

NPL Safeguarding Policy



The National Physical Laboratory (NPL)

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Scope

This policy covers NPL Training's commitment and approach to the safeguarding of children and young people, adults at risk (vulnerable adults), and covers NPL Training's learners, including apprentices.

This Policy should be read in conjunction with the Prevent Policy.

Definitions

A 'child or young person' means any person under the age of 18 (i.e. those who have not yet reached their 18th birthday).

A 'learner' in this policy means any person learning a subject or skill who is a child or young person or a vulnerable adult, including all apprentices on programme with NPL Training.

An 'employee' is any person employed on a full time, part time or contract basis at NPL

A 'adult at risk' or 'vulnerable adult' means any person over the age of 18 who is or may be in need of community care services by reason of mental or other disability, age or illness; and who is or may be unable to take care of him or herself, or unable to protect him or herself against significant harm or exploitation because of mental or other disability, age or illness.

'Employees' means all employees, full-time, part time and contractors, working for NPL Training.

"LADO" means the Local Area Designated Officer, or team of officers (either as part of multi-agency arrangements or otherwise), employed by the Local Authority to be involved in the management and oversight of allegations against people that work with children.

"Safeguarding Officer" means Nikki Emerson / Alison Rooker

Law, Regulations and Guidance

There are various laws, regulations and guidance which are applicable to safeguarding. These include:

- The most recent version of [Working Together to Safeguard Children](#) (DfE)
- The most recent version of: Keeping Children Safe in Education https://assets.publishing.service.gov.uk/media/64f0a68ea78c5f000dc6f3b2/Keeping_children_safe_in_education_2023.pdf Statutory guidance for schools and colleges (DfE Sept 2023)
- [The Education Act 2002](#) s175
- [Mental Health and Behaviour in Schools: Departmental Advice \(DfE 2014\)](#)
- [Sexting in Schools & Colleges – responding to incidents and safeguarding young people](#) (UKCCIS) 2016
- [Review of sexual abuse in schools and colleges](#) (Ofsted 2021)
- [Relationships and sex education \(RSE\) and health education](#) (DfE, September 2021)
- General Data Protection Legislation (2018) https://ec.europa.eu/commission/priorities/justice-and-fundamental-rights/data-protection/2018-reform-eu-data-protection-rules_en

- The Children’s Act 1989 and 2004
- Safeguarding Children 2006
- Safeguarding Vulnerable Groups Act 2006
- The Protection of Freedoms Act 2012 deal with aspects of regulated activity.
- The Equality Act 2010
- The Health & Safety at Work Act
- The Counter-Terrorism and Security Act 2015
- The Prevent Duty Guidance: for further education institutions in England and Wales July 2015
- The Sexual Offences Act 2003

NPL Training’s Commitment

NPL Training recognises its responsibility for safeguarding and protecting the welfare of children and adults at risk (vulnerable adults). NPL Training believes that all people, regardless of age, ability, gender, racial heritage, religious belief and sexual orientation or identity have the right to be valued and respected as individuals and should be protected from harassment, harm and/or abuse.

NPL Training is committed to safeguarding and protecting the welfare of children and adults at risk (vulnerable adults), and expects employees to share this commitment and take responsibility for safeguarding. NPL Training has a safeguarding policy and procedure in place. This safeguarding policy sets out NPL Training’s commitment and approach to safeguarding and the procedures employees, learners and other key stakeholders should follow to report any safeguarding concerns, issues and risks (which includes preventing people from being drawn into terrorism). NPL Training will promote the policy and ensure that all employees, learners and other key stakeholders are made aware of the NPL Training safeguarding policy. Regular training sessions to cover safeguarding, Prevent, British Values etc will be conducted at whole Training Team meetings to promote awareness; the policy will be held centrally on the Apprentice Sharepoint site and details are included in the Learner Handbook.

NPL’s IT department has processes in place to monitor (audit), block, and report anything malicious or potentially dangerous on the network. This includes hardware, technical and logical controls, as well as auditing and reporting protocols. NPL has IT Security Requirements and IT Usage Policy as an addition to the Code of Conduct.

Safeguarding also includes all NPL employees acting in a responsible way to avoid any false allegations of inappropriate behaviour being made about their conduct.

NPL Training may need to share information with external agencies, such as the police, local authorities and the Channel Programme, where necessary, to support the safeguarding of Children and Adults at Risk.

NPL Training is committed to providing a safe and caring learning environment for all of its learners. NPL Training will take every reasonable precaution to minimise risk while providing challenging and enjoyable learning and development activities. learners should feel valued and respected at all times and should be encouraged and supported to raise any concerns about their own safety and the safety of others, including any safeguarding concerns.

Prevent Duty Commitment

NPL Training will work within the Prevent Duty Guidance for further education institutions in England and Wales to help prevent people being drawn into terrorism – not only violent extremism but also non-violent extremism. This includes, but is not restricted to, those linked to Islamist ideology, or to Far Right/Neo-Nazi/White Supremacist ideology, Domestic Terrorism, Irish Nationalist and Loyalist paramilitary groups, and extremist Animal Rights movements.

The government has defined extremism in the Prevent Duty as: vocal or active opposition to fundamental British Values, including democracy, the rule of law, individual liberty and mutual respect and tolerance for those with different faiths and beliefs.

Prevent is part of NPL Training's safeguarding commitment. Please see annex A for more information on the Prevent Duty and British Values and NPL Training's Prevent Policy.

Principles

Safeguarding has a meaning wider than child protection. This policy aims to demonstrate NPL Training's commitment to safeguarding practices that protect and minimise learners, employees and visitors from potential harm and abuse

Requirements

Categories of Abuse

Abuse can involve any one or more of:

- Physical Abuse - a form of abuse which may involve hitting, shaking, throwing, poisoning, burning or otherwise causing physical harm to a child or vulnerable adult.
- Emotional/ Psychological Abuse –the persistent emotional maltreatment such as threats of harm, humiliation, blaming, controlling, harassment, verbal abuse or any other actions causing emotional/psychological abuse.
- Sexual Abuse – encouraging, forcing or enticing a child, young person or vulnerable adult to take part in sexual activities in return for gifts, inducements or any other form of favourable treatment.
- Neglect - the persistent failure to meet a child's or vulnerable adults basic, physical and/or psychological needs, likely to result in the serious impairment of the individual's health or development, such as failing to provide adequate food, clothing and shelter. Young people who are being neglected may show signs of being unhappy, unfocussed or of being out of control.
- Peer on Peer Abuse - substantial proportion of abuse is carried out by other children or young people and includes harmful sexual behaviour, sexting, bullying, gender based bullying, initiations and it can it can be physical, verbal or emotional. Abuse is not to be passed off as banter, nor as being a normal part of growing up.

Specific Safeguarding Issues

The published guidance from the Department for Education (DfE) 'Keeping Children Safe in Education' places emphasis on 'specific safeguarding issues' including:

- bullying including cyberbullying
- child sexual exploitation (CSE)
- domestic violence
- drugs
- fabricated or induced illness
- faith abuse
- female genital mutilation (FGM) see Annex D
- forced marriage
- gangs and youth violence
- gender-based violence/violence against women and girls (VAWG)
- hate
- mental health
- missing children and adults strategy
- preventing radicalisation – see Annex A
- relationship abuse
- sexting
- trafficking

Within the Keeping Children Safe in Education (September 2023) update, further emphasis was placed upon; the role of all employees in safeguarding, early intervention, peer-on-peer abuse and online safety. Further guidance on each of these issues is available on the DfE website.

Responsibilities

NPL Training is committed to delivering and promoting a strong safeguarding culture where learners are valued, respected and protected from harm and abuse. Employees and learners will be encouraged and supported to raise any concerns about their own safety and the safety of others, including any safeguarding concerns. Employees will also be responsible for promoting a strong safeguarding culture.

NPL Training's senior managers will be responsible for ensuring the safeguarding policy (including Prevent) is effective, implemented and adhered to by employees.

The NPL Training Safeguarding Officer (designated person) will be responsible for all day to day safeguarding matters including Prevent.

All NPL Training employees working directly with learners have a responsibility towards safeguarding and will be required to act responsibly and implement the safeguarding policy within their roles. This includes following procedures for reporting any safeguarding concerns and/or disclosures. If employees have any safeguarding concerns (including extremism and/or radicalisation concerns), these should be urgently reported to the Safeguarding Officer.

The NPL Training Safeguarding Officer (designated person) will be responsible for:

- ensuring this policy is posted on Intranet and otherwise appropriately published and that HR record that staff sign to indicate that they have read and understood this policy.
- maintaining their safeguarding knowledge and their continuous professional development in this area.
- reviewing and updating this policy annually and when new legislation is issued.
- providing advice and support to employees on issues relating to safeguarding.
- assessing safeguarding concerns and disclosures, with support from senior managers and HR, as necessary.
- ensuring that an accurate record is kept of all employee safeguarding training.
- assessing employee training needs regularly through testing staff understanding of policy in to practice.
- managing all key documentation relating to safeguarding and reporting safeguarding activities, assessments, enquiries and issues to relevant senior managers, as necessary.
- ensuring the keeping of full and accurate written records of all concerns when noted and reported by employees or when disclosed by a child or young person, ensuring that such records are stored securely and reported onward, but kept separately from the child or young person's HR general file.
- deciding whether to take further action about specific Safeguarding concerns e.g. discuss with LADO on a no names basis, talk to parent, find suitable support, refer to Child Services
- liaising with and making referrals to others on safeguarding matters, as necessary, such as, parents and external organisations/agencies (e.g. local authority, LADO, the channel programme or the police).
- ensuring safe recruitment practices are always followed and employees are selected and recruited following appropriate safe recruitment processes as outlined in both county and national guidance, Keeping Children Safe in Education, September 2021.
- attending multi-agency briefings.
- Ensuring a nominated an appropriately trained deputy is in place to address issues during the absence of the Safeguarding Officer.

NPL Training will liaise closely with the police, the local safeguarding partners and other external agencies, as necessary, on any safeguarding cases and will share information with relevant external agencies, as required. In the absence of the Safeguarding Officer, any safeguarding concerns or disclosures should be reported to HR or the NPL Training Unit Leader.

Any concerns or disclosures about the Safeguarding Officer should be reported in confidence to the Head of HR.

Training and Awareness

NPL Training is committed to training employees to act in accordance with its Safeguarding policy and procedure.

NPL Training will ensure that:

- The Safeguarding Officer (and her/his nominated Deputy) receives relevant safeguarding and Prevent duty training which will provide them with the knowledge and skills needed to fulfil their responsibilities. This training will be refreshed at least every two years. Regular

updating of their knowledge and skills and continuous professional development will also take place, as required

- All employees and subcontractors of NPL Training will be made aware of NPL Training's Safeguarding policy and procedures during their induction into NPL
- NPL Training employees will undertake safeguarding training and Prevent duty training upon joining NPL, which will be appropriate to their role. NPL Training employees will complete suitable refresher training at two yearly intervals. All NPL Training employees will also receive relevant updates in relation to safeguarding and Prevent as required, (for example at team meetings) and at least annually to provide them with relevant skills and knowledge to safeguard children effectively.
- All learners and other key stakeholder (such as employers and parents) will receive safeguarding information and will be made aware of the NPL Training Safeguarding policy. Safeguarding will be covered during learner and employee inductions and noted at workplace reviews.

All training and CPD activities must be recorded in employees training files.

Disclosure and Barring Service Checks

The Disclosure and Barring Service (DBS) helps employers make safer recruitment decisions and prevent unsuitable people from working with vulnerable groups, including children.

NPL Training will follow the Government guidelines on safer recruitment included in the most recent guidance on Keeping Children Safe in Education. This statutory guidance requires schools and colleges to undertake a range of specified checks on employees. NPL Training will ensure that all appropriate checks are carried out on relevant employees, including new employees. Potential new employees in specific areas will be informed of the need to carry out 'enhanced disclosure' checks with the DBS before posts can be confirmed.

Regular monitoring of DBS checks will take place and DBS checks will be updated as necessary.

Safeguarding Concerns

This policy should be followed in relation to all safeguarding concerns or disclosures, including extremism and/or radicalisation concerns.

All learners will be made aware of NPL Training's safeguarding responsibilities and relevant policies. At all times learners should feel valued and respected, and should be encouraged and supported to raise any concerns about their own safety and the safety of others, including any safeguarding concerns.

There are many signs that may indicate an individual is suffering abuse or is at risk of abuse. If employees have **any** concerns they should talk to the Safeguarding Officer. Employees must regularly familiarise themselves with the list of indicators in this policy. The following list, although not exhaustive, should cause an employee to be concerned. When there are **any** safeguarding or welfare concerns employees must put the interests of the child or young person or vulnerable adult first.

- Significant change in behaviour, performance or attitude;

- Concerns about their outward appearance – clothing, hygiene, equipment, possessions;
- Has an injury which is not explained;
- Frequently has injuries (even when reasonable explanations are given);
- Gives confused or conflicting explanations on how injuries were sustained;
- Discloses an experience in which s/he may have been significantly harmed or be at risk of harm;
- Conduct of a parent or carer;
- Unexplained gifts or new possessions from another employee;
- Misuse of drugs or alcohol;
- Self-harm;
- Transient or chaotic lifestyle;
- Extreme religious or cultural practices;
- Conduct of another employee.

Confidentiality

NPL Training employees should never promise or guarantee confidentiality when dealing with safeguarding concerns or disclosures. The degree of confidentiality will be governed by the need to protect the individual.

Safeguarding conversations should always be held in private and employees must not discuss any safeguarding cases with anyone other than those involved in the case.

Safeguarding information will only be shared with employees on a need to know basis. This judgement will be made by the Safeguarding Officer and senior managers.

Responding to and Reporting Concerns

Safeguarding concerns and disclosures, including concerns about individuals being at risk of extremism and/or radicalisation, or allegations against persons in a position of trust, will always be taken seriously and should be reported in line with the safeguarding procedure.

If an employee has a concern or a learner who is a child or young person or a vulnerable adult makes a disclosure, these steps must be followed:

1. Always stop and listen straight away to someone who wants to tell you about incidents or suspicions of abuse.
2. Accept what is being said and allow the individual to talk freely.
3. Never promise or guarantee confidentiality. Let the individual know that you will need to record their concerns/disclosure and will need to report in line with the safeguarding procedure.
4. Remain calm, listen and reassure, allowing the individual to speak without interruptions. Do not display shock or disbelief.
5. Do not ask leading questions that might give your own ideas of what might have happened (e.g. “did he do X to you?” Ask questions like “What do you want to tell me?” or “Is there anything else you want to say?”
6. Avoid criticising the alleged perpetrator.

7. Explain what has to be done next and who will be informed.
8. Reassure the individual that they have done the right thing by sharing their concern/disclosing information
9. Make notes and precisely record the concern/disclosure, using the words of the individual (see template in annex E) and including the date and time of conversation. Do not destroy the original notes.
10. Urgently, the same day, report the concern/disclosure to the designated safeguarding officer and do not discuss the concern/disclosure with anyone else
11. If the designated safeguarding officer is not available, the concern/disclosure should be reported to HR or the Training Group Leader.

Once a safeguarding concern or disclosure has been reported, the designated safeguarding officer and/or relevant senior managers will assess the situation and make a decision on whether the issue needs to be escalated or referred (e.g. to the police, channel panel, the local safeguarding children's boards and/or other external agencies). NPL Training will share information and fully co-operate with relevant external agencies in relation to any safeguarding matters.

Please note – if a learner, an employee or any members of the public are at risk of being in immediate danger or at risk of immediate harm and the safeguarding officer or senior managers are not available, this should be reported to the police immediately. If a direct referral is made the NPL Training Safeguarding Officer should be informed at the earliest opportunity.

Recovery Planning

Dealing with a disclosure from a learner who is a child or young person or a vulnerable adult, may be a stressful experience. The member of staff should therefore consider seeking support for him/herself and discuss this with the Safeguarding Officer.

As every case will be handled with confidentiality (as far as is possible), a learner who is a child or young person or a vulnerable adult must be able to continue at NPL, confident that any incident is not general knowledge. The same will apply for an employee in case of resuming work after an accusation. Counselling may be offered and organised.

Allegations Against Employees - Sexual Abuse

Any form of sexual relationship between employees and a learner who is a child or young person or a vulnerable adult is expressly forbidden, and is likely to amount to criminal offence.

If a learner who is a child or young person, a vulnerable adult or an employee makes an allegation of sexual abuse against an employee the Safeguarding Officer and/or relevant senior manager should be informed immediately. The Safeguarding Officer and/or senior manager must inform any relevant parties, such as, parents and/or any other external agencies/organisations. The police must be informed and NPL will co-operate fully with any enquiries.

Allegations Against Employees – Physical Abuse

The age and level of understanding of learners means physical intervention to enforce compliance with instructions is inappropriate other than as a last resort in extreme circumstances, when a learner who is a child or young person is endangering him/herself or other learners, and at all times minimal force must be used. The use of any unwarranted force or force that may reasonably be expected to cause any injury will amount to a serious disciplinary issue and potentially a criminal offence.

If a learner who is a child or young person or a vulnerable adult or another employee makes an allegation of physical abuse against an employee the Safeguarding Officer and relevant senior manager should be informed immediately and the NPL Disciplinary Procedure will be followed. The Safeguarding Officer will inform any relevant parties, such as, parents and/or any other external agencies/organisations, such as the LADO and police, as necessary and will co-operate fully with any enquiries.

Whistleblowing

"Whistleblowing" is the disclosure of information which relates to suspected wrongdoing or dangers at work. A whistle-blower is a person who raises a genuine concern about such wrongdoing or dangers.

NPL promotes a culture that ensures all employees and individuals based at NPL locations are willing and comfortable to voice their concerns if need be. A learner who is a child or young person or a vulnerable adult cannot be expected to raise concerns in an environment where employees fail to do so. All employees should be aware of their duty to raise concerns, where they exist, about safeguarding. All concerns will be taken seriously by NPL. Full details can be found in the separate NPL Whistleblowing Policy.

Professional Conduct and Maintaining Professional Boundaries

A relationship of trust exists where an employee is in a position of power or influence over a learner who is a child or young person or a vulnerable adult by virtue of the work or nature of the activity being undertaken. Those in a position of trust must carry the responsibility of ensuring that they do not abuse their position or put themselves in a position where allegations of abuse of trust, whether justified or unfounded, could be made.

NPL Training employees must maintain professional boundaries and must adhere to the NPL Code of Conduct. Additionally, and in particular, employees must:

- Never blur the line between professional and personal life.
- Not make demeaning or salacious remarks to or in the presence of learners – verbally or on line.
- Not make remarks about a learner's physical characteristics or development.
- Not text or use social networking sites to contact learners (until they are over 18 years old) nor accept as a friend on social networking sites, chat rooms etc.
- Not take photos of learners using your own device (Photographs should only be taken for agreed and properly consented to educational or marketing purposes).

- Not touch a learner who is a child or young person or a vulnerable adult inappropriately. There may be occasions when it is appropriate for employees to have some physical contact with the child or young person with whom they are working. Some physical contact may be necessary to demonstrate exercises or techniques and individuals with special educational needs may need physical prompts or help. However, touching must only be with permission and in ways that are appropriate to their professional or agreed role and responsibilities.
- If taking learners on external visits, ensure appropriate and safe travel and accommodation and where that requires overnight accommodation should ensure that they do not enter a learner's hotel room, unless the situation necessitates this.
- If they have occasion to speak to a learner who is a child or young person or a vulnerable adult alone, take steps to ensure that they do not put themselves in a position whereby they could be accused of improper behaviour, and have no witnesses to support them. Procedures which could be followed include leaving the door of the room open so that you can be seen by passing employees.
- Not take learners in their own cars and alone other than where strictly required and unavoidable or in an emergency.
- Remember at all times that teaching and learning styles should provide opportunities for learners to work in an atmosphere of trust, acceptance and tolerance. We must be ready to adapt our teaching styles to different needs. Employees should always try to ensure that they:
 - Do not shout;
 - Rarely show anger;
 - Are more often positive than negative;
 - Admit mistakes and apologise for them;
 - Value what learners have to offer;
 - Show genuine pleasure when appropriate;
 - Start afresh after any incident or failure;
 - Display the professionalism of approach we would expect from learners in the future.

If an allegation of professional misconduct or breach of the above requirements is made against an employee the normal NPL Disciplinary Procedures will be followed.

Bullying and Harassment

NPL is committed to promoting positive employment relations as well as fairness and consistency in the treatment of all individuals including learners. A variety of activities aim to reinforce this culture of mutual respect. Robust action is taken if there are allegations of bullying and/or harassment, whether in person or remotely by the internet or telephone. More details on this can be found in the Bullying and Harassment Policy and the NPL Code of Conduct.

Criminal offences

If it is reasonably suspected or believed that a criminal offence has or may have taken place based on a concern being raised by an employee or disclosed by an individual then the police must be notified at the outset - before informing the alleged perpetrator.

It is mandatory for employees to report personally to the police, the discovery through disclosure of cases of FGM or forced marriage; it is a crime. Suspicions of FGM or forced marriage that has taken place or of a risk of FGM or forced marriage, must be reported to the Safeguarding Officer.

Record Keeping

An accurate record should be made for all safeguarding concerns, disclosures, discussions and decisions. Records should include:

- Appropriate personal details of the individual
- The nature of the concern
- The source(s) of information about the concern
- Any advice given/sought (advice should be from the Safeguarding Officer or HR team)
- Whether confidentiality has been discussed with the individual
- Names of employees with whom discussed
- Details of action taken or any referral to an external agency
- Date and signature of the person making the record

Records must be securely stored in accordance with NPL's personnel policies and the Data Protection Act.

Review and Reporting

NPL Training's safeguarding policy and procedures, including any information relating to the prevent duty, will be reviewed annually and approved by a Board Director.

All safeguarding activities, assessments, enquiries and issues will be reported to senior managers.

Guidance

NPL Safeguarding Officer – Hannah Mills – HR , hannah.mills@npl.co.uk ; Tel 020 8943 6838

NPL Training Safeguarding Officer – Alison Rooker – Apprenticeship Lead , Alison.rooker@npl.co.uk; tel 020 8943 8692

If Safeguarding Officer is unavailable, please refer to the HR Team or the Training Unit Leader.

There is a dedicated Safeguarding email address for reporting concerns - safeguarding@npl.co.uk

Associated NPL Documentation

Health & Safety Policy

Equal Opportunities and Diversity Policy

Bullying and Harassment Policy

Whistleblowing Policy

NPL's Code of Conduct

Grievance Procedure

Disciplinary Procedure

NPL Mobile Device Policy

NPL's Prevent Policy

Annex A: The Prevent Agenda

Prevent is part of the Government's counter-terrorism strategy and its aim is to stop people becoming terrorists or supporting terrorism.

Definitions

The following definitions are included in the Governments Prevent Strategy, 2011, glossary of terms.

Extremism: The 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. Also included in the definition of extremism are calls for death to members of our armed forces, whether in this country or overseas.

Radicalisation: Refers to the process by which a person comes to support terrorism and forms of extremism leading to terrorism.

British Values

As part of our commitment to the prevent agenda, NPL Training is dedicated to promoting and exemplifying British values, which are:

- democracy
- the rule of law
- individual liberty
- mutual respect and tolerance for those with different faiths and beliefs

NPL believes that all people, regardless of age, disability, gender, racial heritage, religious belief and sexual orientation or identity have the right to be valued and respected as individuals and should be protected from harassment, harm and/or abuse.

The Risk of Extremism

All employees have the responsibility to report any safeguarding concerns or disclosures, including any extremism radicalisation concerns. Concerns should be reported in line with the NPL safeguarding procedure for reporting concerns and/or disclosures.

A Risk Assessment/Action Plan will be undertaken as appropriate, including if external speakers or visits are to be made with learners.

Referrals and Working with External Agencies

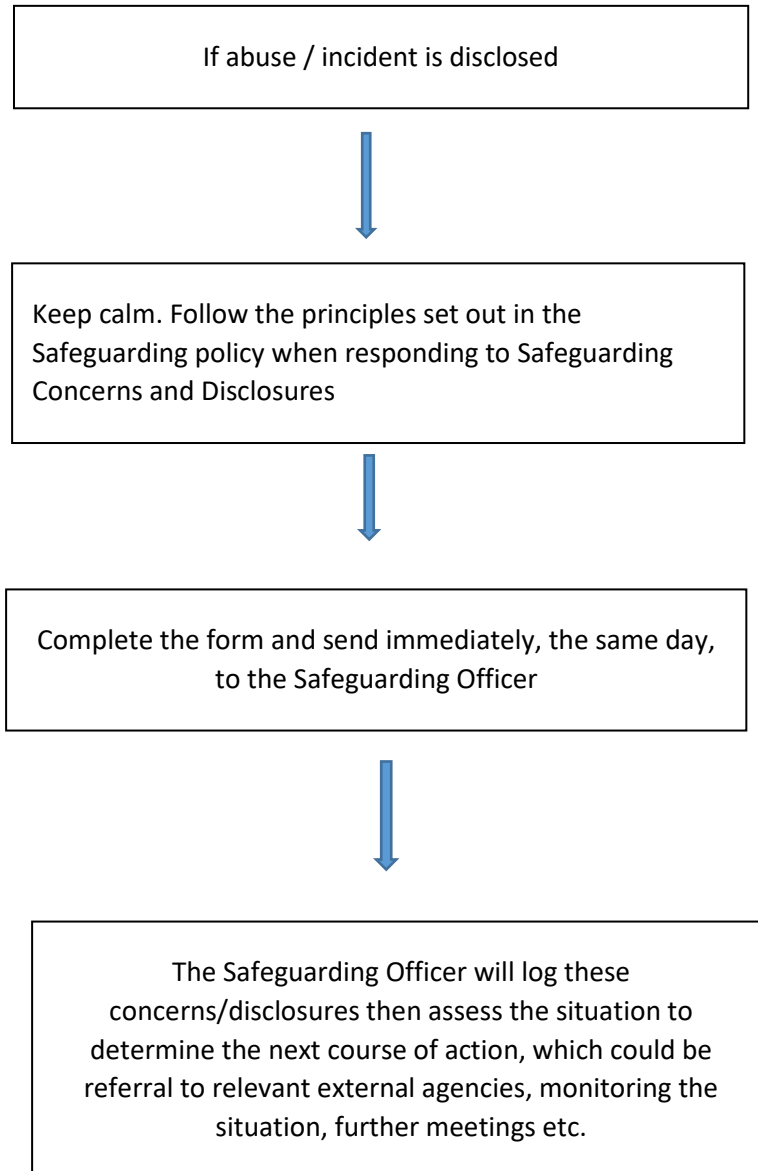
Once a safeguarding concern or disclosure has been reported, the Safeguarding Officer and senior managers will make a decision on whether the issue needs to be escalated or referred to external agencies such as the police and the channel panel.

Use of Information Technology

Employees, learners and visitors using NPLs systems should not create, transmit, receive, view or store unlawful material *or material that is indecent, offensive, defamatory, threatening, discriminatory or extremist. NPL reserves the right to block or monitor access to such material and has firewalls and security in place to prevent such access and report such activity.*

Employees in contravention of this will be subject to NPL's Disciplinary Procedure (section 8.2)
Please see NPL's Policy on the use of the Information Systems and the Internet for more information.

Annex B: Safeguarding Reporting Procedure



Annex C: The 5 R's of Safeguarding

- Recognise – be vigilant and know how to recognise behaviour that may indicate abuse
- Respond – never ignore concerns, signs or disclosures. Respond appropriately and promptly. Respond sensitively to the situation and individual. Do not probe or ask questions
- Report – always report concerns and disclosures to the appropriate person e.g. the designated safeguarding officer
- Record – always record what has happened, precisely and promptly ensuring details are accurate and factual, using relevant documentation
- Refer – the designated safeguarding officer and/or senior managers will decide if referral is appropriate

Annex D: 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.

The age at which girls undergo FGM varies enormously according to the community. The procedure may be carried out when the girl is new-born, during childhood or adolescence, at marriage or during a first pregnancy.

Circumstances and occurrences that may point to FGM happening:

- Child talking about getting ready for a special ceremony
- Family taking a long trip abroad
- Child's family being from one of the 'at risk' communities for FGM (Kenya, Somalia, Sudan, Sierra Leon, Egypt, Nigeria, Eritrea as well as non-African communities including Yemeni, Afghani, Kurdistan, Indonesia and Pakistan)
- Knowledge that the child's sibling has undergone FGM
- Child talks about going abroad to be 'cut' or to prepare for marriage

Signs that may indicate a child has undergone FGM include:

- Prolonged absence from work and other activities
- Behaviour change on return from a holiday abroad, such as being withdrawn and appearing subdued
- Finding it difficult to sit still and looking uncomfortable
- Mentioning something somebody did to them that they are not allowed to talk about
- Secretive behaviour, including isolating themselves from the group
- Disclosure

Any concerns about a possible or disclosed incident of FGM should be reported immediately to the Safeguarding Officer.

Statutory Guidance

<https://www.gov.uk/government/publications/multi-agency-statutory-guidance-on-female-genital-mutilation>

Mandatory Reporting

<https://www.gov.uk/government/publications/mandatory-reporting-of-female-genital-mutilation-procedural-information>

Fact Sheet

https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/496415/6_1639_HO_SP_FGM_mandatory_reporting_Fact_sheet_Web.pdf

Annex E: Safeguarding Recording Form



Training

Safeguarding Report Form

Strictly Confidential

Learner Details

Name	DOB	Age

Course	Tutor

Date of Incident / Disclosure	Time	Person Reporting Incident & Position

Specific Details of Concern / Disclosure (continue on additional sheet(s) if required)

Include who, where, who involved etc

Any further comments

Signature of Reporting Person