

# NPL Training Safeguarding Policy



## **The National Physical Laboratory (NPL)**

NPL is the UK's National Measurement Institute and is a world-leading centre of excellence in developing and applying the most accurate measurement standards, science and technology available.

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**Address:** National Physical Laboratory, Teddington, Middlesex, United Kingdom, TW11 0LW


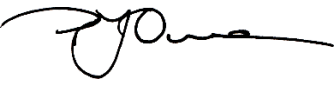
**Email:** [training@npl.co.uk](mailto:training@npl.co.uk)

**Telephone:** +44 (0)20 8943 6606

**e-mail:** [training@npl.co.uk](mailto:training@npl.co.uk)

**URL:** [www.npl.co.uk](http://www.npl.co.uk)

Confirmed updated and approved

Name	Position	Signature	Date
Alison Rooker	Apprentice Lead - Training		24/11/2025
Penny Owen	Executive Sponsor - Apprenticeships		24/11/2025

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## Principles

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

## 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, including the NPL Training team.

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.

"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.

"DSL" means "Designated Safeguarding Lead".

## Law, Regulations and Guidance

Training Providers are now required to have regard to Keeping Children Safe in Education (KCSiE) following the enactment of [The Education and Training \(Welfare of Children\) Act 2021](#).

KCSiE now states that the term 'college' includes providers of post 16 Education as set out in the Apprenticeships, Skills, Children and Learning Act 2009 (as amended): 16-19 Academies, Special Post-16 institutions and Independent Training Providers.

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

- The most recent version of [Working Together to Safeguard Children](#)
- The most recent version of: [Keeping Children Safe in Education](#)
- [The Education Act](#)
- [Mental Health and Behaviour in Schools: Departmental Advice \(DfE 2014\)](#)
- [Sexting in Schools & Colleges – responding to incidents and safeguarding young people](#) (UKCCIS) Updated 2024
- [Review of sexual abuse in schools and colleges](#) (Ofsted 2021)
- [Relationships and sex education \(RSE\) and health education](#) (DfE, Updated December 2025)
- [General Data Protection Legislation \(2018\)](#)
- The Children’s Act [1989](#) and [2004](#)
- [Safeguarding Vulnerable Groups Act 2006](#)
- [The Protection of Freedoms Act 2012](#)
- [The Equality Act 2010](#)
- [The Health & Safety at Work Act 1974](#)
- [The Counter Terrorism and Security Act 2015](#)
- [The Prevent duty: safeguarding learners vulnerable to radicalisation 2023](#)
- [The Sexual Offences Act 2003](#)
- [Worker Protection Act 2023](#)
- [Sharing nudes and semi-nudes: advice for education settings working with children and young people](#)
  
- [Multi-agency Statutory Guidance on Female Genital Mutilation](#)
- Multi-agency statutory guidance for dealing with forced marriage and multi-agency practice guidelines: [Handling cases of forced marriage](#)
- Local guidance for [Kingston and Richmond](#) (NPL Local authority) Safeguarding Children Partnership – including [strategy](#)
- London Areas Safeguarding procedures – [further information](#)

## NPL Training’s Commitment

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

NPL Training believes that regardless of age, ability, gender, racial heritage, religious belief and sexual orientation or identity, our learners –

- have the right to be valued and respected as individuals;
- have the right to be protected from harm, harassment, abuse and neglect;
- have the right to experience their optimum mental and physical health;
- need support that matches their individual needs, including those who may have experienced abuse;
- have the right to express their views, feelings and wishes and voice their own values and beliefs;

- should be encouraged to respect each other's values and support each other;
- have the right to be supported to meet their emotional and social needs as well as their educational needs.

NPL Training is committed to safeguarding and this 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 staff, learners and other key stakeholders are made aware of it.

All staff members receive safeguarding training during their induction, with refresher training provided annually. Apprentices receive safeguarding information and guidance as part of their induction process. The policy will be available on the apprentices' learning platform 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.

## Prevent Duty Commitment

The Prevent duty requires all education providers 'to help prevent the risk of people becoming terrorists or supporting terrorism'. This includes safeguarding learners from extremist ideologies and radicalisation.

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.

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

## 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 - a substantial proportion of abuse is carried out by other children or young people and includes harmful sexual behaviour, sexting, bullying, gender-based bullying and initiations. Abuse 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 homophobic, bi-phobic, trans-phobic and cyber-bullying)
- child sexual exploitation (CSE)
- domestic violence
- drugs
- fabricated or induced illness
- faith abuse
- female genital mutilation (FGM) see Appendix 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 Appendix A
- relationship / domestic abuse
- sexting
- trafficking

Within the Keeping Children Safe in Education (September 2023) update, further emphasis was placed on 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.

## Contextual Safeguarding

Contextual safeguarding is about the impact of the public/social context on young people’s lives, and consequently their safety. It seeks to identify and respond to harm and abuse posed to young people

outside their home, either from adults or other young people. As an approach it looks at how interventions can change the processes and environments, to make them safer for all young people, as opposed to focussing on an individual.

The DSL will be responsible for all day-to-day safeguarding matters and senior managers will be responsible for ensuring the safeguarding policy (including Prevent) is implemented and adhered to by employees.

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 DSL.

The DSL will be responsible for:

- ensuring this policy is posted on the NPL Training website and otherwise appropriately published, and 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 / or 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 staff safeguarding training
- 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 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 2025
- attending multi-agency briefings as necessary
- Ensuring a nominated an appropriately trained deputy is in place to address issues during the absence of the DSL.

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 DSL, any safeguarding concerns or disclosures should be reported to HR or the NPL Training Unit Leader.

Any concerns or disclosures about the DSL 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 DSL 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 at NPL
- NPL Training employees will undertake safeguarding training and Prevent duty training upon joining NPL, as appropriate to their role and 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
- All learners and other key stakeholders (such as employers and parents) will receive safeguarding information and will be made aware of the NPL Training Safeguarding policy. Safeguarding will be covered and noted at workplace reviews.

All training and CPD activities must be recorded in employee 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.

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

NPL follows Safer Recruitment guidelines (e.g. taking up references) and all individuals working with, or for, NPL are required to complete a Baseline Personnel Security Standard (BPSS). This screening verifies identification, ensures individuals are entitled to take up employment and includes a criminal records check.

## Safeguarding Concerns

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

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.

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 DSL. When there are **any** safeguarding or welfare concerns, the interests of the child or young person or vulnerable adult must come first.

This list, although not exhaustive, should cause concern -

- Significant change in behaviour, performance or attitude.
- Differences in their outward appearance – clothing, hygiene, equipment, possessions.
- Unexplained injury or injuries.
- Frequently has injuries (even when reasonable explanations are given).
- Confused or conflicting explanations are given on how injuries were sustained.
- Disclosure of an experience in which they 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.

## Mental Health

NPL Training staff will be alert to signs of mental ill-health and be made aware that mental health problems can, in some cases, be an indicator that a learner has suffered or is at risk of suffering abuse, neglect or exploitation. All staff will take immediate action and speak to the DSL if they have a mental health concern about a learner.

Whilst on-programme, NPL Training staff will aim to create a safe and calm environment where mental health problems are less likely, look to improve the mental health and wellbeing of the whole cohort, and equip learners to be resilient so that they can manage the normal stress of life effectively. This will include teaching learners about mental wellbeing through the curriculum and reinforcing this teaching through activities and ethos.

## Safeguarding Vulnerable Learners

[Exploitation, Trafficking, or So-Called Honour Based Violence \(Including Female Genital Mutilation and Forced Marriage\)](#)

With effect from October 2015, all educational establishments are subject to a mandatory reporting requirement in respect of female genital mutilation (FGM). When a member of staff suspects or discovers that an act of FGM is going to be or has been carried out on a girl aged under 18, that teacher has a statutory duty to report it to the Police.

As of February 2023, it is now illegal for anyone under the age of 18 to marry or enter into a civil partnership, even where violence, threats or another form of coercion are not used.

NPL Training will support and talk to impacted learners and to find ways to address the issues together wherever possible.

## Learners Absent from Education

A learner going missing and / or patterns of unauthorised absence, particularly repeatedly, can act as a vital warning sign of a range of safeguarding risks, including, which may include abuse and neglect; sexual abuse or exploitation; criminal exploitation; mental health problems; substance abuse and other issues. Early intervention is necessary to identify the existence of any underlying safeguarding risks and to help prevent the risk of them going missing in future.

Work around attendance and learners missing from education will be coordinated with safeguarding interventions. NPL Training will hold one or more emergency contact number for each learner and ensure we have taken reasonable enquiries to ascertain the whereabouts of a learner that would be considered 'missing'. (See Appendix F).

## Child on Child / Peer on Peer Abuse & Sexual Harassment

It is important that schools, colleges and training providers such as NPL Training, can recognise that children and young people can abuse their peers, and that this abuse can include physical abuse, sexting, initiation/ hazing, sexual violence and harassment.

NPL Training will adopt the 'universal approach' to tackling abuse and harassment of any kind. We will follow both national and local guidance and policies to support any learner subject to child on child / peer on peer abuse, including sexting (also known as youth produced sexual imagery) and gang violence. We fully understand that even if there are no reports of peer-on-peer abuse by our learners, it may be happening. As such all our staff and learners are supported to be alert to peer-on-peer abuse (including sexual harassment) and to stay safe and be confident that reports of such abuse will be taken seriously.

We will ensure that all learners, regardless of age, have access to a trusted person with whom they can be open within a safe space where they can share their concerns.

The fact that a child or a young person may be LGBTQ+ is not in itself an inherent risk factor for harm. However, children or young people who are LGBTQ+ can be targeted by others. In some cases, a child or young person who is perceived to be LGBTQ+ (whether they are or not) can be just as vulnerable as those who identify as LGBTQ+.

NPL Training's values, ethos and behaviour policies provide the platform for staff and students to clearly recognise that abuse is abuse and it should never be tolerated or diminished in significance. It should be recognised that there is a gendered nature to child on child / peer on peer abuse i.e. that it is more likely that girls will be victims and boys perpetrators.

Schools, colleges and training providers should recognise the impact of sexual violence and the fact that people can, and sometimes do, abuse their peers in this way, regardless of age. When referring to sexual violence this policy is referring to sexual offences under the Sexual Offences Act 2003 as described in Appendix E.

## Criminal Exploitation and County Lines

Child criminal exploitation is a form of abuse and just as with sexual exploitation, both occur where an individual or group takes advantage of an imbalance in power to coerce, manipulate or deceive a child or young person into sexual or criminal activity.

NPL Training will notice and listen to any learners who show signs of being drawn in to anti-social or criminal behaviour and use government guidance to support any learners we are concerned about.

Further information - Criminal Exploitation of children and vulnerable adults: [County Lines guidance](#)

## Domestic Abuse

Domestic abuse refers to any incident or pattern of incidents of abusive behaviour occurring between individuals aged 16 or over who are personally connected to one another. Abuse may occur between intimate partners, ex-partners, or family members, regardless of gender or sexuality.

Under the Domestic Abuse Act 2021, behaviour is considered abusive if it includes one or more of the following:

- Physical or sexual abuse
- Violent or threatening behaviour
- Controlling or coercive behaviour
- Economic abuse, such as restricting access to money, property, or essential goods/services
- Psychological, emotional, or other forms of abuse
- It does not matter whether the abuse is a single incident or a repeated pattern of behaviour.

Two individuals are defined as personally connected if they are or have been married, civil partners, in an intimate personal relationship, relatives, or share parental responsibility for a child.

Children and young people are recognised as victims in their own right if they see, hear, or experience the effects of domestic abuse involving personally connected adults. Abuse directed at someone under 16 is considered child abuse, not domestic abuse.

All staff have a duty to help safeguard individuals who may be experiencing domestic abuse. This responsibility aligns with statutory expectations that agencies must actively protect and support victims and children affected by domestic abuse.

See Appendix C.

## 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 guidance in Appendix 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 DSL and do not discuss the concern/disclosure with anyone else
11. If the designated DSL 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 DSL 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 DSL or senior managers are not available, this should be reported to the police immediately. If a direct referral is made the NPL Training DSL should be informed at the earliest opportunity.

## 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 DSL and senior managers.

## 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 DSL and/or relevant senior manager should be informed immediately. The DSL 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 DSL and relevant senior manager should be informed immediately and the NPL Disciplinary Procedure will be followed. The DSL 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 online.

- Not make remarks about a learner’s physical characteristics or development.
- Not use social networking sites to contact learners 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 DSL.

## 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 DSL 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, the Data Protection Act and UK GDPR.

## 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 DSL.

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.

## Review and Reporting

NPL Training's safeguarding policy and procedures, including any information relating to the prevent duty, will be reviewed annually (or in line with new legislation) and approved by a Board Director.

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

## Guidance

NPL Training DSL – Alison Rooker – Apprenticeship Lead , [alison.rooker@npl.co.uk](mailto:alison.rooker@npl.co.uk); tel 07718 195250 or 020 8943 8692

If DSL 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](mailto: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

## Appendix A: Prevent

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 DSL 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.

Please see NPL's Policy on the use of the Information Systems and the Internet for more information.

### **Indicators of Vulnerability to Radicalisation**

Radicalisation is defined in KCSiE 2024 as “the process by which a person comes to support terrorism and extremist ideologies associated with terrorist groups”.

Extremism is defined by the Government in the Prevent Strategy 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, whether in this country or overseas”.

Extremism is defined by the Crown Prosecution Service as: “the demonstration of unacceptable behaviour by using any means or medium to express views which:

- Encourage, justify or glorify terrorist violence in furtherance of particular beliefs;
- Seek to provoke others to terrorist acts;
- Encourage other serious criminal activity or seek to provoke others to serious criminal acts; or
- Foster hatred which might lead to inter-community violence in the UK.

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.

There is no such thing as a “typical extremist”: those who become involved in extremist actions come from a range of backgrounds and experiences, and most individuals, even those who hold radical views, do not become involved in violent extremist activity.

Learners may become susceptible to radicalisation through a range of social, personal and environmental factors - it is known that violent extremists exploit vulnerabilities in individuals to drive a wedge between them and their families and communities. It is vital that staff are able to recognise those vulnerabilities.

Indicators of vulnerability include:

- 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; and 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 that is 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; 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.

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.

More critical risk factors could include:

- Being in contact with extremist recruiters;
- Family members convicted of a terrorism act or subject to a Channel intervention;
- Accessing violent extremist websites, especially those with a social networking element;
- Possessing or accessing violent extremist literature;
- Using extremist narratives and a global ideology to explain personal disadvantage;
- Justifying the use of violence to solve societal issues;
- Joining or seeking to join extremist organisations;
- Significant changes to appearance and/or behaviour; and
- Experiencing a high level of social isolation resulting in issues of identity crisis and/or personal crisis.

Further information - [Making a referral to Prevent](#)

The DSL will be the main point of contact with relevant Prevent partners to seek advice, collate information and manage referrals, as well as attending Channel meetings as necessary and completing any actions as agreed.

Channel is a voluntary, confidential multi-agency safeguarding programme designed to protect children and adults who are vulnerable to being drawn into terrorism. It operates as part of the Prevent strategy and focuses on early intervention to reduce risks associated with radicalisation.

Channel panels, chaired by the local authority, work collaboratively with partners such as police, education, health and social care to assess concerns and develop tailored support plans.

Participation is not a criminal sanction and does not appear on criminal records. The programme addresses all forms of extremism, including Islamist, extreme right-wing and mixed or unclear ideologies, and provides a wide range of support such as mentoring, mental health assistance, and education or employment help, depending on individual needs.

## Appendix B: Safeguarding Reporting Procedure

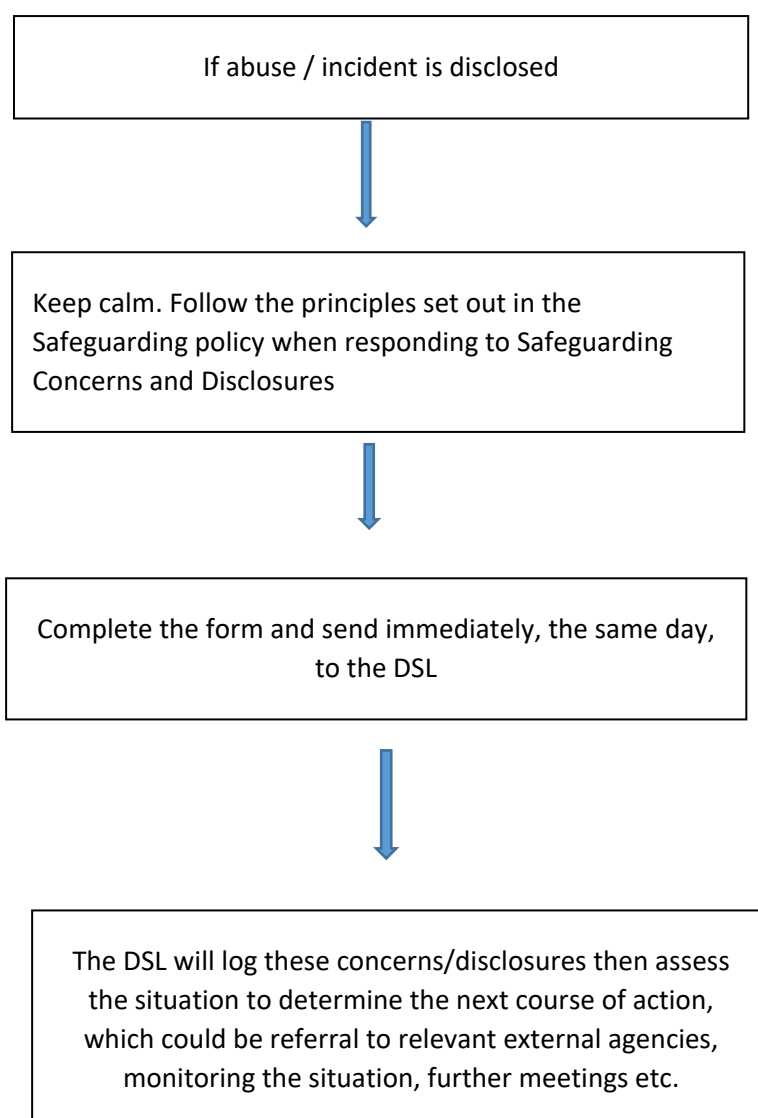
**Recognise** – be vigilant and know how to recognise behaviour that may indicate abuse

**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 DSL

**Record** – always record what has happened, precisely and promptly ensuring details are accurate and factual, using relevant documentation

**Refer** – the DSL and/or senior managers will decide if referral is appropriate



## Appendix C: Domestic Abuse

### Recognising Signs of Domestic Abuse

Staff must remain vigilant and able to identify potential indicators across the full spectrum of abusive behaviours, including physical, sexual, emotional, controlling/coercive and economic abuse. This includes recognising when a child sees or hears domestic abuse, as they are themselves considered victims. [safeguardi...ide.nhs.uk], [legislation.gov.uk] [gov.uk], [ncvo.org.uk]

### Responding Appropriately to Disclosures

- Listen sensitively, without judgement or minimising the concerns raised.
- Reassure the individual that they have done the right thing in speaking up.
- Avoid pressing for details or conducting investigations yourself, in line with statutory guidance that emphasises clear referral pathways and protecting victims. [gov.uk]

### Reporting and Recording Concerns

- Follow organisational safeguarding procedures, ensuring concerns are shared promptly with the designated safeguarding lead.
- Record information accurately and factually, noting dates, observations, and exact wording where possible.
- Ensure information-sharing follows legal and policy frameworks that support multi-agency safeguarding responses. [gov.uk]

### Supporting the Safety and Wellbeing of Victims

- Take all disclosures seriously and prioritise the safety of the individual and any children involved.
- Provide information on available support services and encourage access to specialist domestic abuse agencies in line with statutory guidance. [safeguardi...ide.nhs.uk]
- Understand that victims may face coercion and barriers to seeking help; respond with empathy and without blame.

### Maintaining Professional Boundaries and Confidentiality

Staff must handle all safeguarding information sensitively, sharing it only with the DSL or relevant external agencies, and must avoid any actions that could escalate risk, including directly confronting alleged perpetrators. As part of their safeguarding responsibilities, staff are expected to engage fully in coordinated multi-agency responses, contributing to meetings and information-sharing processes where appropriate, in line with guidance emphasising the importance of collaboration to protect victims and children at risk

## Referral Pathways for Domestic Abuse

Clear and timely referral pathways are essential to safeguarding individuals at risk of domestic abuse. The following outlines the organisational and multi-agency routes staff must follow when concerns arise.

### Immediate Risk – Emergency Services

If there is immediate danger to an individual or child - call 999 and request police or emergency support.

Statutory frameworks highlight the need to protect victims and children at risk, ensuring urgent situations are addressed without delay. [gov.uk]

### Internal Safeguarding Referral

All concerns about domestic abuse must be reported as soon as possible to the DSL.

The DSL is responsible for:

- Reviewing concerns
- Assessing risk
- Making decisions on escalation to external agencies

### Referral to Local Authority Children's or Adults' Services

A referral must be made to the relevant local authority if:

- A child has witnessed, heard, or experienced the impact of domestic abuse (as they are recognised as victims in their own right). [gov.uk], [ncvo.org.uk]
- An adult is at risk of harm and meets the criteria for statutory safeguarding.

Local authorities may initiate assessments or multi-agency planning to protect victims and children.

### Multi-Agency Risk Assessment Conference (MARAC) Referral

Where a victim is at high risk of serious harm or homicide, staff (through the DSL) should refer to the local MARAC. MARACs facilitate coordinated support across police, social care, health, probation and other services, reflecting the multi-agency practice required by domestic abuse policy frameworks. [gov.uk]

### Police Referral (Non-Emergency)

For concerns that require police involvement but are not an emergency:

Use 101 to report incidents, patterns of abuse, stalking, harassment or coercive control.

Police are central partners in domestic abuse safeguarding and risk reduction. [gov.uk]

### Referral to Specialist Domestic Abuse Services

The DSL should ensure victims are supported to access specialist organisations such as:

- Independent Domestic Violence Advisers (IDVAs)
- Refuge/outreach services
- Culturally specific or gender-specific support

NHS safeguarding guidance highlights the importance of directing victims to specialist services that understand the complexities of coercive control, psychological abuse, and barriers to seeking help. [safeguardi...ide.nhs.uk]

#### Internal Risk Management and Multi-Disciplinary Meetings

Where appropriate, the DSL may convene internal risk discussions involving relevant staff (e.g., safeguarding leads, HR, pastoral teams) to coordinate support.

## Appendix 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 DSL.

[Statutory Guidance](#)

[Guidance - Mandatory Reporting of FGM](#)

[Fact Sheet](#)

## Appendix E: Sexual Harassment

Anything that is unwelcome to a person is unwanted and they don't need to have objected to it before. Sexual harassment is unwanted sexual behaviour that has the purpose or effect of violating someone's dignity, or creating an intimidating, hostile, degrading, humiliating or offensive environment.

If the unwanted behaviour violates a person's dignity, or creates a degrading, humiliating, hostile, intimidating or offensive environment for them then it is classified as harassment. It doesn't matter if the person harassing them didn't intend to do it, for example "workplace banter", it's the impact that it has that counts.

Sexual harassment is against the law and has no place in the workplace.

Sexually harassing behaviours can include:

- sexual comments or jokes
- the display or circulation of pornography
- displaying sexually graphic pictures, posters or photos
- suggestive looks, staring or leering
- propositions and sexual advances
- requests or demands for sexual favours
- sexual gestures
- intrusive questions about a person's private or sex life or a person discussing their own sex life
- sexual posts or contact on social media
- spreading sexual rumours about a person
- sending sexually explicit emails or text messages, and
- unwelcome touching, hugging, massaging or kissing.

### **Sexual Offences Act 2003 Definitions**

**Rape:** A person (A) commits an offence of rape if: there is intentional penetration of 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, anus or mouth 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.

**Victimisation** is defined as treating a worker badly because

- they have reported sexual harassment at work,
- it is believed they will report a case of sexual harassment in the future
- or a person has helped someone else to report a case of sexual harassment.

Treating a worker badly can include, but is not limited to:

- dismissing a worker
- excluding a worker from tasks, projects, meetings, or day to day work
- unfair criticism of work
- denying a worker a promotion or development opportunity
- denying a worker shift hours
- telling other companies to not hire someone due to their reporting of sexual harassment.

There is no time limit on when a worker can experience victimisation, providing that the worker is subject to bad treatment as a result of the case involving sexual harassment and not some other reason.

Sexual harassment and victimisation can happen in a work situation, during any situation related to work such as a work social event or site visit, and on social media or any online communication. It can be carried out by other workers and third parties.

Third party means someone who a worker interacts with as part of their job but who is not employed by the same employer as them, for example a customer or a contractor.

If you have been sexually harassed, experienced sexual violence or witness sexual harassment or violence, and wish to talk to someone in confidence, anonymously you can contact:

**For women:**

- National Sexual Violence Helpline: 0808 802 9999
- Women's Aid Federation – [www.womensaid.org.uk](http://www.womensaid.org.uk) / 08457 023 047

**LGBT specialist support**

- Galop – [www.galop.org.uk](http://www.galop.org.uk) / 0800 999 5428

**Men's specialist support**

Survivors UK – [www.survivorsuk.org](http://www.survivorsuk.org)

## Appendix F: Learners Missing from Education

If a learner does not attend a block week session or arranged meeting they should notify their tutor directly by email, phone call or text message, in advance. It is their responsibility to also notify their line manager. This is the process for reporting an absence. Learners will be made aware of and told to follow this process which can be found in the Apprenticeship Handbook.

If a learner has not attended as expected and has not notified their tutor they will not be attending, they are classed as Learners Missing from Education and the following process must be followed.

Learner details	1st step	2nd step	3rd step
Learner over the age of 19 with no safeguarding issues raised previously and no additional learning support requirements.	Tutor attempts contact as soon as they are able, this may be during a break or conclusion of the lesson. Learner must be encouraged to get in touch with an explanation at earliest convenience – via voice message, email or texts.	If a response is not forthcoming by midday at the latest, tutor should contact line manager.	If line manager is unaware of absence and no word is received after 24 hours, Safeguarding team is notified and will pick up contact attempts and emergency contacts may be called.
Learner aged 16 to 18 with no safeguarding issues raised previously and no additional learning support requirements.	Tutor attempts contact immediately upon failure to attend. Learner must be encouraged to get in touch with an explanation at earliest convenience – via voice message, email or texts.  Tutor attempt contact again following session break / lunch break.	If step 1 has failed. Tutor must contact line manager immediately.	If line manager is unaware of absence, tutor must contact the Safeguarding team. SG team will pick up contact attempts and emergency contacts will be called.
Learners with wellbeing or safeguarding issues raised and learners with ALS requirements		Tutor attempts contact immediately upon failure to attend. If no response, tutor will contact line manager immediately. If line manager unaware of whereabouts or any reported absences, tutor contacts	

Safeguarding Team and emergency contacts will be called.

The main purpose of this process is to safeguard learners with a vulnerability; however, it is also a mechanism by which line managers will be kept up to date (outside of workplace progress reviews) of potential disciplinary issues regarding attendance.

## Appendix G: Safeguarding Recording Form



National Physical Laboratory

### 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