



## Safeguarding and Prevent Policy

### Safeguarding and Prevent Policy Statement

NEAT is passionate about safeguarding our learners. We have both a **statutory duty** to safeguard and promote the welfare of children, young people, and adults at risk of harm, and a **moral duty** to do so. We are committed to providing help and support at the earliest opportunity, meeting the needs of children, young people, and adults as soon as concerns emerge.

Our duty under the **PREVENT** strategy to protect learners from radicalisation is embedded in this policy. This includes vigilance to online risks such as **misinformation, disinformation (including fake news), and conspiracy theories**, in line with KCSIE 2025 updates. This policy and procedure set out how we recruit and train our trainers and consultants, support our apprentices, and deal effectively with allegations against staff.

The Safeguarding and Prevent Policy reflects the importance of our responsibility to work together to protect apprentices and staff from **physical, sexual, or emotional abuse, neglect, exploitation, bullying, and emerging online harms**. We are committed to providing a caring, friendly, and safe environment so that all apprentices can learn in a relaxed and secure atmosphere. Every apprentice should be able to participate fully in learning and social activities, in an enjoyable and safe environment, free from harm.

We recognise the statutory nature of **Working Together to Improve School Attendance** (effective September 2025) and will work closely with children's services where safeguarding concerns are linked to attendance or unexplained absence.

This policy applies to all staff, apprentices, visitors, contractors, volunteers, service providers, and subcontractors who may work with:

- **Children** (under 16)
- **Young people** (aged 16–24)
- **Vulnerable adults** (as defined in section 59 of the Safeguarding Vulnerable Groups Act 2006, and/or persons aged 18+ who, due to disability, age, illness, or other circumstances, may be unable to care for or protect themselves from harm or exploitation)

This includes all individuals encountered through any NEAT programmes, including those placed in **alternative provision**, where written confirmation of safeguarding checks will be obtained and arrangements reviewed at least half-termly, or sooner if concerns arise.



**The aims of this Policy are to:**

- Identify the expectations of staff in relation to safeguarding.
- Ensure relevant, effective, and regularly reviewed safeguarding practices are in place.
- Ensure the right of every applicant and apprentice to learn within a safe, supportive, and inclusive environment.
- Promote awareness to staff of the need to safeguard children, young people, and vulnerable adults, recognising that **safeguarding is everyone's responsibility**.
- Ensure that the fundamental rights and needs of our applicants and apprentices are observed and upheld.
- Prevent abuse through the pastoral and wellbeing support offered to all applicants and apprentices.
- Raise awareness of the different types of abuse, neglect, and exploitation, including emerging risks such as online harms, **misinformation, disinformation (including fake news), and conspiracy theories**, in line with the updated "4 Cs" of online safety in KCSIE 2025.
- Provide clear guidelines for staff in handling matters relating to actual or suspected abuse, neglect, or other safeguarding concerns.
- Ensure staff act with professionalism and integrity at all times.
- Deter unsuitable individuals from applying to NEAT by demonstrating our awareness and vigilance in relation to safeguarding through our website, recruitment materials, and job advertisements.
- Reject at interview stage any candidate where we have doubts about their suitability to work with our learners.
- Prevent the risk of abuse by ensuring robust procedures, safer recruitment practices, and safeguarding standards are in place and monitored.
- Ensure compliance with the statutory nature of **Working Together to Improve School Attendance** (effective September 2025), taking appropriate action where safeguarding concerns are linked to non-attendance.
- Maintain effective safeguarding arrangements for apprentices placed in **alternative provision**, ensuring written confirmation of checks is obtained and arrangements are reviewed at least half-termly or sooner if safeguarding concerns arise.
- Ensure that cyber security standards are met, taking appropriate action to protect sensitive information and safeguard against cyber threats, in accordance with KCSIE 2025 requirements.



- **Definition:**

Throughout this policy and procedure, reference is made to “children and young people” meaning those under the age of 18.

Safeguarding and promoting the welfare of children is defined as:

- Protecting children from maltreatment.
- Preventing impairment of children’s health or development.
- Ensuring that 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.

*(Adapted from Keeping Children Safe in Education 2025)*

### **Adults at Risk of Harm**

Throughout this policy, the term ‘**adults at risk of harm**’ refers to people aged 18 years or over who may need or receive community care services by reason of mental health difficulties, disability, age, or illness, and who may be unable to take care of themselves or protect themselves against significant harm, abuse, neglect, or exploitation.

This definition is consistent with the Care Act 2014 and builds on the earlier **No Secrets** guidance (Department of Health, 2000). The safeguarding procedures outlined in this policy apply, with appropriate adaptations, to all apprentices, regardless of age, where there is a safeguarding concern.

### **Vulnerable Learners**

NEAT recognises that some learners may be vulnerable due to their age, personal circumstances, health, learning needs, or social and economic factors. Vulnerability may be temporary or ongoing and may emerge at any stage of the learner journey.

As an Independent Training Provider delivering apprenticeships within the Early Years and Residential Childcare sectors, we are committed to ensuring that all learners are safe, supported and able to participate fully in their training and workplace learning.

A vulnerable learner may include individuals who:

- Are under the age of 18
- Have Special Educational Needs and/or Disabilities (SEND)
- Experience mental health or wellbeing concerns
- Are care experienced or care leavers
- Are young carers
- Are experiencing abuse, neglect, exploitation or domestic abuse
- Are at risk of radicalisation or extremism
- Are facing financial hardship, housing instability or other barriers to learning



NEAT will take appropriate steps to identify and support vulnerable learners through:

- Initial assessment and ongoing progress reviews
- Safeguarding reporting procedures
- Pastoral support from tutors and designated safeguarding staff
- Liaison with employers where concerns arise in the workplace
- Referral to external agencies where necessary

Staff are responsible for recognising potential vulnerabilities and reporting safeguarding concerns in accordance with the organisation's safeguarding procedures.

As apprentices are both learners and employees, NEAT works closely with employers to ensure that apprentices are supported in **both their training environment and workplace**. Employers are expected to provide safe working environments and to report any safeguarding concerns promptly.

NEAT maintains a trained Designated Safeguarding Lead (DSLs) who oversees safeguarding arrangements and ensure that concerns relating to vulnerable learners are managed appropriately and in line with statutory guidance.

Safeguarding vulnerable learners is central to NEAT's safeguarding culture and commitment to learner welfare.

### **Safeguarding in Apprenticeships and the Workplace**

As an apprenticeship provider, NEAT recognises that learners spend a significant proportion of their programme in the workplace as well as in training. Safeguarding therefore extends to both the learning environment and the employer setting.

NEAT works with employers to ensure that apprentices are placed in safe working environments where appropriate safeguarding practices are in place. Employers are made aware of their responsibilities to support the safety and wellbeing of apprentices and to report any safeguarding concerns promptly.

Progress reviews provide regular opportunities for learners to discuss their wellbeing, workplace experiences and any concerns they may have. Where safeguarding concerns arise within the workplace, the organisation will take appropriate action in line with safeguarding procedures and may work with employers and relevant external agencies to ensure the learner's safety.

Learners are informed about how to report concerns both within the organisation and within their workplace.

### **Legislative and Statutory Framework**



This policy has been created with reference to the following statutory and best practice guidance:

- *Working Together to Safeguard Children* (statutory guidance, 2023 update)
- SET Procedures (2015)
- Counter-Terrorism and Security Act (2015)
- *Keeping Children Safe in Education* (2025)
- *Working Together to Improve School Attendance* (statutory guidance, 2025)

## **Radicalisation and Prevent**

Radicalisation is defined as the act or process of making a person more radical or more inclined to adopt extreme political, religious, or ideological beliefs. Extremism is defined as holding views that are far outside the mainstream attitudes of society, including those that oppose fundamental British values such as democracy, the rule of law, individual liberty, and mutual respect and tolerance of different faiths and beliefs.

At NEAT (trading as NEAT), we are fully committed to safeguarding and promoting the welfare of all apprentices and staff. We recognise that safeguarding against radicalisation is no different from safeguarding against any other form of vulnerability.

The **Prevent Duty** requires us to take steps to prevent people from:

- Being drawn into terrorism.
- Supporting or legitimising terrorism.
- Being susceptible to extreme ideology.

In line with KCSIE 2025, our approach also includes vigilance to **online harms linked to radicalisation**, such as exposure to misinformation, disinformation (including fake news), conspiracy theories, and extremist propaganda. This is addressed through staff training, learner awareness sessions, and the implementation of effective filtering and monitoring systems.

## **British Values, Prevent, and Online Safety**

NEAT employees are expected to uphold and promote the fundamental principles of **British Values**, including democracy, the rule of law, individual liberty, and mutual respect and tolerance of those with different faiths and beliefs.

## **Principal Objectives**



- All staff will understand what radicalisation and extremism are, the processes by which they can occur, and why vigilance is essential.
- All apprentices and staff will know that NEAT has clear safeguarding and Prevent policies in place to keep them safe from harm and that these are regularly reviewed to ensure they remain effective and proportionate.
- All staff will be aware of their statutory responsibilities, including compliance with the *Prevent Duty*, and will receive regular training updates in line with current guidance.

### **Promoting Respect, Tolerance, and Diversity**

We promote an environment of respect, tolerance, and diversity. Apprentices and staff are encouraged to share their views and understand that while they are entitled to their own beliefs, these must never be used to influence or pressure others. We recognise that individuals with low aspirations can be more vulnerable to radicalisation; therefore, we aim to equip apprentices and staff with confidence, self-belief, respect, and resilience, alongside high standards and expectations.

### **Online Safety and Digital Resilience**

Apprentices and staff are briefed during induction—and through ongoing standardisation and training—on how to stay safe online. They are taught to:

- Recognise that people are not always who they claim to be online.
- Seek help immediately if they are upset, concerned, or feel unsafe about anything they encounter online.

In line with **KCSIE 2025**, our approach to online safety is framed around the “4 Cs”:

1. **Content** – Exposure to harmful material, including violence, pornography, **misinformation, disinformation (including fake news)**, conspiracy theories, and extremist propaganda.
2. **Contact** – Risk of harmful interactions with others, including grooming, coercion, and exploitation.
3. **Conduct** – Risks from learners’ own online behaviour, including sharing inappropriate material or cyberbullying.
4. **Commerce** – Risks from online fraud, scams, or financial exploitation.

We operate effective **filtering and monitoring systems** to block access to inappropriate websites from NEAT premises and devices. Our systems are regularly reviewed using the Department for Education’s *Plan technology for your school* tool and other relevant guidance.



## Cyber Security and AI Awareness

We meet the **cyber security standards** outlined in KCSIE 2025, ensuring appropriate technical and organisational measures are in place to safeguard sensitive information and protect against cyber threats. Staff are briefed on the safe and responsible use of emerging technologies, including generative AI tools, to prevent misuse and ensure that online safeguarding measures remain robust.

## Training and Awareness

All NEAT staff, contractors, associates, and volunteers undertake appropriate training to ensure they are clear about their safeguarding role, statutory duties, and the parameters of their responsibilities. Training covers:

- The threats, risks, and vulnerabilities linked to radicalisation and extremism.
- The process of radicalisation and how to identify it early.
- Emerging online safety risks, including misinformation and harmful online content.

Through these measures, we ensure that staff remain proactive, informed, and confident in recognising and addressing risks to the welfare of apprentices and colleagues.

## NEAT will:

- Provide a safe and inclusive environment for children, young people, and adults at risk of harm to learn and thrive.
- Identify those who are suffering, or are likely to suffer, significant harm, hardship, neglect, exploitation, or who may be at risk of radicalisation or other vulnerabilities.
- Maintain a clear and effective system for identifying concerns in relation to the abuse of adults at risk of harm, with robust procedures for responding to disclosures sensitively and appropriately.
- Refer promptly any concerns that a child, young person, or adult at risk is suffering, or is likely to suffer, significant harm to the appropriate referral agencies, in line with statutory guidance and local safeguarding procedures.
- Work effectively with others as required by *Working Together to Safeguard Children (2023)* and the *Working Together to Improve School Attendance* (statutory from September 2025), ensuring engagement with children's services where attendance concerns present safeguarding risks.
- Take into account the inter-agency safeguarding procedures of the Blackpool Multi-Agency Safeguarding Hub and other relevant local safeguarding partners.
- Approve, review, and where necessary, update safeguarding and Prevent policies and procedures at least annually, or sooner in response to legislative changes, inspection feedback, or emerging risks.



- Ensure systems for the identification of children, young people, and adults at risk of harm are effective and that procedures for reporting concerns are well understood by all staff, contractors, and volunteers.
- Operate clear procedures for reporting and dealing with allegations of abuse or misconduct by members of staff or others who come into contact with apprentices, including compliance with the *low-level concerns* framework in KCSIE.
- Implement safer recruitment practices to deter, reject, or identify unsuitable individuals from working with learners.
- Ensure that staff receive appropriate induction and ongoing safeguarding and Prevent training, including awareness of the 2025 updates on online safety, misinformation, cyber security standards, and safeguarding in alternative provision.
- For apprentices placed in **alternative provision**, obtain written confirmation that all required safeguarding checks have been completed, and review arrangements at least half-termly or sooner if concerns arise.
- Comply with cyber security standards as set out in KCSIE 2025 to protect sensitive learner and organisational data from cyber threats.

**In developing and maintaining our safeguarding and Prevent policies and procedures, NEAT will take account of** guidance issued by the Department for Education, Ofsted, Blackpool Safeguarding Children Partnership, and other relevant bodies.

## **Types of Abuse, Neglect, and Exploitation**

NEAT uses the following definitions of abuse for children, young people, and adults at risk of harm. We operate a **zero-tolerance** approach to each form of abuse listed below.

### **Abuse**

A form of maltreatment in which an individual inflicts harm or fails to act to prevent harm. Abuse can be perpetrated by adults or by other children/young people.

### **Physical Abuse**

May involve hitting, shaking, throwing, poisoning, burning or scalding, drowning, suffocating, or otherwise causing physical harm. Physical harm may also result from a parent or carer fabricating symptoms of illness or deliberately inducing illness.

### **Emotional Abuse**



The persistent emotional maltreatment of a child or adult at risk, causing severe and long-lasting adverse effects on emotional development. It may involve:

- Conveying that the person is worthless, unloved, or valued only for meeting another's needs.
- Silencing or mocking communication.
- Imposing inappropriate expectations or overprotection.
- Preventing normal social interaction.
- Seeing or hearing the ill-treatment of another.
- Serious bullying (including cyberbullying), causing fear or distress.
- Exploitation or corruption.

In line with KCSIE 2025, emotional abuse also includes emerging online harms such as **misinformation, disinformation (including fake news)**, conspiracy theories, online harassment, and exposure to harmful content.

The *Criminal Justice and Courts Act 2015* created a criminal offence of disclosing private sexual photographs or films without consent (“revenge porn”).

### **Sexual Abuse and Harassment**

Involves forcing or enticing a child, young person, or adult at risk to take part in sexual activities, whether physical (penetrative or non-penetrative) or non-contact, such as:

- Viewing or producing sexual images.
- Watching sexual activities.
- Grooming (including online).

Perpetrators may be male, female, or peers.

### **Child-on-Child Abuse**

Includes physical abuse, sexual abuse, harassment, violence, emotional harm, bullying (online or offline), teenage relationship abuse, and exploitation. It can be motivated by perceived differences (e.g., race, religion, gender, sexual orientation, disability).

### **Upskirting**

A criminal offence under the *Voyeurism (Offences) Act 2019*, involving taking images under a person's clothing without their consent.



## **Sexual Consent**

Consent is a freely given, informed, and specific agreement to participate in sexual activity. Without consent, any sexual activity is unlawful.

## **Neglect**

The persistent failure to meet a child's or adult at risk's basic needs, likely to cause serious impairment to health or development. This includes failure to:

- Provide food, clothing, or shelter.
- Protect from harm.
- Supervise adequately.
- Provide medical care.

Neglect may also be emotional, including unresponsiveness to basic emotional needs.

## **Forced Marriage**

A marriage in which one or both parties do not consent, involving coercion, threats, or deception. This is a criminal offence in the UK.

## **Child Sexual Exploitation (CSE)**

A form of sexual abuse where children under 18 are manipulated or coerced into sexual activity in exchange for goods, money, accommodation, affection, or status. No child under 18 can consent to their own exploitation.

## **Child Criminal Exploitation (CCE)**

Occurs when an individual or group takes advantage of an imbalance of power to coerce, control, manipulate, or deceive a child into criminal activity. This may be in exchange for something (e.g., money, gifts, drugs, affection) or through threat of violence or coercion. CCE can involve children being forced to work in illegal activities such as drug trafficking, theft, or fraud.

## **County Lines**



A specific form of CCE involving the transportation of drugs across areas, often using vulnerable children and young people who are groomed and exploited. This frequently involves coercion, intimidation, violence, and weapons.

### **Serious Youth Violence**

Any offence of most serious violence or weapon-enabled crime committed by someone under 18, including knife crime, gang violence, and assaults. Being a victim of serious youth violence is a recognised safeguarding concern, as it often overlaps with CCE and other exploitation risks.

Children who run away or who are missing from home: There are no exact figures for the number of children who go missing or run away, but estimates suggest that the figure is in the region of 100,000 per year. Children may run away from a problem, such as abuse or neglect at home, or to somewhere they want to be. They may have been coerced to run away by someone else. Whatever the reason, it is thought that approximately 25 per cent of children and young people that go missing are at risk of serious harm. There are particular concerns about the links between children running away and the risks of sexual exploitation. Missing children may also be vulnerable to other forms of exploitation, to violent crime, gang exploitation, or to drug and alcohol misuse.

Although looked after children are particularly vulnerable when they go missing, the majority of children who go missing are not looked after and go missing from their family home. They can face the same risks as a child missing from local authority care.

### **Gang Culture/County Lines**

County lines is a form of criminal exploitation where urban gangs persuade, coerce or force children and young adults to store drugs and money and/or transport them to suburban areas, market towns and coastal towns (Home Office, 2018). It can happen in any part of the UK and is against the law and a form of child abuse.

Children and young people may be criminally exploited in multiple ways. Other forms of criminal exploitation include child sexual exploitation, trafficking, gang and knife crime.

### **Child Trafficking**

Child trafficking is a form of abuse. It involves the recruiting, moving, receiving, and harbouring of children with purpose of exploiting them (HH Department for Education, 2011) Child trafficking is a form of modern slavery. Children are trafficked for:

- Sexual exploitation



- Criminal activity
- Moving drugs
- Benefit fraud
- Selling pirated goods
- Forced marriage
- Domestic servitude
- Forced labour
- Illegal adoption
- Unreported private fostering

## **Domestic Violence**

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

- Psychological
- Physical
- Sexual
- Financial
- Emotional

### **Controlling behaviour is:**

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

### **Female Genital Mutilation:**

This comprises all procedures that involve partial or total removal of the external female genitalia, or other injury to the female genital organs for nonmedical reasons.

### **Radicalisation:**



Some young people and adults at risk of harm may be vulnerable to radicalisation for the purpose of violent extremism. Concerns regarding radicalisation will be referred to Channel which is a multi-agency panel who will offer guidance and support with the aim of preventing activity which could be deemed as criminal.

**Financial or Material Abuse:**

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

**Bullying:**

Bullying someone because of their age, race, gender, sexual orientation, disability and/or transgender will not be tolerated as NEAT operates a zero-tolerance approach. Bullying of this nature is also against the law. Bullying can take many forms and includes:

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

**Cyberbullying:**

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



- **Flaming** Online fights usually through emails, instant messaging or chat rooms where angry and rude comments are exchanged.
- **Denigration** Posting mean online messages through email, instant messaging, chat rooms, or websites set up to make fun of someone.
- **Exclusion** Intentionally leaving someone out of a group such as instant messaging, friend sites, or other online group activities.
- **Outing** Sharing secrets about someone online including private information, pictures, and videos.
- **Impersonation** Tricking someone into revealing personal information then sharing it with others.
- **Harassment** Repeatedly sending malicious messages to someone online.
- **Cyberstalking** Continuously harassing and denigrating including threats of physical harm.

To reiterate, NEAT operates a zero-tolerance policy against all types of abuse, please see Bullying and Harassment Policy for more information.

## **Roles and Responsibilities**

### **Designated Safeguarding Lead**

Our Designated Safeguarding Officers (DSLs) are:

- **Heather Maginnes** – Curriculum and Team Manager  
E: heather.maginnes@neatcollege.com | T: 07595 762921
- **Toni Hughes** – Operations Director  
E: toni.hughes@neatcollege.com | T: 07594 762183

### **Core Responsibilities of the DSL**

The DSL has lead responsibility for:

- Raising awareness across all employees of safeguarding and child protection duties.
- Ensuring staff understand the full range of safeguarding risks, including those newly emphasised in **KCSIE 2025** such as misinformation, disinformation, conspiracy theories, cyber security threats, and harmful online content.
- Overseeing the referral of cases of suspected abuse or allegations.



- Ensuring safeguarding concerns linked to **attendance** are addressed in line with *Working Together to Improve School Attendance* (statutory from September 2025), including engagement with children's services where necessary.
- Maintaining robust safeguarding arrangements for apprentices in **alternative provision** by:
  - Obtaining written confirmation that required safeguarding checks have been carried out by the provider.
  - Reviewing arrangements at least half-termly, or sooner if concerns arise.

## All Employees

All employees must remain vigilant at all times to the risk of abusive behaviour from any source, including family members, peers, other clients, and employees.

- Any suspicion, allegation, or incident of abuse must be referred immediately to a line manager (or another manager if appropriate) for full investigation.
- If the alleged perpetrator is another employee, the matter will be investigated under the Company's Disciplinary Procedure and treated as a safeguarding matter where applicable.
- A written record of all safeguarding reports must be made, including the date, time, name of the person receiving the report, and details of the concern. This must be sent to the DSL **within 24 hours**.

## External Referrals and Consultation

- Where required, the Company will refer details to the appropriate statutory body, including the Local Authority Designated Officer (LADO), the police, or the Disclosure and Barring Service (DBS).
- In all cases involving allegations against individuals in the children's workforce, the DSL will consult with the relevant LADO to determine appropriate next steps.
- We maintain a **key contacts list** for all regional LADOs in areas where we have apprentices placed (see Annex 1) – need to attach

## Acting on Concerns

Concerns may arise in many ways, including:

- A direct disclosure from a child, young person, or vulnerable adult.
- Signs or indicators of abuse.
- Third-party reports or witness accounts.
- Online behaviour or content raising safeguarding concerns.



In every case, it is essential to act **quickly and professionally**, ensuring the safety of the individual is the priority.

### **Training**

- All staff (as a minimum) hold **Level 2 ETF Safeguarding and Prevent** training.
- Regular refresher training incorporates **new and emerging risks** from KCSIE 2025, including online harms, cyber security, alternative provision safeguarding, and attendance-related safeguarding.
- DSLs and senior safeguarding staff undertake enhanced training to ensure compliance with statutory duties.

### **Responsibilities Include:**

- Ensuring all safeguarding and wellbeing concerns are recorded promptly using the **Safeguarding and Wellbeing Form**.
- Referring suspected abuse, neglect, exploitation, radicalisation, or attendance-related safeguarding concerns to the appropriate agencies without delay, in line with statutory duties.
- Providing timely advice and support to staff, consultants, and trainers on safeguarding and Prevent matters.
- Ensuring detailed records are kept of **all safeguarding referrals, complaints, or concerns** — including those that do not lead to a referral — in line with KCSIE 2025 record-keeping requirements.
- Maintaining secure, confidential storage of safeguarding records and ensuring they are shared with relevant agencies in accordance with **information-sharing principles**.
- Ensuring all staff, consultants, trainers, and apprentices have access to the **Safeguarding and Prevent Policy** and are aware of their responsibilities.
- Applying safer recruitment practices consistently, including for apprentices applying to courses that involve working with children, young people, or adults at risk.
- Ensuring **photo identification badges** are issued and worn by all staff, consultants, and trainers.
- For apprentices placed in **alternative provision**, ensuring safeguarding arrangements are documented, reviewed at least half-termly, and that written confirmation of required checks has been obtained from the provider.

### **Responding to Disclosure**

Children, young people, and adults at risk are more likely to disclose abuse to someone they trust. Listening carefully, taking them seriously, and responding appropriately are critical steps in safeguarding.



### **Actions to be taken by the person receiving a disclosure:**

- **React calmly** to avoid causing further distress.
- Avoid asking direct or leading questions — only clarify to ensure you understand. The individual may later be formally interviewed, and they should not have to repeat their account multiple times.
- Take all disclosures seriously, being mindful of any speech, language, or communication needs, cultural differences, or the impact of trauma.
- Reassure them that they are **not to blame** and were right to speak up.
- Avoid making promises of confidentiality that cannot be kept — explain that concerns will be shared with the **Designated Safeguarding Officer (DSL)** who has the authority to take action.
- Record all details immediately on the **Safeguarding Incident Report Form**, using the individual's **exact words** wherever possible. Include:
  - Date and time of the disclosure.
  - Name of the person making the disclosure.
  - Names of any others present.
  - Relevant context (including online or attendance-related factors if applicable).
- Pass the completed report to the DSL **without delay**.

### **How to Deal with Suspicions or Concerns of Abuse or Neglect**

If a child, young adult, or adult at risk of harm tells you about possible abuse or neglect, remember:

- **Never promise confidentiality** – explain from the outset that you may need to share the information to protect them.
- **Listen carefully and remain calm** – allow them to speak without assumptions, judgement, or interruption.
- **Do not interview or investigate** – only ask open questions to clarify understanding. Avoid leading questions or putting words into their mouth.
- **Reassure them** that they have done the right thing by speaking up.
- **Explain the next steps** – tell them you must share the concern with the Designated Safeguarding Officer (DSL), and only those who need to know will be informed.
- **Ask what they would like to happen** – note their wishes, but explain that action may still be taken to safeguard them or others, particularly if they are under 18.
- **Record the main points immediately**, using their exact words wherever possible.
- Use the **Safeguarding and Wellbeing Form (Annexe 3)** to capture key details of the discussion, ensuring all relevant context is included (e.g., online behaviour, attendance issues, or external influences such as county lines activity).



- **Report the concern immediately** to a DSL – do not delay or attempt to resolve the matter yourself.
- Recognise that **adult apprentices** have the right to make their own decisions if they have capacity, but safeguarding action may still be necessary if others are at risk.

### **Confidentiality and Information Sharing**

- Information must be handled on a **need-to-know basis** only, in accordance with data protection legislation and KCSIE 2025 guidance.
- Relevant parties may include:
  - A Designated Safeguarding Officer.
  - Parents/carers (unless this would place the child or adult at further risk).
  - Police or Social Care Services.
  - Senior management where appropriate.
  - The person making the allegation.
  - The alleged abuser (and parents/carers if the abuser is a child or young person).
- All safeguarding records (including concerns that do not result in a referral) must be securely stored and retained in line with our data retention schedule.

### **Reporting Female Genital Mutilation (FGM)**

FGM is illegal in England and Wales under the **FGM Act 2003** (as amended by the *Serious Crime Act 2015*) and is recognised as both **child abuse** and **violence against women and girls**.

**Mandatory Reporting Duty** – Teachers, regulated health professionals, and social care workers must report to the police when, in the course of their duties, they:

- Are informed by a girl under 18 that FGM has been carried out on her; or
- Observe signs that appear to indicate FGM has been carried out, and there is no reason to believe it was for medical purposes.

Key points:

- This is a **personal duty** – the responsibility cannot be transferred.
- Reports should be made **as soon as possible**, and by close of the next working day at the latest.
- In rare cases where immediate reporting may put the child or others at risk, consult the DSL immediately to agree a safe course of action.
- Complying with the duty **does not breach confidentiality**.

### **Partnership Working**

NEAT works closely with **local safeguarding partnerships, multi-agency safeguarding hubs (MASH), and the police** to ensure immediate referrals can be made when necessary.



- We follow *Working Together to Safeguard Children* (2023) and *Working Together to Improve School Attendance* (2025) to ensure concerns about poor or irregular attendance are considered as potential safeguarding matters.
- All actions and decisions relating to safeguarding are recorded in writing, with a clear audit trail of discussions, advice sought, and referrals made.

### **Concerns about Individuals Who Are Not Apprentices with NEAT (Trading as NEAT)**

For young people who are **not apprentices** with NEAT, referrals must be directed to the **head of the organisation** to which they are attached.

- Contact can be made directly or via the Safeguarding Lead if they are on site.
- Where there is **no organisational contact available**, the referral must be made directly to **Children's Services** in the relevant local authority.
- If there is a concern about a **workplace setting**, this should be recorded on the **Safeguarding and Wellbeing Form** and reported immediately to a **Designated Safeguarding Officer (DSL)**.

### **Reporting and Dealing with Allegations of Abuse Against Members of Staff**

These procedures apply to **all staff, consultants, and trainers**, whether teaching, administrative, management, or support.

An allegation of abuse is defined as when a person has:

- Behaved in a way that has harmed, or may have harmed, a child, young person, or adult at risk of harm.
- Possibly committed a criminal offence against, or related to, a child, young person, or adult at risk of harm.
- Behaved towards a child, young person, or adult at risk of harm in a way that indicates they are unsuitable to work with these groups.

### **Procedure following an allegation:**

- The **Designated Safeguarding Lead** must inform the **Local Authority Designated Officer (LADO)**, the police, and any other relevant safeguarding agency without delay.
- The staff member, consultant, or trainer will either be suspended or have their duties withdrawn pending the outcome of the investigation.


All actions, decisions, and outcomes must be **recorded in writing** in line with KCSIE 2025

### **Attendance as a Safeguarding Concern**

In accordance with *Working Together to Improve School Attendance* (statutory from September 2025), attendance issues must be treated as potential safeguarding concerns.

### **Process:**



- Tutors must inform a **DSL** immediately if an apprentice does not attend a scheduled session, 1-2-1 meeting, or review.
- The **DSL will contact the apprentice** in relation to the report to establish the reason for absence.
- If the apprentice cannot be reached, the DSL will contact their **emergency contact** to check on their safety and wellbeing.
- Persistent or unexplained absence will be referred to **Children's Services** or other relevant agencies where safeguarding concerns are identified.
- **Reference:**  
Department for Education (2025) *Keeping Children Safe in Education* [Statutory Guidance for Schools and Colleges]  
 <https://www.gov.uk/government/publications/keeping-children-safe-in-education--2>

### Recruitment and Selection

NEAT aims to recruit and develop skilled, motivated staff who can deliver an outstanding service to our learners, employers, and the wider community. An effective, transparent, and compliant recruitment and selection process is a major contributor to achieving this aim.

We are **committed to safeguarding and promoting the welfare of children, young people, and adults at risk of harm** and expect all staff to share this commitment. Recruitment decisions will always prioritise learner safety and align with **Safer Recruitment** principles as set out in *Keeping Children Safe in Education 2025*.

### Disclosure and Barring Service (DBS)

- All members of staff, consultants, and trainers working in settings with children, young people, or adults at risk of harm — whether on-site or in workplace visits — must hold a **current enhanced DBS check** (issued within the last 3 years) and submit a copy to the Designated Safeguarding Officer.
- Staff must also have completed **Prevent** and **Safeguarding** training within the last 12 months; this will be checked as part of occupational competency.
- Awareness of **online safety risks, misinformation/disinformation, and cyber security standards** (KCSIE 2025) will be incorporated into safeguarding refresher training.

### Single Central Record (SCR)

In line with statutory requirements, NEAT maintains a **Single Central Record** of recruitment and vetting checks. This record includes:

- Identity checks.
- Enhanced DBS (with barred list) checks.
- Right to work in the UK.



- Overseas police checks where applicable.
- Two professional references.
- Safer Recruitment training completion for relevant staff.

This record was **last updated 31 January 2025**.

### **Safer Recruitment Practices**

- All recruitment follows the *Safer Recruitment and Selection Policy*.
- All staff involved in recruitment must have undertaken **Recruitment and Selection Process training**.
- Every interview panel must include **at least one member trained in Safer Recruitment**.
- References will always be obtained directly from referees and verified before appointment.
- It is a **criminal offence** to knowingly employ a person barred from regulated activity with children or vulnerable adults. In cases where controlled activity is considered for a barred person, this will only occur under strict safeguards and with **Director approval**.

### **Employer / Workplace Responsibility**

- For apprentices on placement, it is the **employer's responsibility** to ensure that their own staff and volunteers have completed relevant DBS checks.
- NEAT will not undertake DBS checks for apprentices but will require **written confirmation** from employers that appropriate vetting and safeguarding arrangements are in place.
- Where apprentices are placed in **alternative provision**, we will obtain written confirmation of safeguarding checks and review these arrangements at least half-termly or sooner if concerns arise.

### **Reference:**

Department for Education (2025) *Keeping Children Safe in Education* [Statutory Guidance for Schools and Colleges]

 <https://www.gov.uk/government/publications/keeping-children-safe-in-education--2>

### **PREVENT**

NEAT fully adheres to the **Government's Prevent Strategy** as laid out in the *Counter-Terrorism and Security Act 2015* and subsequent updates, including the duty placed on training providers to safeguard learners from the risk of radicalisation. This duty aligns with the Government's wider counter-terrorism strategy (*CONTEST 2018*, paragraph 114).



All apprentices engaging with NEAT will undertake an **induction session** that includes:

- Health and safety in the workplace.
- Awareness of safeguarding and the **Prevent Duty**.
- Understanding and application of **British Values**.

Our aim is to establish core values for all stakeholders. These are embedded in our expectations for staff and across the apprentice journey. British Values are considered **paramount**, underpinning the principles of citizenship in a modern and diverse United Kingdom. Staff actively promote these values in their delivery and embed safeguarding naturally within teaching, learning, and assessment.

**Leaders and Managers** champion Prevent and safeguarding by:

- Ensuring Prevent and safeguarding are discussed regularly in team meetings, learner forums, and reviews.
- Embedding these themes into organisational communications, marketing, and learner materials.
- Actively promoting equality, diversity, and inclusion, and fostering greater understanding and respect for people of all faiths (or none), ethnic backgrounds, genders, ages, abilities, and sexual orientations.

### **Purpose of the Prevent Strategy**

- **Respond** to the ideological challenge of terrorism and the threat from those who promote it.
- **Prevent** individuals from being drawn into terrorism, ensuring they receive appropriate support and guidance.
- **Work** with sectors and institutions where there is a risk of radicalisation.
- 

### **The Four Ps of CONTEST**

1. **Prevent** – Stop people becoming terrorists or supporting terrorism or violent extremism.
2. **Pursue** – Stop terrorist attacks through disruption, investigation, and detection.
3. **Prepare** – Where an attack cannot be stopped, mitigate its impact.
4. **Protect** – Strengthen protection against terrorist attacks, including borders, transport, infrastructure, and public places.
- 5.

### **Definitions**



- **Extremism** – Vocal or active opposition to fundamental British Values (democracy, rule of law, individual liberty, mutual respect, and tolerance of different faiths and beliefs), including calls for the death of members of the armed forces.
- **Terrorism** – Actions that endanger life, cause serious violence, damage property, or disrupt electronic systems, intended to influence the government or intimidate the public for political, religious, or ideological purposes.
- **Radicalisation** – The process by which a person comes to support terrorism or forms of extremism leading to terrorism.

### **Risk Indicators of Radicalisation**

Staff should remain vigilant for:

- Use of inappropriate or extremist language.
- Possession or promotion of violent extremist literature.
- Sudden behavioural changes or withdrawal.
- Expression of extremist views or advocacy for violence.
- Association with known extremists.
- Attempts to recruit others to extremist causes.
- 

In line with **KCSIE 2025**, staff must also recognise online radicalisation risks, including:

- **Misinformation and disinformation** (e.g., fake news, distorted narratives).
- **Conspiracy theories** that undermine democratic values.
- Extremist propaganda and content shared via social media, encrypted apps, gaming platforms, or online forums.

### **British Values**

The promotion of British Values is embedded in all aspects of our delivery:

- **Democracy** – Encouraging participation, debate, and decision-making.
- **Rule of Law** – Understanding the importance of laws and consequences.
- **Individual Liberty** – Supporting personal choice and freedom within the law.
- **Mutual Respect and Tolerance** – Promoting acceptance of different faiths, beliefs, and lifestyles.

This includes **non-discrimination** against individuals with protected characteristics as set out in the *Equality Act 2010*: age, disability, gender reassignment, marriage and civil partnership, pregnancy and maternity, race, religion or belief, sex, and sexual orientation.

### **Reference:**

Department for Education (2025) *Keeping Children Safe in Education* [Statutory Guidance for



Schools and Colleges]

🔗 <https://www.gov.uk/government/publications/keeping-children-safe-in-education--2>  
HM Government (2023) *Revised Prevent Duty Guidance*

🔗 <https://www.gov.uk/government/publications/prevent-duty-guidance>

## Channel

**Channel** is an early-intervention, multi-agency safeguarding process designed to protect vulnerable people from being drawn into violent extremist or terrorist behaviour. It is part of the Government's *Prevent Strategy* and operates in a similar way to other safeguarding partnerships aimed at protecting those at risk of harm.

Channel works with individuals of **any age** who are at risk of exploitation by extremist or terrorist ideologies. This includes radicalisation linked to:

- Political extremism.
- Religious extremism.
- Mixed, unstable, or unclear ideologies.
- Online radicalisation through misinformation, disinformation, conspiracy theories, or extremist propaganda (as emphasised in **KCSIE 2025**).

## How Channel Works

- Each **Channel Panel** is chaired by the local authority and brings together multi-agency partners, including statutory and non-statutory agencies, to assess the risk and agree a support plan if needed.
- Support may include:
  - Mentoring.
  - Faith guidance.
  - Educational or vocational support.
  - Health and wellbeing interventions.
  - Family support.
  - Diversionary activities such as sport or creative projects.
- Each package of support is **tailored** to the individual's needs and vulnerabilities.
- **Consent** is required for someone to take part in Channel. The process is voluntary, and the individual will always be informed before any intervention is agreed.



## Referral to Channel

**Anyone** can make a referral to Channel. In education, referrals most often come from:

- Staff who have observed concerning behaviour.
- Safeguarding teams.
- The police.
- Other partner agencies such as health, social care, or youth offending teams.

At NEAT (trading as NEAT), the process is:

1. **Immediate internal report** – Any concerns relating to radicalisation, extremism, or Prevent must be reported to a Designated Safeguarding Officer (DSL) immediately.
2. **Initial safeguarding assessment** – The DSL will consider the information, consult the Prevent guidance, and, if necessary, seek advice from the local Prevent team or police Prevent officer.
3. **Referral decision** – If there is a reasonable belief that a learner or stakeholder is at risk of radicalisation, the DSL will complete a Prevent referral form and submit it to the local authority Prevent lead or police.
4. **Multi-agency involvement** – Where accepted, the case will be reviewed at a Channel Panel, and any agreed support plan will be put in place.

## Risk Indicators for Referral

In addition to behavioural changes or extremist language, staff should be alert to **KCSIE 2025** risk indicators, including:

- Sharing or promoting conspiracy theories online.
- Repeated exposure to extremist or radicalising content via social media, messaging apps, or gaming platforms.
- Fixation on specific grievances or “us vs them” narratives.
- Sudden withdrawal from family or friendship groups in favour of new influences.

## Designated Officers for Prevent at NEAT

- **Heather Maginnes** – 07595 762921
- **Toni Hughes** – 07594 762183

## Staff must:

- Report concerns **immediately** to a DSL.



- Never investigate the concern themselves.
- Record all concerns in writing, including specific examples or incidents.

#### References:

- Department for Education (2025) *Keeping Children Safe in Education*  
🔗 <https://www.gov.uk/government/publications/keeping-children-safe-in-education--2>
- HM Government (2023) *Revised Prevent Duty Guidance*  
🔗 <https://www.gov.uk/government/publications/prevent-duty-guidance>

#### Martyn's Law (Protect Duty)

NEAT recognises the importance of **Martyn's Law** (Protect Duty), introduced in tribute to Martyn Hett, who was killed alongside 21 others in the Manchester Arena terrorist attack in 2017. Since 2017, the UK has experienced multiple terrorist attacks, many targeting locations where people gather for everyday activities. The terrorist threat remains **multifaceted, diverse, and continually evolving**, with methods becoming increasingly harder to detect and disrupt.

From **2025**, Martyn's Law introduces a *tiered approach* to security duties for premises and events depending on capacity and activity type. As we operate from a shared business park, we are mindful of our responsibilities under the **Standard Tier** requirements, which include:

- Completing and maintaining a **Standard Terrorism Evaluation** to assess risk.
- Ensuring all relevant staff complete **free online Protect UK training** to understand the nature of the threat and how to respond to it.
- Having proportionate security plans and emergency response arrangements in place.
- Regularly reviewing our preparedness in collaboration with site management and neighbouring organisations.

We understand that terrorist threats can target any location and that preventative security measures are essential. Without consistent application, counter-terrorism efforts can fall behind. Therefore, we will **embed Martyn's Law compliance into our safeguarding and site safety processes**, ensuring that all staff, apprentices, and visitors are aware of our emergency procedures and that relevant training is refreshed regularly.

Further guidance on Martyn's Law and Protect Duty compliance is available from the official UK Government resource:

🔗 **Martyn's Law – Protect Duty Guidance**



## **Martyn's Law – Protect Duty**

NEAT is located within a shared business park, and we recognise our responsibility under the forthcoming **Martyn's Law (Protect Duty)** to ensure the safety of all apprentices, staff, visitors, and stakeholders.

Martyn's Law, named in tribute to Martyn Hett, who was killed in the Manchester Arena terrorist attack in 2017, aims to enhance national security and reduce the risk to the public from terrorism by ensuring that those responsible for publicly accessible locations consider the threat from terrorism and implement **proportionate and effective mitigation measures**.

The terrorist threat in the UK remains **diverse, multifaceted, and continually evolving**, and attacks may be difficult to predict. Without legal compulsion, counter-terrorism preparedness has often been inconsistent across industries. This legislation seeks to address that gap by requiring clear and consistent protective measures.

### **Key aims of Martyn's Law:**

- **Improve preparedness** – ensuring all qualifying venues and organisations have clear processes, plans, and training in place to respond to an incident.
- **Strengthen security culture** – embedding awareness of security threats into day-to-day operations.
- **Proportionate application** – ensuring requirements match the size, nature, and capacity of the location.

### **Proposed tiered approach:**

- **Standard Tier** – Applies to qualifying locations with a **capacity of over 100 people**. Duty holders must complete basic but effective activities to enhance security and preparedness, such as staff training, emergency planning, and clear communication protocols.
- **Enhanced (Higher) Tier** – Applies to locations with a **capacity of over 800 people**. Additional requirements will include more detailed risk assessments, security plans, and potentially the designation of a **Protect Duty Responsible Person** to oversee compliance.

### **Our commitment at NEAT:**

- Conduct regular **threat and risk assessments** to identify vulnerabilities.
- Provide **staff training** on recognising suspicious activity, responding to incidents, and initiating emergency procedures.
- Liaise with **local counter-terrorism security advisors (CTSAs)** and emergency services to ensure plans are current and effective.
- Maintain clear communication systems for incident alerts and instructions.
- Participate in any relevant **government or local authority security initiatives**.

We will continue to monitor government updates and ensure that our **Martyn's Law preparations** are fully compliant ahead of the legislation's implementation.



**Reference:** UK Home Office – Martyn’s Law (Protect Duty) policy update:

<https://www.gov.uk/government/publications/protect-duty/martyns-law>

Version	Date	Comments	Approved By	Review Due
3	September 2025	Reviewed due to Update date of keeping Children Safe in Education 2025		September 2026

### Channel Contacts

Please see Annexe 1 – List of Channel contacts. Sources and Legislation

1. Criminal Justice and Courts Act 2015

<https://www.legislation.gov.uk/ukpga/2015/2/contents/enacted>

2. FGM Act 2003 <https://www.gov.uk/government/publications/female-genital-mutilation-resource-pack/female-genital-mutilation-resource-pack>

3. HH Department for Education <https://www.gov.uk/government/organisations/department-for-education>

4. Serious Crime Act 2015 <https://www.legislation.gov.uk/ukpga/2015/9/contents/enacted>

5. Safeguarding Vulnerable Groups Act 2006

<https://www.legislation.gov.uk/ukpga/2006/47/contents>

6. Protection of Freedom Act 2012

<https://www.legislation.gov.uk/ukpga/2012/9/contents/enacted>

7. Counter Terrorism and Security Act 2015 <https://www.gov.uk/government/collections/counter-terrorism-and-security-bill>

8. Counter Terrorism Strategy (CONTEST) 2018

<https://www.gov.uk/government/publications/counter-terrorism-strategy-contest-2018>

9. Working Together to Safeguard Children 2023

[https://www.gov.uk/government/publications/working-together-to-safeguard-children-- 2](https://www.gov.uk/government/publications/working-together-to-safeguard-children--2)

### Safeguarding Councils List

#### Annexe 2

Area: Blackpool Council

Phon Duty line on 01253 477299 – Immediate Concerns and Support Hub: 01253 477600.

e:

Email [mash@Blackpool.gov.uk](mailto:mash@Blackpool.gov.uk)

: <https://selfservice.blackpool.gov.uk/ss/renderform?t=1207&k=AED2F46D80DC03E13E2752C58EC43C73EA657D07> – referral form



<https://www.Blackpool.gov.uk/adult-safeguarding>

Prevent Police List

**Lancashire Prevent contacts**

If you have concerns about someone and would like more advice:

**Local Authority Prevent team**

Call: 01253 477477

Email [communitysafety@blackpool.gov.uk](mailto:communitysafety@blackpool.gov.uk)

**Police Prevent Team**

Call 01772 413398

Anti-Terrorist Hotline - 0800 789 321

Crime Stoppers - 0800 555 111

**REMEMBER: If urgent: call 999**

**Annexe 1:**



## Safeguarding and Wellbeing Form

Employee logging issue:
Name of Apprentice:
ILR Number:
Date Raised:
Date Closed:
Outcome:

Details of Safeguarding and Wellbeing Issue

Details of Investigation

