

Safeguarding and Child Protection Policy

Including procedures for children, young people, and adults at risk

KEY SAFEGUARDING CONTACTS

Designated Safeguarding Lead (DSL)

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Deputy DSL

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If you have a safeguarding concern, report it immediately to the DSL.
If the DSL is unavailable, contact the Deputy DSL or call 999 in an emergency.

Document Ownership

Policy owned by:	Operations
Policy written by:	Sophie Gilmore
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Version Control Table

Version	Date	Author	Changes
1.0	05/08/2023	S Gilmore	Initial policy creation; approved by Governors
1.1	22/08/2024	P Crocker	DSL name change; reviewed for completeness
1.2	10/07/2025	P Crocker	Updated terminology; added allegations against staff procedure
2.0	01/02/2026	S Gilmore	Major revision: full KCSIE 2024 alignment, expanded specific harms, low-level concerns, online safety, apprentice safeguarding

PART 1: POLICY STATEMENT AND COMMITMENT

1. Introduction and Policy Statement

Hybrid Training Centre (HTC) is committed to safeguarding and promoting the welfare of all children, young people, and adults at risk. We expect all staff, governors, employers, contractors, and volunteers to share this commitment.

Safeguarding and promoting the welfare of children is everyone's responsibility. Everyone who comes into contact with children and their families has a role to play. In order to fulfil this responsibility effectively, all practitioners should make sure their approach is child-centred. This means that they should consider, at all times, what is in the best interests of the child.

(Keeping Children Safe in Education, September 2024)

2. Purpose

This policy:

- Sets out HTC's commitment to safeguarding children, young people, and adults at risk
- Provides clear direction to all staff about expectations and legal responsibilities
- Establishes procedures for identifying, reporting, and responding to safeguarding concerns
- Supports the development of safe environments for learning and development
- Ensures compliance with statutory requirements and best practice guidance

3. Scope

This policy applies to all staff, governors, employers, contractors, agency workers, and volunteers engaged with HTC and NWTC. It covers all learners, including:

- Apprentices (including those under 18 and young adults aged 18-24)
- Skills Bootcamp participants
- Commercial training delegates
- Any other learners accessing HTC services

4. Legal and Regulatory Framework

This policy is written in accordance with the following key legislation and guidance:

- **Keeping Children Safe in Education (September 2024)** - statutory guidance
- **Working Together to Safeguard Children (2023)** - statutory guidance
- Prevent Duty Guidance (December 2023)
- Children Act 1989 and 2004
- Education Act 2002 (Section 175)
- Safeguarding Vulnerable Groups Act 2006
- Counter-Terrorism and Security Act 2015
- Care Act 2014
- Data Protection Act 2018 and UK GDPR
- Sexual Offences Act 2003

5. Definitions

5.1 Child / Young Person

Anyone who has not yet reached their 18th birthday. The fact that a child has reached 16 years of age, is living independently, or is in further education does not change their status or entitlement to services or protection.

5.2 Adult at Risk

An adult (aged 18 or over) who has care and support needs, is experiencing or at risk of abuse or neglect, and as a result of those care and support needs is unable to protect themselves from either the risk of, or the experience of, abuse or neglect (Care Act 2014).

5.3 Safeguarding

Safeguarding and promoting the welfare of children means:

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

5.4 Abuse

A form of maltreatment of a child or adult. Somebody may abuse by inflicting harm or by failing to act to prevent harm. Abuse may be committed by adults or children and may take place wholly online, or technology may be used to facilitate offline abuse.

PART 2: CATEGORIES OF ABUSE AND SPECIFIC SAFEGUARDING ISSUES

6. Categories of Abuse

All staff must be aware of the four main categories of abuse:

6.1 Physical Abuse

A form of abuse which 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 in a child.

6.2 Emotional Abuse

The persistent emotional maltreatment of a child such as to cause severe and persistent adverse effects on the child's emotional development. It may involve conveying 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 child opportunities to express their views, deliberately silencing them, or 'making fun' of what they say. It may feature age or developmentally inappropriate expectations, overprotection, or limiting exploration and learning. It may involve serious bullying, causing children frequently to feel frightened or in danger, or the exploitation or corruption of children.

6.3 Sexual Abuse

Involves forcing or enticing a child or young person to take part in sexual activities, not necessarily involving violence, whether or not the child is aware of what is happening. The activities may involve physical contact, including assault by penetration or non-penetrative acts. 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.

6.4 Neglect

The persistent failure to meet a child's basic physical and/or psychological needs, likely to result in the serious impairment of the child's health or development. Neglect may occur during pregnancy, or once a child is born. It may involve a parent or carer failing to provide adequate food, clothing, or shelter; protect a child from physical and emotional harm or danger; ensure adequate supervision; or ensure access to appropriate medical care or treatment. It may also include neglect of, or unresponsiveness to, a child's basic emotional needs.

7. Specific Safeguarding Issues

All staff should be aware of the following specific safeguarding issues and be alert to indicators:

7.1 Child-on-Child Abuse

All staff should be aware that children can abuse other children (often referred to as child-on-child abuse), and that this can happen both inside and outside of training. All staff should be clear about HTC's policy and procedures with regard to child-on-child abuse and the important role they have to play in preventing it and responding where they believe a child may be at risk. Child-on-child abuse can include:

- Bullying (including cyberbullying, prejudice-based, and discriminatory bullying)
- Abuse in intimate personal relationships between children
- Physical abuse such as hitting, kicking, shaking, biting, hair pulling, or otherwise causing physical harm
- Sexual violence and sexual harassment
- Consensual and non-consensual sharing of nude and semi-nude images/videos
- Causing someone to engage in sexual activity without consent
- Initiation/hazing type violence and rituals
- Upskirting (now a criminal offence)

Staff should never dismiss sexual violence or sexual harassment as 'banter', 'just having a laugh', 'part of growing up', or 'boys being boys'. Such dismissive attitudes can normalise concerning behaviours.

7.2 Child Sexual Exploitation (CSE)

CSE is a form of child sexual abuse where an individual or group takes advantage of an imbalance of power to coerce, manipulate, or deceive a child into sexual activity in exchange for something the victim needs or wants, and/or for the financial advantage or increased status of the perpetrator or facilitator. The victim may have been sexually exploited even if the sexual activity appears consensual. CSE can involve violent, humiliating, and degrading sexual assaults but does not always involve physical contact. CSE can occur through the use of technology.

7.3 Child Criminal Exploitation (CCE) and County Lines

CCE is where an individual or group takes advantage of an imbalance of power to coerce, control, manipulate, or deceive a child into any criminal activity in exchange for something the victim needs or wants, and/or for the financial advantage or increased status of the perpetrator or facilitator. The victim may have been criminally exploited even if the activity appears consensual.

County Lines is a term used to describe gangs and organised criminal networks involved in exporting illegal drugs into one or more importing areas within the UK, using dedicated mobile phone lines. They are likely to exploit children and vulnerable adults to move and store the drugs and money and they will often use coercion, intimidation, violence, and weapons.

7.4 Domestic Abuse

The Domestic Abuse Act 2021 recognises children as victims of domestic abuse in their own right if they see, hear, or experience the effects of domestic abuse. Staff should be aware

that exposure to domestic abuse can have a serious, long-lasting emotional and psychological impact on children.

7.5 So-called 'Honour-Based' Abuse (HBA)

HBA encompasses incidents or crimes committed to protect or defend the honour of the family and/or community, including Female Genital Mutilation (FGM), forced marriage, and practices such as breast ironing. All forms of HBA are abuse and should be handled and escalated as such. Staff must be alert to the possibility of a child being at risk of HBA, or already having suffered HBA.

7.6 Female Genital Mutilation (FGM)

FGM comprises all procedures involving partial or total removal of the external female genitalia or other injury to the female genital organs for non-medical reasons. FGM is illegal in the UK and is a form of child abuse with long-lasting harmful consequences.

Mandatory Reporting Duty: There is a mandatory reporting duty which requires teachers to report to the police where they discover (either through disclosure or visual evidence) that FGM appears to have been carried out on a girl under 18.

7.7 Forced Marriage

A forced marriage is one entered into without the full and free consent of one or both parties and where violence, threats, or any other form of coercion is used to cause a person to enter into a marriage. Since June 2014, forcing someone to marry has become a criminal offence in England and Wales.

7.8 Radicalisation and Extremism (Prevent)

HTC has a duty under the Counter-Terrorism and Security Act 2015 to have 'due regard to the need to prevent people from being drawn into terrorism'. This is known as the Prevent Duty. Extremism is the vocal or active opposition to our fundamental values, including democracy, the rule of law, individual liberty, and mutual respect and tolerance of different faiths and beliefs.

Staff should be alert to changes in learners' behaviour which could indicate they may be in need of help or protection. Concerns should be reported to the DSL who will consider a referral to the Channel programme. See the separate Prevent Policy for full details.

7.9 Mental Health

Mental health problems can, in some cases, be an indicator that a child has suffered or is at risk of suffering abuse, neglect, or exploitation. Only appropriately trained professionals should attempt to make a diagnosis of a mental health problem; however, staff are well placed to observe children day-to-day and identify those whose behaviour suggests they may be experiencing a mental health problem or be at risk of developing one. If staff have a mental health concern about a child that is also a safeguarding concern, they should raise it with the DSL.

7.10 Children Missing Education

All staff should be aware that children going missing, particularly repeatedly, can act as a vital warning sign of a range of safeguarding possibilities. This may include abuse and neglect, child sexual exploitation, child criminal exploitation, or mental health problems. HTC monitors attendance closely and follows up unexplained absences promptly.

7.11 Modern Slavery and Human Trafficking

Modern slavery encompasses slavery, servitude, forced and compulsory labour, and human trafficking. Staff should be aware that apprentices may be particularly vulnerable to exploitation in the workplace. Any concerns should be reported immediately to the DSL. See the separate Modern Slavery Policy for full details.

PART 3: ROLES AND RESPONSIBILITIES

8. Roles and Responsibilities

8.1 Designated Safeguarding Lead (DSL)

The DSL takes lead responsibility for safeguarding and child protection (including online safety). The DSL will:

- Manage referrals to local authority children's social care, the police, the Channel programme, and other agencies
- Work with external agencies and support staff who make referrals
- Refer cases of suspected abuse to the local authority children's social care as required
- Support staff to make referrals to the Disclosure and Barring Service where appropriate
- Refer cases where FGM has occurred to the police
- Maintain accurate and secure safeguarding records
- Ensure all staff access appropriate safeguarding training

- Liaise with the LADO on allegations against staff
- Provide reports to the SMT and Board on safeguarding matters
- Act as a source of support, advice, and expertise for all staff

The DSL must complete Level 3 safeguarding training and update training at least every two years. The DSL will also receive regular updates from the Local Safeguarding Children Partnership (LSCP).

8.2 Deputy DSL

The Deputy DSL is trained to the same level as the DSL and acts in their absence. The Deputy DSL supports the DSL in carrying out their responsibilities and ensures there is always a trained safeguarding lead available.

8.3 Board of Directors

- Hold ultimate accountability for safeguarding and child protection
- Ensure HTC has effective safeguarding policies and procedures in place
- Review and approve the Safeguarding Policy annually
- Receive safeguarding reports at least bi-annually
- Complete annual safeguarding and Prevent training

8.4 Senior Management Team

- Promote a culture of safeguarding across the organisation
- Ensure adequate resources for safeguarding training and activities
- Ensure safer recruitment practices are followed
- Monitor safeguarding concerns and actions on a monthly basis

8.5 All Staff

All staff have a responsibility to:

- Read and understand KCSIE Part One (all staff) or the full document (for those working directly with children)
- Be alert to signs and indicators of abuse and neglect
- Report any concerns immediately to the DSL
- Maintain appropriate relationships and professional boundaries with learners
- Complete mandatory safeguarding training during induction and annual updates
- Know how to report concerns and who to report them to

8.6 Skills Coaches and Assessors

In addition to the responsibilities of all staff, skills coaches and assessors have particular responsibilities due to their regular contact with apprentices in the workplace:

- Monitor apprentice welfare during progress reviews
- Conduct and update employer safeguarding checks
- Be alert to signs of workplace exploitation or modern slavery
- Report any concerns about apprentice safety in the workplace

8.7 Employers

- Be aware of and comply with HTC's safeguarding policy

- Ensure a safe working environment for apprentices
- Report any safeguarding concerns about apprentices to HTC immediately
- Cooperate with HTC in safeguarding investigations

PART 4: PROCEDURES

9. Responding to Concerns

9.1 If a Learner Discloses Abuse

If a learner discloses that they are being abused, staff should:

1. **Listen carefully** - stay calm, give them your full attention, and let them speak in their own words
2. **Reassure them** - tell them they have done the right thing by telling you and that it is not their fault
3. **Do not promise confidentiality** - explain that you will need to share this information with the DSL to help keep them safe
4. **Do not investigate** - your role is to listen and record, not to ask leading questions or investigate
5. **Record accurately** - write down what the learner said using their exact words where possible
6. **Report immediately** - contact the DSL as soon as possible, the same day

9.2 Recording Concerns

All concerns must be recorded using the HTC Cause for Concern / Safeguarding Form, available on SharePoint. The record should include:

- Learner's name, date of birth, and contact details
- Date and time of the concern or disclosure
- The learner's own words (verbatim where possible)
- Description of any visible injuries (using body maps where appropriate)
- Name of the person recording the concern
- Any actions taken
- Clear separation of facts from opinions

Records must be emailed securely to safeguarding@hybridtec.co.uk and stored confidentially.

9.3 Referral Process

The DSL will assess all concerns received and determine the appropriate course of action, which may include:

- Managing the concern internally with appropriate support
- Early Help assessment and referral
- Referral to children's social care or adult social care
- Referral to the police (999 in emergencies)
- Referral to the Channel programme (Prevent concerns)

In an emergency where a child is at immediate risk of harm, call 999 without delay. Do not wait for the DSL.

10. Low-Level Concerns

A low-level concern is any concern, no matter how small, that an adult working in or on behalf of HTC may have acted in a way that is inconsistent with the Staff Code of Conduct, including inappropriate conduct outside of work. Low-level concerns may include, but are not limited to:

- Being over-friendly with children
- Having favourites
- Taking photographs of children on personal devices
- Engaging with learners on personal social media accounts
- Using inappropriate language around learners

Low-level concerns should be reported to the DSL or Group CEO. All low-level concerns will be recorded and monitored for patterns of behaviour. If a pattern emerges, this may escalate to a formal investigation.

11. Allegations Against Staff

All allegations against staff, including supply staff, volunteers, and contractors, must be taken seriously and handled in accordance with KCSIE Part Four. This section applies to allegations that may indicate a person would pose a risk of harm if they continue to work in their present position, or in any capacity with children.

11.1 Types of Allegations

An allegation may relate to a person who works with children who has:

- Behaved in a way that has harmed a child, or may have harmed a child
- Possibly committed a criminal offence against or related to a child
- Behaved towards a child in a way that indicates they may pose a risk of harm to children
- Behaved in a way that indicates they may not be suitable to work with children (including behaviour outside the workplace)

11.2 Reporting Allegations

Allegations must be reported immediately to:

- **The Group CEO** for allegations against any member of staff
- **The Chair of the Board** for allegations against the Group CEO
- **The DSL** should be informed to ensure the child's welfare is addressed

Staff should not investigate allegations themselves or take written statements from children. The initial response should be to listen, reassure, and record factually what has been said.

11.3 Initial Response

Upon receiving an allegation, the Group CEO (or Chair of the Board) will:

7. Treat the matter seriously and keep an open mind
8. Ensure the immediate safety of the child or children involved
9. Not investigate the allegation or interview the child, staff member, or witnesses
10. Secure and preserve any evidence (CCTV, documents, IT records)
11. Contact the Local Authority Designated Officer (LADO) within one working day
12. Make a referral to the police if a criminal offence may have been committed

11.4 Role of the LADO

The LADO must be contacted within one working day of all allegations that meet the criteria above. The LADO will:

- Provide advice and guidance on the investigation process
- Liaise with the police and children's social care as appropriate
- Advise whether a strategy meeting is required
- Monitor the progress of the investigation
- Advise on the appropriate outcome category

HTC will not conduct an internal investigation until advised to do so by the LADO, as this may compromise any police or social care investigation.

11.5 Suspension

Suspension is a neutral act and does not imply guilt. Suspension will be considered where:

- There is cause to suspect a child is at risk of harm
- The allegation is so serious that dismissal for gross misconduct may result
- It is necessary to allow an unimpeded investigation
- The police or LADO advise suspension is appropriate

Alternatives to suspension will be considered, such as redeployment to duties that do not involve contact with children, or working under increased supervision. The reasons for any decision to suspend, and alternatives considered, will be documented.

11.6 Investigation Outcomes

Following investigation, allegations will be categorised as one of the following:

- **Substantiated:** there is sufficient evidence to prove the allegation
- **Malicious:** there is sufficient evidence to disprove the allegation and there has been a deliberate act to deceive
- **False:** there is sufficient evidence to disprove the allegation
- **Unsubstantiated:** there is insufficient evidence to either prove or disprove the allegation (this does not imply guilt or innocence)
- **Unfounded:** there is no evidence or proper basis to support the allegation

11.7 Action Following Investigation

Where an allegation is substantiated and the person is dismissed or resigns, or would have been dismissed had they not resigned, HTC will make a referral to:

- **The Disclosure and Barring Service (DBS)** where the criteria for referral are met
- **The Teaching Regulation Agency (TRA)** where the person carried out teaching work
- A referral to the DBS is a legal duty and will be made within one month of the person leaving HTC.

'Settlement agreements' (also known as 'compromise agreements') must not be used to prevent a referral to the DBS or TRA where the criteria are met.

11.8 Support for Those Involved

HTC recognises that being subject to an allegation can be stressful. Support will be provided to all those involved:

- **The child:** The DSL will ensure appropriate support is provided and consider whether counselling or other support services are needed
- **The person subject to the allegation:** Will be advised to contact their trade union or professional association. A named contact will be provided to keep them informed of progress. HTC's Employee Assistance Programme is available
- **Parents/carers:** Will be informed in agreement with the LADO and kept updated on progress, subject to restrictions on sharing information during investigation
- **Staff witnesses:** Will be supported throughout the process and reminded of confidentiality requirements

11.9 Timescales

HTC will work with the LADO to ensure cases are resolved as quickly as possible, consistent with a thorough investigation. Target timescales are:

- LADO notified within one working day of allegation being received
- Initial evaluation completed within three working days
- Strategy meeting held within five working days if required
- 80% of cases resolved within one month; 90% within three months

11.10 Record Keeping

A clear and comprehensive record will be kept of all allegations, including:

- Details of the allegation, how it was received, and by whom
- Decisions made with reasons, including LADO advice
- Actions taken and by whom
- The outcome of the investigation and any follow-up actions
- Any referrals made (DBS, TRA, police)

Records will be retained on the individual's personnel file and a copy provided to the person concerned. Records will be retained until the person reaches normal pension age or for 10 years from the date of the allegation, whichever is longer.

Where an allegation is found to be malicious, it will be removed from the personnel file. For unfounded, unsubstantiated, or false allegations, a summary will be retained with a clear statement of the outcome.

11.11 Learning from Allegations

Following the conclusion of any case, HTC will review the circumstances to identify any improvements to policies, procedures, or practice. This may include reviewing the Staff Code of Conduct, induction processes, or safeguarding training. Any lessons learned will be shared with the Board and implemented across the organisation.

PART 5: ONLINE SAFETY

12. Online Safety

HTC recognises that the internet and technology present particular safeguarding challenges. The breadth of issues classified within online safety is considerable, but can be categorised into four areas of risk:

- **Content:** Being exposed to illegal, inappropriate, or harmful content
- **Contact:** Being subjected to harmful online interaction with other users
- **Conduct:** Personal online behaviour that increases the likelihood of, or causes, harm
- **Commerce:** Risks such as online gambling, inappropriate advertising, phishing, and financial scams

12.1 Filtering and Monitoring

HTC has appropriate filtering and monitoring systems in place on all IT systems. These systems are reviewed regularly to ensure they remain appropriate and effective. Filtering decisions are risk-assessed and documented. Staff are trained to understand the importance of these systems and their role in keeping learners safe online.

12.2 Staff Use of Technology

Staff must not use personal devices to take photographs or videos of learners. Staff must not communicate with learners via personal social media accounts or personal messaging apps.

All professional communication should be through HTC systems. See the Acceptable Use of IT Policy for full details.

PART 6: SAFER RECRUITMENT AND TRAINING

13. Safer Recruitment

HTC operates safer recruitment practices to deter, identify, and reject individuals who may pose a risk to children. Key elements include:

- Enhanced DBS checks with barred list checks for all staff in regulated activity
- Verification of identity and right to work
- Two satisfactory references covering at least five years
- Prohibition checks (Teacher Regulation Agency) where appropriate
- Section 128 checks for senior managers
- Online searches on shortlisted candidates
- Single Central Record maintained and audited monthly

See the Recruitment and Selection Policy for full details of safer recruitment procedures.

14. Training

All staff receive safeguarding training as follows:

- **Induction:** Safeguarding policy, KCSIE Part One, Prevent, reporting procedures, DSL contact details
- **Annual updates:** Refresher training on safeguarding, online safety, and Prevent
- **Regular updates:** As required to ensure staff are kept up to date with local issues and emerging risks
- **DSL training:** Level 3 safeguarding training, updated every two years

15. Record Keeping and Information Sharing

All safeguarding records are stored securely with access restricted to the DSL, Deputy DSL, and senior leadership as appropriate. Records are retained in accordance with statutory requirements and awarding organisation conditions.

Information may be shared with external agencies (children's social care, police, health services) where necessary to safeguard a child. The Data Protection Act 2018 and UK GDPR do not prevent the sharing of information for the purposes of keeping children safe.

16. Monitoring and Review

This policy will be reviewed annually and updated as required in response to changes in legislation, statutory guidance, local safeguarding arrangements, or following a safeguarding incident or near miss. The Board will receive a safeguarding report at least bi-annually.

17. Related Policies

- Prevent Policy
- Recruitment and Selection Policy
- Staff Code of Conduct
- Whistleblowing Policy

- Acceptable Use of IT Policy
- Modern Slavery Policy
- Complaints Policy
- Disciplinary Policy
- Learner Code of Conduct

APPENDIX A: KEY CONTACTS

Contact	Details
HTC Designated Safeguarding Lead	Patsy Crocker Tel: 0151 524 2951 Mobile: 07887 492832 safeguarding@hybridtec.co.uk
HTC Deputy DSL	James McCawley Tel: 0151 524 2951
Liverpool Children's Social Care	Tel: 0151 233 3700 (24/7)
Liverpool Adult Social Care	Tel: 0151 233 3800 (24/7)
Sefton Out of Hours	Tel: 0151 934 3555
LADO (Local Authority Designated Officer)	Contact via local authority children's services
Merseyside Police (non-emergency)	Tel: 101
Police Emergency	Tel: 999
Prevent / Channel Referral	Tel: 0151 777 4878
Regional Prevent Coordinator	Claire Little claire.little@education.gov.uk 07385 114867
NSPCC Helpline	Tel: 0808 800 5000
Childline	Tel: 0800 1111
Modern Slavery Helpline	Tel: 0800 012 1700
FGM Helpline	Tel: 0800 028 3550
Forced Marriage Unit	Tel: 020 7008 0151



Sophie Gilmore
Group CEO

Date: 01 .02 .2026