

Safeguarding Policy

CITB / NCC

2025 - 2026

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Policy Overview

CITB is committed to safeguarding the welfare and protection of all and believes it is always unacceptable for anyone to experience abuse or discrimination of any kind; it takes all reasonable steps to protect all from harm and accepts its responsibility for the wellbeing and safety of its stakeholders, including children, young people, and adults at risk and wider staff teams.

CITB will make every effort to comply with current national legislation, ensuring that the Board of Trustees, Executive Management Team, Leadership Team, and wider staff teams understand and meet their safeguarding responsibilities.

CITB will ensure that the rights of learners are respected regardless of age, sex, sexual orientation, disability, race (including colour, nationality, ethnic origin), religion or beliefs, gender reassignment, pregnancy, and maternity status, marital or civil partnership status.

As a Training Provider, CITB/NCC complies with its responsibility under the Counter Terrorism and Security Act (CTSA) 2015 to have due regard to the need to prevent people from being drawn into terrorism.

Principles and Values

CITB has identified the following principles and values concerning safeguarding:

- CITB recognises that safeguarding is everyone's responsibility and will support staff to develop their understanding of safeguarding to equip learners with the knowledge to keep themselves safe.
- CITB is committed to working proactively with all staff, learners, providers, employers, and partner agencies to provide an environment in which every individual is free from abuse and harm. CITB will adhere to the best practice guidance in safeguarding and to statutory guidance.

Strategy Objectives

The Safeguarding Policy supports the CITB Strategic Plan with the following objectives:

- To provide a safe learning environment for learners, staff, and visitors.
- To identify children, young people and vulnerable adults who are suffering, suspected of suffering or at risk of suffering significant harm.
- To reduce the risk of significant harm to children, young people and vulnerable adults from abuse or other types of exploitation, including radicalisation.
- To ensure appropriate safeguarding action is taken to preserve safety at home, at work, and in training.
- To support individuals in maintaining control over their lives and in making informed choices without coercion.

Construction is a challenging industry, with one of the highest suicide rates among UK industries, with a culture of silence contributing to rising cases of stress, anxiety and depression. But at CITB/NCC we aim to challenge the stigma around mental health and have a commitment to



support all learners who enter this challenging but rewarding career. This safeguarding policy supports this aim, alongside education, health and safety, and welfare support.

Policy Scope

This Operational Policy covers:

- Learners and customers.
- Employees.
- Employers.
- Suppliers (external partners who provide training or employability services on our behalf); and
- External stakeholders and visitors.

This Policy applies to all people who work for or advise CITB, including permanent, fixed-term, or temporary staff, contractors, interim staff under contract, people on work experience, and agency workers.

This policy should be read in conjunction with the policies and procedures referred to in the main body of this policy, or referenced in **Appendix A**.

Legislation and Guidance

It is a statutory requirement that all staff should read and understand Part 1 and Annex A of the current Keeping Children Safe in Education guidance, and/or Safeguarding in Scotland guidance as per the region(s) in which they work. (available to all staff via MyLearning)

Further legislation relevant to this policy is referenced in **Appendix B**.

Accountability, Responsibilities, and Training

The Designated Safeguarding Leads (DSL) have lead responsibility for safeguarding and child protection within the organisation. There are two named DSLs at CITB/NCC, and they are the Safeguarding and Welfare Senior Manager and the Safeguarding Policy & Practice Specialist Lead. The DSLs report to the Head of Quality and Safeguarding and are supported by 3 Deputy DSLs – Safeguarding and Wellbeing Advisors. There is an appointed Board member with responsibility for safeguarding.

It is the responsibility of all staff to ensure that any concerns, no matter how minor, regarding abuse, harm, or wellbeing are reported to the Safeguarding Team in accordance with the process set out in this policy. All Managers should ensure that their teams comply with this policy.

Completion of mandatory safeguarding training is a condition of employment, and all staff are required to undertake training at induction, and then on a regular basis. Staff members who have additional responsibilities (e.g. DSLs, DDSLs) will complete additional specialist training every two years. Board members receive induction and annual training.

Welfare Support

CITB is committed to providing early help and recognises that Early Help is more effective in promoting the welfare of all children, young people and vulnerable adults rather than reacting later. We believe that Early Help is important and are committed to supporting both learners and



staff when a welfare need is identified. Effective early help relies upon identifying those who would benefit from early help, assessing their needs and providing targeted support services. Staff must remain vigilant to learners who may have additional vulnerabilities, including those with Special Educational Needs and Disabilities (SEND), those currently in care, care leavers, or learners with any other recognised vulnerabilities.

Welfare support is provided on an individual basis. It may involve support from those within CITB or signposting to local and/or national charities and agencies to ensure that their welfare needs are met. Learners are provided with a list of national support services during Induction, and further information on these services is available on CITB sites. Each site has a Welfare Team to support learners.

What is Safeguarding?

Safeguarding is a term used to denote measures to protect the health, wellbeing, and human rights of individuals, which allow people, children, young people, and adults to live free from abuse, harm, and neglect.

Child Protection is part of safeguarding and promoting welfare. This refers to the activity that is undertaken to protect specific children who are suffering, or are likely to suffer, significant harm.

All staff need to be aware that safeguarding incidents can occur in situations both inside and outside of their families. Young people can be vulnerable to multiple harms including (but not limited to) sexual abuse (including harassment and exploitation), domestic abuse in their own relationships, criminal exploitation, serious youth violence, county lines, and radicalisation. **ALL** concerns, regardless of when or where they occurred, should be reported to the Safeguarding Team.

Online Safety

All staff should be aware that technology plays a significant role in many safeguarding and wellbeing issues. Learners are at risk of abuse and other risks online as well as face-to-face. In many cases, abuse will take place concurrently both online and offline.

As a training provider, NCC acknowledges that online safety is one of the integral components to keeping staff and learners safe. NCC provides safe access to the internet and digital technology to all staff.

Access to the internet using Wi-Fi within NCC premises will be monitored. Internet filtering systems are in place to monitor and safeguard all from accessing inappropriate sites; this is regularly reviewed and monitored by the Technology team to ensure the filters have not been compromised. Filtering and monitoring software flags any concerning inputs to IT, Safeguarding Team, and relevant staff.

Downloading and forwarding unauthorised copyright information or materials that may be considered defamatory, racist, sexist, homophobic, incites hatred or violence, are sexually explicit or otherwise contravenes **NCC's Equality and Diversity Strategy Standards, Learner Code of Conduct**, or other key organisational policies will be treated as gross misconduct. Emails received and/or passed on that contain jokes of a sexual or racial nature, or jokes that cause offence and can be considered as harassment, should be reported.

Radicalisation and Prevent – Counter Terrorism

As a Training Provider, CITB complies with its responsibility under the Counter Terrorism and Security Act (CTSA) 2015 to have due regard to the need to prevent people from being drawn into terrorism. This is often referred to as Prevent Duty. Its key function is to safeguard individuals



from radicalisation and extremism by identifying and supporting those at risk before they commit criminal acts.

The Prevent Duty is part of the Counter-Terrorism and Security Act 2015 (Section 26). It places a legal responsibility on schools and education providers to act proportionately and reasonably to prevent radicalisation. Compliance is monitored by Ofsted and other regulatory bodies.

All CITB staff and learners are provided with information and training on Prevent and British values, which includes guidance on who to contact if they are concerned that someone may be vulnerable to being drawn into terrorism.

To support the fulfilment of this duty, CITB has a Prevent Action Plan that is reviewed regularly, along with Prevent Duty Procedures (see **Appendix D**), which should be referred to for specific information and guidance.

Absence from education

All staff should be aware that absence from education, particularly repeatedly and/or for prolonged periods, can act as a vital warning sign of a range of safeguarding possibilities. This may include abuse and neglect, such as sexual abuse or exploitation, and can also be a sign of criminal exploitation, including involvement in county lines. It may indicate mental health problems, risk of substance abuse, or other safeguarding concerns. Early intervention is essential to identify any underlying safeguarding risks and to help prevent the risks of non-attendance in the future. **Detailed guidance is contained within the NCC Attendance Strategy.**

Safeguarding and Accommodation

CITB is committed to ensuring that all apprentices accommodated during training are safe, supported, and supervised in line with the *Further Education Residential Accommodation: National Minimum Standards (DfE)*.

Apprentices may be accommodated either in onsite residential facilities at NCC East or in pre-approved hotels arranged through an authorised provider (*ArrangeMY*). Accommodation will only be used where it has been risk assessed and meets safeguarding expectations.

Additional safeguarding measures are in place for apprentices under 18 and those identified as vulnerable. Under-18s will not be placed in hotel accommodation unless exceptional circumstances are agreed with a Designated Safeguarding Lead (DSL). All female learners in England have the option to complete their training at NCC East, which offers safe, single-gender accommodation.

Appropriate supervision, welfare checks, and regular staff contact will be maintained for all apprentices in residential accommodation. Welfare staff are accessible to apprentices throughout their stay, with clear routes for raising concerns. All apprentices will receive information on how to raise concerns, report incidents, and access support while in accommodation. Safeguarding responsibilities apply equally across all accommodation types, including partner provider colleges.

All accommodation arrangements are subject to regular monitoring, feedback, and review to ensure compliance with safeguarding standards.

Reporting and Recording Concerns

All staff must ensure that they are familiar with and understand the '5 R' principles that underpin the reporting and referral process referenced in **Appendix C**. These are:

- **Recognise** the signs of abuse
- **Respond** and react accordingly
- **Record** the facts of the disclosure
- **Report** the disclosure as soon as possible/within 24 hours
- **Refer** all relevant concerns to external agencies as appropriate

The DSLs will refer all relevant concerns to external agencies as appropriate.

In situations where an individual may be at risk of immediate harm, it may be necessary for a staff member to contact the emergency services. In these cases, staff must ensure the information is reported to a DSL as soon as it is practical, but always on the same day, with an electronic report submitted within 24 hours.

All staff must be aware that they cannot promise confidentiality if this could compromise the safety or wellbeing of a learner, or that of another.

It is vital that throughout the process, the learner's views are taken into account, and they are never made to feel that they are creating a problem.

When to make a report

All CITB/NCC staff have a duty to report any concerns they may have that a learner may be at risk of harm, abuse, or have wellbeing concerns, even if the learner has requested that the incident be kept confidential between themselves and the member of staff.

Staff are required to report:

- If abuse or harm is suspected
- If abuse or harm is witnessed
- When an allegation of abuse or harm is made
- When a learner discloses abuse or harm
- Where they have any other concern for learner wellbeing.

Staff should be aware that a learner may not feel ready or know how to tell someone that they are being abused, or they may not recognise their experience as harmful. This should not prevent staff from having professional curiosity and speaking with the Safeguarding Team if they are concerned.

Staff should be aware that incidents and/or behaviours can be associated with factors outside of college and work, and/or can occur between children/learners/adults in these external environments.

Appendix F provides a summary and definitions of types of abuse and wider safeguarding concerns.

The Reporting Procedure

CITB has a confidential internal process for the reporting and recording of concerns. It is important to note that, when any suspicions or allegations of harm or abuse have been reported, information is kept confidential and only shared on a 'need to know' basis.

Where any information obtained needs to be shared with outside agencies to ensure the safety and welfare of an individual, this will be undertaken in accordance with the safeguarding information sharing guidelines detailed in **Appendix H**.

All records are stored securely in accordance with GDPR requirements.

Key reporting process steps are detailed in **Appendix C**.

All staff should be aware of indicators of abuse and neglect. Neglect and safeguarding issues are rarely stand-alone events that can be defined or labelled by a single term. In most cases, multiple issues will overlap with one another.

If a staff member is unsure about a concern, they should always speak with a member of the Safeguarding Team or a DSL.

Appendix F provides further information on potential indicators of abuse and neglect.

Reporting Concerns Relating to a Learner

All concerns should be recorded using CITB's internal electronic incident reporting facility within 24 hours. If the person reporting does not have access to our electronic system, then an email should be sent to the Safeguarding Team - **apprenticeships.safeguarding@citb.co.uk**

- The Safeguarding Team will triage all reports and give relevant staff members access to view the record.
- Individuals who report the allegation, or make the disclosure, are required to keep the matter confidential and only discuss it with CITB's Safeguarding Team and/or specifically designated personnel.
- If the allegation is reported by a partner provider (college), the person receiving the report must liaise with CITB's Safeguarding Team and any other relevant parties.
- Staff based at NCC Colleges must inform the Safeguarding Team of any incidents immediately. The matter must be kept confidential to the designated people dealing with the incident.

CITB's Safeguarding Team will keep all relevant parties informed of the outcome if/as appropriate.

Reporting by a Learner or Employer

A learner or employer can raise a concern to their Instructor/Lecturer, Apprentice Development Coach/Officer, the Welfare Team, or relevant contact within CITB. Reports can also be made directly to the Safeguarding Team by email: **apprenticeships.safeguarding@citb.co.uk** or via one of the numbers in the Useful Contacts at the end of this policy.

Safeguarding and Safer Recruitment

CITB is fully committed to safer recruitment processes that support the effective recruitment of new employees. CITB undertake the required checks for all staff in line with current guidance. These checks include but are not limited to, identity, professional references, employment history, qualifications, DBS / PVG checks, and CITB also reserves the right to undertake online searches of potential candidates. A **Safer Recruitment Policy** is in place and should be read in conjunction with this policy.

Low-level Concerns – Staff

A low-level concern can be self-referred or raised by others. Low-level concerns are those that do not meet the threshold for referral to a LADO/Local Authority, or the police, but, as part of an open culture of safeguarding, should be talked about. Everyone is encouraged to report low-level concerns, even through a self-referral, so that inappropriate or concerning behaviours are dealt

with early and professional boundaries are maintained. The **Low-level Concern Policy** should be referred to for greater detail.

Managing Safeguarding Allegations Against Staff

Occasionally, CITB will receive complaints or allegations against a member of staff. It is important that a fair and balanced approach is taken to ensure that both the complainant and the staff member are safeguarded. Detailed procedures are contained in **CITB Disciplinary and Grievance Policies and Procedures**, and in line with relevant legislation and guidance regarding the Management of Safeguarding Allegations Against Staff.

In situations where such an allegation is made, the individual receiving the information must:

- Take the issue seriously and note the facts of the allegation
- Inform the Designated Safeguarding Lead on the day that the allegation is made.

All staff should take care not to place themselves in a vulnerable position with learners and act in line with **CITB's Code of Conduct** and **Safeguarding Learners: Colleague Code of Conduct**.

All concerns received will be taken seriously, and CITB policy procedures will be adhered to. Concerns raised will be discussed with the Local Authority Designated Officer or Local Child Protection Committee (Scotland), if appropriate. Allegations that do not reach the threshold for referral to external agencies will be recorded as a Low-Level Concern where appropriate.

Threshold for referral – Where it is alleged that anyone working for CITB/NCC has:

- Behaved in a way that harmed a child, or may have harmed a child and/or
- Possibly committed a criminal offence against or related to a child, and/or
- behaved toward a child or children in a way that indicates he or she may pose a risk of harm to children, and/or
- behaved or may have behaved in a way that indicates they may not be suitable to work with children.

The last bullet point above includes behaviour that may have happened outside of college premises, which may make an individual unsuitable to work with children; this is known as transferable risk.

Additional Learning Support

CITB/NCC aims to support all learners' learning needs and styles to help them achieve their apprenticeship. Where CITB/NCC is aware of an additional learning need or disability (SEND), relevant information will be shared with CITB/NCC's Additional Learning Support team and the Safeguarding Team as appropriate.

Medical/Vulnerability Learner Risk Assessment

A **Medical/Vulnerability Risk Assessment** will be undertaken as necessary for learners who are identified as vulnerable. The risk assessment ensures that appropriate provision is in place to meet the individual learner's needs. Where such a risk assessment forms part of a broader support plan for a learner, it will only be shared with relevant parties on a 'need to know' basis.

Campaigns and Events and Visiting Speakers

Where campaigns/events involving any external organisations take place on CITB premises, the CITB/NCC organiser will need to liaise with relevant managers to ensure safety and safeguarding



measures are in place prior to the campaign/event, and CITB's Visiting Speakers procedures must be fully complied with at all times.

Visitors to NCC Sites

All staff, learners, and visitors to NCC sites are required to comply with NCC sign-in and sign-out procedures. This includes all visitors being issued with and ensuring that designated coloured lanyards and visitors' badges are clearly worn at all times.

Any person not visibly wearing the relevant staff, learner or visitor identification will be asked to produce this. All visitors must be accompanied by a member of CITB/NCC staff. Safeguarding information will be provided to all visitors by reception staff. This must be read, and procedures followed.

Data Protection and UK GDPR (General Data Protection Regulations)

CITB stores and processes information in compliance with the Data Protection Act (2018), and in accordance with the UK General Data Protection Regulation. Any information shared in relation to a safeguarding concern is processed in accordance with relevant requirements on information disclosures.

Complaints and Whistleblowing

CITB has policies and procedures in place to deal with complaints and whistleblowing. The CITB Complaints Policy is available on the CITB website.

Useful Contacts

Diane Thompson	Safeguarding & Welfare Senior Manager (Designated Safeguarding Lead)
	Diane.Thompson@citb.co.uk 07350 372246
James Pollard	Safeguarding Policy & Practice Specialist Lead (Designated Safeguarding Lead)
	James.Pollard@citb.co.uk 07471 535055
Tamsen Collins	Tamsen.Collins@citb.co.uk Safeguarding & Wellbeing Advisor
Lauren Yarwood	Lauren.Yarwood@citb.co.uk Safeguarding & Wellbeing Advisor
AJ Fenton-Beaumont	AJ.Fenton-Beaumont@citb.co.uk Safeguarding & Wellbeing Advisor
Safeguarding email	apprenticeships.safeguarding@citb.co.uk
Vicky Barker	Victoria.Barker@citb.co.uk Head of Quality & Safeguarding
Andrew Swan	Andrew.Swan@citb.co.uk Health, Safety & Environment Manager
Gary Cumiskey	Gary.Cumiskey@citb.co.uk Head of NCC
Steve Ankers	Steven.Ankers@citb.co.uk Deputy Head of NCC

Appendix A **Linked Policies and Procedures**

NCC Learner code of conduct

NCC Attendance Strategy

CITB/NCC Drug and Alcohol Policy (learner)

NCC Learner Discipline Policy

NCC Equality & Diversity strategy

CITB Colleagues safeguarding code of conduct

CITB/NCC Low level concerns (Staff)

CITB Discipline Policy (Staff)

CITB Fairness Inclusion & Respect Policy

CITB Whistleblowing

Appendix B **Legislation and Guidance**

England

- Keeping Children Safe in Education 2025
- Working together to safeguard children 2023
- The Children Act 1989 and 2004
- The Care Act 2014
- Children and Social Care Act 2017
- Protection of Freedoms Act 2012
- The Counter-Terrorism and Sentencing Act 2021
- Education and Training (Welfare of Children) Act 2021
- What to do if you're worried about a child being abused 2015
- Prevent duty guidance – England, Scotland, and Wales
- National Risk Framework to support Assessment Children and Young People
- Modern Slavery Act 2015
- Education Act 2002
- Education and Training (Welfare of Children) Act 2021
- Data Protection Act 2018
- General Data Protection Regulations (GDPR)
- Human Rights Act 1998
- Equality Act 2010
- Information Sharing – Advice for practitioners providing safeguarding services to children, young people, parents and carers 2024
- Guidance for safer working practice for those working with children and young people in education settings 2022
- Sharing nudes and semi-nudes: advice for education settings 2020

Wales

- Keeping Learners Safe 2022 (Wales)
- Wales Safeguarding Procedures 2019
- Social Services and Well-being (Wales) Act 2014
- Safeguarding Children: Working Together Under the Children Act 2004

Scotland

- The Children (Scotland) Act 1995 & 2020
 - The Children and Young People (Scotland) Act 2014
 - The Protection of Children (Scotland) Act 2003
 - National Guidance for Child Protection in Scotland 2023
 - Getting it right for every child (GIRFEC) (Scottish Government, 2023)
 - The Protection of Vulnerable Groups (Scotland) Act 2007
 - The Counter-Terrorism and Security Act 2015
 - United Nations Convention on the Rights of the Child (Incorporation) (Scotland)
 - Female Genital Mutilation (Protection and Guidance) (Scotland) Act 2020
 - Sexual Offences (Scotland) Act 2009
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- Protection of Children and Prevention of Sexual Offences (Scotland) Act 2005
 - Children (Equal Protection from Assault) (Scotland) Act 2019
 - Forced Marriage etc. (Protection and Jurisdiction) (Scotland) Act 2011
 - Criminal Justice and Licensing (Scotland) Act 2010
 - Domestic Abuse (Scotland) Act 2018
 - Adult Support and Protection (Scotland) Act 2007
 - Protection of Vulnerable Groups (Scotland) Act 2007
 - Human Trafficking and Exploitation (Scotland) Act 2015
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Appendix C The 5Rs Process – Detailed Guidance

The following '5 R' process MUST be followed by **ALL** staff:

Recognise the signs of abuse.

Respond and react accordingly.

Record the facts of the disclosure.

Report the disclosure as soon as possible/within 24 hours.

Refer the DSL will refer all relevant concerns to external agencies as appropriate.

Recognise

Signs of abuse can be recognised as a contrast to the individual's usual behaviour or observed from a change in their physical appearance, as mentioned below:

- Physical – this could include lack of personal hygiene, self-harm, substance or drug abuse, noticeable signs of bruising or flinching when being touched, developed a speech disorder or learning difficulty that cannot be attributed to a physical or psychological cause.
- Behavioural – this could include sudden changes in a person's character, lack of confidence, low self-esteem, withdrawal or being aggressive or angry for no reason, becoming anxious or tearful.

The information above is by no means exhaustive, and an individual may not wish to disclose something that they perceive as 'normal.'

Staff should be aware that a learner may not feel ready or know how to tell someone that they are being abused, or they may not recognise their experience as harmful. This should not prevent staff from having professional curiosity and speaking with the Safeguarding Team if they have a concern.

Respond

People are often reluctant to talk about abuse. Many perpetrators may tell people to keep the abuse a secret and frighten them with unpleasant consequences.

Listed below are some ways to respond to issues or concerns:

- Stay calm and listen carefully to what is being said.
- Do not promise to keep confidential any information that has been shared. Find an appropriate early opportunity to explain that it is likely the information will need to be shared with others, but that this will be on a 'need to know' basis.
- Reassure the person that they have done the right thing by telling you, but do not tell them that everything will be okay; sometimes things get worse before they get better.
- Allow the person to continue at his/her own pace – asking questions for clarification only; try to ask: "Tell me. Explain to me. Describe to me" to avoid leading for a particular answer.
- Tell them what you will do next, and with whom the information will be shared.
- Do not delay in discussing your concerns and, if necessary, passing this information on.

If you feel that anyone is at immediate risk, please take any reasonable steps within your role to protect any person from immediate harm, for example:

- Separate the alleged perpetrator and victim – but only if it is safe to do so.
- Call an ambulance or a GP if someone needs medical attention.
- Call the emergency services/police if a crime is taking place or has taken place.

Inform the Designated Safeguarding Lead (DSL) as soon as possible on the same day/and complete an online report within 24 hours.

Any violence by a learner or member of staff **MUST** be reported to the DSL and through the CITB H&S/HR Process.

If you are suspicious but no disclosure has taken place, you can discuss your concerns with your manager, or one of the Safeguarding Team. All concerns should be reported.

If a person approaches you to make allegations of inappropriate behaviour or misconduct against a member of staff:

- Contact a DSL and/or Head of Quality and Safeguarding.
- The DSL will follow the guidelines for **Disciplinary and Grievance Policy and Procedures – Managing Allegations Against Staff**.
- Do not question the person making the allegation or investigate the matter yourself, apart from establishing what the concern is. Reassure them that the allegation will be taken seriously.

Record

All CITB/NCC learner safeguarding reports must be submitted via the CITB secure safeguarding reporting system, where access is both restricted and password-protected. Where access to the learner safeguarding reporting system is not available, please note the following information and forward it to the Safeguarding Team:

- Your details
- Name of those involved
- Date of incident(s)/disclosure/suspicion
- Details of incident(s)/disclosure/suspicion
- Background information
- Actions taken.

Incidents/concerns must then be recorded using the CITB secure safeguarding management system at the next available opportunity.

Whilst you can record observations, do not interpret or give an opinion as this may bias the information provided and jeopardise any future investigation into the allegation.

Report

Any issues or concerns, allegations or suspicions relating to safeguarding must be taken seriously and reported to the Safeguarding Team immediately. All learner concerns must be recorded via the CITB secure safeguarding management system. Concerns about staff members should be reported directly to a DSL or Head of Quality and Safeguarding.

- If the DSLs are not available, speak with the Head of Quality and Safeguarding.
 - The Safeguarding Team will triage all reports and give relevant staff members access to view the record.
-



- If the allegation/concern is reported by a partner provider (college), the person receiving the report must log the incident onto the CITB secure safeguarding management system in line with CITB protocol.
- If the allegation/concern is reported by an employer, the person receiving the report must log the incident on the CITB secure Safeguarding Management Systems in line with CITB protocol.

All staff are reminded that information should only be shared on a 'need to know' basis and they are required to keep all safeguarding information confidential. It should only be discussed with CITB safeguarding staff.

Refer

The DSL will refer all relevant concerns to external agencies as appropriate. In situations where an individual may be at risk of immediate harm, it may be necessary for a staff member to inform the emergency services, Social Services or make a referral via the Prevent process. In these cases, it is vital that they ensure that the information is reported to the DSL as soon as is practical, but always on the same day and an electronic report is submitted within 24 hours.

The DSL will refer or support you with guidance on next steps and/or with signposting to the relevant external agency.

Concerns about a young person subject to a Child Protection Order should be relayed to the Safeguarding Team immediately. A member of the Safeguarding Team will then inform the learner's keyworker.

It is vital that throughout the process, the views of the learner are considered, and they are never made to feel that they are creating a problem.

Learners Aged 18 Years or Over

All disclosures to CITB staff should be recorded using CITB's secure safeguarding management system. There is no need to report past abuse to any outside agency unless there is a risk to others aged under 18 years, or it concerns an adult at risk, in which case the relevant safeguarding procedures should be followed.

The learner may wish to involve the police. The role of CITB is to support them through this process. Alternatively, the abuse may be in the past and learners may require being directed towards a counselling agency, such as NSPCC, Victim Support, Support Line, or other abuse survivor support agencies.

Appendix D CITB Prevent Duty Procedures

Introduction

CITB is committed to the safeguarding of all service users and believes it is always unacceptable for anyone to experience abuse or discrimination of any kind; it takes all reasonable steps to protect all from harm and accepts its responsibility for the well-being and safety of its stakeholders, including children and adults at risk.

CITB will make every effort to comply with current legislation, ensuring that the CITB Board of Trustees, Executive Management Team, Senior Leadership Team, and wider staff teams understand and meet their safeguarding responsibilities.

As a Training Provider, CITB complies with its responsibility under the Counter Terrorism and Security Act (CTSA) 2015 to have due regard to the need to prevent people from being drawn into terrorism. This is often referred to as the Prevent Duty.

The Prevent Duty operates in accordance with the UK definition of extremism, as set out in the 2024 New definition of extremism (2024) - GOV.UK (www.gov.uk)

Aims of the Guidance

This guidance is designed to set out the CITB's position and approach with regard to the Prevent duty and aligns its aims in respect of the key strategic objectives of the Prevent strategy as set out in the Prevent duty guidance.

- Respond to the ideological challenge of terrorism and the threat we face from those who promote it.
- Prevent people from being drawn into terrorism and ensure that they are given appropriate advice and support.
- Work with sectors and institutions where there are risks of radicalisation that we need to address; and
- Balance the need to ensure compliance with legislative directives whilst respecting and valuing the diversity of the individual.

Definitions

Extremism is the vocal or active opposition to our fundamental British values, including democracy, the rule of law, individual liberty, and mutual respect and tolerance of those with different faiths and beliefs

Radicalisation is the process of a person legitimising support for, or use of, terrorist violence.

Terrorism is an action that endangers or causes serious violence to a person/people; causes serious damage to property; or seriously interferes or disrupts an electronic system. The use or threat must be designed to influence the government or to intimidate the public and is made for the purpose of advancing a political, religious or ideological cause.

Extremism

Extremism is the promotion or advancement of an ideology based on violence, hatred or intolerance, that aims to:

1. negate or destroy the fundamental rights and freedoms of others; or
-

2. undermine, overturn or replace the UK's system of liberal parliamentary democracy and democratic rights; or
3. Intentionally create a permissive environment for others to achieve the results in (1) or (2).

The types of behaviour below are indicative of the kind of promotion or advancement that may be relevant to the definition and serve as a critical guide to its application. The further context below is also an essential part of the definition.

- Ideological Shifts and Expression
 - Justifying the use of violence or illegal actions to achieve ideological goals
 - Sharing or promoting extremist content (online or offline), including symbols, slogans, or literature.
 - Demonising specific groups based on religion, ethnicity, nationality, gender, or political beliefs.
- Social and Peer Influence
 - Recruiting others to a cause or ideology, especially targeting vulnerable individuals.
 - Forming or joining exclusive groups that isolate themselves from wider society or school/workplace
- Behavioural and Emotional Changes
 - Sudden withdrawal from family, friends, or usual activities.
 - Increased hostility or aggression, particularly towards perceived "outsiders" or authority figures.
 - Paranoia or conspiracy thinking, especially around government, media, or societal structures.
- Online Activity
 - Sharing or creating propaganda, including videos, memes, or manifestos.
 - Using coded language or symbols associated with extremist ideologies.
- Actions and Planning
 - Traveling to conflict zones or expressing a desire to do so for ideological reasons.
 - Acquiring or attempting to acquire weapons or materials that could be used for harm.
 - Testing boundaries (e.g., security, rules, or policies) in ways that suggest preparation for harmful acts.

Terrorist groups often draw on extremist ideology developed by extremist organisations. Some people who join terrorist groups have previously been members of extremist organisations and have been radicalised by them.

The Government has defined extremism as “vocal or active opposition to fundamental British values, including democracy, the rule of law, individual liberty and mutual respect and tolerance of different faiths and beliefs. We also include in our definition of extremism calls for the death of members of our armed forces.”

The UK continues to face a diverse and evolving range of terrorist threats. While Islamist extremist groups such as Daesh (Islamic State) have historically been prominent, there has been a significant rise in threats linked to extreme right-wing ideologies in recent years.

The Prevent strategy acknowledges that both violent and non-violent forms of extremism, regardless of ideology, can create conditions in which terrorist narratives and radicalisation can thrive.

There is no single way of identifying who is likely to be vulnerable to being drawn into terrorism. Factors that may have a bearing on someone becoming vulnerable may include peer pressure, influence from other people or via the internet, bullying, crime against them or their involvement in crime, anti-social behaviour, family tensions, race/hate crime, lack of self-esteem or identity and personal or political grievances.

The Prevent strategy deals with all forms of terrorism and with non-violent extremism, which can create an atmosphere conducive to terrorism and can popularise views which terrorists then exploit. It also makes clear that preventing people from becoming terrorists or supporting terrorism requires challenging extremist ideas that are used to legitimise terrorism and are shared by terrorist groups. The strategy also means intervening to stop people from moving from extremist (albeit legal) groups into terrorist-related activity.

CITB's Approach to Prevent

CITB has implemented prevent-related responsibilities in a proportionate and risk-based way. All staff should demonstrate an awareness and understanding of the risk of radicalisation. The risk will vary greatly and can change rapidly, but no area, institution, or body is risk-free. The Prevent Duty is not about preventing individuals from holding political and religious views and concerns, but about supporting our service users in expressing and acting on those concerns in a non-extremist way.

Prevent is an essential element within our safeguarding policy and processes. Prevent focuses on safeguarding learners and stakeholders, encouraging a learning environment where issues can be raised and discussed safely.

CITB also aligns its approach to prevent closely with the core principles of British values: Democracy, Rule of law, Individual liberty, Mutual Tolerance & Respect. These topics are embedded into learner inductions and discussed widely across the curriculum at NCC.

CITB's Leadership Team oversee our Prevent strategy by:

- Ensuring all staff, including the Board and Senior Managers, receive awareness training on Prevent.
- Providing training to ensure staff understand their safeguarding responsibilities and processes, and outline how to make a referral to the Police Prevent team.
- Providing staff training and guidance on recognising potential signs that a customer/learner may be becoming involved with extremist organisations.
- Creating a point of contact for Prevent and Safeguarding-related issues.
- Maintaining links with the local Prevent Contacts.
- Ensuring British values are promoted and embedded within employability, personal development, and all teaching and learning activities.
- Maintaining robust IT policies that can deal effectively with potential online risks from extremist organisations, through the appropriate use of filtering and monitoring usage.
- Ensuring our rigorous risk assessment process is in place and utilised, which ensures Prevent is fully considered, including visitors and external speakers.
- Ensuring our partner providers have appropriate policies in place.

Identifying Learners Vulnerable to Radicalisation

CITB has a duty to identify learners who may be vulnerable to radicalisation. The aim is not to criminalise individuals but to provide early support and early intervention to those at risk of being drawn into extremist ideologies or terrorist activities. Staff are vigilant in identifying these learners by observing the following indicators:

- **Identity Crisis** – the learner is distanced from their cultural/religious heritage and experiences discomfort about their place in society.
- **Personal Crisis** – the learner may be experiencing family tensions; a sense of isolation; low self-esteem; they may have dissociated from their existing friendship group and become involved with a new and different group of friends; they may be searching for answers to questions about identity, faith and belonging.
- **Personal Circumstances** – migration, local community tensions and events affecting the learner/s country or region of origin may contribute to a sense of grievance triggered by personal experience of racism or discrimination or aspects of government policy.
- **Unmet Aspirations** – the learner may have perceptions of injustice; a feeling of failure; or rejection of civic life.
- **Experiences of Criminality** – which may include involvement with criminal groups, imprisonment, and poor resettlement/reintegration.
- **Special Educational Need** – learners may experience difficulties with social interaction, empathy with others, understanding the consequences of their actions and awareness of the motivations of others.

However, this list is not exhaustive, nor does it mean that all young people experiencing the above are at risk of radicalisation for the purposes of violent extremism.

Concerns are reported through to the DSL's and/or safeguarding team to ensure that learners receive appropriate support and intervention at the earliest opportunity.

Raising concerns

CITB is vigilant to concerns about the presence of radicalisation and/or extremism and is committed to addressing such issues appropriately in partnership with communities and other organisations. All concerns should be reported in the first instance using the procedures outlined in **Appendix C** of this policy. Where it is deemed appropriate, CITB Safeguarding Team will refer the individual to the Local Police Prevent Team for assessment and support. All referrals will be made with the individual's consent.

Useful Contacts and Resources

Diane Thompson Safeguarding & Welfare Senior Manager T: 07350 372246 E: Diane.Thompson@citb.co.uk	James Pollard Safeguarding Policy & Practice Lead T: 07471 535055 E: James.Pollard@citb.co.uk
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[Prevent Duty Guidance for England, Scotland, and Wales](#)

[New definition of extremism \(2024\) - GOV.UK](#)

E-Learning:

[Prevent duty training: Learn how to support people susceptible to radicalisation | Prevent duty training](#)

Appendix E **Child on Child Abuse (Learner on Learner Abuse)**

Responding to child-on-child abuse

It is recognised that on occasions the abuse may be from children, young people, or other learners; in this respect, the College has developed a specific response to this abuse (often referred to as child-on-child abuse). Such abuse can happen anywhere, both inside and outside of college, face-to-face or virtually online.

Child-on-child abuse is most likely to include, but is not limited to:

- Bullying (including cyberbullying, prejudice-based and discriminatory bullying)
- Abuse in intimate personal relationships between children/young people/learners
- Physical abuse such as hitting, kicking, shaking, biting, hair pulling, or otherwise causing physical harm (this may include an online element which facilitates, threatens and/or encourages physical abuse)
- Sexual violence, such as rape, assault by penetration and sexual assault (this may include an online element which facilitates, threatens and/or encourages sexual violence)
- Sexual harassment, such as sexual comments, remarks, jokes and online sexual harassment, which may be standalone or part of a broader pattern of abuse
- Causing someone to engage in sexual activity without consent, such as forcing someone to strip, touch themselves sexually, or to engage in sexual activity with a third party
- Consensual and non-consensual sharing of nude and semi-nude images and/or videos (also known as sexting or youth-produced sexual imagery). It is recognised that the sharing of such images of children is illegal and abusive, even in the case that such image sharing is consensual
- Upskirting, which typically involves taking a picture under a person's clothing without their permission, with the intention of viewing their genitals or buttocks to obtain sexual gratification, or cause the victim humiliation, distress or alarm; and
- Initiation/hazing type violence and rituals (this could include activities involving harassment, abuse or humiliation used as a way of initiating a person into a group and may also include an online element)

CITB/NCC adopts a zero-tolerance approach to all kinds of child-on-child abuse. Staff must challenge inappropriate behaviour between children/young people/learners and ensure that unacceptable behaviours are not downplayed or dismissed as 'just banter', 'part of growing up', 'just having a laugh' or 'boys being boys'.

CITB/NCC maintains an attitude that 'it could happen here' and has a whole-college approach to developing a culture to recognise and address child-on-child abuse. Although girls are more likely to be victims and boys' perpetrators, the College does not tolerate any child-on-child abuse, and it will be taken seriously. Staff and learners must report all concerns of child-on-child abuse, both online and offline, including those that have happened outside of the College.

The following procedure provides guidance for staff who receive a disclosure of child-on-child abuse and/or recognise signs of abuse.

- If staff have any concerns about the welfare of a child or adult at risk, they should act on these immediately.
- Reassure the victim that they are being taken seriously, regardless of how long it has taken them to come forward and that they will be supported and kept safe.
- Don't promise confidentiality, as it is very likely a concern will have to be shared further.
- Listen carefully, reflecting back, not asking leading questions and only prompting with open questions.
- Take notes as accurately as possible what was said, use the learner's own words; do not interpret.

Actions following a Disclosure:

You must make sure the learner is safe and then contact one of the College's Designated Safeguarding Leads immediately and log the report through NCC's safeguarding reporting system.

CITB/NCC will consider every report of child-on-child abuse on a case-by-case basis and the DSL and/or DDSL will make an immediate risk and needs assessment to respond to the concern and support all learners affected.

The potential actions following a report of child-on-child abuse are:

- Manage internally using the appropriate NCC procedure.
- Early help.
- Referrals to the Local Authority social care team.
- Report to the police.

The designated member of staff must notify the DSL or Deputy DSL as soon as possible of a serious disclosure or suspicion being raised.

Appendix F Definitions – Abuse and Wider Safeguarding Concerns

All staff should be aware of indicators of abuse and neglect and exploitation, understanding that children can be at risk of harm inside and outside of the school/college, inside and outside of home, and online.

Exercising professional curiosity and knowing what to look for is vital for the early identification of abuse and neglect so that staff can identify cases of children who may require help or protection.

All school and college staff should be aware that abuse, neglect, exploitation, and safeguarding issues are rarely standalone events and cannot be covered by one definition or one label alone. In most cases, multiple issues will overlap.

If a staff member is unsure about a concern, they should always speak with a member of the Safeguarding Team.

Any child/young person may benefit from early help, but all staff should be particularly alert to the potential need for early help for a child who:

- is disabled or has certain health conditions and has specific additional needs
- has special educational needs (whether or not they have a statutory Education, Health and Care Plan)
- has a mental health need
- is a young carer
- is showing signs of being drawn into anti-social or criminal behaviour, including gang involvement and association with organised crime groups or county lines
- is frequently missing/goes missing from care or home
- has received suspensions and is at risk of being permanently excluded.
- is at risk of modern slavery, trafficking, sexual or criminal exploitation
- is at risk of being radicalised or exploited
- has a family member in prison or is affected by parental offending
- is in a family circumstance presenting challenges for the child/young person, such as drug and alcohol misuse, adult mental health issues and domestic abuse
- is misusing drugs or alcohol themselves
- has returned home to their family from care
- is at risk of honour-based abuse such as Female Genital Mutilation or forced marriage
- is a privately fostered child
- is persistently absent from education.

All staff should be aware of indicators of abuse and neglect, and specific safeguarding issues such as exploitation, so that they are able to identify cases of learners who may be in need of help or protection.

It is important to remember that technology is a significant component in many safeguarding and wellbeing issues. Learners are at risk of abuse online as well as face to face. In many cases abuse and other risks will take place concurrently both online and offline. Children can also abuse other children online, this can take the form of abusive, harassing, and misogynistic/misandrist messages, the non-consensual sharing of indecent images, especially around chat groups, and the sharing of abusive images and pornography to those who do not want to receive such content.

Child/Young Person

A child is a person under the age of 18 years. A young person is generally thought as of one over the age of 13 years, but under the age of 18 years.

Adult at Risk

Is a person who is aged 18 years or over and at risk of abuse or neglect because of their need for care and support.

Abuse

A form of maltreatment: generally, physically, sexually, or mentally injuring a person. Somebody may abuse or neglect a child/young person or adult at risk by inflicting harm or failing to act to prevent harm. Harm can include ill treatment that is not physical as well as the impact of witnessing ill treatment of others. This can be particularly relevant, for example, in relation to the impact on children of all forms of domestic abuse, including where they see, hear or experience its effects. Children may be abused in a family or in an institutional or community setting by those known to them or, more rarely, by others. Abuse can take place wholly online, or technology may be used to facilitate offline abuse. Children may be abused by an adult or adults or by another child or children.

Physical Abuse

May involve hitting, shaking, throwing, poisoning, burning, or scalding, drowning, or suffocating, or otherwise causing physical harm to a child or adult at risk. Physical harm may also be caused when a parent or carer fabricates the symptoms of, or deliberately induces illness, in a child.

Emotional Abuse Children

The persistent emotional maltreatment of a child such as to cause severe and persistent adverse effects on the child's emotional development. It may involve conveying to a child that they are worthless; or unloved; or inadequate; or valued only insofar as they meet the needs of another person. It may include not giving the child opportunities to express their views, deliberately silencing them or 'making fun' of what they say and how they communicate.

It may feature age or developmentally inappropriate expectations being imposed on children. These may include interactions that are beyond the child's developmental capability, as well as overprotection and limitation of exploration and learning, or preventing the child participating in normal social interaction.

It may involve seeing or hearing the ill treatment of others. It may involve serious bullying (including cyber-bullying), causing children frequently to feel frightened or in danger, or the exploitation or corruption of children. Some level of emotional abuse is involved in all types of maltreatment of a child, though it may occur alone.

Adult at Risk

Psychological abuse – including emotional abuse, threats of harm or abandonment, deprivation of contact, humiliation, blaming, controlling, intimidation, coercion, harassment, verbal abuse, isolation or unreasonable and unjustified withdrawal of services or supportive networks.

Sexual Abuse Children

Forcing or enticing a child or young person to take part in sexual activities, not necessarily involving a high level of violence, whether or not the child is aware of what is happening. The activities may involve physical contact, including assault by penetration (for example, rape or oral sex) or non-penetrative acts such as masturbation, kissing, rubbing, and touching outside the clothing. They may include non-contact activities, such as involving children in looking at, or in the production of, sexual images, watching sexual activities, encouraging children to behave in sexually inappropriate ways, or grooming a child in preparation for abuse. Sexual abuse can take place online, and technology can be used to facilitate offline abuse.

Sexual abuse is not solely perpetrated by adult males. Women can also commit acts of sexual abuse, as can other children. The sexual abuse of children by children is a specific safeguarding issue in education (see Child on Child abuse **Appendix E**).

Adult at Risk

Sexual abuse is the direct or indirect involvement of the adult at risk in sexual activity or relationships, which they:

- do not want or have not consented to
- cannot understand and lack the mental capacity to be able to give consent to
- have been coerced into because the other person is in a position of trust, power or authority (for example, a care worker).

Neglect

Children

The persistent failure to meet a child's basic physical and/or psychological needs, is likely to result in serious impairment of the child's health and development. Neglect may occur during pregnancy as a result of maternal substance abuse. Once a child is born, neglect may involve a parent or carer failing to:

- provide adequate food, clothing and shelter, including exclusion from home or abandonment
- protect a child from physical and emotional harm or danger
- ensure adequate supervision (including the use of inadequate caregivers); or
- ensure access to appropriate medical care or treatment.

It may also include neglect of, or unresponsiveness to, a child's basic emotional needs.

Adult at Risk

Neglect and acts of omission – including ignoring medical or physical care needs, failure to provide access to appropriate health, care and support or educational services, the withholding of the necessities of life, such as medication, adequate nutrition, and heating.

Mental Health

Where children have suffered abuse and neglect, or other potentially traumatic adverse childhood experiences, this can have a lasting impact throughout childhood, adolescence and into adulthood. It is key that staff are aware of how these children's experiences can impact on their mental health, behaviour, attendance, and progress in learning.

Only appropriately trained professionals should attempt to make a diagnosis of a mental health problem. Staff, however, are well placed to identify those whose behaviour suggests that they may be experiencing a mental health problem or be at risk of developing one.

If staff have a mental health concern about a learner, this should be reported to the Safeguarding Team using the CITB safeguarding reporting process.
Support information is available in **Appendix G**

Cybercrime

Cybercrime is criminal activity committed using computers and/or the internet. It is broadly categorised as either 'cyber-enables' (crimes that can happen off-line but are enabled at scale and at speed on-line) or 'cyber-dependent' (crimes that can be committed only by using a computer).

Serious Violence

All staff should be aware of indicators which may signal that someone is at risk from, or involved with, serious violent crime. These may include increased absences, a change in friendship groups, significant decline in performance, signs of self-harm or significant change in wellbeing, or signs of assault or unexplained injuries. Unexplained gifts or new possessions could indicate involvement with individuals associated with criminal networks or gangs and may be at risk of criminal exploitation.

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

We know that different forms of harm often overlap, and that perpetrators may subject children and young people to multiple forms of abuse, such as criminal exploitation.

In some cases, the exploitation or abuse will be in exchange for something the victim needs or wants, and/or for the financial advantage or increased status of the perpetrator or facilitator.

Children can be exploited by adult males or females, as individuals or groups. They may also be exploited by other children, who themselves may be experiencing exploitation – where this is the case, it is important that the child perpetrator is also recognised as a victim.

CSE and CCE can affect both males and females and can include those who have been moved (commonly referred to as trafficking) for the purpose of exploitation.

While age may be a contributing factor for an imbalance of power, there are a range of other factors that could make someone more vulnerable to exploitation, including gender, sexual identity, cognitive ability, learning difficulties, communication ability, physical strength, status, and access to economic or other resources.

Some of the following can be indicators of both criminal and sexual exploitation:

- Appear with unexplained gifts, money, or new possessions.
- Associate with others involved in exploitation.
- Suffer from changes in emotional wellbeing.
- Misuse drugs and alcohol.
- Go missing for periods of time or regularly come home late, and
- Regularly miss college or do not take part in education.

Some specific forms of CCE can include children being forced or manipulated into transporting drugs or money through county lines, working in cannabis factories, shoplifting, or pickpocketing. They can also be forced into or manipulated into committing vehicle crime or

threatening/committing serious violence to others.

CSE can be a one-off occurrence or a series of incidents over time and range from opportunistic to complex organised abuse. It can involve force and/or enticement-based methods of compliance and may, or may not, be accompanied by violence or threats of violence.

Some additional specific indicators that may be present in CSE are children who:

- have older boyfriends or girlfriends, and
- suffer from sexually transmitted infections, display sexual behaviour beyond expected sexual development or become pregnant.

County Lines

A term used to describe gangs and organised criminal networks involved in exporting illegal drugs using dedicated mobile phone lines or other form of 'deal line.' This activity can happen locally as well as across the UK – no specified distance of travel is required. Children and vulnerable adults are exploited to move, store, and sell drugs and money. Offenders will often use coercion, intimidation, violence (including sexual violence), and weapons to ensure compliance of victims.

Learners can be targeted and recruited into county lines in a number of locations, including education establishments and social settings, with social media being increasingly used to target and recruit victims.

Cuckooing

Cuckooing is a practice where people take over a person's home and use the property to facilitate exploitation.

There are different types of cuckooing:

- Using the property to grow, deal, store or take drugs.
- Using the property to sex work.
- Using the property to store weapons.
- Taking over the property as a place for them to live.
- Taking over the property to financially abuse the tenant.

The most common form of cuckooing is where drug dealers or gang members take over a person's home and use it to store or distribute drugs. They may begin by befriending the adult at risk. They will then offer the adult at risk something of interest to them, this could be a relationship, friendship, drugs and/or alcohol, money, or clothing. In exchange they may ask to 'borrow' a room, to store something or meet other 'friends' at the property. In some cases, the gang may make it clear that this is for criminal purposes, i.e., drug supply, or they may use an excuse as to why they want to use the property.

Gradually the 'benefits' will reduce and may eventually come to an end, and more and more people will come and go from the address. The gang members/drug dealers may threaten the adult at risk verbally or physically if they try to put a stop to their criminal activity. They will also discourage family/friends and support workers from visiting the vulnerable adult's address.

Bullying

The repetitive, intentional hurting of one person or group by another person or group, where the relationship involves an imbalance of power. Bullying can be physical, verbal or psychological. It can happen face-to-face or online.

Bullying behaviour can be:

- Physical – pushing, poking, kicking, hitting, biting, pinching etc.
- Verbal - name calling, sarcasm, spreading rumours, threats, teasing, belittling.
- Emotional – isolating others, tormenting, hiding books, threatening gestures, ridicule, humiliation, intimidating, excluding, manipulation and coercion.
- Sexual – unwanted physical contact, inappropriate touching, abusive comments, homophobic abuse, exposure to inappropriate films etc.
- Online /cyber – posting on social media, sharing photos, sending nasty text messages, social exclusion
- Indirect - Can include the exploitation of individuals.

Low-level disruption and the use of offensive language can in itself have a significant impact on its target. If left unchallenged or dismissed as banter or horseplay it can also lead to reluctance to report other behaviour. Early intervention can help to set clear expectations of the behaviour that is and isn't acceptable and help stop negative behaviours escalating.

All incidents of bullying, including cyber-bullying, racist, homophobic and gender related bullying are taken seriously, and will be dealt with in accordance with NCC Bullying and Harassment procedures (Learner Code of Conduct).

Child-on-Child (Learner-on-Learner) sexual violence and sexual harassment

Sexual violence and sexual harassment can occur between two or more children of any age and sex, through statutory education and into college. It can occur also through a group of children sexually assaulting or sexually harassing a single child or group of children. Sexual violence and sexual harassment exist on a continuum and may overlap; they can occur online and face-to-face (both physically and verbally) and are never acceptable. CITB is aware of the importance of:

- making clear that there is a zero-tolerance approach to sexual violence and sexual harassment, that it is never acceptable, and it will not be tolerated. It should never be passed off as “banter”, “just having a laugh”, “a part of growing up” or “boys being boys”. Failure to do so can lead to a culture of unacceptable behaviour, an unsafe environment and in worst case scenarios a culture that normalises abuse, leading to children accepting it as normal and not coming forward to report it
- recognising, acknowledging, and understanding the scale of harassment and abuse and that even if there are no reports it does not mean it is not happening, it may be the case that it is just not being reported
- challenging physical behaviour (potentially criminal in nature) such as grabbing bottoms, breasts and genitalia, pulling down trousers, flicking bras and lifting up skirts. Dismissing or tolerating such behaviours risks normalising them.

Children who are victims of sexual violence and sexual harassment wherever it happens, may find the experience stressful and distressing. This will, in all likelihood, adversely affect their educational attainment and will be exacerbated if the alleged perpetrator(s) attends the same college. (**Appendix E**)

Sexual Violence

Sexual violence and sexual harassment can occur between two children of any age and sex. It can also occur through a group of children sexually assaulting or sexually harassing a single child or group of children. CITB will not tolerate sexual violence or sexual harassment towards anyone within CITB.

It is important that schools and colleges are aware of sexual violence and the fact children can, and sometimes do, abuse other children in this way and that it can happen both inside and outside of college. When referring to sexual violence in this advice, we do so in the context of child-on-child sexual violence.

When referring to sexual violence we are referring to sexual offences under the Sexual Offences Act 2003/136 as described below:

- **Rape:** A person (A) commits an offence of rape if: he intentionally penetrates the vagina, anus or mouth of another person (B) with his penis, B does not consent to the penetration and A does not reasonably believe that B consents.
- **Assault by penetration:** A person (A) commits an offence if: s/he intentionally penetrates the vagina or anus of another person (B) with a part of her/his body or anything else, the penetration is sexual, B does not consent to the penetration and A does not reasonably believe that B consents.
- **Sexual assault:** A person (A) commits an offence of sexual assault if: s/he intentionally touches another person (B), the touching is sexual, B does not consent to the touching and A does not reasonably believe that B consents. (NOTE - Schools and colleges should be aware that sexual assault covers a very wide range of behaviour so a single act of kissing someone without consent or touching someone's bottom/breasts/genitalia without consent, can still constitute sexual assault).
- **Causing someone to engage in sexual activity without consent:** A person (A) commits an offence if: s/he intentionally causes another person (B) to engage in an activity, the activity is sexual, B does not consent to engaging in the activity, and A does not reasonably believe that B consents. (NOTE – this could include forcing someone to strip, touch themselves sexually, or to engage in sexual activity with a third party).

What consent is

Consent is about having the freedom and capacity to choose. Consent to sexual activity may be given to one sort of sexual activity but not another, e.g. to vaginal but not anal sex or penetration with conditions, such as wearing a condom. Consent can be withdrawn at any time during sexual activity, and each time activity occurs. Someone consents to vaginal, anal or oral penetration only if s/he agrees by choice to that penetration and has the freedom and capacity to make that choice.

- a child under the age of 13 can never consent to any sexual activity
 - the age of consent is 16
 - sexual intercourse without consent is rape
-

Sexual Harassment

When referring to sexual harassment we mean 'unwanted conduct of a sexual nature' that can occur online and offline and both inside and outside of school or college. When we reference sexual harassment, we do so in the context of child-on-child sexual harassment. Sexual harassment is likely to: violate a child's dignity, and/or make them feel intimidated, degraded, or humiliated and/or create a hostile, offensive or sexualised environment.

Whilst not intended to be an exhaustive list, sexual harassment can include:

- sexual comments, such as telling sexual stories, making lewd comments, making sexual remarks about clothes and appearance, and calling someone sexualised names.
- sexual "jokes" or taunting
- physical behaviour, such as deliberately brushing against someone, interfering with someone's clothes. Schools and colleges should be considering when any of this crosses a line into sexual violence – it is important to talk to and consider the experience of the victim.
- displaying pictures, photos, or drawings of a sexual nature • upskirting (this is a criminal offence)
- online sexual harassment. This may be standalone, or part of a wider pattern of sexual harassment and/or sexual violence. It may include:
 - consensual and non-consensual sharing of nude and semi-nude images and/or videos. Taking and sharing nude photographs of those aged under 18 is a criminal offence.
 - sharing of unwanted explicit content
 - sexualised online bullying
 - unwanted sexual comments and messages, including, on social media
 - sexual exploitation; coercion and threats, and
 - coercing others into sharing images of themselves or performing acts they are not comfortable with online.

It is important that colleges consider sexual harassment in broad terms. Sexual harassment (as set out above) creates a culture that, if not challenged, can normalise inappropriate behaviours and provide an environment that may lead to sexual violence.

Harmful sexual behaviour

Children's sexual behaviour exists on a wide continuum, ranging from normal and developmentally expected to inappropriate, problematic, abusive and violent. Problematic, abusive and violent sexual behaviour is developmentally inappropriate and may cause developmental damage. A useful umbrella term is "harmful sexual behaviour" (HSB). The term has been widely adopted in child protection and is used in this advice. HSB can occur online and/or face-to-face and can also occur simultaneously between the two. HSB should be considered in a child protection context.

The Response to a Report of Sexual Violence or Sexual Harassment

The initial response to a report from a learner is important. It is essential that all victims are reassured that they are being taken seriously and that they will be supported and kept safe. A victim should never be given the impression that they are creating a problem by reporting sexual violence or sexual harassment. Nor should a victim ever be made to feel ashamed for making a report. If staff have a concern about a learner, or a learner makes a report to them, they should

follow the CITB reporting process so that a member of the Safeguarding Team can follow the appropriate referral process. As is always the case, if staff are in any doubt as to what to do, they should speak to a member of the Safeguarding Team.

Preventing Radicalisation

Children may be susceptible to radicalisation into terrorism. Similar to protecting children from other forms of harm and abuse, protecting children from this risk should be a part of a colleges safeguarding approach.

Extremism is the vocal or active opposition to our fundamental values, including democracy, the rule of law, individual liberty and the mutual respect and tolerance of different faiths and beliefs. This also includes calling for the death of members of the armed forces.

Radicalisation refers to the process by which a person comes to support terrorism and extremist ideologies associated with terrorist groups.

Terrorism is an action that endangers or causes serious violence to a person/people, causes serious damage to property, or seriously interferes or disrupts an electronic system. The use of threat must be designed to influence the government or to intimidate the public and is made for the purpose of advancing a political, religious, or ideological cause.

As with other safeguarding risks, staff should be alert to changes in behaviour that could indicate a learner may be in need of protection and reports to the Safeguarding Team should be made if a concern is identified. This may result in the DSL making a Prevent referral.

The Prevent Duty

All schools and colleges are subject to a duty under section 26 of the Counter- Terrorism and Security Act 2015, in the exercise of their functions, to have “due regard to the need to prevent people from becoming terrorists or supporting terrorism”. This duty is known as the Prevent duty. **Appendix D** provides the CITB procedures with regards to the Prevent Duty.

Additional Learning Needs and Disabilities (SEND)

Learners with additional learning needs (ALN) and disabilities can face additional safeguarding challenges. CITB/NCC acknowledges additional barriers can exist when recognising abuse and neglect in this group of people.

These can include:

- assumptions that indicators of possible abuse such as behaviour, mood and injury relate to the learner's disability without further exploration
- the potential for children/young people/learners with ALN and disabilities being disproportionately impacted by behaviours such as bullying, without outwardly showing any signs
- communication barriers and difficulties in overcoming these barriers

CITB/NCC has Additional Learning Support teams to support learners who require additional learning support.

Domestic Abuse

Includes any incident, or pattern of incidents, of controlling, coercive or threatening behaviour, violence, or abuse, between those aged 16 or over who are, or have been, personally connected to each. The abuse can encompass, but is not limited to physical, emotional, and economic

abuse, and coercive and controlling behaviour.

Types of domestic abuse include intimate partner violence, abuse by family members, teenage relationship abuse and child to parent abuse. Anyone can be a victim of domestic abuse, regardless of sexual identity, age, ethnicity, socio-economic status, sexuality or background and domestic abuse can take place inside or outside of the home.

All children can witness and be adversely affected by domestic abuse in the context of their home life where domestic abuse occurs between family members. Experiencing domestic abuse can have a serious, long-lasting emotional and psychological impact on children. In some cases, a child may blame themselves for the abuse or may have had to leave the family home as a result.

Young people can also experience domestic abuse within their own intimate relationships. This form of child-on-child abuse is sometimes referred to as 'teenage relationship abuse.'

So-called 'Honour'-Based Abuse

So-called 'honour'-based abuse (HBA) encompasses incidents or crimes which have been committed to protect or defend the honour of the family and/or the community, including female genital mutilation (FGM), forced marriage, and practices such as breast ironing. Abuse committed in the context of preserving 'honour' often involves a wider network of family or community pressure and can include multiple perpetrators.

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. It is illegal in the UK and a form of child abuse with long-lasting harmful consequences.

If an employee, in the course of their work, discovers that an act of FGM appears to have been carried out on a girl under the age of 18, this must be reported to the Safeguarding Team immediately and this will be escalated to the police by the DSL.

Care and sensitivity should be shown to adults at risk who have been subject to FGM, and further support should be sought where required. As this differs from region to region, if in doubt you should contact the Safeguarding Team.

Mandatory Reporting of FGM

Teachers must personally report to the police cases where they discover that an act of FGM appears to have been carried out. Unless the teacher has good reason not to, they should still consider and discuss any such case with CITB's DSL (or a deputy) and involve local authority children's social care as appropriate. The duty does not apply in relation to at risk or suspected cases (i.e. where the teacher does not discover that an act of FGM appears to have been carried out, either through disclosure by the victim or visual evidence) or in cases where the woman is 18 or over. In these cases, teachers should follow local safeguarding procedures.

Forced Marriage

A clear distinction must be made between a forced marriage and an arranged marriage. In arranged marriages, the families of both spouses take a leading role in choosing the marriage partner but the choice whether or not to accept the arrangement remains with the people who are marrying.

A forced marriage is one entered into without the full and free consent of one or both parties and where violence, threats or any other form of coercion is used to cause a person to enter into a marriage. Threats can be physical or emotional and psychological. A lack of full and free consent can be where a person does not consent or where they cannot consent (if they have learning disabilities, for example). Nevertheless, some perpetrators use perceived cultural practices to coerce a person into marriage.

In addition, since February 2023 it has also been a crime to carry out any conduct whose purpose is to cause a child to marry before their 18th birthday, (England & Wales) even if violence, threats, or another form of coercion are not used. As with the existing forced marriage law, this applies to non-binding, unofficial 'marriages' as well as legal marriages.

Modern Slavery

Encompasses slavery, human trafficking, and forced or compulsory labour. Exploitation can take many forms, including: sexual exploitation, forced labour, slavery, servitude, forced criminality and the removal of organs.

Discriminatory Abuse

Including forms of harassment, bullying, slurs, isolation, neglect, denial of access to services or similar treatment because of race, gender and gender identity, age, disability, religion or because someone is lesbian, gay, bisexual, or transgender. This includes racism, sexism, ageism, homophobia or any other form of hate incident or crime.

Homelessness

Being homeless or being at risk of becoming homeless present a real risk to a child's welfare. In most cases, homelessness may be considered in the context of children who live with their families; however, it should also be recognised that, in some cases, 16- and 17-year-olds could be living independently from their parents or guardians, for example through their exclusion from the family home, and they will require a different level of intervention and support. Local authority children's social care will be the lead agency for these young people, and the DSLs will ensure appropriate referrals are made based on the child's circumstances.

All concerns around learner homelessness, regardless of the age of the learner, should be reported to the Safeguarding Team. CITB works closely with the Lighthouse Charity and other support agencies to signpost learners to appropriate help and advice.

Financial or Material Abuse

Including theft, fraud, internet scamming, exploitation, coercion in relation to an adult's financial affairs or arrangements, including in connection with wills, property, inheritance or financial transactions, or the misuse or misappropriation of property, possessions, or benefits.

Organisational (sometimes referred to as institutional)

Including neglect and poor care practice within an institution or specific care setting such as a hospital or care home, for example, or in relation to care provided in a person's own home. This may range from one off incidents to on-going ill treatment. It can be through neglect or poor professional practice because of the structure, policies, processes, and practices within an organisation.

Mate Crime

This is when vulnerable people are befriended by members of the community who go on to



exploit and take advantage of them. It may not be an illegal act, but it still has a negative effect on the individual. A mate crime is carried out by someone the person knows and often takes places in private.

All staff should be aware that abuse, neglect, and safeguarding issues are rarely standalone events and cannot be covered by one definition or lone label alone. In most cases, multiple issues will overlap with one another, therefore staff should always be vigilant and always raise any concerns with the Safeguarding Team.

Staff should maintain an attitude of 'It could happen here' and should always act in the best interest of our learners.

Appendix G **Signposting to support**

Lighthouse Club – A construction-focused charity providing a 24/7 helpline and financial support

[Lighthouse Charity](#) 0345 605 1956

Band of Builders – A construction-focused charity providing a 24/7 helpline and support

[Band of Builders | National Construction Charity](#) Free 24-hour text service offering support and guidance from a trained counsellor. If you are feeling low or overwhelmed, **text BOB to 85258**.

Samaritans – Provides free mental health support nationwide [Samaritans](#) Call [116 123](#) (UK-wide) at any time

Mind – Provides free mental health support nationwide [Getting help in a mental health crisis](#)

Mates in Mind – Offers training and mental health resources [Mates in Mind](#) 020 3510 5018

NHS - Call 111 and select option 2 to speak to the NHS Mental Health Crisis Response Service 24/7

PAPYRUS – Under 35s can Call 0800 068 4141 Text 88247 [Papyrus UK Suicide Prevention](#)

WithYou - A drug, alcohol and mental health support charity. With over 80 services across England and Scotland, we provide free and confidential support and advice [WithYou](#) Online chat support.

Crisis – Providing support for people at risk of homelessness across England, Scotland and Wales [Crisis homelessness charity](#)

Homeless Project Scotland – Providing support all across Scotland [Homeless Project Scotland](#)

GAMCARE - Freephone 24/7 National Gambling Helpline: [0808 8020 133](#) [GamCare](#)

Cruse - [Cruse Bereavement Support](#) Helpline 0808 808 1677

Appendix H Information Sharing – Seven Golden Rules

Information sharing in a safeguarding context means the appropriate and secure exchange of personal information, between practitioners and other individuals with a responsibility for children, in order to keep them safe from harm.

Information sharing is essential for identifying patterns of behaviour, or circumstances in a child's life that may be evidence that they are at risk of harm or are being harmed and need some form of support or protection. This includes but is not limited to:

- child abuse, neglect or exploitation
- situations where timely supportive intervention could prevent concerns about a child's wellbeing from escalating
- when a child is at risk of going missing or has gone missing
- when multiple children appear linked to the same risk
- where there may be multiple local authorities and agencies or organisations involved in the care of a child's care

The Seven golden rules for sharing information (including personal information):

1. All children have a right to be protected from abuse and neglect. Protecting a child from such harm takes priority over protecting their privacy, or the privacy rights of the person(s) failing to protect them. The UK General Data Protection Regulation (UK GDPR) and the Data Protection Act 2018 (DPA) provide a framework¹ to support information sharing where practitioners have reason to believe failure to share information may result in the child being at risk of harm.

2. When you have a safeguarding concern, wherever it is practicable and safe to do so, engage with the child² and/or their carer(s), and explain who you intend to share information with, what information you will be sharing and why. You are not required to inform them, if you have reason to believe that doing so may put the child at increased risk of harm (e.g., because their carer(s) may harm the child, or react violently to anyone seeking to intervene, or because the child might withhold information or withdraw from services).

3. You do not need consent to share personal information about a child and/or members of their family if a child is at risk or there is a perceived risk of harm. You need a lawful basis to share information under data protection law, but when you intend to share information as part of action to safeguard a child at possible risk of harm, consent may not be an appropriate basis for sharing. It is good practice to ensure transparency about your decisions and seek to work cooperatively with a child and their carer(s) wherever possible. This means you should consider any objection the child or their carers may have to proposed information sharing, but you should consider overriding their objections if you believe sharing the information is necessary to protect the child from harm.

4. Seek advice promptly whenever you are uncertain or do not fully understand how the legal framework supports information sharing in a particular case. Do not leave a child at risk of harm

because you have concerns you might be criticised for sharing information. Instead, find out who in your organisation/agency can provide advice about what information to share and with whom. This may be your manager/supervisor, the designated safeguarding children professional, the data protection/information governance lead (e.g., Data Protection Officer⁵), Caldicott Guardian, or relevant policy or legal team. If you work for a small charity or voluntary organisation, follow the NSPCC's safeguarding guidance.

5. When sharing information, ensure you and the person or agency/organisation that receives the information take steps to protect the identities of any individuals (e.g., the child, a carer, a neighbour, or a colleague) who might suffer harm if their details became known to an abuser or one of their associates.

6. Only share relevant and accurate information with individuals or agencies/organisations that have a role in safeguarding the child and/or providing their family with support, and only share the information they need to support the provision of their services. Sharing information with a third party rarely requires you to share an entire record or case-file – you must only share information that is necessary, proportionate for the intended purpose, relevant, adequate and accurate.

7. Record the reasons for your information sharing decision, irrespective of whether or not you decide to share information. When another practitioner or organisation requests information from you, and you decide not to share it, be prepared to explain why you chose not to do so. Be willing to reconsider your decision if the requestor shares new information that might cause you to regard information you hold in a new light. When recording any decision, clearly set out the rationale and be prepared to explain your reasons if you are asked.

Information from - Information Sharing Advice for practitioners providing safeguarding services for children, young people, parents and carers May 2024 [Info sharing advice content May 2024.pdf](#)

Safeguarding Reporting via Safeguarding Management System (SMS)

