citb.co.uk](mailto:James.Pollard@citb.co.uk) 07471 535055

In the event of an emergency Call 999.

If you are unable to contact the DSL, please contact a Deputy DSL.

### Safeguarding and Wellbeing Advisor

Tamsen Collins  
M:07584 114 871  
E:Tamsen.collins@citb.co.uk

### Safeguarding and Wellbeing Advisor

Lauren Yarwood  
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### Additional support is also available from the Student Welfare Team

England	Jacqui Yawn – Welfare Manager
NCC East	Trevor Boulter- Student Welfare Officer Team Leader
NCC South	Kevin Ramsey- Student Welfare Officer
NCC Scotland	Sharon Wilson – Student Welfare Officer



#### Record your Concerns and Actions

Record your actions and concerns on My Concern.

The Designated Safeguarding Lead or Deputy Designated Safeguarding Lead will triage the concern and communicate the following steps to support the learner with the most appropriate staff members.

- Initiate a well-being check with the learner (where necessary).
- Implement a comprehensive chronology of the case notes to date.
- Make relevant referrals to internal/external agencies.
- Provide relevant information to the DSL in our sub-contractor colleges (Scotland)
- Alert relevant staff members to the concern.
- Decide and communicate appropriate next steps to support the learner moving forward.

#### Informing Senior Leaders and the Board

Designated Safeguarding Lead will provide a safeguarding update to the Senior Leadership Team on a monthly basis and quarterly to the Board.



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## Section 2 - Policy Overview

This Operational Safeguarding Policy (including Child Protection) represents CITB's commitment to safeguarding the welfare and protection of all children, young people, and adults at risk who have contact with the organisation. It aligns our approach to Keeping Children Safe in Education (DfE/2024) and nation-specific guidance in Wales and Scotland.

This is statutory guidance to which CITB must have due regard in carrying out its duties to safeguard and promote the welfare of children, young people and vulnerable adults. All children, young people and adults, without exception, have the right to protection from abuse regardless of age, disability, gender reassignment, marriage and civil partnership, pregnancy and maternity, race, religion and belief, sex, sexual orientation or socio-economic background. We will uphold and teach others to uphold the Values of Democracy, Rule of Law, Individual Liberty and Respect, as well as promote principles that support equality of opportunity for all.

We instil a safer recruitment policy led by our Director of HR ensuring all employees are carefully selected, trained, supervised and have an appropriate level of DBS/PVG check in place where required. We will ensure that all employees adopt and abide by all company policies and procedures at all times. This links to the CITB Operational Safer Recruitment Policy.

CITB also has a statutory duty to have “due regard to the need to prevent people from being drawn into terrorism”. This policy defines how CITB, its employees, suppliers and external stakeholders can effectively meet this duty. The Prevent Strategy is part of the UK Government’s overall Counter-Terrorism Strategy, known as CONTEST. The aim of Prevent specifically is to stop people from becoming drawn into terrorism.



## Principles and Values

CITB has identified the following principles and values concerning safeguarding:

- CITB recognises that safeguarding is everyone's responsibility and will support staff to develop their understanding of safeguarding to equip learners with the knowledge to keep themselves safe.
- CITB is committed to working proactively with all staff, learners, providers, employers and partner agencies to provide an environment in which every individual is free from abuse and harm.

CITB will adhere to the best practice guidance in safeguarding and will adhere to statutory guidance including:

### England and Wales

- The Childrens Acts 1989 and 2004
- The Care Act 2014
- Protection of Freedoms Act 2012
- The Counter-Terrorism and Sentencing Act 2021
- Education and Training (Welfare of Children) Act 2021 - Education and Training (Welfare of Children) Act 2021 [legislation.gov.uk](http://legislation.gov.uk)
- Keeping Children Safe in Education 2024
- Working together to safeguard children: A guide to inter-agency working to safeguard and promote the welfare of children (HM Government) December 2023 -
- What to do if you're worried about a child being abused (HM Government) March 2015 - Stat guidance template ([publishing.service.gov.uk](http://publishing.service.gov.uk))
- Prevent duty guidance: DfE for further education institutions in England and Wales April 2023 -
- Wales Safeguarding Procedures in Wales

### Scotland

- The Children (Scotland) Act 2020
- The Children and Young People (Scotland) Act 2014
- The Protection of Children (Scotland) Act 2003
- National Guidance for Child Protection in Scotland 2021
- National action plan to prevent and tackle child sexual exploitation (Scottish Government, 2016)
- Getting it right for every child (GIRFEC) (Scottish Government, 2023)
- The Protection of Vulnerable Groups (Scotland) Act 2007
- The Counter-Terrorism and Security Act 2015
- [United Nations Convention on the Rights of the Child \(Incorporation\) \(Scotland\)](#)
- [Female Genital Mutilation \(Protection and Guidance\) \(Scotland\) Act 2020](#)
- [Sexual Offences \(Scotland\) Act 2009](#)



- [Protection of Children and Prevention of Sexual Offences \(Scotland\) Act 2005](#)
- [Criminal Justice and Licensing \(Scotland\) Act 2010](#)
- [Domestic Abuse \(Scotland\) Act 2018](#)

### Corporate Strategy Objectives

CITB's Corporate Strategy has identified the following objectives:

- To provide a safe learning environment for learners, staff and visitors.
- To identify children, young people and vulnerable adults who are suffering, suspected of suffering or at risk of suffering significant harm.
- To reduce the risk of significant harm to children, young people and vulnerable adults from abuse or other types of exploitation, including radicalisation.
- To ensure appropriate action is taken to preserve safety at home, at work, and in training.
- To support individuals in maintaining control over their lives and in making informed choices without coercion.

We will achieve these aims by:

- Outlining the CITB's safeguarding structure;
- Establishing common procedures that enable children, young people and adults at risk to receive the protection and support they are entitled to;
- Providing a consistent framework for signposting and making referrals to external support agencies;
- Taking reasonable action to see that children, young people and vulnerable adults are kept safe, both in their home and employment environments and whilst attending provision either direct or contracted through CITB;
- Recognising and taking action to prevent safeguarding issues, including radicalisation;
- Defining the responsibilities of the CITB and its employees in responding to safeguarding and preventing concerns/allegations;
- Providing common values, principles and practices that underpin the protection of children, young people and adults at risk;
- Defining the different types of abuse, signs, symptoms and indicators; and
- Setting standards of practice that safeguard children, young people and vulnerable adults at risk.
- Promote fundamental Values, including freedom of speech and rights to be safe and listened to, by creating an environment that encourages every learner to raise any concerns;
- Developing learners' knowledge of how to stay safe at home, work and online through the curriculum.



- Work with employers to build their understanding of a commitment to the principles of safeguarding and Prevent duty.

### Policy Scope

This Operational Policy covers:

- Learners and customers.
- Employees.
- Employers.
- Suppliers (external partners who provide training or employability services on our behalf); and
- External stakeholders and visitors.

This Policy applies to all people who work for or advise CITB, including permanent, fixed term or temporary staff, contractors, interim staff under contract, people on work experience and agency workers.

### A Contextualised Approach to Safeguarding

CITB has adopted a contextualised approach to safeguarding. We recognise that young people may be at risk of significant harm not only within their home environment but also outside it. The traditional safeguarding approach does not consider extra-familial contexts, which has led to cases of abuse and exploitation falling under the radar.

Extra-familial contexts include young people's peer groups, support networks, online contacts, and local communities or neighbourhoods. Safeguarding concerns in these contexts could include harassment or violence from their peers, a risk of grooming—whether online or in person—and high levels of crime or gang violence in their local area.

As well as involving wider consideration of contexts, contextual safeguarding entails a different method of intervention from the traditional approach. In the past, all interventions have taken place with the young person and their family, regardless of where the harm originated from. However, it has been shown that this is inadequate in cases of extra-familial abuse; parents do not have any control over these outside contexts and cannot change them.

A more effective method is to intervene with the outside environment itself to prevent harm from occurring.

The contextual safeguarding approach is crucial for everyone with a responsibility to safeguard young people. It is important to understand your role on the broader system.



## The 6 Principles of Safeguarding

The principles of safeguarding underpin safeguarding policies and actions in any setting where vulnerable adults are regularly present. CITB is aware that a proportion of the learner group is regarded as more vulnerable due to Additional Learning Needs, Care Status, Previous and/or current Safeguarding Concerns or other ongoing concerns.

For this reason, we have adopted the 6 principles of safeguarding to support our day-to-day safeguarding practice. These principles ensure safeguarding is person-centred, considering at-risk adults as individuals with unique safeguarding needs. The principles are:

1. Empowerment: People being supported and encouraged to make their own decisions and informed consent.
2. Prevention: It is better to act before harm occurs.
3. Proportionality: The least intrusive response appropriate to the risk presented.
4. Protection: Support and representation for those in greatest need.
5. Partnership: Local solutions through services working with their communities.
6. [Accountability: Ensuring accountability for safeguarding actions.](#)

## Section 3 – Key Definitions

Throughout this document reference is made to “children and young people”. This term is used to mean “those under the age of 18” as defined in the Children Act 2004 and the Children’s and Young People (Scotland) Act 2014.

CITB recognises that some adults are also vulnerable to abuse; accordingly, the procedures may be applied (with appropriate adaptations) to allegations of abuse and the protection of vulnerable adults. The definition of Vulnerable Adults can be found in the [Safeguarding Vulnerable Groups Act 2006](#), [The Protection of Vulnerable Groups \(Scotland\) Act 2007](#) and the [Safeguarding Vulnerable Groups Act 2006 Wales](#)

Safeguarding is defined as the proactive action that is taken to promote the welfare of children and young people and protect them from harm.

Safeguarding means:

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

*(Working Together to Safeguard Children 2023, England)*



These same principles are reflected in Scotland's guidance; [Getting it right for every child \(GIRFEC\) 2021](#).

### Types of Concern

CITB recognises that this policy will incorporate a range of safeguarding issues, including (Signs of Concern can be found in the Appendices):

- Neglect.
- Physical abuse.
- Child Sexual Exploitation (CSE).
- Sexual abuse, violence, and harassment.
- Emotional abuse.
- Bullying, including online bullying and prejudice-based bullying.
- Racist, disability and homophobic or transphobic abuse.
- Gender-based violence/violence against women and girls.
- Child-on-child sexual harassment and sexual violence (Peer-on-peer),
- Radicalisation and/or extremist behaviour.
- Child Criminal Exploitation (CCE), including trafficking and county lines.
- Serious violent crime.
- Risks linked to using technology and social media, including online bullying; the risks of being groomed online for exportation or radicalisation; and risks of accessing and generating inappropriate content, for example, 'sexting'.
- Relationship abuse.
- Upskirting.
- Substance misuse.
- County Lines
- Issues specific to a local area or population, such as gang activity and youth violence.
- Domestic abuse.
- Female genital mutilation and Breast Ironing.
- Forced marriage.
- Fabricated or induced illness.
- Poor parenting.
- Homelessness.
- So-called honour-based violence.
- Other issues not listed here but pose a risk to learners and vulnerable young adults.



## Online Safety

CITB recognises the benefits and challenges associated with technology. These risks can be categorised into four key areas.

- Content: being exposed to illegal, inappropriate or harmful material,- For example: Pornography, extremism and self-harm.
- Conduct: personal online behaviour that increases the likelihood of, or causes, harm- For example: making, sending and receiving explicit image.
- Contact: being subjected to harmful online interaction with other users– For example: peer-to-peer pressure, commercial advertising and adults posing as children with the intention to harm.
- Commerce: risks such as online gambling, inappropriate advertising, phishing and or financial scams.

CITB ensures that appropriate filtering and monitoring systems are in place when learners and staff access organisational systems and internet provision. We acknowledge that whilst filtering and monitoring is an important part of our online safety responsibilities, it is only one part of our role. Learners and staff may have access to systems externally to our control such as mobile phones and other internet-enabled devices and technology.

By upholding this policy and providing training about the risks associated with being online, including accessing and downloading inappropriate material and images, keeping personal and financial information safe, having secure and different passwords, as well as the risks associated with grooming, we will meet our commitment to take every reasonable step to ensure the safety and welfare of children, young people and adults within our remit. Staff must not provide learners with their personal phone numbers, or email addresses and must not be friends with learners on social media platforms including but not limited to Facebook, Twitter (X), Instagram or LinkedIn. Staff should not form WhatsApp or text group chats with learners.

In line with KCSiE 2023: The DSL and other nominated members of staff receive daily activity search reports to identify any service user who is attempting to access content such as Weapons, Extremism, Suicide, Self-Harm and Drugs & Alcohol.

Weekly reports are issued to identify search categories which have been identified as lesser risk. These include Gambling, Cryptocurrency, Illegal downloads and Chat forums.

These reports apply to NCC colleges only.



### Welfare Concerns (Early Help Support)

As outlined in KCSiE 2024, Early help is strengthened, now encompasses a wider range of vulnerabilities, and has been updated to reflect the refined Working Together to Safeguard Children guidance.

CITB is committed to providing early help and recognises that Early Help is more effective in promoting the welfare of all children and vulnerable adults rather than reacting later. We believe that Early Help is important and commit to supporting both learners and staff when a welfare need is identified. Effective early help relies upon identifying those who would benefit from early help, assessing their needs and providing targeted support services. Staff should be aware of learners who are vulnerable due to an identified need such as SEND, are in care, or have previously been in care or have other identified vulnerabilities.

Welfare support is provided on an individual basis and may involve support from those within CITB or signposting to local and/or national charities and agencies to ensure that their welfare needs are met. Learners are provided with a list of national support services during Induction, and further information on these services is available on CITB sites, and each site has a Welfare Officer to support learners

### Significant Harm

Significant harm means the ill-treatment or the impairment of health or development, including impairment, suffered from seeing or hearing the ill-treatment of others. 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.

### Child Protection

Child protection is the activity undertaken to protect specific children who are suffering, or are likely to suffer, significant harm.

CITB will make an immediate referral to Local Safeguarding Partners (local authorities in Scotland) when it suspects that a child has been exposed to significant harm. A referral is normally made by the Designated Safeguarding Lead or Safeguarding and Wellbeing Advisor but can be made by anyone within the organisation. Staff who make a referral should always follow up on their concerns if they are not satisfied with the response and referrals should be made to the area where the child lives. In the event that a referral is made by a member of staff who is not part of the safeguarding team, they are required to alert either the Senior Manager for Safeguarding & Welfare or DSL immediately.

The Data Protection Act 2018 and General Data Protection Regulations (GDPR) do not prevent the sharing of information to keep children safe. Fears about sharing information must not be allowed to stand in the way of the need to promote welfare and protect the safety of children. If staff are concerned that a child may be a potential



victim of modern slavery or human trafficking then a referral should be made to the National Referral Mechanism as soon as possible 0800 0121 700 or [report it online](#).

### Definitions of Hate Crime

Hate Crime is defined as acts of violence directed at people because of who they are or who someone thinks they are.

The Police and Crown Prosecution Service have agreed on a common definition for Hate Incidents. This definition stipulates that something is a hate incident if the victim or anyone else believes it was motivated by hostility or prejudice based on one of the following 5 personal characteristics:

- Disability
- Race
- Religion
- Transgender
- Sexual orientation

**Any crime can be prosecuted as a hate crime** if the offender has either:

- demonstrated hostility based on race, religion, disability, sexual orientation or transgender identity

**Or**

- been motivated by hostility based on race, religion, disability, sexual orientation or transgender identity

Someone can be a victim of **more than one** type of hate crime.

This means that if anyone believes something is a hate incident, the authorities should record it as such.

- Ensure that accurate safeguarding records relating to individual learners are kept separate from their learner files and are marked 'Strictly Confidential'. These will be kept in a password-protected or locked file in all respects, following the CITB policy and all legislation relating to the protection of personal data.
- Monitor individuals about whom there are concerns.
- The DSL or Deputy DSL will attend all relevant Safeguarding and Child Protection meetings and conferences.



## Section 4 - Working With Other Agencies and Parents

CITB is committed to working with external agencies to ensure that the safeguarding and well-being needs of both children and adults are met. It recognises that GDPR is not a barrier to sharing safeguarding information with designated bodies.

### Communication with Parents / Guardians / Carers

Where possible, safeguarding concerns will be shared with parents, guardians or carers unless:

- It is judged that it would increase the risk of harm to the individual concerned.
- The individual is aged 16 years and judged to be 'competent in requesting that information is not shared with their parents/guardians/carers.

### Vulnerable Adult

A person aged 18 and over who receives, or is the subject of, a regulated activity as defined in the Act. However, the term is defined differently depending on the context, and in its widest sense means any adult who is unable to take care of themselves or unable to protect themselves from abuse or neglect. This aligns with the Care Act 2014 (England and Wales) and The Safeguarding Vulnerable Groups Act 2007 (Scotland)

For the purposes of this guidance, below are some criteria that may impact an adult's vulnerability:

- receiving a social care service;
- receiving a health service;
- living in sheltered accommodation;
- detained in custody or under a probation order;
- require assistance in the conduct of his /her affairs;
- receiving a service or participating in an activity targeted at older people;
- people with disabilities or physical or mental health conditions; and
- any other adults whose circumstances make them vulnerable at a particular time.

**Note:** CITB does not automatically presume that someone with these characteristics is an at-risk adult.

All adults should consent to a referral before a CITB staff member contacts an external service, unless there is a threat to life. This consent should be recorded on the chronology of the safeguarding management system (MyConcern).

A referral is normally made by the Designated Safeguarding Lead or Safeguarding and Wellbeing Advisor but can be made by anyone within the organisation. Staff who make a referral should always follow up on their concerns if they are not satisfied with the response. Referrals should be made to the area in which the adult lives.



In the event that a referral is made by a member of staff who is not part of the safeguarding team, they are required to alert either the Senior Manager for Safeguarding & Welfare or DSL immediately.

If an adult is a victim of modern slavery and agrees to a referral, contact should be made to the National Referral Mechanism as soon as possible 0800 0121 700 or [report it online](#).

### Confidentiality

CITB regards confidentiality and the disclosure of information as extremely important and this ethos is embedded into the policy. Information is shared on a need-to-know basis, normally as the learner agrees. However, information can be shared if it is believed there is a significant risk to the child or others or for the 'prevention or detection of crime'. Information can also be shared where staff believe the information is in the public interest. This may include if they believe the person is being controlled or coerced. Individuals must be able to evidence their rationale for sharing information to make their decision to share defensible. Information-sharing protocols with external organisations should be adhered to.

### Information Sharing Protocols

We recognise that knowing where and when to share information can be challenging however it is important to follow the correct process.

We actively encourage learners to refer themselves for support, and we may get referrals for support from our partner providers. When working with learners, staff need to follow guidance on how and when to share information:

- Explain openly and honestly, at the outset, what information will or could be shared and why, except where this may cause significant harm to the learner or put others at risk.
- Before sharing information with any other party, consult with the DSL or DDSL to agree on who it is necessary to share information with.
- Learners' well-being and safety must be the overriding factor in sharing information about them.
- Respect the wishes of learners and their families not to share confidential information unless, in your judgement, there is sufficient need to override confidentiality.
- Ensure any information shared is accurate and up to date.
- Only share information that is necessary for the learner's well-being and safety and is only shared with those necessary.
- Seek advice from a Safeguarding and Wellbeing Advisor or Designated Safeguarding Lead if necessary.
- Any sharing of personal data must be carried out in accordance with CITB's policies on data protection & data sharing and in accordance at all times with legislation in relation to the protection of personal data. Advice should be sought



from the CITB Legal Team before the sharing of any personal data outside the organisation.

## Section 5 – Key Accountabilities and Responsibilities

CITB will ensure that all managers and staff understand the importance of safeguarding and, in accordance with best practices, receive relevant checks and training in safeguarding where required by legislation.

All apprentices and their employers will receive information on our Safeguarding Policy and procedures and best practices for Keeping Safe including online safety and cyberbullying, as part of their induction programme.

We aim to establish a 'One CITB' approach to safeguarding, to:

- provide a safe learning environment for learners, staff and visitors;
- identify children, young people and vulnerable adults who are suffering, suspected or at risk of suffering significant harm.

CITB is committed to developing an effective culture of safeguarding across the organisation to protect all learners and staff who may require early help or are at risk of neglect, abuse, grooming, exploitation or radicalisation. As an organisation, we aim to support learners to reduce their risk of harm by ensuring they are supported and aware of the risks online, locally and nationally. Within CITB there is an appointed and trained Senior Responsible Person (SRP), from the Executive team, and an appointed and trained Designated Safeguarding Lead (DSL) who are both accountable to the CITB Board. The organisation has the following appointed and trained personnel within the safeguarding structure, whose roles are designed to support the Safeguarding Team:

- Deputy Designated Safeguarding Leads
- Safeguarding and Wellbeing Advisors
- Welfare Team

### CITB Board

All CITB Board Members are responsible for ensuring that the CITB safeguarding policies and procedures align with government guidance and inter-agency procedures.. They must also ensure that the company operates safe recruitment procedures, ensuring that all relevant checks are carried out on staff (permanent and contracted) who will be working with learners and that this policy and its procedures are always adhered to. Candidates are informed that online searches may be conducted on shortlisted candidates.



The Board will appoint a Senior Responsible Person from the Executive. The DSL will meet with the Senior Responsible Person in relation to incidents occurring or policies changing as appropriate. The Board is responsible for reviewing and updating this policy annually through the Senior Responsible Person.

The Board is accountable for ensuring that the Designated Safeguarding Lead has ongoing training and support to develop resources. The DSL is responsible for the training and updates for the Deputy Designated Safeguarding Leads, Safeguarding and Wellbeing Advisors and the Welfare Officers.

The Chair of the Board is responsible for liaising with the Local Authority and relevant partner agencies in the event of allegations against the Chief Executive of the organisation.

### Senior Responsible Person

The Senior Responsible Person (SRP) at CITB is the Chief Executive Officer, **Tim Balcon**. He has delegated the role of SRP to the Head of Quality, Safeguarding, Personal Development & Learner Support, **Steven Ankers**, who will undertake this role on his behalf. They will be responsible for instigating an annual review of the organisation's policy and procedure for Safeguarding through the Designated Safeguarding Lead. As part of this annual review, the Executive Team will judge the efficiency of the procedures in conjunction with the Senior Responsible Person and the Designated Safeguarding Lead.

### Designated Safeguarding Lead

CITB's Designated Safeguarding Leads (DSL) with lead responsibility for safeguarding is **Diane Thompson or James Pollard**. The DSLs can be contacted on 07350 372246 / 07471 535055 or by email at [Diane.Thompson@citb.co.uk](mailto:Diane.Thompson@citb.co.uk) / [James.Pollard@citb.co.uk](mailto:James.Pollard@citb.co.uk). The DSL has received appropriate training and has a responsibility for raising awareness within the organisation of any issues relating to the welfare of children, young people, and vulnerable adults. The DSL will ensure the promotion of a safe environment for children and young people to learn in, and the filtering and monitoring system and the process is in place to protect learners. The DSL has the responsibility for ensuring any Deputy Leads are trained to the same standard as the DSL.

If the DSL does not feel that sufficient arrangements are in place for all young people, it is their responsibility to escalate concerns to the Senior Responsible Person immediately.

The DSL will:

- Ensure there are a sufficient number of trained and competent colleagues with designated responsibility for safeguarding.



- Make certain that all colleagues receive adequate training to identify potential safeguarding issues and to respond appropriately to disclosures, including the relevant updates in KCSIE yearly.
- Maintain a confidential recording system for safeguarding and learner protection concerns, ensuring record keeping is accurate and secure.
- Ensure robust policies are maintained and all other relevant information and material are effectively communicated across the organisation, ensuring locally established procedures are followed and maintained.
- Following an initial risk assessment, the DSL will refer suspected safeguarding issues to the appropriate local agency. Where training provision is delivered through a partnership agreement, the DSL will be responsible for liaising with the training provider or sub-contracting college.
- Support staff with advice and guidance on safeguarding issues.
- Ensure HR maintains a single central record of relevant checks and certificates of training. This ensures that all staff working with children, young people, and vulnerable adults undertake appropriate safeguarding training and that this is kept up to date with refresher training at no more than two-year intervals.
- Ensure , learners, and apprentices are being made aware of safeguarding issues and that safeguarding is discussed during apprenticeship induction and reviews.
- Ensure appropriate measures are in place to safeguard apprentices in their place of work and study.
- Review the reports from the filtering and monitoring system, ensuring reports are received and analysed for action.
- Develop effective working relationships with key safeguarding agencies and services. Represent or ensure the organisation is appropriately represented at inter-agency safeguarding meetings (including Child Protection conferences).
- Providing the Board with a quarterly written report and attending Board meetings by invitation.

#### Deputy Designated Safeguarding Lead

The Deputy Designated Safeguarding Leads will be responsible for safeguarding and child protection in the absence of the Designated Safeguarding Lead. They will:

- Take appropriate actions when the DSL is not available.
- Promote the importance of safeguarding across their teams
- Provide support and guidance to all staff members when dealing with safeguarding concerns/incidents.

#### Safeguarding and Wellbeing Advisors

The Safeguarding and Wellbeing advisors have responsibility for managing safeguarding concerns within their geographical areas. They will:



- Be the first point of contact for colleagues dealing with a safeguarding incident/concern.
- Offer support and guidance to teams to effectively manage safeguarding incidents.
- Manage the reporting of area safeguarding concerns within My Concern to ensure that all concerns are triaged, monitored and closed out in a timely manner.
- Where required, liaise with the DSL, Welfare Teams, or the Area and Operations Managers/ Area Managers to identify the most appropriate support to meet the needs of individual learners.
- Ensure that colleagues within their geographical areas undertake mandatory safeguarding and prevent training and development in line with the CITB apprenticeships safeguarding training and development matrix.
- Deliver both bespoke and statutory training to staff working within regulated activities. This includes, induction sessions, yearly refresher training, Prevent, and bespoke CPD which is relevant to the target audience.

#### Training for Safeguarding Leads

- The Senior Responsible Person for Safeguarding, the DSL and the DDSL, Safeguarding and Wellbeing Advisors, and the Welfare Team will be regularly trained on a two-year cycle on safeguarding and PREVENT and will update and familiarise themselves with new government legislation and recommendations as required across the three nations.
- All employees will receive safeguarding training on induction and throughout their employment as prescribed in this Policy

#### Staff responsibilities

All staff, including consultants, working with learners are reminded of their responsibilities to ensure that all learners are in a healthy and safe environment. They should, therefore, ensure that the relevant Health and Safety and Safeguarding checks have been made using the Pre-Placement Check List. Where an apprentice is regularly working alone with a single employer/e the employer is expected to risk assess the situation in line with their own safeguarding/health and safety policy prior to the apprentice(s) commencing employment.

All Staff have a responsibility to:

- Provide a safe environment in which learners can learn.
- Ensure all learners develop appropriate strategies to recognise and respond to risk and build resilience.
- Identify and recognise learners who may require additional support, who are suffering, or are likely to suffer significant harm.
- Provide support and assistance for learners where appropriate and reasonable.



- Take appropriate action to prevent safeguarding concerns from escalating and work with other services as needed.
- Safeguard learners' well-being and maintain public trust in the organisation
- Maintain an attitude of 'it could happen here' where safeguarding is concerned and always act in the learner's best interests.
- Know their responsibilities linked to the filtering and monitoring system as identified in the Colleague Code of Conduct.
- Respond to, and refer any concerns about learners or other members of the community in accordance with this policy.
- Contribute towards, read and adhere to the organisation's policies.
- Ensure any learner's welfare concerns are always reported to the Safeguarding Team.

### Staff Training

All staff will be required to undertake safeguarding training as part of their induction. The training will be linked to their roles and responsibilities and will include safeguarding and child protection training, online safety, the Prevent Duty, and their responsibilities relating to filtering and monitoring. Managers will receive additional training on Safer Recruitment.

CITB has a duty to promote safeguarding issues and measures to staff and ensure that they can:

- Analyse their own practice against established good practice and assess risk to ensure their practice is likely to protect them from false allegations.
- Recognise their responsibilities and report any concerns about suspected poor practice or possible abuse (Code of Conduct);
- Follow the guidelines for staff, including Reporting Concerns ("Whistleblowing"); and
- The DSL will inform staff throughout the year of safeguarding trends and information regarding local Prevent concerns.

### Unexplained and/or persistent absences from education

All staff should be aware that a learner going missing from education is a potential indicator of abuse or neglect. Staff should also be aware that being absent may also be a sign of abuse.

CITB has a procedure in place for responding to unauthorised absences and for dealing with learners who go missing from education, particularly on repeat occasions, to help identify the risk of abuse and neglect, including sexual exploitation, and to help prevent the risks of their going missing in future.



## Section 6- Safeguarding and Safer Recruitment

CITB is fully committed to safer recruitment processes that support the effective recruitment of new employees. A Safer Recruitment Policy is in place and should be read alongside this policy. Our commitment is based on:

- Safeguarding and protecting all children and young people by implementing robust safer recruitment practices
- Ensuring one person is trained on safer recruitment on each interview panel
- Identifying and rejecting applicants who are unsuitable to work with children and young people
- Identify any gaps in employment that will be discussed with applicants during interviews
- Responding to concerns about the suitability of applicants during the recruitment process
- Ensuring two references are taken for each potential employee from a senior member of their previous organisation, and organisations are asked if any safeguarding concerns have been raised.
- Responding to concerns about the suitability of employees and volunteers once they have begun their role
- Ensuring training in safeguarding and safer recruitment is completed for relevant colleagues and ensuring that at least one person who has completed safer recruitment training is included on interview panels when recruiting for a post that meets the regulated activity criteria.
- Ensuring all new staff, contractors and volunteers participate in an induction which includes safeguarding and child protection.
- Ensuring our safer recruitment process works alongside other policies, for example, our equal opportunities policy.

### Checks on Staff

Where this document refers to a relevant check, this means a check with the Disclosure and Barring Services or Disclosure Scotland (PVG) of the fullest extent available in accordance with best practice. Such checks do not reduce the need to carry out referencing and other background checks in the recruitment and appointment of staff.

CITB reserves the right to undertake online searches of potential candidates, and this will be included when advertising roles.

All staff working with children and young people in regulated activity will require an enhanced relevant check before they start working with them. All DBS and Disclosure Scotland Checks will be renewed on a 3-yearly cycle.



A list of job roles requiring enhanced DBS/PVG checks is held by the DSL and HR. This will be highlighted on all vacancy adverts that require the check prior to start of employment.

If spent convictions are identified through the DBS/PVG process, the DSL, The Senior Manager for Safeguarding & Welfare and posts line manager will determine suitability and complete a risk assessment where appropriate.

### Section 7- Responding to Safeguarding Concerns

Members of staff dealing with reports should consider the following:

- In the case of a vulnerable adult who has difficulty communicating, CITB will seek expert support.
- Staff should not investigate concerns or allegations themselves as this could compromise any future criminal case, but should report them immediately to the Safeguarding and Wellbeing advisors.
- A detailed record of the concern should be reported in My Concern, CITBs online reporting system [My Concern Login](#)
- In an urgent situation where both the Safeguarding and Wellbeing advisors and the DSL / DDSL are unavailable, consideration should also be given to contacting the police or the relevant social services team direct, if the member of staff to whom the concerns are reported considers the circumstances to constitute an emergency.
- In the case of a vulnerable adult or a child living in care, it should be recognised that their home or daycare provider may be implicated in an allegation of abuse. Given this, the consent of the individual should be requested to inform the relevant Children / Adult Services Department or any independent key worker or carer, as appropriate. If it is judged that there is a significant risk to the immediate safety of the individual, the Designated Safeguarding Lead should inform the relevant authorities, including the Police, even if consent has been withheld. They should explain to the individual that their “duty of care” responsibilities requires this course of action.
- Once a report has been made to the Safeguarding and Wellbeing Advisor, they will be responsible for ensuring that the case is handled in line with policy, procedures and good practice. Any further information that comes to light, or any further incidents, should be reported through My Concern without delay.

### Safeguarding Within a Work-Based Learning Environment

Where individuals are accessing their learning/training within a working environment their main point of contact with CITB will be via their Apprenticeship Development Officer (Scotland) or Apprentice Development Coach (England). These staff should be



vigilant concerning any safeguarding issues that learners may raise while being on an employer's premises may raise additional complexities.

Staff should follow these procedures:

- In the case of an adult making a safeguarding disclosure, the Apprenticeship Development Officer/Apprentice Development Coach should strongly encourage the individual to seek appropriate professional support (e.g., GP, Police, ACAS, CAB, HSE, Trade Union, Counsellor, Samaritans, Specialist Helpline) and make notes of the disclosure/advice on My Concern. The Safeguarding team will need to be made aware of the disclosure so additional advice/guidance can be provided. This may be particularly helpful in the respect of how to deal with allegations of workplace bullying or breaches or Health and Safety.
- If a member of staff believes there is a risk of harm either to the young person or to others, a referral will be made, and the Designated Safeguarding Lead notified.

Commented [JP1]: Located elsewhere in the policy

### Responding to Disclosures

If a learner discloses to you that he or she has been abused in some way you must:

- Inform the individual that you must pass the information on, but that only those that need to know about it will be told. Inform them who you will report the matter to.
- Listen carefully and stay calm.
- Do not interview the individual, but question normally and without pressure to ensure that you understand what they are telling you.
- Do not put words into the individual's mouth or ask leading questions.
- Reassure the individual that they have done the right thing by telling you.
- Note the main points carefully.
- Make a detailed note of the date, time, place, what the individual said or did, and your questions.
- Report the issue as a matter of urgency to a Safeguarding Team Member.
- Do not make promises that you cannot keep.

If you witness or suspect a safeguarding issue, you must report any incident or concerns immediately to a member of the safeguarding team and document them immediately on My Concern. Your concerns should include factual details relating to them, including, where possible, the language used by the suspected person at risk. Where appropriate, it is the responsibility of the DSL to contact the relevant authorities.



## Section 8: Allegations Against Staff and Learners

### Staff Safeguarding Principles

CITB staff are expected, at all times, to adhere to the following principles:

- The welfare of our learners is paramount.
- Staff are responsible for their actions and behaviour and should avoid any conduct which could lead any reasonable person to question their motivations and intentions (see Staff Code of Conduct).
- Staff must work openly and transparently.
- Staff must promptly discuss and/or take advice from the Safeguarding Team if they have acted in a way that may give rise to concern.
- Staff that breach the law or other professional guidelines set out by CITB may be subject to disciplinary action and/or criminal action and/or other proceedings, including barring by the Disclosure and Barring Services (or other relevant sanctions).
- Staff should know and understand CITBs' disciplinary procedure, whistleblowing policy, and complaints procedure alongside this safeguarding policy.

### Abuse of Trust

Under the Sexual Offences Act 2003, it is an offence for a person over 18 to have a sexual relationship with a child under 18 where that person is in a position of trust in respect of that child, even if the relationship is consensual.

This applies where the child is in full-time education, and the person works in the same establishment as the child, even if s/he does not teach the child.

### Allegations Against Staff

All members of staff are aware of CITB's policy and procedure for whistleblowing (see The Whistleblowing Policy) and have a responsibility to raise any poor or unsafe practices. Such concerns will always be taken seriously by senior leaders. Not raising concern regarding a colleague's behaviour is a disciplinary offence as it could put a learner at risk.

Where an allegation is made against CITB staff, or there is concern about how a member of staff behaves towards a learner, this will be investigated per CITB Disciplinary policies and procedures. Allegations made against staff must also be reported to the DSL. Concerns raised will be discussed with the Local Authority Designated Officer or Local Child Protection Committee (Scotland), if appropriate. These organisations will advise whether further action needs to be taken in addition to CITB's disciplinary procedure. Where an allegation related to safeguarding is made against the CEO, this should be reported to the Chair of the Board immediately.



#### Key things to be remembered are:

- Dates, times and details of the allegation should be written down
- DSL will assess whether the case needs to be investigated and, if necessary, notify the Local Authority Designated Officer (LADO) or Local Authority (Scotland).
- If inappropriate behaviour with no crime or significant harm, this will be addressed through CITB Disciplinary procedures.
- Where appropriate CITB will cooperate with external agencies, and this will be the role of the DSL.
- Where external agencies are involved, DSL will take further action only under the guidance of external agencies such as informing parents and will keep all notes of the process to date.
- Actions against members of staff will be in accordance with the Safeguarding Policy and disciplinary procedures.
- Outcomes will be appropriately recorded in line with the Safeguarding Policy.
- If a person leaves during the investigation, the investigation must continue, and appropriate barring schemes must be notified.
- Any conclusions should provide the basis for reviewing internal procedures and incorporating any learning into policies and procedures.

CITB will comply with its obligations to make appropriate referrals to the Disclosure and Barring services/PVG; further information can be found at the [Disclosure and Barring Scheme](#) for England and Wales and [Disclosure Scotland](#) in Scotland. Further whistleblower guidance can be found on the government's website [Whistleblowing for employees: What is a whistleblower - GOV.UK \(www.gov.uk\)](#). Staff members can also access the NSPCC whistleblowing helpline if they do not feel able to raise concerns regarding learner protection failures internally. Staff can call 0808 800 5000, which is available from 8:00 am to 8:00 pm, Monday to Friday, and email [help@nspcc.org.uk](mailto:help@nspcc.org.uk).

#### Low-level Concerns Staff

A low-level concern can be self-referred or raised by others. Low-level concerns are those that do not meet the threshold for referral to a LADO/Local Authority, or the police, but, as part of an open culture of safeguarding, should be talked about. Everyone is encouraged to report low-level concerns, even through a self-referral, so that inappropriate or concerning behaviours are dealt with early and professional boundaries are maintained.

A low level of concern would be where, for example, a member of staff behaved in a way that is inconsistent with the staff code of conduct, but it isn't considered serious enough to refer to the LADO/Local Authority such as a staff member being over-friendly with learners, using inappropriate language, favouring a learner or picking on a learner, making inappropriate social media posts, making fun of learners work,



making fun of a learner in front of other learners, or accompanying a learner home from an event alone (albeit with the consent).

Low-level concerns will be dealt with efficiently and appropriately in accordance with the staff code of conduct and, where appropriate, any other relevant school policy, such as the data protection policy.

In the event of a low-level concern being raised with the DSL, they will:

- (i) Collect evidence from witnesses and the person concerned.
- (ii) Collate the information and advise what actions should be taken – this could range from a conversation with the person to a warning or formal disciplinary proceedings.
- (iii) Keep a record of the concerns.
- (iv) All information will be held in confidence and securely, in line with data protection laws (the Data Protection Act 2018 and UK GDPR).
- (v) Records will be reviewed regularly to identify any patterns or systematic issues within the college.
- (vi) Patterns of staff behaviour could result in a more serious concern that meets the threshold test or results in disciplinary action for an individual.
- (vii) To agree on further action to be taken in respect of the learner and staff member

Low-level concerns will be maintained in accordance with the Data Management Policy and Procedure and kept on a staff member's file for the duration of employment but will not be included in references. Further information on low-level concerns can be found in the Low-Level Concerns Policy.

### Allegations Against Learners

All apprentices will receive information on safeguarding as part of their induction at the start of their apprenticeship programme, which will include contact details for the Safeguarding Team. In addition, safeguarding health and safety, along with equality and diversity, will be discussed during each progress review with the apprentice.

Where a safeguarding allegation is made against a learner by another learner, member of staff or an apprentice's colleague, it should be referred immediately to the DSL. Where an allegation is shared with us by the employer of an apprentice, which they are investigating through their own procedures, we must make a detailed written record of the allegation, including the steps the employer is taking to investigate the matter. This must be recorded using the CITB reporting mechanisms

Child-on-child sexual harassment and sexual violence (peer-on-peer) can take various forms, including:

- serious bullying (including cyber-bullying),



- relationship abuse,
- domestic violence,
- child sexual exploitation,
- youth and serious youth violence,
- harmful sexual behaviour,
- and/or gender-based violence.

Young people's experiences of abuse and violence are rarely isolated events, and they can often be linked to other things that are happening in their lives and the spaces in which they spend their time. Any response to child-on-child sexual harassment and sexual violence, therefore, needs to consider the range of possible types of child-on-child sexual harassment and sexual violence set out above and capture the full context of a young person's experiences. This can be done by adopting a contextual safeguarding approach and by ensuring that our response to incidents of peer-on-peer abuse considers any potential complexity.

Abusive behaviour can happen to learners in college, their workplace and other settings, and it is necessary to consider what abuse is and looks like, how it can be managed and what appropriate support and intervention can be put in place to meet the needs of the individual and what preventative strategies may be put in place to reduce further risk of harm.

Abuse is abuse and should never be tolerated or passed off as 'banter' or 'part of growing up'. Equally, abuse issues can sometimes be gender specific, e.g., girls being sexually touched/assaulted and boys being subject to initiation/hazing type violence (KCSIE).

Research suggests that child-on-child sexual harassment and sexual violence may affect boys differently from girls and that this difference may result from societal norms (particularly around power, control and how femininity and masculinity are constructed) rather than biological makeup.

It is important to consider the forms abuse may take and the subsequent actions required. Young people with Learning Difficulties and Disabilities (LDD) may be at higher risk of child-on-child sexual harassment and sexual violence and will need a methodology of approach that ensures the victim always feels safe and supported.

All CITB colleagues should be aware that young people can abuse other young people (often referred to as child-on-child sexual harassment and sexual violence). This is most likely to include, but may not be limited to:

- abuse in intimate personal relationships between peers;
- bullying (including cyberbullying);
- physical abuse such as hitting, kicking, shaking, biting, hair pulling, or otherwise causing physical harm (this may include an online element which facilitates, threatens and/or encourages physical abuse);



- sexual violence, such as rape, assault by penetration and sexual assault; (this may include an online element which facilitates, threatens and/or encourages sexual violence);
- Sexual misconduct, such as unwanted conduct creates an intimidating, hostile, degrading, humiliating or offensive environment. Intimidation or promising reward or benefit in return for sexual favour.
- sexual harassment, such as sexual comments, unwanted sexual advances, remarks, jokes and online sexual harassment, which may be stand-alone or part of a broader pattern of abuse;
- sharing self-generated indecent images (also known as sexting);
- initiation/hazing type violence and rituals (this could include activities involving harassment, abuse or humiliation used as a way of initiating a person into a group and may also include an online element);
- up skirting, which typically involves taking a picture under a person's clothing without them knowing to view their genitals or buttocks to obtain sexual gratification or cause the victim humiliation, distress or alarm.
- Sexually harmful behaviour, violence and sexual harassment can occur between two learners of any age and gender. It can also occur through a group of learners sexually assaulting or sexually harassing a single learner or group of learners. Child-on-child sexual harassment and sexual violence often involves an imbalance of power between the perpetrator and the victim. This could involve perpetrators having control over the relationship, which makes it difficult for those they abuse to defend themselves. This imbalance of power can manifest itself in several ways.

Sexual Harassment and Sexual Violence may be physical, psychological (knowing what upsets someone), or social (e.g., isolating or excluding someone). It could also include issues such as revenge porn or what are often gender issues (e.g., girls being inappropriately touched or boys being involved in initiation activities). Learners who are victims of sexual violence and sexual harassment will likely find the experience stressful and distressing. This will likely adversely affect their educational attainment as well as their emotional and mental well-being.

Sexual violence and sexual harassment exist on a continuum and may overlap; they can occur online and offline (both physically and verbally) and are never acceptable. All victims must be taken seriously and offered appropriate support. Disclosures of sexual violence and sexual harassment are extremely complex to manage. Victims must be protected and offered appropriate support, and every effort is made to ensure their education is not disrupted. It is also important that other learners and CITB colleagues are supported and protected as appropriate.



### Allegations Against Other Site Users

CITB does not currently sublet its premises to other agencies. However, the organisation is aware that safeguarding policies and procedures must be included in any agreement should this change in the future. The organisation is also aware of the requirement to follow its own safeguarding procedures should safeguarding concerns be raised against members of another organisation using the site.

### Section 9- Principles of Dealing with Child on Child (Peer on-Peer Sexual Harassment and Sexual Violence)

CITB has adopted the following principles:

- All learners have a right to undertake their training and learning in a safe environment. Learners should be free from harm (in any form), whether the perpetrator is an adult or another young person.
- Recognising that young people can abuse their peers, and this will be dealt with under the overarching guidance of CITB's Safeguarding Policy and in line with KCSiE (2023)
- Being clear that all forms of child-on-child sexual harassment and sexual violence are not acceptable, will never be tolerated and is not an inevitable part of growing up.

CITB will minimise the risk of child-on-child sexual harassment and sexual violence by:

#### Prevention:

- Taking a whole organisational approach to safeguarding (including Child Protection)
- Providing training to staff and learners on child-on-child sexual harassment, sexual violence, and harmful sexual behaviours
- Providing a clear set of values and standards underpinned by the CITB's Code of Behaviour
- Engaging with specialist support and intervention partners.
- Empowering students and CITB colleagues to challenge and report rumours or suspicions

#### Responding to Disclosures of Child-on-Child Sexual Harassment and Sexual Violence:

- Learners making a disclosure will be taken seriously, kept safe and well-supported.



- CITB colleagues receiving the disclosure will contact the DSL or member of the safeguarding team and record the incident on the My Concern safeguarding management system
- CITB colleagues taking a disclosure will never promise confidentiality
- Where the learner is under 18, the DSL or safeguarding team will normally inform parents or parents/guardians/carers (unless this would put the student at greater risk).
- If a child or young person is at risk of harm, is in immediate danger, or has been harmed, a referral will be made to Children's Social Care and/or Police
- A thorough investigation will then be conducted
- Consider referrals to other external appropriate agencies (as appropriate)
- Consider what action needs to be taken against the perpetrator at that time

#### Risk Assessment:

Following disclosure, the DSL will make an immediate risk and needs assessment on a case-by-case basis.

The Risk assessment will consider:

- The victim, especially their protection and support.
- The alleged perpetrator, their support needs and any disciplinary action.
- All other learners at the college.
- The victim and the alleged perpetrator sharing classes and space at college.

The risk assessment will be recorded and kept under review. Where there have been other professional interventions and/or other specialist risk assessments, these professional assessments will be used to inform CITB's approach to supporting and protecting learners.

#### Actions:

The DSL will consider:

- The wishes and views of the victim
- The nature of the incident includes whether a crime has been committed and the level of harm caused.
- The ages of the learners involved.
- Developmental stages of the learner
- Any power imbalance between the learners.
- Any previous incidents.
- Ongoing risks.
- Other related issues or wider context.

The DSL will manage the report with the following options:



- Manage internally
- Early Help
- Refer to Children's Social Care
- Report to the police (generally in parallel with a referral to Social Care)

#### Ongoing Response to Child-on-Child Sexual Harassment and Sexual Violence (Peer-on-Peer)

The DSL will manage each disclosure on a case-by-case basis and will keep the risk assessment under review.

- Where there is a criminal investigation into a child-on-child sexual harassment and sexual violence case, the alleged perpetrator will, if deemed appropriate, be suspended whilst the investigation takes place.
- The DSL and relevant managers of the curriculum will consider how best to keep the victim and perpetrator a reasonable distance apart on college premises and on transport where appropriate.
- Where a criminal investigation into a child-on-child sexual harassment and sexual violence case leads to a conviction or caution, CITB will, if it has not already, consider any suitable sanctions, including consideration of permanent exclusion
- Where the perpetrator is going to remain on-site, the principal would be to keep the victim and perpetrator in separate groups and consider the most appropriate way to manage potential contact on college premises and transport. The nature of the conviction or caution and wishes of the victim will be especially important in determining how to proceed in such cases
- The victim, alleged perpetrator and other witnesses (young people & adults) will receive appropriate support and safeguards on a case-by-case basis.

CITB recognises that taking disciplinary action and providing appropriate support are not mutually exclusive actions and will occur at the same time if necessary



## Section 10 – Prevent Statutory Duty

The Prevent Duty works in accordance with the UK definition of extremism set out in 2024: [New definition of extremism \(2024\) - GOV.UK \(www.gov.uk\)](https://www.gov.uk/government/news/new-definition-of-extremism-2024)

Extremism is the promotion or advancement of an ideology based on violence, hatred or intolerance, that aims to:

1. negate or destroy the fundamental rights and freedoms of others; or
2. undermine, overturn or replace the UK's system of liberal parliamentary democracy and democratic rights; or
3. intentionally create a permissive environment for others to achieve the results in (1) or (2).

The types of behaviour below are indicative of the kind of promotion or advancement which may be relevant to the definition and are an important guide to its application. The further context below is also an essential part of the definition.

Section 26 of the Counter-Terrorism and Security Act 2015 in England and Scotland ('CTSA Act') places a duty on CITB, in the exercise of its functions, to have "*due regard to the need to prevent people from being drawn into terrorism*". This is known as the Prevent Duty.

The term "*due regard*" in the CTSA Act means that CITB should consider all the other factors relevant to how it carries out its usual functions and activities and place an appropriate amount of weight on the need to prevent people from being drawn into terrorism.

Terrorist groups often draw on extremist ideology developed by extremist organisations. Some people who join terrorist groups have previously been members of extremist organisations and have been radicalised by them.



The Government has defined extremism as “vocal or active opposition to fundamental British 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.”

The most significant and publicised threat is currently Islamic State and its associated groups. However, wider groups are outside of this such as those associated with the Far Right. The Prevent Strategy acknowledges that non-violent extremist groups can create an atmosphere in which terrorist ideology can grow.

There is no single way of identifying who is likely to be vulnerable to being drawn into terrorism. Factors that may have a bearing on someone becoming vulnerable may include peer pressure, influence from other people or via the internet, bullying, crime against them or their involvement in crime, anti-social behaviour, family tensions, race/hate crime, lack of self-esteem or identity and personal or political grievances.

The Prevent strategy deals with all forms of terrorism and with non-violent extremism, which can create an atmosphere conducive to terrorism and can popularise views which terrorists then exploit. It also makes clear that preventing people from becoming terrorists or supporting terrorism requires challenging extremist ideas where they are used to legitimise terrorism and are shared by terrorist groups. The strategy also means intervening to stop people from moving from extremist (albeit legal) groups into terrorist-related activity.

### CITB's Prevent Objectives

The three specific strategic objectives under Prevent are:

- Respond to the ideological challenge of terrorism and the threat we face from those who promote it.
- Prevent people from being drawn into terrorism and ensure they are given appropriate advice and support.
- Work with sectors and institutions where there are risks of radicalisation that we need to address.

CITB has a Prevent Action Plan that reflects its risk assessment carried out against the respective Prevent Duty (see [Revised Prevent Duty Guidance England and Wales](#) and [Revised Prevent Duty Scotland](#))

[Prevent Duty Guidance for FE in England and Wales](#)

[Prevent Duty Guidance for FE in Scotland](#)

### CITB's Approach to Prevent

CITB has implemented its prevent-related responsibilities in a proportionate and risk-based way. All staff should demonstrate an awareness and understanding of the risk



of radicalisation. The risk will vary greatly and can change rapidly, but no area, institution, or body is risk-free. The Prevent Duty is not about preventing individuals from having political and religious views and concerns but about supporting our customers and learners in using those concerns or acting on them in a non-extremist way.

Prevent is an important element within our safeguarding policy and processes. Prevent focuses on safeguarding learners and stakeholders and encourages a learning environment where issues can be raised and discussed safely.

CITB's Leadership Team oversee our Prevent strategy by:

- Ensuring all staff, including The Board and Senior Managers, receive awareness training on Prevent.
- Providing training to ensure staff understand their safeguarding responsibilities and processes and policy to outline how to make a referral to the Channel team.
- Providing staff training and guidance on recognising potential signs that a customer/learner may be becoming involved with extremist organisations.
- Creating a single point of contact for Prevent and Safeguarding related issues.
- Maintaining links with the local Prevent Coordinators.
- Ensuring British values are promoted and embedded within employability, skills development, and all teaching and learning activities.
- Maintaining robust IT policies that can deal effectively with potential online risks from extremist organisations, through the appropriate use of firewalls and monitoring usage.
- Ensuring our rigorous risk assessment process is in place and utilised, which ensures Prevent is fully considered, including visitors and external speakers.
- Ensuring our subcontractor providers have appropriate policies in place.

Home Office Training for managers and delivery staff: [Prevent E Learning](#)

Channel Training for managers: [Home Office Channel Training Module](#)

[Use of CITB premises by external agencies / other organisations](#)

All external agencies and organisations that use CITB premises or the National Construction Colleges premises are provided with, amongst other policies, access to the Safeguarding Policy.

[External Speakers – In line with the NCC Visiting Speakers and Organisations Policy](#)

An external speaker is anyone who is not a learner or a member of the CITB staff.

CITB may organise opportunities for learners to hear from external speakers or let its premises to external organisations for community events. In both cases, CITB is responsible for ensuring that the organisation is suitable.



Organisers of a visiting speaker or organisation event should, in advance of the event, complete a checklist which includes consideration of the speaker(s) and content of any presentation, and the potential audience to whom it is intended to be delivered. During this process, potential visiting speakers are issued with 'visit guidelines' and required to confirm their understanding through signature.

We must consider the following points before agreeing for an external organisation to use CITB premises:

- The topic and purpose of the event,
- Whether it would be appropriate for learners (and the likelihood of learners attending the event if held outside normal training times),
- The reputation of the organisers and any speakers – CITB will check the organisers' and any speakers' status and history by searching the internet, including social media,
- Who might attend,
- Any risks to CITB's reputation and ethos,
- The potential or likelihood that any visit will stir up hatred or incite violence,
- The views of external agencies, the community safety team, local police or the local Prevent coordinator if there are concerns.

#### Promoting British Values and Prevent

CITB actively promotes the fundamental British values identified in the Government's Prevent Duty Guidance of:

- Democracy – an understanding of how citizens can influence decision-making through the democratic process;
- The rule of law – an appreciation that living under the rule of law protects individual citizens and is essential for well-being and safety;
- Individual liberty – an understanding that the freedom to choose and hold other faiths and beliefs is protected in law;
- Mutual respect – an acceptance that other people having different faiths or beliefs (or having none) should be accepted and tolerated and should not be the cause of prejudicial or discriminatory behaviour; and
- Tolerance of those with different faiths and beliefs – an understanding of the importance of identifying and combatting discrimination.

Promoting these values means challenging opinions or behaviours contrary to fundamental British values. Employees should not promote, or tolerate to be promoted, views or theories as facts that are contrary to established scientific or historical evidence and explanation. The aim is to improve safeguarding and standards of spiritual, moral, social, and cultural development and strengthen barriers to extremism.



## Section 11- Lessons Learnt

CITB must learn from safeguarding concerns so that we can continue to improve our safeguarding provision. When safeguarding incidents are closed out, CITB should evaluate the management of the concern and document the following factors regarding lessons learned:

- Where there is a lesson to be learned, who the lessons learnt are relevant to and therefore should be made aware of them;
- How the relevant lessons will be communicated, for example, through a monthly safeguarding meeting or dedicated training session; and
- How the effectiveness of the lessons learned will be assessed to ensure they are being implemented.

All lessons learnt are identified, and these will be recorded in a Lessons Learnt Log with appropriate actions and outcomes, which will be evaluated by the Safeguarding & Welfare sub-board as a standard agenda item.

## Policy Reviews

The Safeguarding Policy & Practice Specialist Lead is responsible for reviewing the Safeguarding Policy. All amendments should be agreed upon with the Senior Responsible Person before being tabled at the Executive or Board.

The overall policy review should be undertaken annually, as a minimum, and should be reviewed related to:

- incidents (3 monthly);
- legislative changes.
- changes required by the Board;
- changes required by Local Safeguarding Boards recommendations, and recommendations from Serious Case Reviews



## Appendix A Categories and Signs of Abuse

Abuse is a behaviour towards a person that either deliberately or unknowingly causes a person harm or endangers their life, human or civil rights. It can be passive, e.g., failing to take action or to care for someone, failing to raise the alarm about abuse, or active, e.g., hitting, stealing or doing something that causes harm.

Abuse can be a one-off or something that is repeated. Abuse can be triggered or made worse by an incident or event such as the COVID-19 pandemic in 2020.

Abuse can be:

- Physical.
- Neglect or acts of omission e.g., being left in wet or soiled clothing, or malnutrition
- Sexual (including peer-on-peer abuse involving sexual violence or sexual harassment).
- Psychological/emotional (including the use of text, social networks and email).
- Violation of rights e.g., preventing an individual from speaking his/her thoughts and opinions.
- Institutional e.g., failure to provide a choice of meals or failure to ensure privacy or dignity; or
- Discriminatory in nature e.g., racial, sexual or religious harassment.
- Online abuse: cyberbullying, intimidation, exploitation, grooming, radicalisation.
- Child criminal exploitation includes children being used to carry drugs or money from urban to rural areas. In the case of at-risk adults, it may also include physical abuse such as inappropriate restraint, forcing, forcible administration of medication, neglect or abandonment.
- Financial abuse such as exerting improper pressure to sign over money from pensions or savings, etc.
- Domestic abuse can encompass a wide range of behaviours and maybe a single incident or a pattern of incidents. That abuse can be but is not limited to, psychological, physical, sexual, financial or emotional. Children can be victims of domestic abuse. They may see, hear, or experience the effects of abuse at home and/or suffer domestic abuse in their own intimate relationships (teenage relationship abuse). All of which can have a detrimental and long-term impact on their health, well-being, development, and learning ability.



### **Sexual Abuse & Consent:**

Sexual abuse includes sexual violence, sexual harassment and Criminal Sexual Exploitation (CSE). Sexual abuse involves forcing or enticing a young person to take part in sexual activities, not necessarily involving a high level of violence, whether or not the learner is aware of what is happening. The activities may involve physical contact, including assault by penetration (for example rape or oral sex) or non-penetrative acts such as masturbation, kissing, rubbing and touching outside of clothing. They may also include non-contact activities, such as involving learners in looking at, or in the production of, sexual images, watching sexual activities, encouraging learners to behave in sexually inappropriate ways, or grooming a learner 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 learners.

Harassment and bullying are abusive ways of treating others. People who harass or bully use cruel comments, gestures, threats, or actions. They try to insult, demean, exclude, shame, or hurt others. Sometimes, people who harass and bully do it with sexual comments or actions. This is called sexual harassment or sexual bullying. This can be towards all genders by all genders.

Signs can be:

- Sudden changes in behaviour and educational performance.
- Displays of affection which are sexual and age-inappropriate.
- Self-harm, self-mutilation or attempts at suicide.
- Alluding to secrets which they cannot reveal.
- Tendency to cling or need constant reassurance.
- Regression to younger behaviour
- Distrust of familiar adults, e.g., the anxiety of being left with relatives,
- Unexplained gifts or money.
- Depression and withdrawal.
- Sexually transmitted disease.
- Fire setting.

Sexual harassment and bullying include things like these:

- Making sexual jokes, comments, or gestures
- Spreading sexual rumours (in person, by text, or social media)
- Posting sexual comments, pictures, or videos



- Taking or sending sexual pictures or videos
- Asking someone for naked pictures of themselves ("nudes")
- Asking for sex or offering to have sex
- Touching or grabbing someone in a sexual way

Commented [JP2]: Not relevant for staff policy.

### **Physical Abuse:**

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

Signs can be:

- Bruises and abrasions around the face.
- Damage or injury around the mouth.
- Bi-lateral injuries such as two bruised eyes.
- Bruising to the soft area of the face such as the cheeks.
- Fingertip bruising to the front or back of the torso.
- Bite marks.
- Burns or scalds (unusual patterns and spread of injuries).
- Deep contact burns such as cigarette burns.
- Injuries suggesting beatings (strap marks, welts).
- Covering arms and legs even when hot.
- Aggressive behaviour or severe temper outbursts.
- Inadequate, inconsistent, or excessively plausible explanations or a delay in seeking treatment should signal concern.

### **Emotional Abuse:**

The persistent emotional maltreatment of a learner such as to cause severe and adverse effects on the learner's emotional development. It may involve conveying to a learner that they are worthless or unloved, inadequate, or valued only insofar as they meet the needs of another person. It may include not giving the learner 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 on learners. These may include interactions that are beyond a learner's developmental capability as well as overprotection and limitation of exploration and learning or preventing the learner from participating in normal social



interaction. It may involve seeing or hearing the ill-treatment of another. It may involve serious bullying (including cyberbullying), causing learners frequently to feel frightened or in danger, or the exploitation or corruption of learners. Some level of emotional abuse is involved in all types of maltreatment of a learner, although it may occur alone.

Signs can be:

- Overreaction to mistakes.
- Lack of self-confidence/esteem.
- Sudden speech disorders.
- Self-harming.
- Eating disorders.
- Extremes of passivity and/or aggression.
- Compulsive stealing.
- Drug, alcohol, and solvent abuse.
- Unwillingness or inability to interact with others.
- Excessive need for approval, attention and affection.
- 

#### **Neglect:**

The persistent failure to meet a learner's basic physical and/or psychological needs is likely to result in the serious impairment of the learner's health or development. Neglect may occur during pregnancy as a result of maternal substance abuse. Neglect may involve a parent or carer failing to: provide adequate food, clothing and shelter (including exclusion from home or abandonment); protect a learner from physical and emotional harm or danger; ensure adequate supervision (including the use of inadequate caregivers); or ensure access to appropriate medical care or treatment. It may also include neglect of, or unresponsiveness to, a learner's basic emotional needs.

Signs can be:

- Constant hunger.
- Poor personal hygiene.
- Constant tiredness.
- Inadequate clothing.
- Frequent lateness or non-attendance at the training centre.
- Untreated medical problems.
- Poor relationship with peers.
- Compulsive stealing and scavenging.
- Rocking, hair twisting and thumb sucking.
- Running away.
- Loss of weight or being constantly underweight.



- Low self-esteem.

### **Child on Child Sexual Harassment and Sexual Violence (Peer on peer abuse):**

Peer-on-peer sexual harassment and sexual violence is behaviour by individuals or groups of individuals which can be a one-off incident or repeated over time. Peer-on-peer abuse is behaviour that intentionally hurts another individual or group whether physically or emotionally. All peer-on-peer abuse is unacceptable and will be taken seriously. Peer-on-peer abuse can take on many forms including serious bullying (including cyberbullying), relationship abuse, domestic abuse, child sexual exploitation, youth and serious youth violence, financial abuse, harmful sexual behaviour and /or gender-based violence and is often motivated by prejudice against particular groups steered by a dislike for a person.

Signs can be:

- Race
- Religion
- Gender
- Sexual orientation
- Special educational needs or disabilities
- Where a child is adopted, in care or has care responsibilities
- Is suffering from health problems
- Has an actual or perceived difference (e.g., physical or cultural difference)

### **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.



## Appendix B – Further information

Regulated activity in relation to children:

[Keeping children safe in education - GOV.UK \(www.gov.uk\)](http://www.gov.uk)

[Working Together to Safeguarding Children 2023](#)

[National Guidance for Child Protection in Scotland 2021](#)

[Keeping Learners Safe - Welsh Government Guidance.](#)

The national approach in Scotland to improving outcomes and supporting the well-being of children and young people by offering the **right** help at the **right** time from the **right** people: [Getting it right for every child: understanding wellbeing leaflet](#)

Wales arrangements relating to how all agencies and professionals should work together to safeguard and promote children's welfare and protect them from harm: [Safeguarding Children: Working Together Under the Children Act 2004](#)

[All Wales Safeguarding Procedures](#)

NSPCC's pages concerning preventing abuse of children: [Preventing abuse](#)

Statutory guidance relating to supervision of activity with children, which is regulated activity when unsupervised: [Supervision of Activity with Children](#)

Disclosure and Barring Service information: [DBS Guidance](#) and [Disclosure Scotland](#)

Guidance on Prevent:

[Prevent Duty Guidance.](#)

[Revised Prevent Duty Guidance England and Wales](#)

[Revised Prevent Duty Guidance Scotland](#)

Home Office Training for managers and delivery staff: [Prevent E Learning](#)

Online Channel Training:

[Chanel Awareness E-Learning](#)

Wider staff awareness training for all staff: [ETF Training Portal](#)



Main contacts for Child Protection Concerns in Scotland - [NSPCC Child Protection Systems - Scotland](#)



## Appendix C – Policy Details

Policy Owner: Safeguarding Policy & Practice Specialist Lead

Policy prepared by: James Pollard (DSL & Safeguarding Policy & Specialist Lead)

Input provided by:

- Keeping Children Safe in Education (statutory guidance)
- Working Together to Safeguard Children
- Getting It Right for Every Child - Understanding Wellbeing
- National Guidance for Child Protection in Scotland 2014
- Wales Safeguarding Procedures 2019
- NSPCC Safeguarding Policy Guidance
- Ofsted: Education Inspection Framework
- Safeguarding Lead
- CITB Well-being Group



## Appendix D- Safeguarding Review Calendar

<b>January</b>	<b>February</b>
Board report Safeguarding Meeting Learner Survey Safeguarding induction Single Central Record Audit Newsletter	Board report Safeguarding Meeting Safeguarding induction Newsletter Single Central Record Audit Safer Internet Day
<b>March</b>	<b>April</b>
Board report Safeguarding Meeting Safeguarding induction Single Central Record Audit Prevent Risk Assessment Review Prevent and Safeguarding Action Plan Review Colleague Annual Disclosure Review Safeguarding Executive Report Newsletter	Board report Safeguarding Meeting Safeguarding induction Single Central Record Audit Check Learner Review Comments/ Learning Walk of sites / observation of safeguarding delivery Newsletter Stress Awareness Month
<b>May</b>	<b>June</b>
Board report Safeguarding Meeting Safeguarding induction Single Central Record Audit Newsletter Mental Health Awareness Week Learning at Work Week	Board report Safeguarding Meeting Safeguarding induction Single Central Record Audit Prevent Risk Assessment Review Prevent and Safeguarding Action Plan Review Colleague Annual Disclosure Review Safeguarding Executive Report Newsletter Learner Survey Careers Week
<b>July</b>	<b>August</b>
Board report Safeguarding Meeting Safeguarding induction Single Central Record Audit International Day of Friendship Newsletter	Board report Safeguarding Meeting Safeguarding induction Safeguarding Policy Updates including linked policies Single Central Record Audit



September	October
Board report Safeguarding Meeting Safeguarding Induction Safeguarding Training- linked to Policy Updates- Learner Facing Staff Single Central Record Audit Safeguarding Executive Report Newsletter World Suicide Day	Newsletter Board report Safeguarding Meeting Safeguarding induction Single Central Record Audit Check Learner Review Comments/ Learning Walk of sites/observation of safeguarding delivery Newsletter National Hate Crime Awareness Week World Mental Health Day
November	December
Board report Safeguarding Meeting Safeguarding induction Single Central Record Audit Newsletter National Stress Awareness Day International Day for the elimination of violence against girls Anti-bullying Month Men's Health Awareness Month	Board report Safeguarding Meeting Safeguarding induction Single Central Record Audit Safeguarding Executive Report Newsletter Universal Month for Human Rights Human Rights Day International Volunteer Day