



Northern  
Regeneration cic

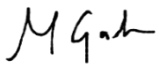
## NORTHERN REGENERATION CIC

### Safeguarding Policy

September 2021

(Version 1.5)

<b>Review Date:</b>	September 2021	<b>Revision Date:</b>	September 2022
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<b>Signature:</b>	 Melissa Gallimore, Operations Manager
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## 1. SAFEGUARDING POLICY STATEMENT

Safeguarding is everyone's responsibility

Northern Regeneration is committed to safeguarding and promoting the welfare of all learners/apprentices and staff. Northern Regeneration recognises that a safe and trustworthy environment combined with clear lines of communication and decisive action ensures the best outcomes for all learners/apprentices and staff. Northern Regeneration expects all staff, volunteers, sub-contractors, employers and partners to endorse and practice this commitment at all times.

## 2. INTRODUCTION

Northern Regeneration has safeguarding statutory duties and responsibilities in relation to its learners/apprentices as set out below.

### SAFEGUARDING CHILDREN

In relation to learners/apprentices under the age of 18 years old, and classed as a child in law, Northern Regeneration has a statutory duty, as set out in the Education Act 2002 and Children Act 2004, to promote and safeguard the welfare of children and have due regard to guidance issued by the Secretary of State at all times. Northern Regeneration adopts the definition used in the statutory guidance: *Working Together to Safeguard Children 2018*, issued by the Department for Education (DfE), which applies to all children and, defines safeguarding and promoting children and young people's welfare as:

- protecting children from maltreatment.
- preventing impairment of children's health or development.
- ensuring that children are growing up in circumstances consistent with the provision of safe and effective care, and
- taking action to enable children to have the best outcomes.

The above statutory guidance defines child protection as part of safeguarding and promoting welfare. Child protection is the activity undertaken to protect children who are suffering, or are likely to suffer significant harm including all forms of abuse and neglect, female genital mutilation or other so-called honour based violence, and extra-familial threats like radicalisation and any kind of child exploitation. Such concerns will be referred into Children Social Care and the Police if appropriate.

### SAFEGUARDING ADULTS

In relation to learners/apprentices 18 years and over, and classed as an adult in law, Northern Regeneration has a statutory safeguarding duty, as set out in the Care Act 2014, which must be seen in conjunction with Mental Capacity Act (including DoLs) 2005 and the Human Rights Act 1998. Northern Regeneration must have regard to guidance issued by the Secretary of State at all times.

The adult safeguarding duties under the Care Act 2014 apply to an adult, aged 18 or over, who:

- has needs for care and support (whether or not the Local Authority is meeting any of those needs) and
- is experiencing, or at risk of abuse or neglect; and
- as a result of those care and support needs is unable to protect themselves from either the risk of, or the experience of abuse or neglect.

The Care Act 2014 defines safeguarding as “protecting an adult’s right to live in safety, free from abuse and neglect.” The above duties apply in relation to any person who is aged 18 or over and at risk of abuse or neglect because of their needs for care and support. Such concerns will be referred into Adult Social Care and the Police if appropriate.

Whilst these duties have to be met for a referral to Adult Social Care and/or the Police, Northern Regeneration policy is to safeguard all learners/apprentices. So though a concern may not meet the threshold for such a referral and/or support of these external agencies, Northern Regeneration is committed to safeguarding and supporting all learners/apprentices as appropriate.

The adult with care and support needs, in need of safeguarding, will hereafter be referred to as the adult throughout this policy.

### **LOOKED AFTER CHILDREN, PREVIOUSLY LOOKED AFTER CHILDREN AND CARE LEAVERS**

Staff should be aware that these learners/apprentices may need additional services, assistance, protection and consideration.

The safeguarding lead and the deputy is the point of contact for coordinating support for these learners/apprentices both internally and externally. Northern Regeneration will hold a record of these learners/apprentices including contact details of the learner’s social worker, virtual school and carer; relevant contact details for previously looked after children; and, the details of the personal advisor and next of kin for care leavers.

For looked after learners/apprentices, staff are expected to work alongside the safeguarding officers/lead to attend Personal Education Plan meetings to support their education as well as support with the Looked After Child review meetings.

Northern Regeneration will liaise as necessary with the social worker, personal adviser and/or next of kin regarding any issues of concern affecting the learner/apprentice.

### **LEARNERS/APPRENTICES WITH SPECIAL EDUCATIONAL NEEDS AND DISABILITIES**

Staff should be aware that these learners/apprentices may face additional safeguarding challenges. Additional barriers can exist when recognising abuse and neglect in this group of learners/apprentices including communication barriers.

#### **STAFF MUST;**

- Be aware that these learners/apprentices may not outwardly show any signs of abuse;
- Further explore possible indicators of abuse such as behaviour, mood and injury without making assumptions that these factors just relate to the learner’s disability;

- Monitor these groups of learners/apprentices to ensure that they are not being disproportionately impacted by behaviours such as bullying or peer group isolation.
- These learners/apprentices will have a support profile in place to guide staff in providing additional support to overcome any barriers.

### 3. INHERENT PRINCIPLES OF THE POLICY

Safeguarding is the responsibility of all staff with Northern Regeneration playing its part in preventing, identifying and reporting abuse and neglect.

As well as ensuring that safeguarding concerns are addressed, we will also ensure that learners/apprentices who attend Northern Regeneration sites are kept safe from harm whilst they are in our charge. To this end, this policy must be seen in conjunction with other policies as appropriate and external legislation and guidance.

Northern Regeneration will not limit its view of what constitutes abuse or neglect, as they can take many forms and the circumstances of the individual case should be considered.

When dealing with safeguarding concerns, it is important that all staff should 'Think Family' and consider the family members within the household and wider networks who may be at risk of or experiencing abuse or neglect. Northern Regeneration will make referrals to Children or Adults Social Care when this is necessary to safeguard children and adults in need of safeguarding. Northern Regeneration will engage with County Lines and other external agencies to support all learners on all programmes.

The following six principles underpin all safeguarding work in Northern Regeneration:

- **Empowerment** – learners/apprentices being supported and encouraged to make their own decisions and informed consent. If consent isn't given, but in order to fulfil its statutory safeguarding duties, Northern Regeneration still has to make a referral to Children/Adult Social Care and/or the Police. This will be explained sensitively and supportively along with an explanation as to the reasons why.
- **Prevention** – it is better to take action before harm occurs.
- **Proportionality** – the least intrusive response to the risk presented.
- **Protection** – support and representation for those in greatest need.
- **Partnership** – local solutions through services working with their communities. Communities have a part to play in preventing, detecting and reporting neglect and abuse.
- **Accountability** – accountability and transparency in delivering safeguarding.

### 4. AIMS OF THIS POLICY

The aims of this policy are:

- To ensure that learners/apprentices are effectively safeguarded from the potential risk of harm at Northern Regeneration and that the safety and wellbeing of the learner is of the highest priority in all aspects of Northern Regeneration's work.
- To help Northern Regeneration maintain its ethos whereby staff, volunteers, contractors, sub-contractors, employers, learners/apprentices, parents, carers, guardians and visitors feel able to articulate any concerns comfortably, safe in the knowledge that effective action will be taken as appropriate.
- To outline Northern Regeneration's commitment to safeguard and promote the

welfare of learners/apprentices.

## 5. PURPOSE OF THIS POLICY

To ensure all members of Northern Regeneration:

- Are aware of their responsibilities in relation to safeguarding learners/apprentices.
- Know the procedures that should be followed if they have a safeguarding cause for concern.
- Know how to access additional information regarding safeguarding.
- Are aware of the key indicators relating to child and adult abuse and/or neglect.
- Support the commitment to safeguarding, child and adult protection.
- Principles

Northern Regeneration has a statutory duty to safeguard its learners/apprentices as set out in the 'Introduction' section of this policy.

Northern Regeneration recognises its legal and moral duty to promote the well-being of learners/apprentices and protect them from harm and respond to safeguarding concerns when they arise.

We believe that every learner/apprentice has, at all times and in all situations, a right to feel safe and protected from any situation or practice that results in them being physically, or psychologically damaged.

We agree that we have a primary responsibility for the care, welfare and safety of the learners/apprentices in our care, and we will carry out this duty through our teaching and learning, day to day practices, extracurricular activities, pastoral care and extended activities. In order to achieve this, all staff, in whatever capacity, will at all times act proactively in learner welfare matters especially where there is a possibility that a learner may be at risk of significant harm.

We will enable learners/apprentices, through personal development sessions and other support activities, to develop the skills they need to stay safe from harm. We will also help them to develop the confidence they need to speak up for themselves and others. We will provide effective support, guidance and care if a learner shares a concern with us.

Learners/apprentices should be able to:

- Recognise and manage risks in different situations.
- Judge what kind of physical contact is acceptable and what is not acceptable.
- Recognise when their personal safety is threatened and when and where to get help.
- We will design systems that will:
  - Prevent unsuitable people working with learners/apprentices.
  - Promote safe practice and challenge poor and unsafe practice.

Northern Regeneration seeks to adopt an open and accepting attitude towards learners/apprentices as part of their responsibility for pastoral care. Northern Regeneration hopes that parents/carers and learners/apprentices feel free to talk about any concerns and will see the business as a safe place if there are any difficulties at home.

Learners/apprentices' worries and fears will be taken seriously if they seek help from a member of staff. However, staff must not promise secrecy if concerns are such that referral must be made to the appropriate agencies in order to safeguard the learner's welfare and/or

protect them from abuse and/or neglect. Learners/apprentices will be made aware of this legal obligation.

If there are suspicions that a learner's physical, sexual or emotional well-being is being, or is likely to be, harmed, or that they are being neglected or abused in any way, appropriate action will be taken. This action will be in accordance with the safeguarding procedures, if the learner is under 18 or Safeguarding Adult Board, if learner is over 18, of the Local Authority area where the learner resides.

As a consequence, we:

- assert that Northern Regeneration is an integral part of the safeguarding processes.
- recognise that safeguarding learners/apprentices is a responsibility of the whole business.
- will ensure through training and supervision that all staff are alert to the possibility that a learner is at risk of or suffering harm and know how to report concerns or suspicions.
- will designate a senior member of staff with knowledge and skills in recognising and acting on safeguarding concerns. S/he will act as a source of expertise and advice and is responsible for coordinating action with the business and liaising with other agencies.
- ensure that all staff with designated responsibility for safeguarding learners/apprentices will receive appropriate training.
- will share our concerns with others who need to know and assist in any referral process.
- will ensure that all staff who have a suspicion that a learner may be suffering or may be at risk of suffering significant harm, refer such concerns immediately to the Designated Safeguarding Lead, who will refer on to Children/Adults Social Care in accordance with the Local Safeguarding Children/Adults Board based in the Local Authority where the learner lives. Should the Designated Safeguarding Lead not be available, the member of staff with the concern will themselves make a referral to Children/Adults Social Care as appropriate.
- will ensure that all staff are aware of the safeguarding procedures of Safeguarding Children/Adult Boards and, where appropriate, the Local Authority, and act on any advice given by them.
- safeguard the welfare of learners/apprentices, through positive measures to address bullying, especially where this is aggravated by sexual or racial factors, disability or special educational needs, cyber bullying or internet technologies; will ensure through the recruitment and selection of volunteers and paid employees that all staff are suitable to work with children and adults who need safeguarding.
- will act swiftly and make appropriate referrals to the Local Authority Designated Officer where an allegation has been made that a member of staff has committed an offence against a learner, harmed a learner, or acted in a way that calls into question their suitability for working with learners/apprentices.

## **Prevent**

It is important that all learners/apprentices are protected from the risk of radicalisation. Section 26 of 'the Counter-Terrorism and Security Act 2015' (the Act) places a duty on certain bodies ("specified authorities" listed in Schedule 6 to the Act), in the exercise of their functions, to have "due regard to the need to prevent people from being drawn into terrorism". It is the responsibility of Northern Regeneration in its capacity as a provider of

education, to have regard to this duty. The duty also requires Northern Regeneration to 'actively promote' the fundamental British values of democracy, the rule of law, individual liberty, and mutual respect and tolerance of those with different faiths and beliefs.

Please refer the Prevent Policy.

### **Female Genital Mutilation**

Female Genital Mutilation (FGM) is illegal in England and Wales under the FGM Act 2003. It is a form of child abuse and violence against women. FGM comprises all procedures involving partial or total removal of the external female genitalia for nonmedical reasons.

Section 5B of the FGM Act 2003 introduces a mandatory reporting duty which requires regulated health and social care professionals and teachers in England and Wales to report 'known' cases of FGM in under 18s which they identify in the course of their work to the police, where they either:

- Are informed by a girl under 18 that an act of FGM has been carried out on her; or
- Observe physical signs which appear to show that an act of FGM has been carried out on a girl under 18 and they have no reason to believe that the act was necessary for the girl's physical or mental health or for purposes connected with labour or birth.

Complying with the duty does not breach any confidentiality requirement or other restriction on disclosure which might otherwise apply.

The Designated Safeguarding Lead must make an appropriate referral to Children's Social Care if FGM is suspected. In these cases, parents will not be informed before seeking advice. This duty does not apply in 'at risk' or suspected cases.

For all other staff, normal safeguarding procedures apply in the reporting of FGM cases.

The Home Office guide ['Mandatory Reporting of Female Genital Mutilation – procedural information'](#) provides further information.

### **Peer on Peer Abuse**

Staff should be aware that learners/apprentices are capable of abusing their peers. This is generally referred to as peer on peer abuse and can include, though not limited to, bullying, cyberbullying; sexual violence and sexual harassment; physical abuse; sexting; initiating/hazing type violence and rituals. Whilst staff need to be aware of the gendered nature of peer on peer abuse, all peer on peer abuse is unacceptable and will be taken seriously.

Northern Regeneration will not tolerate peer on peer abuse. Abuse is abuse and will not be passed off as banter. Every report of peer on peer abuse will be taken seriously and considered on a case by case basis, supported by other agencies, such as children's social care and the police as appropriate. Staff must report such allegations.

Northern Regeneration will make an immediate risk and needs assessment following the report of peer on peer abuse, including consideration of how to support and protect the victim and alleged perpetrator.

The risk and needs assessment will consider the victim, especially their protection and support; the alleged perpetrator; and, all other learners/apprentices (and if appropriate adult

learners/apprentices and staff) and any actions appropriate and proportionate to keep them all safe.

The response will be proportionate to the case and support for the victim and alleged perpetrator tailored on a case-by-case basis.

A proactive approach is adopted to preventing peer on peer abuse and includes;

- mandatory staff training;
- learner awareness through personal development;
- zero tolerance to peer on peer abuse articulated through policy statement, personal development and training.

### **Learner on Learner Sexual Violence and Sexual Harassment**

Sexual violence and sexual harassment is not acceptable and will not be tolerated. Every report of sexual violence or sexual harassment will be taken seriously and considered on a case by case basis, supported by other agencies, such as children's social care and the police as required. Staff must report such allegations.

An immediate risk and needs assessment following the report of sexual violence will be made. The risk assessment will consider the risk posed to all learners/apprentices and staff and adequate measures will be put in place to protect them and keep them safe. Northern Regeneration will consider the need for a risk assessment on a case by case basis for reports of sexual harassment.

The risk and needs assessment will consider the victim, especially their protection and support; the alleged perpetrator; and, all other learners/apprentices (and if appropriate adult learners/apprentices and staff) and any actions appropriate and proportionate to keep them all safe.

A proactive approach is adopted to preventing learner on learner sexual violence and sexual harassment and includes;

- mandatory staff training;
- learner/apprentice awareness through personal development sessions;
- zero tolerance to peer on peer abuse articulated through policy statement, personal development sessions and training.

### **Dealing with Concerns**

Concerns should be reported to the Designated Safeguarding Lead immediately and should also be recorded. Staff should provide as much detail as possible about the concern, clarifying the basic facts. If an alleged crime has been committed, it is necessary to gather the basic facts about the alleged perpetrator (including name, age, address, access to children and adults), but not take any action that might alert the alleged perpetrator.

A safeguarding cause for concern is an action, observation, disclosure or discussion that makes staff feel anxious about the safety or wellbeing of a learner/apprentice.

If, at any point, there is a risk of immediate serious harm to a learner/apprentice or staff believe that a learner/apprentice is suffering or likely to suffer significant harm, contact must be made with the Designated Safeguarding Lead or a member of the Senior Management



Team (SLT), immediately so that prompt, appropriate action and referrals can be made to safeguard the learner/apprentice. If staff are unable to make contact with the Designated Safeguarding Lead or a member of SLT, a referral must immediately be made by that member of staff directly to Children or Adult Social Care, depending on the age of the learner and it must be to the Social Care team in the Local Authority area where the learner resides. In addition, if appropriate, support from the relevant emergency services should be sought (Police/Ambulance/Fire Services).

If a learner has a Social Worker, staff must keep the Social Worker updated on any safeguarding concerns regarding the learner, as well as the Safeguarding Team.

An electronic safeguarding file will also be raised, and this will include:

- Learner Information Sheet.
- Details of other agencies the learner may be working with.
- Whether a child protection, child in need, early help assessment or adult safeguarding arrangements are in place.
- Chronological information including cause for concerns, emails, telephone calls, meeting notes.
- Concerns about and/or contact with the learner and actions taken.
- Information on any siblings.

The file will be marked 'live' and details will be added to the safeguarding database/log. The file will be stored in a secure place.

Staff should be aware that records may be shared with others at some stage and in exceptional cases, the possibility that they may become evidence in court proceedings.

### **Safeguarding Arrangements for 14-16-Year-Old Learners/apprentices**

Some learners/apprentices are aged between 14-16 years old and will be in the equivalent to Years 10 & 11 of secondary school.

### **Safeguarding Structure and the Role of Staff**

The Designated Safeguarding Lead for Safeguarding and Prevent is:

Melissa Gallimore

In their absence, these matters will be dealt with by the Deputy Designated Safeguarding Lead and Prevent is:

Simon Knowles

### **Recruitment**

In order to ensure that learners/apprentices are protected we will ensure that our staff and volunteers are carefully selected, screened, trained and supervised.

We accept our responsibility to follow the guidance set out in the most up to date version of the statutory guidance 'Keeping Children Safe in Education'. In particular, we will ensure that the following checks are satisfactorily completed before a person takes up a position:

- Identity checks to establish that applicants are who they claim to be including having sight of an applicant's birth certificate, passport and/or driving license.

- Checking academic qualifications, to ensure that qualifications are genuine.
- References being undertaken prior to interview and enquiring about suitability to work with children and/or vulnerable adults.
- Previous employment history will be examined and any gaps accounted for.
- Appropriate Disclosure and Barring Service (DBS) checks are completed.
- The process will also confirm that the 'Preventing Illegal Working; Declaration of Entitlement to Work in the UK' is completed.

We understand that some people otherwise unsuitable for working with children and adults in need of safeguarding may use volunteering to gain access to children and adults. For this reason, any volunteers in whatever capacity, will be recruited in line with Recruitment and Selection Policy.

### **Induction and Training**

All new members of staff will receive induction training, which will give them an overview of the organisation and ensure they know its purpose, values, services and structure, as well as how to identify and report abuse and safeguarding concerns within the appropriate levels of confidentiality.

All staff will attend refresher training every 3 years, which includes updates via newsletters, emails, and staff meetings that staff are expected to participate in.

### **Conduct of Staff**

Northern Regeneration has a duty to ensure that high standards of professional behaviour exist among all staff who come into contact with learners/apprentices and that all members of staff are clear about what constitutes appropriate behaviour and professional boundaries.

At all times, members of staff are required to work in a professional way with learners/apprentices. All staff should be aware of the dangers inherent in:

- working alone with a learner.
- physical interventions.
- cultural and gender stereotyping.
- dealing with sensitive information.
- giving to and receiving gifts from learners/apprentices and parents.
- contacting learners/apprentices through private telephones (including texting), e-mail, msn, or social networking websites.
- disclosing personal details inappropriately.
- meeting learners/apprentices and families outside working hours or duties.

Appropriate training will be provided to staff in relation to the areas listed above.

If any member of staff has reasonable suspicion that a learner is suffering harm and fails to act in accordance with this policy and the relevant Safeguarding Children and Adults Board procedures, this will be viewed as misconduct.

An agreed 'Whistleblowing' policy in relation to safeguarding is in place in order to support the ethos where learners/apprentices and staff can talk freely about concerns, poor or unsafe practice potential failings knowing they will be listened to and appropriate action taken. If staff feel they are unable to raise their issue internally or feel that their genuine concerns are not being addressed other whistleblowing channels are available.

There are a range of mechanisms in place to ensure that learners/apprentices feel comfortable to express their concerns to staff, for example:

- at any stage of a learner's course as promoted during induction.
- via learner meetings.
- learning mentor drop in sessions.
- an open approach to discussing issues with staff.

### **Allegations Against a Member of Staff**

Allegations against members of staff, whether paid or unpaid, must be reported immediately reported to the safeguarding officers and SLT will then decide on the next steps.

If the learner is a child (under 18) and anyone makes an allegation (current or historic) or it is suspected that a member of staff may have:

- behaved in a way that has harmed a child, or may have harmed a child;
- possibly committed a criminal offence against or related to a child; or
- behaved towards a child or children in a way which indicates s/he may pose a risk of harm to children.

This must be reported without delay to the safeguarding officers who will handle such allegations. Basic information about the allegation will be collated and a decision made as to whether it meets the threshold to be reported to the Local Authority Designated Officer (LADO) and within the 24-hour timescale of reporting such concerns to LADO. The LADO will discuss the concerns and offer advice and guidance on how the situation will be managed. Northern Regeneration will not investigate the concerns or enter into discussions with the alleged perpetrator without initial advice and guidance from the LADO.

If the learner is an adult (18+) with care and support needs and an allegation (current or historic) is made or it is suspected that a member of staff may have:

- Behaved in a way that has harmed or may have harmed an adult with care and support needs;
- Possibly committed a criminal offence against or related to an adult with care and support needs;
- Behaved towards an adult with care and support needs in a way that indicates s/he is unsuitable to work with adults with care and support needs;
- Behaved in a way that has harmed children or may have harmed children which means their ability to provide a service to adults with care and support needs must be reviewed;
- May be subject to abuse themselves and as a consequence means their ability to provide a service to adults with care and support needs must be reviewed.
- Behaved in a way which questions their ability to provide a service to an adult with care and support needs which must be reviewed e.g. conviction for grievous bodily harm against someone who an adult with care and support needs is not.

This must be reported without delay to the safeguarding officers who will handle such allegations.

### **Subcontracting**

Northern Regeneration is committed to ensuring that all learners in our subcontracted provision are safeguarded.

Where Northern Regeneration contracts its services to outside providers, we will ensure that these providers have received the appropriate training in safeguarding and prevent and have relevant policies and procedures in place. We will ensure there are arrangements in place to link on such matters. Such considerations will be made explicit in any contract or service level agreement with the provider.

### **Contracting**

- All contractors will be asked to provide an enhanced DBS check. If they are unable to provide this, they will be supervised at all times whilst undertaking work on site
- Northern Regeneration is responsible for determining the appropriate level of supervision.
- Northern Regeneration should always check the identity of contractors and their staff on arrival at the site.

### **Visitors/Guest Speakers**

- All visitors/guest speakers will be asked to provide an enhanced DBS check. If they are unable to provide this, they will be supervised at all times whilst undertaking activities on site
- Northern Regeneration is responsible for determining the appropriate level of supervision.
- Northern Regeneration should always check the identity of visitors/guest speakers on arrival at the site.

### **Monitoring IT**

Northern Regeneration CIC has laptops on site to support the training of apprentices and learners. IT usage is managed and monitored as follows:

- All laptops have been set up by an external IT Consultant with the necessary software packages and are password protected
- All laptops have installed firewalls and antivirus software
- All staff, apprentices and learners discuss the safe use of IT during their induction and are issued guidance in a dedicated Staff Handbook/ Learner Handbook
- Apprentices and learners can only access a laptop in the presence of a member of staff

### **Photographing Learners/apprentices under the age of 18**

We will not allow images of learners/apprentices to be used on Northern Regeneration's websites, social media, publicity, or press releases, without express permission to do so. Northern Regeneration cannot however be held accountable for photographers or video footage taken by parents or members of the public at functions.

On the occasions that Northern Regeneration has a photographer or videographer present at events or for other purposes we will inform and seek additional permissions to use any footage or photographs taken on any media.

### **Confidentiality and Sharing Information**

All data about learners/apprentices is handled in accordance with the requirements of the law and any national and local guidance.

Any member of staff who has access to sensitive information about a learner or the learner's family must take all reasonable steps to ensure that such information is only disclosed to those people who need to know when there is a legal duty to share information.

Regardless of the duty of confidentiality, working within the remit of our safeguarding duties, if any member of staff has reason to believe that a learner may be suffering harm, or be at risk of harm, their duty is to forward this information without delay.

### **Retention of Safeguarding Records**

In accordance with requirements safeguarding records will be kept for ten years.