

Safeguarding and Child Protection Policy

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2 Associated Policies

- Safer Recruitment Policy
- Code of Conduct
- Disciplinary Policy
- Whistleblowing Policy
- General Data Protection Policy (GDPR)
- Safeguarding SharePoint protocol
- Complaints procedure
- Safe working practice
- Recruitment and selection
- Safeguarding concerns and allegations made about staff, supply staff, contractors and volunteers, including low level concerns guidance (safeguarding policy)
- Grievance and disciplinary
- Staff/learner online communication Confidentiality and information sharing (in safeguarding policy)

3 Key Varsity Training Safeguarding Contacts

Name	Role	Contact Number	Contact Email
Kevin Piper	Senior Designated Leader for Safeguarding	07949 166307	kevin.piper@varsitytraining.co.uk
Hilary Douglas Smith	Deputy Safeguarding Leader	07449 599982	hilary.douglas@varsitytraining.co.uk
David Maytham	CEO	07772 690411	david.maytham@varsitytraining.co.uk
Police	To report a crime and immediate risk of harm or abuse to a child	Tel: 101 In an emergency: 999 (only)	Police

4 Policy Statement

- 4.1 Varsity Training believes it is unacceptable for a young person/ adult, apprentice or adult to experience any kind of abuse and recognises its responsibility to safeguard their welfare by a commitment to practice which protects them.
- 4.2 At Varsity Training, we believe in fostering a personalised centred and coordinated approach to safeguarding young people/ adults protection in all our company. Our strategic safeguarding model promotes a consistent and co-ordinated approach to policy and practice across the company.
- 4.3 We recognise it is both our statutory and moral duty to promote the safety and welfare of all children in our trust and prepare them well for the next phase of their life.
- 4.4 Safeguarding is the overarching term used to describe the protection of the health, wellbeing and human rights of individuals.
- 4.5 Safeguarding comprises 4 main aims:
- protection from maltreatment or significant harm
 - preventing impairment of health or development
 - ensuring all learners have the opportunity to experience circumstances consistent of safe and effective care
 - take action to enable people to achieve the best outcomes

(Working Together to Safeguard Children, 2013 defines maltreatment as; 'Inflicting harm or failing to prevent harm' The Children Act, 2004 defines harm as; 'Ill-treatment or the impairment of health or development' Significant can be defined as; 'compared to the health and development of another with that which could be reasonably expected of a similar person (child, young person, adult or learner))

- 4.6 Many areas are considered to fall under the definition of safeguarding including
- Abuse (emotional and physical)
 - Exploitation (sexual, criminal)
 - Harassment and bullying (including online) Discriminatory abuse
 - Financial abuse
 - Institutional abuse Mental health
 - Forced marriage Neglect or self harm Domestic violence
 - Radicalisation and extremism

- 4.7 We understand the importance of recognising the signs and symptoms of potential maltreatment or significant harm and how to report and refer a concern to the appropriate agencies so that they can investigate and take the necessary action.
- 4.8 We recognise that a learner who is abused, experiencing bullying or is witness to violence may feel alone, frightened and confused. We understand our responsibility to provide a stable, encouraging and safe environment.
- 4.9 Compliance with Funding Rules. In establishing this policy we acknowledge our compliance with ESFA safeguarding guidance, by ensuring that apprentices are safe in their workplaces and that employers understand their safeguarding responsibilities.

5 How we support safeguarding and child protection

Our Company supports safeguarding by:

- 5.1 Providing direction and guidance from the designated safeguarding team
- 5.2 Proactively analysing trends and priorities
- 5.3 Offering professional development and training on common themes
- 5.4 Ensure our Designated Safeguarding Leads have time for research and networking to share best practice, offers advice and ensures consistency
- 5.5 Implementing a robust timetable of audits and reviews:
 - Annual SCR audit
 - Annual safeguarding compliance audit
 - Annual safeguarding review
- 5.6 Providing professional training, supervision, mentoring and/or support to DSLs.
- 5.7 Ensuring consistency in all aspects of safeguarding
- 5.8 Workplace Partnership: Our workplace partnership consists of representatives from the employer and our Varsity Training DSLs, having a clear understanding of their respective roles and responsibilities in safeguarding apprentices. We have a shared commitment to creating a safe and supportive environment for apprentices and liaise with employers as part of our safeguarding duties outlined in this document.

6 Core Principles

- 6.1 Safeguarding is everyone's responsibility.
- 6.2 All staff always act in the best interest of the learner / apprentice.
- 6.3 We encourage professional curiosity and a culture of vigilance.
- 6.4 We are committed to creating a culture of safeguarding where young people / apprentices feel safe and can thrive.
- 6.5 Through our company systems, we support each other in careful decision making.
- 6.6 As a company, we are committed to safer recruitment.
- 6.7 We are committed to providing high quality professional development on safeguarding for all our staff.
- 6.8 We are committed to partnership working and outward looking.
- 6.9 Our staff know their apprentices and are supported to develop their own safeguarding culture and curriculum.
- 6.10 Appendix 1 outlines the four categories of abuse that all employees should be aware of.

7 Safeguarding at Varsity Training

- 7.1 Safeguarding is everyone's responsibility, and it is the duty of Varsity Training to safeguard and promote the welfare of our young people / apprentices. We focus on providing a safe and welcoming environment for all of our apprentices regardless of age, ability, culture, race, language, religion, gender identity or sexual identity. All of our apprentices have equal rights to support and protection.
- 7.2 The company is legally obliged and has a clear commitment to safeguarding and promoting the welfare of children and vulnerable adults who access our services. We take seriously our responsibility to safeguard and promote the welfare of our learners, and we will work together with our staff and relevant external agencies to promote a joined-up approach to safeguarding.
- 7.3 The company believes that all staff have a collective and individual duty to provide a caring, safe and supportive environment that positively promotes the health and wellbeing of each learner. Staff, through training and support, will take responsibility to understand their role in supporting safeguarding across all aspects of provision and for familiarising themselves with this policy, the safeguarding reporting structure and related documentation, and the overarching safeguarding (including Prevent) policies and procedures.

8 Scope

- 8.1 One of the cornerstones of our safeguarding culture is this policy and the procedures contained within it. This policy applies to all staff, volunteers, local advisory board members and company directors, all of whom are trained upon its contents and on their safeguarding duties. We update this policy at least annually to reflect changes to law and guidance and best practice.
- 8.2 The company instigates a whole organisational approach to safeguarding. We understand that any of our learners may experience outcomes or barriers to their learning which may be a cause for concern. We make sure that all our staff are trained to recognise behaviours, signs and symptoms of significant harm or need and will act appropriately and in the interest of the learner when required.
- 8.3 We will make sure that our safeguarding policy and related procedures are compliant with legislation and guidance issued by the Government, DfE, ESFA and other relevant bodies, and operate in line with the requirements of the Local Safeguarding Children Boards and Safeguarding Adult Boards for the regions in which we deliver provision. We will review them annually to ensure that they remain current. All our staff are made aware of the relevant policies and procedures and their commitment to ensuring the implementation and effectiveness.
- 8.4 This policy should be read alongside our other company policies as outlined at the beginning of this document.

9 Safeguarding our apprentices

- 9.1 We work with our local safeguarding partners, statutory guidance and legislation to promote the welfare of young people and adults and protect them from harm. This includes contributing to inter-agency plans which provide additional support to the learner as required.
- 9.2 All of our staff have an equal responsibility to act on any suspicion or disclosure that may indicate that a learner is at risk of harm, including online. Any apprentice or staff involved in a child protection or safeguarding issue will receive appropriate support as soon as problems emerge.
- 9.3 Our strong safeguarding culture ensures that we treat all apprentices with respect and involve them in decisions that affect them. We encourage positive, respectful and safe behaviour among our staff and apprentices and we set a good example by conducting ourselves appropriately.

- 9.4 Identifying safeguarding and child protection concerns often begin with recognising changes in young people's and adults' behaviour and knowing that these changes may be signs of abuse, neglect or exploitation. Challenging behaviour may be an indicator of abuse.
- 9.5 All of our staff will reassure our apprentices that their concerns and disclosures will be taken seriously and that they will be supported and kept safe.
- 9.6 It is expected that employers of apprentices will have their own safeguarding policies which learners are expected to read and understand. Our DSL will liaise with employer safeguarding officers, in line with policies and procedures as required.

10 Legislation

The following safeguarding legislation and guidance has been considered when drafting this policy:

- Keeping Children Safe in Education (2025), DfE – in force from September 2025.
- Working Together to Safeguard Children (2025), HM Government.
- What to do if you're worried a child is being abused (2015).
- The Teacher Standards (2012).
- The Safeguarding Vulnerable Groups Act (2006).
- Section 157 of the Education Act (2002).
- The Education (Independent School Standards) Regulations (2014).
- The Domestic Abuse Act (2021).
- PACE Code C (2019).
- Information sharing: advice for practitioners providing safeguarding services (2025): <https://www.gov.uk/guidance/data-protection-in-schools>.
- Statutory Framework for the Early Years Foundation Stage (EYFS).

11 Roles and Responsibilities

11.1 The Company

- 11.1.1 Support the development of every learner in ways which foster security, confidence and independence.
- 11.1.2 Provide learning environments, both physical and remote, in which learners feel safe, valued and respected.

- 11.1.3 Implement preventative safeguarding measures to help raise awareness of safeguarding and protect learners from maltreatment or harm.
- 11.1.4 Ensure learners have an awareness of safeguarding and understand how to access support.
- 11.1.5 Ensure the employers we work with are aware of their safeguarding obligations through familiarisation with relevant legislation. Take steps to understand safeguarding in practice within their organisation and the responsibilities they hold for the people they employ. We will work with employers to provide guidance and support and ensure they understand their responsibilities for reporting any concerns through our procedures.
- 11.1.6 Maintain open channels of communication with our employers. Learners may act very differently depending on their environment and may feel more comfortable discussing sensitive issues with different people.
- 11.1.7 Ensure that safer recruitment measures are implemented for staff working in regulated activity with learners.
- 11.1.8 Employ designated members of staff responsible for raising awareness of safeguarding and Prevent, and for providing specialist support to staff and learners.
- 11.1.9 Support all staff affected by their experiences of safeguarding concerns and protect learners by encouraging staff to share concerns using the confidential reporting process by contacting the lead safeguarding officer.
- 11.2 The Designated Safeguarding Lead
 - 11.2.1 Ensuring safeguarding and child protection policies are known, understood and used appropriately by staff.
 - 11.2.2 Working with the Board of Varsity Training to ensure that child protection policies are reviewed annually and that procedures are reviewed regularly.
 - 11.2.3 Acting as a source of support, advice and expertise for all staff on child protection and safeguarding matters.
 - 11.2.4 Liaising with the CEO / Board of Directors regarding ongoing enquiries under section 47 of the Children Act 1989 and police investigations, and being aware of the requirement for children to have an Appropriate Adult in relevant circumstances.
 - 11.2.5 Acting as a point of contact with the three safeguarding partners.
 - 11.2.6 Making and managing referrals to social care, the police, or other agencies.
 - 11.2.7 Taking part in strategy discussions and inter-agency meetings.
 - 11.2.8 Liaising with the case manager, LADO and the designated officer(s) at the local authority if allegations are made against staff.

11.2.9 Making staff aware of training courses and the latest local safeguarding arrangements available.

11.2.10 Transferring data and records to appropriate persons as required for safeguarding cases.

11.2.11 Referral to partner organisations' Designated Safeguarding and Prevent Officer for support and assessment of concern.

11.2.12 Working with the CEO to ensure that the relevant recruitment requirements are met.

11.2.13 Reporting to the Board of Directors about the standard of safeguarding in the company. The Designated Safeguarding Lead takes lead responsibility for safeguarding and child protection, including online safety, at Varsity Training.

11.2.14 Checking emails for any safeguarding referrals daily and responding to telephone calls for concerns on the same working day (as soon as possible).

11.3 The Deputy Designated Safeguarding Lead

11.3.1 Deputy DSLs are trained to the same level as the DSL and support the DSL with safeguarding matters on a day-to-day basis. The ultimate lead responsibility for child protection remains with the DSL.

11.3.2 The Deputy DSL will deputise in the absence of the DSL.

11.4 The Varsity Board of Directors

11.4.1 The role of the Board of Directors is to provide support and challenge to the DSL. The Board will review the management of safeguarding through Board meetings so that the safety and wellbeing of children can continuously improve.

11.4.2 Key roles include:

- Understanding the requirements of Keeping Children Safe in Education (2025).
- Supporting and challenging the standards of safeguarding company-wide.
- Confirming that consistent and compliant safeguarding practice takes place across the company.
- Meeting regularly with the DSL to discuss safeguarding issues and agree actions to continuously improve safeguarding practice.

11.5 All Staff

All staff have a duty to:

11.5.1 Understand and fulfil safeguarding responsibilities as outlined in this policy and related procedures, reporting structures and supporting documents.

11.5.2 Ensure that all learner data is kept confidential in line with the apprenticeship college data protection policy.

11.5.3 Report any safeguarding concerns or disclosures immediately to a safeguarding officer in line with the reporting procedure and supporting guidance.

11.5.4 Maintain strict confidentiality with learners in line with policy and guidance.

11.5.5 Engage in safeguarding and Prevent training and complete safeguarding assessments where required.

11.5.6 Access additional information, advice and support when appropriate.

11.5.7 Act on the basis that the welfare of the learner is of paramount concern and, if in doubt, immediately seek advice from a safeguarding officer.

11.5.8 Have an awareness of contextual safeguarding. This is an approach to understanding and responding to learners' experiences of significant harm beyond their families. It recognises that relationships formed in neighbourhoods, peer groups and online environments may involve violence or abuse and that learners may be vulnerable beyond their immediate home environment. Extra-familial harm can take a variety of forms, including:

- Sexual exploitation
- Criminal exploitation
- Online abuse
- Peer-on-peer and relationship abuse
- Risks associated with gangs
- Risks associated with radicalisation
- Safeguarding risks in public spaces
- Trafficking and modern slavery

11.5.9 Recognise that safeguarding information will only be shared with individuals who need to be made aware in order to appropriately discharge responsibilities and duty of care.

11.5.10 Immediately disclose information which, if not shared, may compromise a learner's safety or welfare. All staff will be supported by the safeguarding team.

11.5.11 Endeavour to share the intention to report a concern with parents or carers and the learner where appropriate, unless doing so would place the learner at greater risk of harm.

11.5.12 Uphold a zero tolerance approach to all forms of harassment and abuse. Inappropriate behaviour will not be tolerated or dismissed as banter. Staff are empowered to challenge inappropriate behaviour and report concerns.

12 Apprentices who may be vulnerable

Some young people and adults are at greater risk of abuse. This increased risk can be caused by many factors including social exclusion, isolation, discrimination and prejudice. To ensure that all of our learners receive equal protection, we give special consideration to apprentices who:

- 12.1 Are vulnerable because of their race, ethnicity, religion, disability, gender identity or sexuality.
- 12.2 Are vulnerable to being bullied, or engaging in bullying.
- 12.3 Are at risk of sexual exploitation, forced marriage, female genital mutilation, or being drawn into extremism.
- 12.4 Live in chaotic or unsupportive home situations.
- 12.5 Live transient lifestyles, live away from home, or live in temporary accommodation.
- 12.6 Are affected by parental substance abuse, domestic violence or parental mental health needs.
- 12.7 Do not have English as a first language.

13 Apprentices who may have special educational needs and disabilities

13.1 Young people and adults with special educational needs (SEN) and disabilities can face additional safeguarding challenges. Additional barriers can exist when recognising abuse and neglect in this group, which can include:

- Assumptions that indicators of possible abuse, such as behaviour, mood and injury, relate to the person's disability without further exploration.
- Being more prone to peer group isolation.
- The potential for those with SEN and disabilities to be disproportionately impacted by behaviours such as bullying without outwardly showing signs.
- Communication barriers and difficulties in overcoming these barriers.

13.2 Our staff are trained to be aware of and identify these additional barriers to ensure this group of learners are appropriately safeguarded.

14 Apprentices missing from education or employment

- 14.1 At Varsity Training we closely monitor attendance and absence. Tutors contact apprentices or their sponsoring settings where attendance is a concern. Where appropriate, we liaise with educational establishments to understand wider attendance and absence patterns.
- 14.2 Apprentices being absent from education or apprenticeship programmes for prolonged periods or on repeat occasions can be an indicator of abuse and neglect. This may include sexual abuse or exploitation, child criminal exploitation, mental health problems, risk of travelling to conflict zones, risk of female genital mutilation or risk of forced marriage. Staff are alert to these risks.

15 Mental Health

- 15.1 Apprenticeship providers have an important role to play in supporting the mental health and wellbeing of apprentices. Our apprenticeship curriculums and programmes actively consider and teach apprentices about mental health and wellbeing, including how to manage workload.
- 15.2 All staff are aware that mental health problems can be an indicator that an apprentice has suffered, or is at risk of suffering, abuse, neglect or exploitation.
- 15.3 Staff may also be aware, through disclosure, that apprentices have suffered experiences which can impact on their mental health, behaviour and education.
- 15.4 Where staff are concerned that an apprentice's mental health is also a safeguarding concern, this will be discussed with the DSL.

16 Apprentices who are lesbian, gay, bi, trans, intersex, asexual (LGBTQI+)

- 16.1 The fact that a learner may be LGBTQI+ is not in itself an inherent risk factor for harm. However, young people who are LGBTQI+, or perceived to be LGBTQI+, can be targeted by others. The risk can be compounded where learners lack a trusted adult with whom they can be open.
- 16.2 Our staff endeavour to reduce barriers and provide a safe space for apprentices to speak out or share concerns.

16.3 Our staff recognise the many unknowns about the impact of social transitioning and carefully consider the broad range of needs that apprentices may have. This is done in partnership with others, except in the exceptionally rare circumstances where involving parents would constitute a significant risk of harm to the child or young person. This position remains under review pending the outcome of consultation.

17 Child-on-Child Abuse

17.1 Child-on-child abuse, where children harm other children, is unacceptable and will be taken seriously. It will not be tolerated or dismissed as banter, jokes or part of growing up. While it is more likely that boys may be perpetrators and girls victims, all allegations are dealt with in the same manner regardless of gender.

17.2 All staff should be clear about the company's policies and procedures for addressing child-on-child abuse and maintain an attitude of "it could happen here".

17.3 Child-on-child abuse can take many forms, including:

- Physical abuse such as shaking, hitting, biting, kicking or hair pulling.
- Bullying, including cyberbullying, prejudice-based and discriminatory bullying.
- Sexual violence and harassment, including sexual assault, sexual comments, inappropriate sexual language, remarks or jokes.
- Causing someone to engage in sexual activity without consent, such as forcing someone to strip, touch themselves sexually or engage in sexual activity with a third party.
- Up-skirting, which involves taking a picture under a person's clothing without their knowledge for sexual gratification or to cause humiliation, distress or alarm.

17.4 When working with apprentices aged 16 or 17, staff must remain alert to the risk of child-on-child abuse. Abuse can occur even where there are no reports, and staff must report any concerns. Particular attention should be paid to online environments due to the nature of apprenticeship delivery. This type of abuse may also include:

- Bullying or cyberbullying, including prejudice-based and discriminatory bullying.
- Abuse in intimate personal relationships.
- Sexual violence, including online elements that facilitate, threaten or encourage abuse.
- Sexual harassment, including sexual comments, jokes, remarks and online harassment.
- Consensual and non-consensual sharing of nude or semi-nude images or videos, sometimes referred to as sexting.

18 Minimising Risk

18.1 Risk to under-age learners can be reduced through the following measures:

- Promoting an open and honest environment where learners feel safe and confident to share concerns and worries.
- Using training and induction programmes to outline acceptable and unacceptable behaviour.
- Ensuring learners are well supervised, particularly in environments where they may be vulnerable.
- Early involvement of other parties or agencies where there are concerns about individual learners.

19 Investigations of Child-on-Child Abuse

19.1 All allegations of child-on-child abuse must be passed immediately to the DSL, who will investigate and manage the allegation. This will include:

19.1.1 Gathering information by speaking to those involved as soon as possible.

19.1.2 Deciding on action. Where there is a belief that a learner is at risk of significant harm, a referral will be made to social care. The DSL will work with social care to determine next steps, which may include contacting the police. In other cases, the company behaviour policy may be followed alongside this Safeguarding and Child Protection Policy.

19.1.3 Informing parents or carers of under-18 apprentices where appropriate. The safety and wellbeing of the learner remains paramount, and where notifying parents may increase risk, advice will be sought from children's social care and/or the police before doing so.

19.1.4 Recorded – all concerns, discussions and decisions made, and the reasons for those decisions, will be recorded in writing, kept confidential and stored securely on the company child protection and safeguarding systems. Records will include a clear and comprehensive summary of the concern, details of how the concern was followed up and resolved, and a note of the action taken, decisions reached and the outcome.

19.1.5 Where allegations of a sexual nature are made, the company will follow the statutory guidance set out in Part 5 of *Keeping Children Safe in Education (2025)*.

19.1.6 Learners can report allegations or concerns of child-on-child abuse to any staff member. That staff member will pass the allegation to the DSL in accordance with this policy.

- 19.1.7 Our staff reassure all victims that they are taken seriously, regardless of how long it has taken them to come forward, and that they will be supported and kept safe. Staff will never give the impression that a victim is creating a problem by reporting sexual violence or sexual harassment, nor will victims be made to feel ashamed for making a report.
- 19.1.8 Abuse that occurs online or outside of our apprenticeships will not be downplayed and will be treated equally seriously. We recognise that sexual violence and sexual harassment occurring online can introduce a number of complex factors, including widespread abuse or harm across multiple social media platforms that can lead to repeat victimisation.
- 19.1.9 The support required for the learner who has been harmed will depend on their individual circumstances and the nature of the abuse. We will liaise with the learner's sponsor or employer to access employee assistance where appropriate.
- 19.1.10 Support may also be required for the learner who has caused harm. We will seek to understand why the learner acted in this way and consider what support may be required to help the learner and/or change behaviours. The consequences for the harm caused or intended will be addressed.

20 Serious Violence

- 20.1 All staff are made aware of indicators that children or learners may be at risk from, or involved with, serious violent crime. These indicators include increased absence, changes in friendships or relationships with older individuals or groups, a significant decline in performance, signs of self-harm or a significant change in wellbeing, and signs of assault or unexplained injuries. Unexplained gifts may also indicate that children have been approached by, or are involved with, individuals associated with criminal gangs.
- 20.2 All staff are made aware of the range of risk factors which increase the likelihood of involvement in serious violence. These may include being male, frequent absence, having experienced maltreatment, and involvement in offending behaviour such as theft or robbery.

21 Child Criminal Exploitation (CCE) and Child Sexual Exploitation (CSE)

21.1 Both CCE and CSE are forms of abuse and both occur where an individual or group takes advantage of an imbalance of power to coerce, manipulate or deceive a child into taking part in sexual or 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 and/or through violence or the threat of violence. This power imbalance can be due to a range of factors, including:

- Age
- Gender
- Sexual identity
- Cognitive ability
- Physical strength
- Status
- Access to economic or other resources

21.2 Abuse can be perpetrated by individuals or groups, males or females, and children or adults. They can be one-off occurrences or a series of incidents over time and may or may not involve force or violence. Exploitation can be physical and take place online.

21.3 Child Criminal Exploitation (CCE)

21.3.1 CCE can include children being forced or manipulated into transporting drugs or money through county lines, working in cannabis factories, shoplifting or pickpocketing, being forced or manipulated into committing vehicle crime or threatening or committing serious violence to others.

21.3.2 Children can become trapped by this exploitation as perpetrators can threaten victims (and their families) with violence or entrap and coerce them into debt. They may be coerced into carrying weapons such as knives or carry a knife for a sense of protection.

21.3.3 Children involved in criminal exploitation often commit crimes themselves. They may still have been criminally exploited even if the activity appears to be something they have agreed or consented to.

21.3.4 It is important to note that the experience of girls who are criminally exploited can be very different to that of boys and both boys and girls being criminally exploited may be at higher risk of sexual exploitation.

21.3.5 CCE indicators can include children who:

- appear with unexplained gifts or new possessions
- associate with other young people involved in exploitation
- suffer from changes in emotional well-being
- misuse drugs or alcohol
- go missing for periods of time or regularly return home late

- regularly miss education or do not take part in education

21.4 Child Sexual Exploitation (CSE)

21.4.1 CSE is a form of child sexual abuse which 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 clothing. It may include non-contact activities, such as involving children in the production of sexual images, forcing children to look at sexual images or watch sexual activities, encouraging children to behave in sexually inappropriate ways or grooming a child in preparation for abuse.

21.4.2 CSE can occur over time or be a one-off occurrence and may happen without the child's immediate knowledge, for example through others sharing videos or images of them on social media.

21.4.3 CSE can affect any child who has been coerced into engaging in sexual activities. This includes 16 and 17 year olds who can legally consent to have sex. Some children may not realise they are being exploited, for example they believe they are in a genuine romantic relationship.

21.4.4 Sexual exploitation is a serious crime and can have a long-lasting adverse impact on a child's physical and emotional health. It may also be linked to child trafficking.

21.4.5 CSE indicators can include those listed above.

21.4.6 Children who have older boyfriends or girlfriends.

21.4.7 Children who suffer sexually transmitted infections or become pregnant.

21.4.8 We include the risks of criminal and sexual exploitation in our RSE and health education curriculum. It is often the case that the child does not recognise the coercive nature of the exploitative relationship and does not recognise themselves as a victim.

21.4.9 Victims of criminal and sexual exploitation can be boys or girls and it can have an adverse impact on a child's physical and emotional health.

21.4.10 All staff are aware of the indicators that children are at risk of or are experiencing CCE or CSE.

21.4.11 All concerns are reported immediately to the DSL. Staff must always act on any concerns that a child is suffering from or is at risk of criminal or sexual exploitation.

22 Sharing nudes and semi-nudes

- 22.1 Sharing photos, videos and live streams online is part of daily life for many children and young people, enabling them to share their experiences, connect with friends and record their lives. Sharing nudes and semi-nudes means the sending or posting online of nude or semi-nude images, videos or live streams by young people under the age of 18. This could be via social media, gaming platforms, chat apps or forums, or carried out offline between devices via services like Apple's AirDrop.
- 22.2 The term 'nudes' is used as it is most commonly recognised by young people and more appropriately covers all types of image sharing incidents. Alternative terms used by children and young people may include 'dick pics' or 'pics'. Other terms used in education include 'sexting', 'youth produced sexual imagery' and 'youth involved sexual imagery'.
- 22.3 The motivations for taking and sharing nudes and semi-nudes are not always sexually or criminally motivated. Such images may be created and shared consensually by young people who are in relationships, as well as between those who are not in a relationship. It is also possible for a young person in a consensual relationship to be coerced into sharing an image with their partner. Incidents may also occur where:
- children and young people find nudes and semi-nudes online and share them claiming to be from a peer
 - children and young people digitally manipulate an image of a young person into an existing nude online
 - images created or shared are used to abuse peers, for example by selling images online or obtaining images to share more widely without consent to publicly shame

23 County Lines

- 23.1 County lines is a term used to describe gangs and organised criminal networks involved in exporting illegal drugs around the country using dedicated mobile phone lines. Children and vulnerable adults are exploited to move, store and sell drugs and money, with offenders often using coercion, intimidation, violence and weapons to ensure compliance of victims.
- 23.2 County lines exploitation can occur where an individual or group takes advantage of an imbalance of power to coerce, manipulate or deceive a child. Children can be targeted and recruited into county lines in a number of locations, including schools and colleges.
- 23.3 Additional specific indicators that may be present where a child is criminally exploited include children who:
- go missing and are subsequently found in areas away from home
 - have been the victim or perpetrator of serious violence (for example knife crime)

- are involved in receiving requests for drugs via a phone line, moving drugs, handing over and collecting money for drugs
 - are exposed to techniques such as 'plugging', where drugs are concealed internally to avoid detection
 - are found in accommodation with which they have no connection or in a hotel room where there is drug activity
 - owe a 'debt bond' to their exploiters
 - have their bank accounts used to facilitate drug dealing
- 23.4 All staff are aware of indicators that children are at risk from or experiencing criminal exploitation. The main indicator is increased absence during which time the child may have been trafficked for the purpose of transporting drugs or money.

24 Domestic Abuse (DA)

- 24.1 The Domestic Abuse Act 2021 introduces a legal definition of domestic abuse and recognises the impact of domestic abuse on children if they see, hear or experience the effects of abuse.
- 24.2 Domestic abuse is any incident or pattern of incidents of controlling, coercive, threatening behaviour, violence or abuse, between those aged 16 or over who are, or have been, intimate partners or family members regardless of gender or sexuality. It includes people who have been or are married, are or have been civil partners, have agreed to marry one another or each have or have had a parental relationship in relation to the same child. It can include psychological, physical, sexual, financial and emotional abuse.
- 24.3 Anyone can be a victim of domestic abuse, regardless of sexual identity, age, ethnicity, socioeconomic status, sexuality or background and domestic abuse can take place inside or outside of the home. This means children can also be victims of domestic abuse.
- 24.4 Children and young adults can witness and be adversely affected by domestic violence in their home life. Experiencing domestic abuse and exposure to it can have a serious emotional and psychological impact on children and young adults, and in some cases, they may blame themselves for the abuse or may have had to leave the family home as a result. All of which can have a detrimental and long-term impact on their health, wellbeing, development and ability to learn. All our staff understand that seeing, hearing and experiencing the effects of domestic abuse can have a significant impact on children.
- 24.5 All staff are aware of the impact domestic violence can have on a child. If any of our staff are concerned that a child has witnessed domestic abuse, they will report their concerns immediately to the DSL.

25 Honour-Based Abuse (HBA)

- 25.1 So-called 'honour-based' abuse (HBA) encompasses actions taken to protect or defend the honour of the family and/or the community, including female genital mutilation (FGM), forced marriage and practices such as breast ironing.
- 25.2 Abuse committed in the context of preserving "honour" often involves a wider network of family or community pressure and can include multiple perpetrators. Our staff are aware of this dynamic and additional risk factors and we take them into consideration when deciding what safeguarding action to take.
- 25.3 If staff are concerned that a child may be at risk of HBA or who has suffered from HBA, they should speak to the designated safeguarding lead.

26 Female Genital Mutilation (FGM)

- 26.1 FGM comprises all procedures involving partial or total removal of the external female genitalia or other injury to the female genital organs. It is illegal and a form of child abuse with long-lasting harmful consequences.
- 26.2 FGM is carried out on females of any age, from babies to teenagers to women. Our staff are trained to be aware of risk indicators, including concerns expressed by girls about going on a long holiday during the summer break. If staff are concerned that a child may be at risk of FGM or who has suffered FGM, they should speak to the designated safeguarding lead.
- 26.3 Our trainers are also under legal duty to report to the police where they discover that FGM has been carried out on a child under 18. In such circumstances, our apprenticeship trainers will personally report the matter to the police as well as informing the designated safeguarding lead.

27 Forced Marriage

- 27.1 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. Coercion may include physical, psychological, financial, sexual and emotional pressure or abuse.
- 27.2 Forced marriage is illegal. It is also illegal to carry out any conduct whose purpose is to cause a child to marry before their eighteenth birthday, even if violence, threats or another form of coercion are not used. As with the existing forced marriage law, this applies to non-binding, unofficial 'marriages' as well as legal marriages.

- 27.3 Our staff are trained to be aware of risk indicators, which may include being taken abroad and not being allowed to return to the UK.
- 27.4 Forced marriage is not the same as arranged marriage, which is common in many cultures.
- 27.5 If staff are concerned that a child may be at risk of forced marriage, they should speak to the designated safeguarding lead.

28 Extremist Ideology and Radicalisation - PREVENT

- 28.1 Extremism is defined 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. Radicalisation refers to the process by which a person comes to support terrorism and extremist ideologies associated with terrorist groups. Whilst Islamic fundamentalism is the most widely publicised, extremism and radicalisation can occur in other cultures, religions and beliefs, including the far right and white supremacy. Our staff are trained to identify those at risk of being radicalised or drawn into extremism.
- 28.2 An important part of our safeguarding duty is the prevention of extremism and radicalisation. As part of the Counter-Terrorism and Security Act 2015, we are required to pay due regard to the need to prevent individuals from being drawn into terrorism.
- 28.3 There is no single way of identifying a person who may be vulnerable to extremist ideology, and it is often the culmination of a number of influences which can include family, friends or relationships they have made online or in the physical world. Extremism can also include non-violent action.
- 28.4 All staff are expected to undertake training and awareness raising and be familiar with the preventing extremism and radicalisation policy.
- 28.5 All learners are expected to undertake training and awareness raising as part of their programme of learning.
- 28.6 An important part of Prevent is the promotion of British values. These are the norms that shape our society, and which are enshrined in law, through legislation such as the Equality Act 2010. British values are described as:
- democracy
 - the rule of law
 - individual liberty and mutual respect
 - tolerance for those with different faiths and beliefs

- 28.7 All learners are encouraged to explore ideas in a context where these values are recognised and respected.
- 28.8 If staff are concerned regarding the ideology being shared by a learner, they should speak to a DSL or immediately refer to PREVENT.

29 Online Safety

- 29.1 The increasing use of the internet and digital technology has presented huge opportunities to enrich the learning environment for our learners through the use of online classrooms, e-portfolios and learning software, and to support them to expand their personal horizons and skills in the digital space. If we are to provide our learners with access to and engagement with online content, we need to ensure they have the skills to be able to use the internet safely and develop appropriate online behaviours.
- 29.2 It is essential that learners are safeguarded from potentially harmful and inappropriate online material. As well as educating learners about online risks, we have appropriate and effective filtering and monitoring systems in place to limit the risk of learners being exposed to inappropriate content, subjected to harmful online interaction with other users and to ensure their own personal online behaviour does not put them at risk.
- 29.3 Empowering our learners to be active and ethical digital citizens requires building capacity to safely navigate the digital space. Digital environments bring enormous opportunity, but also risks.
- 29.4 Our learners need to be aware of ways in which they can protect themselves online and ensure the security of their personal data. Online safety risks can be categorised into four areas of risk:
- Content: being exposed to illegal, inappropriate or harmful content such as pornography, fake news, misogyny, self-harm, suicide, radicalisation and extremism
 - Contact: being subjected to harmful online interaction with other users such as peer-to-peer pressure and adults posing as children or young adults to groom or exploit
 - Conduct: personal online behaviour that increases the likelihood of, or causes, harm such as making, sending and receiving explicit images, sharing other explicit images and online bullying
 - Commerce: risks such as online gambling, inappropriate advertising, phishing or financial scams
- 29.5 An important part of our learners' development is becoming a critical thinker. Developing a critical mindset will also help learners to examine and assess the validity and authenticity of information online.
- 29.6 Additional online safety training will be provided to learners who are aged 16 or 17 years of age.

- 29.7 Company devices and systems are managed via an IT management service provider who provide appropriate filtering and monitoring, cyber security and user guidance and support. When learners and staff use our equipment, it is monitored closely and suitable firewalls and software safeguards have been installed to prevent any unauthorised or harmful attacks. All staff have received cyber and online safety awareness training.
- 29.8 Any concern regarding online behaviour or use will be responded to in line with our safeguarding reporting procedure and other relevant policies.
- 29.9 All staff are aware of these risk areas and should report any concerns to the DSL.
- 29.10 Monitoring and filtering standards are in place in line with KCSIE (2025) and DFE Data Standards (2024). Monitoring and filtering are important tools for protecting children and learners from harmful content online. These include:
- **Online Safety Policy:** our online safety policy that sets out the approach to managing online safety risks, including clear policies on monitoring and filtering internet access
 - **Appropriate Filtering:** appropriate filtering to block access to harmful content such as pornography, extremist materials and content that could be harmful to children
 - **Regular Reviews:** regular review of filtering systems to ensure they are effective and up-to-date
 - **Staff Training:** staff receive training on how to use filtering systems effectively and how to recognise and respond to signs of online abuse
 - **Apprentice Training:** as part of enrolment and induction, apprentices receive training in online safety and social media
 - **Proportionality:** monitoring or filtering must be proportionate to the risk and must not infringe on children's rights to privacy

30 Staff and Learner Relationships

- 30.1 Staff understand that inappropriate behaviour towards learners is unacceptable. It is a criminal offence for staff to engage in any sexual activity with a learner under the age of 18.
- 30.2 Staff receive guidance on personal online activity and clear rules exist regarding electronic communication and online contact with learners. Breaches of these rules are treated as serious disciplinary matters.
- 30.3 The Code of Conduct outlines expectations of staff behaviour.

31 Allegations Against Staff

- 31.1 The company's procedures on dealing with allegations made against staff or workers are outlined at Appendix 2.
- 31.2 All staff and workers are expected to ensure their behaviour during the course of their employment within and outside of the workplace is consistent with the company's Code of Conduct.
- 31.3 If a safeguarding concern or allegation is made about a member of staff, our set procedures outlined at Appendix 2 must be followed.
- 31.4 The full procedure for managing such allegations or concerns is set out in Part Four of Keeping Children Safe in Education 2025.
- 31.5 Safeguarding concerns or allegations made about staff who no longer work at the company will be reported to the police.

32 Allegations That Meet the Harm Threshold (against staff)

- 32.1 An allegation of harm is defined as:
- behaved in a way that has harmed a child, or may have harmed a child; and/or
 - possibly committed a criminal offence against or related to a child; and/or
 - behaved towards a child or children in a way that indicates he, she or they may pose a risk of harm to children; and/or
 - behaved or may have behaved in a way that indicates they may not be suitable to work with children and young people
- 32.2 The Company, through the DSL, will ensure that in all of these circumstances the Local Authority Designated Officer is contacted for advice on how to proceed.

32.3 Allegations of harm will likely be dealt with in line with the Company's Disciplinary Policy.

33 Low-Level Concerns That Do Not Meet the Harm Threshold (against staff)

33.1 Low level concerns are defined as:

- allegations that do not meet the harm threshold
- behaviour that is inconsistent with the Company's Code of Conduct
- behaviour that causes a sense of unease or a 'nagging doubt'

33.2 More information about low level concerns is outlined at Appendix 3.

34 Reporting Concerns (allegations of harm / low level concerns)

34.1 All staff will never need to apologise for staying vigilant or reporting concerns.

34.2 No concern is too big or too small. All staff must believe that 'it can happen here' to avoid complacency setting in.

34.3 Staff should ensure that if they are in doubt, they will report the concern anyway.

34.4 Appendix 4 outlines who staff should report concerns should they arise. Allegations against staff should be reported to the designated senior leader for safeguarding. Allegations against the DSL should be reported to the Head of Apprentices.

34.5 Staff may also report their concerns directly to children's social care or the police if they believe direct reporting is necessary to secure action.

34.6 Staff will be provided appropriate feedback when they raise concerns so that they are reassured that their concern has been dealt with.

35 Safeguarding Training

35.1 Annual safeguarding training includes changes to Keeping Children Safe in Education, Working with Children and Young People and then complemented by the company's safeguarding CPD throughout the year.

35.2 All staff receive ongoing safeguarding training throughout the year and set out in the company's safeguarding CPD in areas including but not limited to online safety, signs of abuse, FGM, Prevent.

- 35.3 Staff will receive updates throughout the year through e.g. emails, SharePoint, news etc. Staff are expected to read and remain up to date.
- 35.4 New staff receive safeguarding training within the first week of their employment with the company. They are provided with:
- Online training that covers an introduction to safeguarding and the basic principles of safeguarding.
 - A new starter induction that includes detailed safeguarding training that covers statutory KCSiE information, Varsity Training Safeguarding Principles and detailed information on internal safeguarding arrangements.
 - Local contextualised safeguarding induction where staff are provided with information from the DSL on local safeguarding arrangements to include information on the Safeguarding Policy, recording cause for concern protocol, identification of the safeguarding team and information on local reporting procedures.
 - Our DSLs receive additional training to ensure they can sufficiently uphold the duties and responsibilities of the role.

36 Safer Recruitment

- 36.1 The company's approach to safer recruitment is set out in the Safer Recruitment Policy. All those involved with the implementation of safer recruitment are required to adhere to this policy as part of their professional responsibilities.
- 36.2 The Safer Recruitment Policy is compliant with Keeping Children Safe in Education 2025 and is reviewed annually.
- 36.3 The Safer Recruitment Policy also includes our approach to ensuring that workers are subject to the appropriate checks that are required in line with Keeping Children Safe in Education.
- 36.4 All relevant staff are made aware of the disqualification from childcare guidance and their obligations to disclose to us relevant information that could lead to disqualification.
- 36.5 No worker is allowed to start work within Varsity Training unless they have been subject to the appropriate pre-employment checks including enhanced disclosure and barring service (DBS) where required. Any breach of this will be dealt with as a serious conduct issue.
- 36.6 The Company ensures that Varsity Training maintains their own single central record.

- 36.7 The single central record will be formally reviewed and audited annually during the Autumn Term by the Designated Senior Leader. In addition, best practice reviews of the SCR will be implemented during Spring and Summer so that there are at least three reviews annually. These may be conducted by the DSL or General Manager.
- 36.8 Recruitment processes will include safeguarding questions and vetting processes will include reviewing of information via applications and statements. A safeguarding statement will be used.

37 Safeguarding and Child Protection Procedures

- 37.1 Abuse, neglect and exploitation are forms of maltreatment. Somebody may abuse, neglect or exploit a child or young adult by inflicting harm or by failing to act to prevent harm. Abuse may be committed by adult men or women and by other children and young people.
- 37.2 Keeping Children Safe in Education 2025 refers to four categories of abuse. These are set out at Appendix One along with indicators of abuse.

37.3 Taking Action

Any learner could become a victim of abuse. Key points for staff to remember for taking action are:

- 37.3.1 In an emergency, take the action necessary to help the child. If necessary, call 999.
- 37.3.2 Complete a record of concern form and report the concern to the DSL as soon as possible.
- 37.3.3 Share information on a need-to-know basis only and do not discuss the issue with colleagues, friends or family.

37.4 If you are concerned with a learner's welfare

- 37.4.1 Staff may suspect that a learner may be at risk. This may be because the learner's behaviour has changed, their appearance has changed or physical signs are noticed. In these circumstances, staff will give the pupil the opportunity to talk and ask if they are OK.
- 37.4.2 If the learner does reveal that they are being harmed, staff should follow the advice below.

37.4.3 Staff are aware that the learner may not feel ready or know how to tell someone that they are being abused, exploited, or neglected, and/or they may not recognise their experiences as harmful. They may feel embarrassed, humiliated, or being threatened, which could be due to their vulnerability, disability and/or sexual orientation or language barriers. This will not prevent our staff from having a professional curiosity and speaking to our DSL if they have concerns about a young person or learner.

37.5 If a learner discloses

37.5.1 If a learner tells a member of staff about a risk to their safety or wellbeing, the staff member will:

- remain calm and not overreact;
- allow them to speak freely;
- not be afraid of silences;
- not ask investigative questions;
- give reassuring nods or words of comfort – “I’m so sorry this has happened”, “I want to help”, “This isn’t your fault”, “You are doing the right thing in talking to me”;
- not automatically offer physical touch as comfort;
- let them know that in order to help them they must pass the information on to the DSL;
- tell the learner what will happen next;
- complete the company reporting process and pass it to the DSL as soon as possible;
- report via telephone to the DSL that a safeguarding concern has been made as soon as possible.

37.6 Referral to Children’s Social Care

37.6.1 The DSL will make a referral to children’s social care if it is believed that a learner (aged 16 or 17) is suffering or is at risk of suffering significant harm. The learner (subject to their age and understanding) and the parents will be told that a referral is being made, unless to do so would increase the risk to the child.

37.7 Reporting directly to child protection agencies

37.7.1 Staff should follow the reporting procedures outlined in this policy. However, they may also share information directly with children’s social care or the police if they are convinced that a direct report is required or if the Designated Safeguarding Lead or the deputy are not available and a referral is required immediately.

37.8 Sharing information and confidentiality

37.8.1 Child protection issues necessitate a high level of confidentiality. Staff should only discuss concerns with the Designated Safeguarding Lead or Deputy Designated Safeguarding Lead. Where concerns relate to the DSLs, then the concern should be raised with the Head of Apprentices.

38 Sharing Information

- 38.1 The DSL will normally obtain consent to share safeguarding information. Where there is good reason to do so, the DSL may share information without consent, and will record the reason for deciding to do so.
- 38.2 Information sharing will take place in a timely and secure manner and only when it is necessary and proportionate to do so and the information to be shared is relevant, adequate and accurate.
- 38.3 Information sharing decisions will be recorded, whether or not the decision is taken to share.
- 38.4 The UK GDPR and the Data Protection Act 2018 do not prevent staff from sharing information with relevant agencies, where that information may help to protect a child. If any member of staff receives a request from a learner or employer to see child protection or safeguarding records, they will refer the request to the Data Protection Officer. The company should refer to DfE Data Protection guidance for more information in data protection compliance.

39 Storage Information

- 39.1 Child protection / safeguarding information will be stored separately from the learners apprenticeship files. It will be stored and handled in line with our Retention and Destruction Policy.
- 39.2 Our GDPR policy and our Retention and Destruction policy is available on request.

40 Special Circumstances

40.1 Looked After Children (under 18 apprentices)

- 40.1.1 The most common reason for children becoming looked after is as a result of abuse or neglect. The company ensures that staff have the necessary skills and understanding to keep looked after children safe. Appropriate staff have information about a child's looked after status and care arrangements, including the level of authority delegated to the carer by the authority looking after the child. The designated teacher for looked after children and the DSL have details of the child's social worker and the name and contact details of the local authority's virtual head for children in care.

40.2 Learners with a social worker

40.2.1 Learners may need a social worker due to safeguarding or welfare needs. Apprentice employers and / or the Local authorities will share this information with us, and the DSL will hold and use this information to inform decision about safeguarding and promoting the learner's welfare.

40.3 Private fostering arrangements

40.3.1 A private fostering arrangement occurs when someone other than a parent or a close relative cares for a child for a period of 28 days or more, with the agreement of the child's parents. It applies to children under the age of 16, or aged under 18 if the child is disabled. By law, a parent, private foster carer or other persons involved in making a private fostering arrangement must notify children's services as soon as possible.

40.3.2 Where a member of staff becomes aware that a learner may be in a private fostering arrangement they will tell the DSL of the circumstances and appropriate liaison can be made.

Signed

CGriggs

Camilla Griggs

General Manager

Version log

Version	Change Detail	Effective From	Effective To	Approved By
1.3	Updated to reflect Keeping Children Safe in Education (2025)	10/10/2025	Not Set	David Maytham
1.2	Policy owner updated	01/09/2025	09/10/2025	David Maytham
1.1	Approved	01/09/2024	02/09/2025	David Maytham

41 Appendices

Appendix 1 – Four Categories of Abuse

It is vital that staff are also aware of the range of behavioural indicators of abuse and report any concerns to the designated safeguarding lead. It is the responsibility of staff to report their concerns.

All staff should be aware that abuse, neglect, exploitation and safeguarding issues are rarely stand-alone events that can be covered by one definition or label. In most cases, multiple issues will overlap with one another.

Physical abuse

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

- have bruises, bleeding, burns, bites, fractures or other injuries
- show signs of pain or discomfort
- keep arms and legs covered, even in warm weather
- be concerned about physical bruises which may be visible or hiding of injuries
- an injury that is not consistent with the account given
- symptoms of drug or alcohol intoxication or poisoning
- inexplicable fear of adults or over-compliance
- violence or aggression towards others including bullying
- isolation from peers

Emotional abuse

Emotional abuse is 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 to a child 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 or how they communicate. It may feature age or developmentally inappropriate expectations being imposed on children. These may include interactions that are beyond a child's developmental capability, as well as overprotection and limitation of exploration and learning, or preventing the child participating in normal social interaction. It may involve seeing or hearing the ill-treatment of another. It may involve serious bullying (including cyber bullying), causing children frequently to feel frightened or in danger, or the exploitation or corruption of children. Some level of emotional abuse is involved in all types of maltreatment of a child, although it may occur alone. The following may be indicators of emotional abuse:

- the child consistently describes him/herself in negative ways
- over-reaction to mistakes
- delayed physical, mental or emotional development
- inappropriate emotional responses, fantasies
- self-harm
- drug or solvent abuse
- running away
- appetite disorders – anorexia nervosa, bulimia; or
- soiling, smearing faeces, enuresis

Sexual abuse

Sexual abuse involves forcing or enticing a child or young person to take part in sexual activities, not necessarily involving a high level of violence, whether or not the child 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 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.

Sexual abuse is not solely perpetrated by adult males. Women can also commit acts of sexual abuse, as can other children. The following may be indicators of sexual abuse:

- sexually explicit play or behaviour or age-inappropriate knowledge
- aggressive behaviour including sexual harassment or molestation
- clothing issues e.g. pulling down sleeves, inappropriate clothing for weather
- anal or vaginal discharge, soreness or scratching
- bruises or scratches in the genital area
- reluctance to go home
- refusal to communicate
- depression or withdrawal
- isolation from peer group
- eating disorders, for example anorexia nervosa and bulimia
- self-harm
- substance abuse
- acquire gifts such as money or a mobile phone from new 'friends'

Neglect

Neglect is 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, for example, as a result of maternal substance abuse. Once a child is born, neglect may involve a parent or carer failing to:

- provide adequate food, clothing and shelter (including exclusion from home or abandonment);
- protect a child from physical and emotional harm or danger;
- ensure adequate supervision (including the use of inadequate care-givers); or

- ensure access to appropriate medical care or treatment.

It may also include neglect of, or unresponsiveness to, a child's basic emotional needs. The following may be indicators of neglect:

- constant hunger or stealing, scavenging and/or hoarding food
- frequent tiredness
- frequently dirty or unkempt
- poor attendance or often late
- poor concentration
- illnesses or injuries that are left untreated
- failure to achieve developmental milestones or to develop intellectually or socially
- responsibility for activity that is not age appropriate such as cooking, ironing, caring for siblings
- the child is left at home alone or with inappropriate carers

The following may be indicators of exploitation:

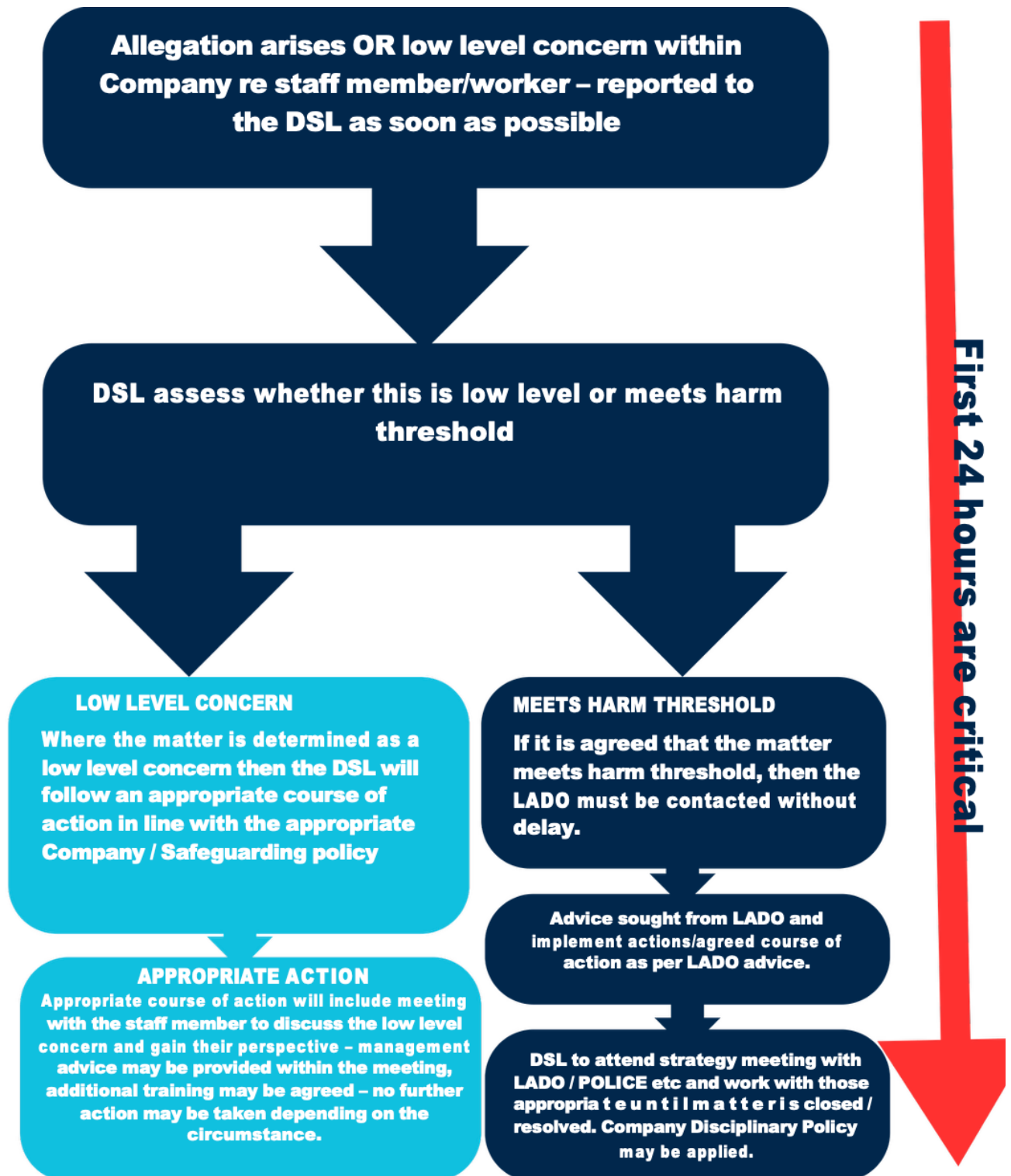
Common signs that may suggest someone is being exploited include the following:

- friendships, relationships or association with controlling individuals or groups
- isolation from peers and social networks
- unexplained injuries, ill health, or suspicion of assault
- changes in emotional wellbeing
- changes in behaviour and lifestyle
- going missing
- secretiveness
- concerning use of the internet, social media or mobile phones
- unexplained acquisition, or loss, of money and personal items

This is not an exhaustive list, and signs of concern will differ between people and situations.

- grooming and exploitation are usually gradual processes – changes in someone's appearance, behaviour and personal circumstances are often small, gradual, and may not be noticed immediately.
- sometimes people may appear positive and confident – they may be unaware that they are being exploited or view their involvement positively, especially if they have been groomed.

41.1 Appendix 2 - Allegations Management Process



If a complaint is made against the DSL or DDSL, it should be directed to the General Manager, who is supported by the Board of Governors.

41.2 Appendix 3 - Low level concerns guidance for staff

All staff are expected to report concerns, no matter how small, about their own behaviour or that of another member of staff working at Varsity Training. Leaders work with staff to actively create and embed a culture of openness, trust and transparency in which the clear values and expected behaviour set out in the “Guidance for safer working practice for those working with children and young people in education settings” is followed.

Definition of a low-level concern

- Allegations that do not meet the harm threshold
- Behaviour that is inconsistent with the Company’s Code of Conduct
- Behaviour that causes a sense of unease or a ‘nagging doubt

Reporting a low level concern

Where a low-level concern has been identified this will be reported as soon as possible to the DSL. However, it is never too late to share a low-level concern if this has not already happened. If the low level concern is about the DSLs or the Board, Appendix 4 provides information on who the most appropriate people are to report.

Recording concerns

A summary of the low-level concern should be written down, signed, timed, dated and shared by the person bringing the information forward. Where concerns are reported verbally (by telephone) to the DSL and record via the company safeguarding reporting system.

Responding to low-level concerns

Where a low-level concern has been raised this will be taken seriously and dealt with promptly. The DSL will:

- Seek advice as required from external agencies
- Speak to the person reporting the concern to gather all the relevant information and gain their response, The discussion may be held in line with the informal stages of the Disciplinary Policy.
- Where necessary further fact finding will be carried out to gather all relevant information. This may involve speaking to anyone else who may have been witness to the low level concern.
- Outline their expectations with the staff member moving forwards on correcting their behaviour
- Reissue them with a copy of the Code of Conduct and ask the staff member to re-familiarise themselves with the expectations of the document
- Implement any follow up actions, eg additional training/supervision required Follow up the discussion in writing and share this with the staff member

- The DSL or line manager should ensure that the employee understands that failure to improve or a repeat of the behaviour may lead to further action being taken.

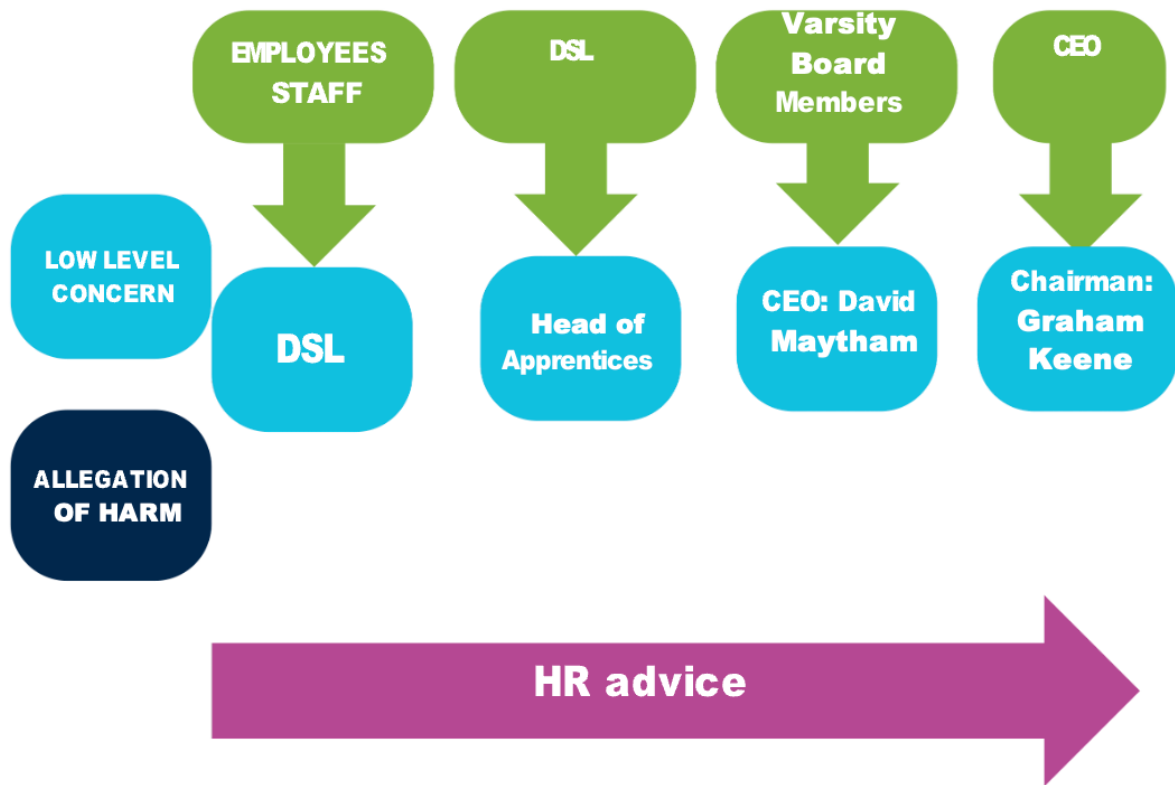
Can the reporting person remain anonymous?

The reporting member of staff can remain anonymous at the point of low level concerns reporting. However, they may be identifiable depending on the nature of the concern raised. No staff member will be subject to detrimental treatment having raised concerns. If they are, they must report this immediately so that it can be dealt with by leaders.

Should staff report concerns about themselves (i.e. self-report)?

It may be the case that a person finds themselves in a situation which could be misinterpreted, or might appear compromising to others; or they may have behaved in a manner which on reflection they consider falls below the standard set out in the Code of Conduct. In these circumstances they should self-report. This will enable a potentially difficult situation to be addressed at an early opportunity if necessary.

41.3 Appendix 4 – Who to Report to



41.4 Appendix 5 – Remembering the 4 R's of safeguarding children

1. **Recognising** – the signs of abuse. This may be emotional, sexual, physical or neglect (see Key definitions section below).

2. **Recording** – the information you have, to the best of your ability, without adding your own opinions.

3. **Reporting** – to the designated Safeguarding Lead who may also need to report to the Safeguarding Panel to decide the next steps.

4. **Referral** – to the appropriate external agencies.

- Police
- Local safeguarding Partnership
- Children's Social Care Services
- Disclosure & Barring Service

41.5 Appendix 6 – Sharepoint Reporting Safeguarding Concerns Protocol

At Varsity Training, Sharepoint is used to report safeguarding concerns. All members of staff have access to Sharepoint and it is accessible 24 hours a day. Staff should fill in all details as required. When completing details of the concern, staff should be as thorough as possible, and use the learners exact language.

Staff should record:

- Learners first name
- Learners last name
- Date and time of concern
- Date and time of reporting
- Name of reporter
- Category of concern (select most appropriate from the drop down)
- Outline of events (detail and learner voice should be included)

The following timescales should be used to report safeguarding concerns.

- **Low level concerns** where learner is not at immediate risk: reported on the Sharepoint Safeguarding Log by end of the same working day (by 5.30pm) and email to the DSL (also by end of working day).
- **Where learner might be of imminent risk:** immediate (or as soon as possible) reporting to DSL via telephone **and** email. Immediate (or as soon as possible) reporting on to Sharepoint.

DSLs should check emails daily, during their working hours and respond to any concerns.

Telephone should also be checked at key times of the day e.g. lunchtime, end of the working day, to ensure swift pick up of any serious concern that is reported.

Where the DSL is unavailable at an immediate point, they should respond and make contact with the reporter as soon as is possible.

When responding to concerns, DSLs should complete the SharePoint Safeguarding log noting the action taken and whether any further action is required, and if so by when. They should then recomplete the log after any further action.

When the concern can be closed, this should also be shown by clicking the appropriate drop down on the safeguarding log