



# Safeguarding Policy

## Introduction

DRL Services are a training provider dedicated to making a positive contribution to a strong and safe community. We recognise the right of every individual to stay safe and we are committed to safeguarding any child or vulnerable person and to provide a safe learning environment to all apprentices. We have a duty of care when they are in our charge, and we will do everything we can to provide a safe and caring environment whilst they attend our facilities.

All vulnerable groups, regardless of age, disability, gender, racial heritage, religious belief, sexual orientation or identity, have the right to equal protection from all types of harm or abuse.

## **Definition of a Child/Young Person**

The definition of 'a child' in child protection guidance is anyone who has not yet reached their 18th birthday. The UN Convention on the Rights of the Child, ratified by the UK government in 1991, states that a child means every human being below the age of eighteen years unless, under the law applicable to the child, majority is attained earlier.

## **What is a Vulnerable Person?**

This is defined as an adult over 18 years of age who is or may be in need of community care services by reason of disability, age or illness; and is or may be unable to take care of, or unable to protect themselves against significant harm or exploitation. Vulnerable adults aged 19-25 will be classed as high need apprentices.

## **What is Abuse?**

Abuse is mistreatment by any other person or persons that violates a person's human and civil rights. The abuse can vary, from treating someone with disrespect in a way that significantly affects the person's quality of life, to causing actual physical or mental suffering. Abuse can consist of a single act or repeated acts. It may be physical, verbal or psychological. It may be an act of neglect or an omission to act and can occur anywhere.

## **Types of Abuse to Recognise**

- Alcohol and Substance misuse
- Bullying and cyberbullying
- County Lines
- Concealed pregnancy
- Discriminatory
- Domestic abuse, including honour-based abuse (HBA)
- Emotional
- Exploitative use of technology
- Female Genital Mutilation (FGM)
- Financial or material abuse
- Faith abuse

- Gambling
- Hate and 'mate' crime
- Misuse of technology
- Modern slavery
- Neglect and acts of omission
- Organisational or institutional
- Psychological
- Physical
- Radicalisation
- Self-neglect
- Sexual
- Sexual Exploitation
- Spiritual abuse
- Substance misuse
- Trafficking
- Child-on-child abuse
- Serious Violence

## **Scope**

This policy covers safeguarding and applies to all staff, apprentices, children, vulnerable persons and other people working on behalf of DRL or involved within the company. The aim of the policy is to ensure everyone is aware of and understands their responsibilities, signs that there may be a safeguarding concern, along with the reporting procedures for all safeguarding issues.

There is a responsibility to follow the guidance laid out in this policy, and to pass on any welfare concerns using the required procedures. It is inclusive of specific highlighted safeguarding agenda areas as defined by law, and in the wider context of all our apprentices. This policy also aligns our compliance with the Government Prevent Duty and runs alongside our separate Prevent Policy, which sets out DRL's specific obligations under the Counter-Terrorism and Security Act 2015, including awareness of and referral to the Channel programme for individuals identified as vulnerable to radicalisation.

We expect all staff, and other people working on behalf of DRL, to promote good practice by being an excellent role model, contribute to discussions about safeguarding and to positively involve people in developing safe practices. We will make sure that all children, young people and adults have the same protection regardless of age, disability, gender reassignment, race, religion or belief, sex, or sexual orientation.

## **Data Protection**

We will treat any personal information by which an individual can be identified in accordance with the provisions of the Data Protection Act 2018 and the UK General Data Protection Regulation (UK GDPR) and will not share information with any third party, except where required by law. Sharing personal data for the purposes of safeguarding is permitted under the Data Protection Act 2018 where it is necessary to protect an individual from harm. Fears about sharing information must not be allowed to stand in the way of the need to safeguard and promote the welfare of children and vulnerable adults.

## **Policy**

We all have a responsibility to ensure that children, young people and adults at risk are protected from harm, informed about potential risks to their welfare, and understand how to seek help. We ensure all concerns are dealt with timely and appropriately. We also have a responsibility to minimise the risk of allegations against staff.

All staff are committed to safeguarding and protecting children and vulnerable adults against potential harm or actual harm. This strategy defines the way DRL will meet its duty of care to safeguarding. It states the commitment DRL have made to furthering lifelong learning opportunities at all levels of work-based learning.

All organisations that work or encounter children, young adults and/or adults at risk need to have safeguarding policies and procedures in place. We therefore adhere to Keeping Children Safe in Education 2025 and all employees receive training annually.

Government guidance is clear that all organisations working with children, young people, adults at risk, parents, carers and/or families have responsibilities for safeguarding. It is important to remember that children, young people, and adults at risk can also abuse and that such incidents fall into the remit of this policy.

Safeguarding issues are everyone's responsibility. We believe everyone has a responsibility to promote the welfare of all children and young people, to keep them safe and to practise in a way that protects them. All staff of DRL will follow and implement the safeguarding policy. Staff will sign an induction form to acknowledge they have fully read and understood the policy. The welfare of the under-18, apprentices or vulnerable adults is of primary concern, and it is the duty of all staff to report any concerns. If any staff or other people working on behalf of DRL have an under-18 or vulnerable adult protection issue brought to their notice, observe an incident of abuse, or have cause for concern, they must treat this as a priority over other work and address the issue immediately.

Safeguarding relates to the action taken to promote the welfare of children and vulnerable adults and to protect them from harm. All staff should have a basic awareness of safeguarding issues. This includes:

- Being alert to the possibility of abuse and neglect
- Having enough knowledge to recognise an abusive or potentially abusive event or set of circumstances
- Knowing who in the organisation to raise concerns with
- Being competent to take the appropriate immediate or emergency action

DRL are committed to safeguarding our apprentices by ensuring that:

- We listen to, value and respect all people
- The welfare of the child or vulnerable adult is paramount
- All children and vulnerable adults regardless of age, disability, gender, racial heritage, religious belief, sexual orientation or identity have the right to equal protection from all types of harm or abuse
- Recruiting staff and volunteers safely, ensuring all necessary checks are made
- Appointing a Designated Safeguarding Lead (DSL) and a Deputy Designated Safeguarding Lead. The DSL and deputy should undergo training every two years to provide them with the knowledge and skills required to carry out the role, with knowledge updated at least annually through e-bulletins, meetings with other DSLs, or reading safeguarding developments
- By making sure all staff and volunteers follow the safeguarding and child protection procedures
- That all staff are aware that children and young people can perpetrate abuse against other children and young people (child-on-child abuse)
- That all staff understand the importance of challenging inappropriate behaviours between peers
- Reviewing our policy and good practice annually or dependent on any lawful changes in between annual reviews
- Supporting all apprentices in accessing support so they can learn and work safely
- Working in an open environment, avoiding private or unobserved situations and encouraging open communication
- Prioritising the welfare of under-18s and/or vulnerable adults

- Being proactive in action when abuse is suspected
- Working in partnership with children, vulnerable adults, their parents, carers and other agencies
- Providing effective management for staff through supervision, support and training
- Making the safeguarding policy available to all on the internal cloud-based system, learner portals, by calling 01277 586 486 or emailing [safeguarding@drlservices.co.uk](mailto:safeguarding@drlservices.co.uk)

By implementing this safeguarding policy DRL Services Ltd will ensure:

- All workers understand their legal and moral responsibility to protect children and young people from harm, abuse and exploitation. Child protection training is provided during induction and in subsequent training
- All workers understand their responsibility to work to the standards detailed in this policy at all times
- All staff are aware of the indicators which may signal children are at risk from serious violent crime, including increased absence, changes in friendships, significant decline in performance, signs of self-harm, or signs of assault or unexplained injuries
- All staff are aware of risk factors increasing the likelihood of involvement in serious violence, including frequent absence or exclusion from school, child maltreatment, and involvement in offending
- All workers understand their duty to report concerns about a child or young person, or a worker's conduct towards a child or young person, to the named DSL
- Procedures relating to the conduct of workers are implemented consistently and equitably
- All workers understand their obligations under the Prevent Duty, including awareness of the Channel referral pathway, and have appropriate training
- Opportunities are provided for all workers to develop their skills and knowledge in relation to the welfare and protection of children and young people
- Staff maintain an appropriate level of confidentiality by involving only those who need to be involved, such as the DSL (or deputy) and social care. Staff should never promise a child or young person that they will not tell anyone about a report of abuse
- Children, young people and vulnerable adults are enabled to express their views and will have access to the organisation's Complaints Procedure
- We keep up to date with national developments relating to the welfare and protection of children and young people
- Appropriate background checks are undertaken when anyone joins the organisation and before they start working directly with children and young people
- We develop effective links with relevant external agencies, local safeguarding boards and co-operate with safeguarding referral requirements
- Written records of safeguarding concerns are kept even when there is no need to refer the matter to relevant agencies
- All records are stored securely in accordance with the Data Protection Act 2018 and UK GDPR
- All staff are aware of indicators of abuse and neglect; if unsure, they should always speak to the DSL (or deputy)
- Consent for any care, activity or intervention is obtained from the individual if of sufficient age and understanding, or from a parent/carer as defined within relevant Regulatory Authority guidance

We will ensure that no individual with additional learning needs or a disability faces any further safeguarding issues such as peer group isolation, bullying, or communication difficulties. Regular checks and assessments will take place where we feel there are additional safeguarding issues.

For further guidance: [Send-code-of-practice-0-to-25](#)

## **Early Help and Early Intervention**

Early help means providing support as soon as a problem or concern emerges at any point in a person's life. Effective early help relies on all staff being aware of the potential need for early intervention and understanding when to refer concerns to the DSL. In line with Keeping Children Safe in Education 2025 and Working Together to Safeguard Children 2023, DRL will identify and act on early indicators of concern before they escalate to formal safeguarding thresholds.

Early help considerations include learners who:

- Are frequently absent from the programme without explanation
- Show a significant and unexplained change in behaviour, performance or wellbeing
- Are known to have previously been in care, or have a social worker
- Have an Education, Health and Care (EHC) plan with associated vulnerabilities
- Are subject to or at risk of exploitation, radicalisation or domestic abuse
- Are experiencing difficulties at home or in the workplace

Where a member of staff identifies that an apprentice may benefit from early help, this should be discussed with the DSL, who will consider whether a referral to an appropriate support service, local authority early help team or other agency is appropriate. Early intervention does not replace the need to make a formal referral where a safeguarding threshold is met.

## **Transitional Safeguarding**

DRL Services delivers apprenticeships exclusively to learners aged 18 and over. We recognise that vulnerabilities do not disappear on a person's 18th birthday. Transitional safeguarding is the bridging of children's and adults' safeguarding frameworks to ensure continuity of protection for young adults aged 18-25. DRL is committed to applying a transitional safeguarding lens to its work with all apprentices in this age group.

This is particularly relevant for learners who:

- Were previously known to children's services or have recently left care
- Are care leavers (the local authority retains responsibilities until age 25)
- Have an Education, Health and Care (EHC) plan
- Were previously subject to a Child Protection Plan
- Have experienced childhood trauma, exploitation or domestic abuse
- Are known to have complex mental health needs

## **Adult Safeguarding**

The primary legal framework for adult safeguarding is the Care Act 2014. Under Section 42, local authorities have a duty to make enquiries (or ensure others do) where they reasonably suspect an adult with care and support needs is experiencing or is at risk of abuse or neglect and is unable to protect themselves. DRL recognises that, as a provider working exclusively with adults, adult safeguarding obligations are as significant as those relating to children.

The Care Act 2014 identifies ten categories of abuse relevant to adults at risk:

- Physical abuse — including hitting, slapping, pushing, kicking, misuse of medication, restraint, or inappropriate physical sanctions
- Domestic violence or abuse — including psychological, physical, sexual, financial, and emotional abuse, as well as so-called 'honour'-based violence

- Sexual abuse — including rape, indecent exposure, sexual harassment, inappropriate looking or touching, sexual teasing or innuendo, sexual photography, subjection to pornography, witnessing sexual acts, or sexual assault
- Psychological or emotional abuse — including threats of harm or abandonment, deprivation of contact, humiliation, blaming, controlling, intimidation, coercion, harassment, verbal abuse, cyberbullying, isolation, or unreasonable and unjustified withdrawal of services or supportive networks
- Financial or material abuse — including theft, fraud, internet scamming, coercion in relation to an adult's financial affairs, or the misuse or misappropriation of property, possessions, or benefits
- Modern slavery — encompassing slavery, human trafficking, forced labour, and domestic servitude
- Discriminatory abuse — including forms of harassment, slurs, or similar treatment because of race, gender or gender identity, age, disability, sexual orientation, or religion
- Organisational or institutional abuse — including neglect and poor care practice within an institution or specific care setting, or in relation to care provided in a person's own home
- Neglect and acts of omission — including ignoring medical, emotional, or physical care needs, failure to provide access to appropriate health, care, and support, and withholding of necessities of life such as medication, adequate nutrition, and heating
- Self-neglect — covering a wide range of behaviour, including neglecting personal hygiene, health, or surroundings, and failure to seek medical attention

DRL will ensure that:

- The DSL and Deputy DSL are familiar with the adult safeguarding referral pathway via the Local Authority Adult Social Care team and the relevant Safeguarding Adults Board (SAB)
- Any staff member who has a concern about an adult at risk must report this to the DSL in the same way as a concern about a child — using the same recording procedures and without delay
- Where a Section 42 enquiry is initiated by the local authority, DRL will cooperate fully and provide any information requested
- The principle of Making Safeguarding Personal (MSP) is applied — adult safeguarding is person-centred, and the adult at risk is involved in decisions about how to respond to their situation wherever possible
- Where a learner is transitioning from children's to adults' services, DRL engages proactively with relevant teams to ensure continuity of support
- Care leavers are identified at induction and offered appropriate additional pastoral support
- Staff are trained to understand both children's and adults' safeguarding frameworks and the particular needs of young adults aged 18–25

## **Designated Safeguarding Leads**

DRL has a Designated Safeguarding Lead (DSL) and a Deputy Designated Safeguarding Lead (Deputy DSL). Both can be contacted at:

Safeguarding contact: [safeguarding@drlservices.co.uk](mailto:safeguarding@drlservices.co.uk) | 01277 586 486

The identity of the current DSL and Deputy DSL is provided to all staff at induction and is displayed on the internal system and learner portal.

The DSL has the responsibility to oversee and ensure that this safeguarding policy, which includes e-Safety, is fully implemented and that DRL attains safeguarding standards. The DSL has a key responsibility for raising awareness of issues relating to the welfare of children, young people and vulnerable adults and the promotion of a safe environment for learning. In the absence of the DSL, the Deputy DSL assumes all DSL responsibilities.

The responsibilities of the DSL include:

- Monitoring and recording all concerns
- Overseeing the referral of cases of suspected abuse or allegations to the relevant investigating agency
- Providing advice and support to other staff on issues relating to child and adult safeguarding
- Making referrals to social care, or police, as relevant, without delay
- Contacting the Local Authority Designated Officer (LADO) for allegations against staff that meet the harm threshold — see the [Allegations Against Staff](#) section for detail
- Maintaining a proper record of any protection referrals, complaints or concerns (even where that concern does not lead to a referral)
- Liaising with other agencies and building links with external stakeholders
- Arranging training for all staff ensuring safeguarding arrangements are current, fit for purpose, circulated to all personnel, and implemented
- Ensuring apprentices are aware of these safeguarding arrangements
- Monitoring to ensure concerns and subsequent actions are recorded
- Auditing and reviewing this policy and procedures
- Maintaining awareness of learners who have open cases with children's services, adult social care, or a multi-agency plan, and ensuring these learners receive appropriate support

## **Safeguarding Culture and Staff Wellbeing**

DRL is committed to creating and maintaining an organisational culture in which safeguarding is embedded as a shared responsibility. All staff should feel safe, supported, and confident to raise safeguarding concerns without fear of embarrassment, dismissal, or reprisal.

We recognise that managing a safeguarding concern, particularly one involving disclosure of abuse or a serious incident, can be distressing for the member of staff involved. DRL will ensure that:

- Staff who raise safeguarding concerns are supported by the DSL and, where appropriate, by the senior leadership team
- Staff who have managed a disclosure or difficult safeguarding situation are offered a debrief and access to appropriate support
- The culture of the organisation actively encourages staff to raise any concern, however low-level, without delay
- No member of staff is made to feel that raising a concern is an overreaction
- Safeguarding is a standing agenda item in staff team meetings and supervision

This commitment to a positive safeguarding culture is reflected in the Ofsted Education Inspection Framework (November 2025), under which inspectors evaluate the culture of the organisation and the confidence of staff in safeguarding arrangements as part of the standalone safeguarding judgment (Met/Not Met).

## **Low-Level Concerns**

There may be issues that arise that would be classed as low-level concerns — meaning they may not necessarily meet the harm threshold or pose a significant risk. However, all concerns are shared responsibly. The interests of all are paramount irrespective of circumstances.

Staff do not need to determine whether a concern meets the harm threshold or determine a level of risk before raising it. They have an obligation to raise any safeguarding observation as part of DRL's proactive safeguarding culture. The person raising the concern should:

- Provide a concise written record including a brief context in which the low-level concern arose
- Include details which are as precise and accurate as possible
- Sign, time, and date the record

All concerns should be forwarded to the DSL or Deputy DSL at [safeguarding@drlservices.co.uk](mailto:safeguarding@drlservices.co.uk). The DSL will follow up with the individual, no matter how low-level the concern may appear, to gain their account and make appropriate records. Any referrals should be noted on the safeguarding log.

## **E-Safety and Online Safety**

All apprentices should be able to use the internet where applicable for any educational development, whilst ensuring that safeguarding measures are also in place at all times. DRL will ensure:

- The safety and wellbeing of all those using the internet, social media or any mobile devices
- We operate in line with our values and within the law, including compliance with the Online Safety Act 2023
- All staff follow the correct approach to online safety
- We support and encourage apprentices to use the internet, social media and mobile phones in a way that keeps them safe and shows respect for others
- Usernames, logins, email accounts and passwords are used effectively and securely
- Personal information is held securely and shared only as appropriate
- Images of apprentices are used only after written permission has been obtained, and only for the purpose for which consent has been given
- All staff are aware of safeguarding issues such as the sharing of unwanted images or videos
- When an incident involving nudes and semi-nudes comes to a member of staff's attention, this will be shared with the DSL with a view to referring to appropriate agencies
- Appropriate filtering and monitoring systems are in place, reviewed annually and assessed against the DfE's Filtering and Monitoring Standards and Generative AI product safety expectations
- All staff are made aware of filtering and monitoring provisions, their roles and responsibilities, and how to escalate concerns
- Social media platforms and new technologies are examined and risk-assessed before use within the organisation

## **Online Content Risks**

Staff should be alert to the following categories of online content risk, consistent with Keeping Children Safe in Education 2025:

- Illegal or harmful content, including extremist material and images of child sexual abuse
- Contact risk: harmful contact with others, including grooming, bullying, and exploitation
- Conduct risk: harmful behaviours online, including sharing of images and cyberbullying
- Disinformation, misinformation and conspiracy theories: content that is factually incorrect or deliberately misleading, which can cause real-world harm and may be connected to radicalisation
- Artificial intelligence (AI) risks: the misuse of generative AI tools, including the creation of harmful content, deepfake imagery, and AI-enabled grooming or exploitation

## **Cyber Bullying**

Staff at DRL will educate all apprentices of the importance and seriousness of cyber bullying by encouraging the correct use of any technology. All staff are trained to respond effectively to any reports of cyber bullying or harassment. DRL endeavours to block access to inappropriate websites using firewalls, antivirus protection and filtering systems.

- All bullying is damaging but cyber-bullying and harassment can be invasive of privacy at all times and may be criminal acts
- We will support victims and, when necessary, will work with the Police to detect those involved in criminal acts
- We may use the full range of sanctions to correct or remove apprentices who bully fellow apprentices or harass staff
- We will use our power of confiscation where necessary to prevent crimes or misuse of equipment
- All staff are aware they have a duty to bring to the attention of senior staff and managers any example of cyber-bullying or harassment that they know about or suspect

## **Learners with Prolonged Absence**

Any learner being absent for a prolonged period could be a vital sign of a safeguarding issue, potentially including neglect, sexual exploitation, criminal exploitation, or domestic abuse. Prolonged or unexplained absence must be treated as a potential safeguarding concern in line with the most up to date Keeping Children Safe in Education guidance. DRL will reach out and continue to be in regular contact with any absent learner. If a safeguarding issue is suspected, the DSL will report in accordance with this policy. General information and advice can be found via the Home Office's Missing Children and Adults Strategy.

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

All staff should understand the importance of challenging inappropriate behaviours between peers. DRL's values and ethos provide the platform for staff and apprentices to clearly recognise that abuse is abuse and should never be tolerated or diminished in significance.

Child-on-child abuse is behaviour by an individual or group intending to physically, sexually, or emotionally hurt others. All staff should be aware of safeguarding issues arising from child-on-child or learner-on-learner abuse, including:

- Bullying (including online bullying)
- Physical abuse such as hitting, kicking, shaking, biting, hair pulling, or otherwise causing physical harm
- Sexual violence and sexual harassment
- Sharing of nudes and semi-nudes
- Initiation or hazing type violence and rituals
- Domestic abuse in the intimate relationships of learners (teenage relationship abuse)

All staff receive training in identifying and responding to child-on-child (where & if relevant) and learner-on-learner abuse as part of their induction and annual safeguarding training. Early intervention is key to preventing harmful sexual behaviour from escalating.

## **Responding to Child-on-Child Abuse**

All reports will be managed on a case-by-case basis with the DSL or deputy taking a leading role using professional judgement and supported by other agencies as needed. We will take all reports seriously and reassure the victim that they will be supported and kept safe. Staff will not promise confidentiality as the concern may need to be shared with the DSL and possibly external agencies.

When there has been a report of sexual violence, the DSL (or deputy) will make an immediate risk and needs assessment. The assessment will consider: the victim and their protection and support; the alleged perpetrator; and all others who may be affected. Risk assessments will be recorded and reviewed regularly. DRL will have clear and effective systems for reporting incidents of sexual harassment and sexual violence and sharing information with multi-agency safeguarding partners.

## **Contextual Safeguarding**

DRL recognises that abuse and exploitation can occur in a range of social contexts beyond the home or workplace, including peer networks, online environments, and community settings. This principle of contextual safeguarding requires practitioners to look beyond the immediate relationship between an individual and their family or employer to understand the broader context in which harm is taking place. Contextual factors are particularly relevant when considering county lines, serious violence, CSE, CCE, honour-based abuse, radicalisation, and child-on-child abuse.

## **Child Sexual Exploitation (CSE) and Child Criminal Exploitation (CCE)**

Both CSE and CCE are forms of abuse that occur where an individual or group takes advantage of an imbalance in 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, and/or through violence or the threat of violence. CSE and CCE can affect people of any gender and can include children who have been trafficked for the purpose of exploitation.

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

CSE is a type of sexual abuse in which children are sexually exploited for money, power or status. Some indicators of CSE include:

- Going missing for periods of time or regularly coming home late
- Regularly missing education or not taking part in their programme
- Appearing with unexplained gifts or new possessions
- Associating with other young people involved in exploitation
- Having older boyfriends or girlfriends
- Suffering from sexually transmitted infections
- Mood swings or changes in emotional wellbeing
- Drug and alcohol misuse and displaying inappropriate sexualised behaviour

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

CCE is where an individual or group coerces, controls, manipulates or deceives a child into any criminal activity in exchange for something the victim needs or wants, through violence or the threat of violence. CCE can include:

- Being forced to work in cannabis factories
- Being coerced into moving drugs or money across the country (county lines)
- Forced to shoplift or pickpocket, or to threaten other young people
- Children who appear with unexplained gifts or new possessions
- Children who suffer changes in emotional wellbeing or misuse drugs and alcohol

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

FGM comprises all procedures involving partial or total removal of the external female genitalia or other injury to the female genital organs for non-medical reasons. It is illegal in the UK under the Female Genital Mutilation Act 2003 and the Serious Crime Act 2015.

**Mandatory reporting duty:** Section 74 of the Serious Crime Act 2015 places a duty on regulated professionals, including those working in education and training, to report to the police where, in the course of their professional duties, they either see signs that an act of FGM appears to have been carried out on a girl under 18, or where a girl discloses to them that she has been subjected to FGM. This mandatory duty applies to all staff at DRL. Failure to comply is a criminal offence. Reporting to the police does not prevent staff from also making a referral to children's social care.

Indicators that FGM may have taken place include: a girl having difficulty walking, sitting or standing; appearing distressed or withdrawn after an absence; spending longer than usual in the bathroom; having unexplained absence particularly after a school holiday; or talking about a 'special procedure' or 'becoming a woman'. Any concern about FGM must be reported immediately to the DSL.

## **Reporting of Safeguarding Incidents**

Anyone working in direct contact with under-18s or vulnerable adults may come across signs of harm and/or abuse. If you suspect someone is being abused, communicate your concerns with your line manager in the first instance and/or the DSL via [safeguarding@drlservices.co.uk](mailto:safeguarding@drlservices.co.uk). Staff should be aware of signs, behaviours, and of conversations that suggest or indicate abuse, or a person has been harmed.

If any of the following occurs, report this immediately to a colleague, your line manager or the DSL and record the incident:

- If you accidentally hurt a child, young person, or vulnerable adult
- If they seem distressed in any way
- If a person misunderstands or misinterprets something you have done
- If you are concerned that the individual is being abused

When handling any disclosures: take what is being said seriously; do not investigate; stay calm. No person making a disclosure should be made to feel ashamed. All disclosures should be recorded promptly, carefully and precisely on a safeguarding record form, whilst seeking further guidance from the DSL. For all incidents or concerns, follow current safeguarding procedures. Record the facts reported and/or observed and report them to the DSL. It is the DSL's responsibility to investigate and report any safeguarding issue to appropriate external organisations if required. All staff should note that it is not their responsibility to try to resolve issues.

When any concern or allegation of abuse is made and notified to the local authority, social care or police, DRL must notify the National Apprenticeship Helpdesk on 08000 150600 or [helpdesk@manage-apprenticeships.service.gov.uk](mailto:helpdesk@manage-apprenticeships.service.gov.uk) within 24 hours, providing the name of the training provider, a high-level summary of the incident (without disclosing personal information), and confirmation of whether it is to be investigated by the local authority or the police.

If any apprentice needs to speak to someone regarding any concerns, please contact your Tutor or call the Training Manager on 01277 586 486.

We will always listen and act accordingly. No apprentice should feel alone or unable to voice their concerns.

## **Local Authority Contacts**

Thurrock MASH | [thurrockmash@thurrock.gov.uk](mailto:thurrockmash@thurrock.gov.uk) | 01375 652802

[thurrock.first@thurrock.gov.uk](mailto:thurrock.first@thurrock.gov.uk) | 01375 511 000

24-hour protection line for children and vulnerable adults: 0345 603 7634

Concerned about an adult? Essex Social Care Direct: 0345 603 7630

Report a concern about a child to the Children and Families Hub: 0345 603 7627

Out of hours or bank holidays - Emergency Duty Team: 0345 606 1212

Email: [initialresponseteam@essex.gcsx.gov.uk](mailto:initialresponseteam@essex.gcsx.gov.uk)

For concerns outside our local area, use the online tool: Report Child Abuse to Your Local Council

NSPCC Child Protection Helpline: 0808 800 5000 | Childline: 0800 1111

## Records

DRL are committed to keeping records which are:

- Recorded on a safeguarding incident form
- Of sufficient detail to identify the individual who is the subject of concern and any significant others
- Accurate and factual — a true record of what has been monitored/observed, what has been said and by whom, what gave cause for concern, what action has and/or will be taken, and the reason for those actions
- Non-judgmental
- Timely — completed within 24 hours
- Signed and dated by the writer and co-signed by the DSL or Deputy DSL
- Shared as appropriate by the DSL or Deputy DSL
- Stored safely and securely in accordance with the Data Protection Act 2018 and UK GDPR

Child protection files must be kept separate from general learner records. Where a learner leaves DRL's provision, the DSL will ensure the child protection file is transferred securely to the receiving institution within five days for an in-year transfer, with confirmation of receipt obtained.

## Whistleblowing

DRL encourages the sharing of any concerns regarding the safeguarding of children, young people, and adults at risk as soon as possible with the DSL or Deputy DSL. If individuals reporting concerns within our organisation do not feel they have been acted upon appropriately, we support their right to report concerns to social care, the police, and/or the relevant regulatory authority (e.g. Ofsted, DfE). All staff and volunteers should feel able to raise concerns about poor or unsafe practice and know that such concerns will be taken seriously by the senior management team.

Where a staff member feels unable to raise an issue with their employer, or feels their genuine concerns are not being addressed:

- General guidance on whistleblowing: Whistleblowing for employees — GOV.UK ([www.gov.uk](http://www.gov.uk))
- NSPCC dedicated reporting line: 0800 028 0285 (Monday to Friday 8am to 8pm) | [help@nspcc.org.uk](mailto:help@nspcc.org.uk)

## Safer Recruitment

Safe recruitment is integral to the safeguarding of children, young people, and vulnerable adults. DRL will take all possible steps to prevent unsuitable persons working with apprentices, young or vulnerable people, in line with relevant Keeping Children Safe in Education guidance. When interviewing potential staff, DRL will ensure that:

- There is an open recruitment process with vacancies advertised with a clear commitment to safeguarding
- Full personal details are obtained by application form with relevance to previous work with children, young people and adults at risk
- A rigorous interview is conducted with specific questions relating to safeguarding
- Applicants' identity and claims to qualifications are verified and copies taken
- References are taken up by direct contact with referees
- Evidence of date of birth and address is obtained to confirm right to work in the UK
- An enhanced Disclosure and Barring Service (DBS) check is conducted where appropriate. This will be made clear on the job advert and application form, along with a statement of DRL's commitment to safeguarding

- At least one person on each interview panel has undertaken safer recruitment training, in line with Ofsted's safer recruitment guidelines
- No person is subject to a prohibition order within Section 141B of the Education Act 2011

Any appointment will only be confirmed subject to: a satisfactory DBS check if required; follow-up of references by telephone; a check of essential qualifications; confirmation of the right to work in the UK; suitable online checks; International Child Protection Certificate (ICPC) and/or certificates of good conduct where applicable; and completion of a satisfactory probationary period of 6 months.

All new staff, paid and unpaid, will receive induction training as soon as possible and sign to confirm they have received and understood this policy, been given relevant resources, and agreed to read, understand and abide by relevant Keeping Children Safe in Education guidance. Staff will receive further safeguarding training at the appropriate level and complete the online government Prevent training. Updated training is normally required every 2 years (online) or 3 years (face to face), reviewed annually via the staff matrix.

## **Single Central Record**

DRL is required by relevant Keeping Children Safe in Education guidance to maintain a Single Central Record (SCR) of pre-appointment checks for all staff.

The SCR must record whether the following checks have been carried out and the date each was completed:

- Identity check
- Enhanced DBS check (with children's barred list check) — requested/certificate received. Note: only applicable where regulated activity takes place
- Prohibition from teaching check (Section 141B, Education Act 2011) via <https://www.gov.uk/guidance/check-a-teachers-record>
- Further checks on people who have lived or worked outside the UK
- A check of professional qualifications where required
- A check to establish the person's right to work in the United Kingdom

DRL may additionally record in the SCR: whether relevant staff have been informed of their duty to disclose relevant information; checks made on volunteers; dates on which safeguarding and safer recruitment training was undertaken; and the name of the person who carried out each check. The SCR can be maintained in paper or electronic form. The DSL is responsible for maintaining the SCR and ensuring it is accurate and accessible for inspection.

## **Disclosure and Barring Service (DBS) Checks**

The Disclosure and Barring Service (DBS) is an executive agency of the Home Office. Its primary purpose is to help employers make safer recruitment decisions. DRL will ensure that all staff have an enhanced DBS check before commencing regulated activity.

DBS referral duty: In addition to pre-appointment checks, DRL has a legal duty to refer an individual to the DBS where it removes a person from regulated activity (or would have done so had the person not left) because the person has harmed or poses a risk of harm to a child or vulnerable adult. The DSL is responsible for managing DBS referrals in accordance with the DBS's referral guidance. DRL will ensure there is evidence of any referral made to the DBS. Failure to refer where the legal duty is met may be a criminal offence.

## Keeping Yourself Safe

To maintain your safety and the safety of apprentices, the following are strictly prohibited:

- Befriending apprentices on personal social media sites
- Distributing personal telephone numbers
- Visiting apprentices at home or transporting apprentices to and from locations
- Using sarcasm, insults, or belittling comments towards apprentices
- Entering into personal relationships with apprentices

It is also important to be mindful of the following when conducting yourself. These expectations are set out in DRL's Staff Behaviour Policy (Code of Conduct), which all staff should read, understand and sign at induction:

- One-to-one meetings should take place at a neutral, visible location
- Maintain professional boundaries at all times when carrying out work on behalf of DRL
- Be respectful of all young and vulnerable people; you are in a position of trust
- Do not promise to keep secrets or ask others to do so
- Avoid spending time alone with apprentices in a closed environment; if unavoidable, ensure a member of site staff is aware of where you are
- Be mindful if you acquire an apprentice who creates a conflict of interest — discuss alternative assessor arrangements with your line manager
- If at any point you feel unsafe in an apprentice's company, inform the site manager, your line manager, the DSL, and leave the premises

## Keeping Apprentices Safe

DRL offers an apprenticeship service which places potential apprentices into employment. This creates a greater duty of care. A service level agreement is undertaken prior to the apprentice commencing employment to clarify expectations in relation to health and safety and employment requirements. A risk assessment of employer sites will be performed, and any issues actioned.

Health and safety vetting and monitoring is carried out during apprentice induction. This involves a discussion between the Trainer, employer and apprentice and allows the trainer to be confident in the employer's ability to keep the apprentice safe during their employment.

Prior to placing any apprentice with an employer, DRL undertakes a structured vetting process. The full detail of this process, including the checks carried out, the documentation required, and the risk assessment criteria applied, is set out in DRL's Recruitment Policy. DRL will not place an apprentice with an employer who has not satisfactorily completed this vetting process.

Apprentices are made aware of all DRL's relevant policies, who the DSL and Deputy DSL are, and how to report a concern during their induction to the programme. The safeguarding email address [safeguarding@drlservices.co.uk](mailto:safeguarding@drlservices.co.uk) is provided to all apprentices to allow them to access support confidentially.

If staff feel there may be any mental health issues relating to an apprentice, please seek immediate action and notify the DSL. Resources for staff and apprentices regarding mental health:

- Every Mind Matters (NHS): <https://www.nhs.uk/every-mind-matters/>
- Mental health and wellbeing in further education (DfE): <https://www.gov.uk/guidance/mental-health-and-wellbeing-support-in-further-education>

- OHID mental wellbeing resources: <https://www.gov.uk/government/collections/mental-health-and-wellbeing>
- Further external partner list available from the DSL

## **Legal Framework**

DRL's safeguarding practice is guided by the following key legislation and statutory guidance:

- Children Act 1989: The child's welfare is paramount; safeguarding and promoting it is the priority.
- Children Act 2004: Duty on local authorities to work closely with those providing services to children and young people.
- Education Act 2002: Duty on further education institutions to carry out their function with a view to safeguarding and promoting the welfare of children and young people.
- Rehabilitation of Offenders Act 1974 (Exceptions Order 1975, as amended): Makes certain regulated activity exempt from the Act and requires an Enhanced DBS Check.
- Safeguarding Vulnerable Groups Act 2006: Legislative framework for the Vetting and Barring Scheme for those working with children and vulnerable adults.
- Counter-Terrorism and Security Act 2015: Places the statutory Prevent Duty on education providers, requiring them to have due regard to the need to prevent people from being drawn into terrorism. DRL's specific Prevent obligations are set out in the separate Prevent Policy.
- Serious Crime Act 2015 (Section 74 — FGM mandatory reporting duty): Statutory duty on regulated professionals to report to the police where an act of FGM appears to have been carried out on a girl under 18.
- Care Act 2014: Primary legal framework for adult safeguarding, placing a duty on local authorities to make enquiries where an adult with care and support needs may be at risk of harm.
- Domestic Abuse Act 2021: Extends the statutory definition of domestic abuse to include economic abuse and coercive/controlling behaviour; creates new duties and protections for victims. DRL staff should be aware of teenage relationship abuse as a form of domestic abuse.
- Apprenticeships, Skills, Children and Learning Act 2009: Requires Independent Training Providers to make arrangements to exercise their functions with a view to safeguarding and promoting the welfare of children receiving education or training.
- Online Safety Act 2023: Establishes a regulatory framework for online platforms in relation to illegal content and harmful material; shapes the online safety obligations and awareness of all education and training providers.
- Working Together to Safeguard Children 2023 (statutory guidance): Sets out how organisations and individuals should work together to safeguard and promote the welfare of children, including national multi-agency child protection standards.
- Keeping Children Safe in Education 2025 (statutory guidance): Primary statutory guidance for all education and training providers. All staff are required to read and understand Part One of KCSIE 2025.
- Safeguarding Children and Safer Recruitment in Education: Covers recruitment and selection processes, vetting checks, and duties for safeguarding and promoting the welfare of children in education.
- SEND Code of Practice 0 to 25 Years: Guidance on supporting children and young people with special educational needs and disabilities.

## **Further Staff Guidance**

The following resources provide additional guidance for staff:

- Working Together to Safeguard Children 2023 — GOV.UK ([www.gov.uk](http://www.gov.uk))
- Keeping Children Safe in Education 2025 — GOV.UK ([www.gov.uk](http://www.gov.uk))
- Sharing nudes and semi-nudes: advice for education settings — GOV.UK ([www.gov.uk](http://www.gov.uk))

- Advice to schools and colleges on gangs and youth violence — GOV.UK ([www.gov.uk](http://www.gov.uk))
- Criminal exploitation of children and vulnerable adults: county lines — GOV.UK ([www.gov.uk](http://www.gov.uk))
- Female Genital Mutilation: guidance and resources — GOV.UK ([www.gov.uk](http://www.gov.uk))
- Prevent duty and Channel referral guidance for further education institutions — GOV.UK ([www.gov.uk](http://www.gov.uk))
- DBS referral guidance: Making barring referrals to the DBS — GOV.UK ([www.gov.uk](http://www.gov.uk))
- Contextual safeguarding — [contextualsafeguarding.org.uk](http://contextualsafeguarding.org.uk)
- NSPCC Learning homepage — [learning.nspcc.org.uk](http://learning.nspcc.org.uk)

## Compliance

Regular evaluations and reviews of this policy, including reporting procedures and concerns monitoring, will be undertaken to ensure compliance throughout DRL. This policy will be reviewed annually or sooner if there are significant changes to legislation, statutory guidance, or regulatory requirements. The next scheduled review date is set out in the policy record below. Concerns monitoring is the ongoing responsibility of the DSL and will be reported to the senior leadership team.

Policy Record Details	
<b>Policy Owner:</b>	DRL Services Ltd
<b>Version:</b>	V3
<b>Date Approved:</b>	1 September 2024
<b>Signed By:</b>	David Jamieson
<b>Last Reviewed Date:</b>	3 February 2026
<b>Reviewed by:</b>	David Jamieson / Kerry Prigg (DSL) / Alexia Buttarro (Deputy DSL)
<b>Next Review Date:</b>	1 September 2026