

Safeguarding Policy

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1. OUR COMMITMENT

All our employees who work with learners have a crucial role to play in shaping their lives. You have a unique opportunity to interact in ways that are both affirming and inspiring. This policy has been produced (and is supported by Information, Advice and Guidance) to help you establish safe and responsive environments which safeguard all and reduce the risk of you being unjustly accused of improper or unprofessional conduct. We all have a duty of care to safeguard and promote welfare, and to enhance awareness of the broader welfare spectrum, specifically the issues facing young people in society and create a culture where young people can speak out or share their concerns

2. OBJECTIVES

The policy aims to ensure you are aware of and understand your responsibilities, those of others, signs that there might be a safeguarding concern, along with the reporting procedures for all safeguarding issues.

3. SCOPE

This policy covers the safeguarding of Children and Adults at Risk as defined below for Lifetime Group (Lifetime is the trading name for both Lifetime Training Group Limited and The IT Skills Management Company Limited.). This scope also extends to the safeguarding of children and adults at risk in settings where our learners are employed

Our learners across all nations include those in EPA, those within sub-contracted provision, and individuals in settings where we deliver services, falling into the category of children or adults at risk. This encompasses specific highlighted safeguarding agenda areas as defined by law, as specified in Keeping Children Safe in Education (2024), and, in the wider context, all our students and learners. This policy is also influenced by and aligns with the requirements set out in 'The Education Act (2002) Section 175' and 'Working Together to Safeguard Children (2023) updated Dec 2023'. Additionally, this policy aligns with the government's Counter-terrorism and Security Act 2015, which places a duty upon all education providers to consider the need to prevent people from being drawn into terrorism. This Prevent Duty forms part of the wider government's CONTEST counter-terrorism strategy:

- Prevent terrorism – stop people from becoming terrorists
- Pursue terrorism – disrupt and stop terror attacks
- Protect against terrorism – strengthen UK protection
- Prepare to deal with terrorism – mitigate the impact of attacks that can't be stopped.

The Prevent strategy seeks to mitigate the threat of terrorism in the UK by preventing individuals from becoming terrorists or supporting terrorist activities. It has three specific strategic objectives:

1. Address the ideological challenge of terrorism and the threat posed by those who promote it.
2. Prevent individuals from being drawn into terrorism while ensuring they receive appropriate advice and support.
3. Collaborate with sectors and institutions at risk of radicalisation that require our attention.

For more details about how Lifetime meets the Prevent Duty, see our Prevent Policy

4. KEY CONTACTS

The safeguarding team can be contacted via supportme@lifetimetraining.co.uk

Head of Safeguarding and Health and Safety: Michelle Kent – 07795 486090

Safeguarding Board representative – Chief Learning Officer Paul Swindale - 07557431211

External Safeguarding Consultant - Learner Experience Committee Chair, Barbara Van Der Ecken - quality@bvde.co.uk

Additional Designated Safeguarding Officers listed below:

Lois Heighton - Quality Partner & Deputy Safeguarding Lead - 07870 747729

Debra Winder – Social Support Tutor and Deputy Safeguarding Lead - 07469 083838

Alex Butcher – Compliance Officer - 01173142816

Lesley Lacey - Social Support Tutor - 07557 433513

Claire Scott - Management Development Coach - 07970 036234

Sarah Gardner English and Maths Coach 07971397080

5. DEFINITIONS

Safeguarding refers to the protection of children and vulnerable adults from abuse and neglect, while promoting health, and development, ensuring safety and care, and ensuring optimum life chances.

- A child is defined as anyone under the age of 18, as cited in the Education Act (2002). Recent attention has been drawn to the fact that some children are treated as adults, particularly regarding the responsibilities placed on teenagers who are being exploited, as well as the adulting of black children and young people. This issue should be given due consideration.
- An adult at risk, as defined by the Care Act (2014), is anyone over the age of 18 who is at risk of abuse or neglect due to their need for support or personal circumstances.
- In Scotland, the general definition of a "child" is anyone under the age of 18. This definition is used in the Children and Young People (Scotland) Act 2014. However, specific legal contexts may have different age definitions. For example, the Children's Hearings (Scotland) Act 2011 defines a child as anyone under 16.
- In Scotland - protected adult The Act, defines 'adults at risk' as individuals, aged 16 years or over, who:
 - are unable to safeguard themselves, their property, rights or other interests;
 - are at risk of harm; and
 - because they are affected by disability, mental disorder, illness or physical or mental infirmity, are more vulnerable to being harmed than others who are not so affected
 - The presence of a particular condition does not automatically mean an adult is an "adult at risk". Someone could have a disability but be able to safeguard their well-being etc. It is important to stress that all three elements of this definition must be met. It is the whole

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of an adult's particular circumstances which can combine to make them more susceptible to harm than others.

The Safeguarding Agenda encompasses a broad spectrum of potential risks both within and outside apprenticeship settings, at home, and online. (see Appendix F for full definitions and indicators of a Safeguarding concern).

- Abuse encompasses physical, emotional, financial, institutional, sexual, organisational, and exploitation forms.
- Self-neglect
- Discrimination
- Child sexual exploitation
- Bullying and cyberbullying
- Cybercrime
- Domestic abuse, including what children see, hear or experience.
- Substance misuse
- Fabricated or induced illness
- Faith abuse
- Forced marriage
- Gang and youth violence
- Private fostering
- Female genital mutilation (FGM)
- Gender based violence
- Radicalisation
- Sexting
- Peer-on-Peer abuse, including sexual harassment
- Relationship abuse, including teenage relationship abuse
- Trafficking and modern slavery
- Breast ironing
- Mental health concerns
- Sexual violence and sexual harassment, including child-on-child abuse
- Unexplained and/or persistent absences from education

Alongside the Safeguarding Agenda mentioned above, this may be attributable to, but not limited to, any of the following:

- Residing in sheltered accommodation

- Receiving any form of health care
- Is or has been supported by a social worker
- Receiving welfare services to support their need for independent living
- Receiving a service based on their age or disability
- Residing in residential accommodation like a care home
- Receiving domiciliary care in their own home
- An expectant or nursing mother residing in a care home.
- Individual under the supervision of the probation service

The definitions of a child and an adult at risk provide the rationale for legislative intervention. It is important to note that learners can be temporarily vulnerable due to changes in circumstances or poor mental health. Additionally, a person may be deemed to be at a higher risk of a safeguarding issue affecting them due to various other factors. This is known as Contextual Safeguarding. These areas should be examined thoroughly when planning and agreeing on early help interventions. Areas to explore include:

- Low-level numeracy and literacy skills, or complex learning needs
- English is not a first language
- Unsupportive employers, line managers or colleagues
- Underrepresentation and/or belonging to one of the 'nine protected groups'
- Children and young people exploring their gender identity and/or experiencing gender dysphoria
- Carrying out the role of caregiver for a family member, which includes young carers
- A background in offending or displaying signs of being drawn into anti-social or criminal behaviour, including gang involvement and associations with organised crime groups.
- A visible or hidden disability or social need
- Having special educational needs (regardless of whether they possess a statutory Education, Health and Care Plan)
- Lives 'In Care', recently transitioned 'Out of Care' or is frequently missing/goes missing from care or home
- Is a privately fostered child
- Family circumstances presenting challenges for the child, such as drug and alcohol misuse, adult mental health issues and domestic abuse, or is generally unsupportive
- Coming from a Pupil Referral Unit or having been subject to multiple suspensions/exclusions
- Risk of modern slavery, trafficking, sexual and/or criminal exploitation
- Risk of being radicalised or exploited
- Having a parent or carer in custody, or is affected by parental offending, and is misusing alcohol and other drugs themselves
- Risk of so-called 'honour'-based abuse, such as Female Genital Mutilation or Forced Marriage

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Some groups of learners have been identified as possibility of being more vulnerable, and each has proportionate measures in place to ensure the learners are fully supported should they require additional support . These include learners on an EHCP, Coach Core learners and In Care learners

6. OUR RESPONSIBILITY

Safeguarding and promoting the welfare of children is everyone's responsibility. Everyone who comes into contact with children, young people and adults at risk, and their families has a role to play. To fulfil this responsibility effectively, all practitioners should make sure their approach is person-centred and should consider, at all times, what is in their best interests and that it complies with relevant governmental guidance and legislation.

Lifetime has a duty of care to ensure children, young people and adults at risk are protected from harm, are informed about potential risks, and understand and feel confident to seek help. We ensure all concerns are dealt with discreetly, timely and appropriate manner, providing help and support to meet individual needs as soon as concerns are raised. We also have a responsibility to minimise the risk of harm and allegations against Lifetime's team members.

All staff must comply with and pass the relevant background disclosure checks required by each UK nation. They must have a good understanding of what constitutes a safeguarding or welfare concern and the relevant legislation and government guidance in their country, sector and place of work.

All must have read and understand the requirements of the country in which they work, Keeping Children Safe in Education, 2023 (KCSIE) Part 1 for England and The Children & Young People (Scotland) Act for Scotland and know how to provide support, guidance, and the correct channels for escalating a concern.

Ongoing training and awareness raising will be provided to support confidence and ensure a clear understanding of individual roles and responsibilities as detailed below:

- Lifetime Directors/Board - to be knowledgeable about safeguarding and to ensure effective policies are in place to protect and safeguard all learners, employer partners and Lifetime team members. They will receive detailed safeguarding reporting to analyse and action plan at each board meeting. Lifetime will comply with relevant data protection legislation and safe and secure archiving policies for each nation, including the Data Protection Act 2018, and the UK General Data Protection Regulation (UK GDPR). They will lead by example and ensure and promote a culture where everyone feels safe, protected and free from harm and has the confidence to speak out or share concerns where needed.
- CEO - to ensure policies are implemented and observed across Lifetime Group, and sufficient time and resources are allocated to employees to carry out their roles and responsibilities effectively.
- Head of Safeguarding and Health and Safety – to manage all aspects of welfare, safeguarding and health and safety across the Lifetime Group. To act as the main conduit between national and local multi-agency safeguarding partners, including local authorities, the police, clinical commissioning groups, Prevent Coordinators, and all contractual organisations, employer partners, and other key stakeholders. They will manage legislation and policy changes and inform strategic direction in consultation with the board, including for training, CPD, quality assurance and standardisation. They will manage and support the Designated Safeguarding Team. They will nominate a deputy as and when required.

- Designated Safeguarding Leads - review procedures and policies on a timely basis and carry out standardisation across case outcomes. They review trends and plan appropriate interventions and resources. They routinely attend internal and external welfare and safeguarding training events to develop and maintain their knowledge and skills to support learners across all nations.
- Designated Safeguarding Officers – signpost information, advice and guidance, and carry out case investigations and support staff with reported potential and actual welfare and safeguarding concerns, liaising with external bodies where appropriate. All cases are managed and reported discretely with full records kept on a locked SharePoint site for monitoring and trend purposes only, and for reporting at the board and sector level. All cases are anonymised and shared only on a need-to-know basis. CPD is regularly updated to ensure they are competent to carry out the role.
- Social and Additional Support Tutors – provide specialist support for learners between the ages of 16 and 18 inclusive and those identified as vulnerable or at risk. They advise on child welfare, safeguarding and child protection matters, taking part in strategy discussions and inter-agency meetings, and/or supporting other staff to do so. They contribute to the assessment of children and young people and liaise with schools, social workers, financial institutions, housing associations, and medical representatives, etc, to arrange appropriate interventions and support.
- Safeguarding Administration support – monitor the supportme inbox twice daily and ensure a Designated Safeguarding Officer is informed about any new concerns within 24 hours. All cases are logged on a confidential spreadsheet and discretely marked against the relevant learner on Aptem.
- Mental Health Champions - while their role is supporting employees with their own any wellbeing concerns. They may as part of this role support an employee who is supporting a learner through a welfare or wellbeing concern if it has an effect on their own wellbeing
- Our Delivery Team (Coaches/Tutors/Pathway Planners and EPAs) - create a culture where learners and employer partners can speak out or share their concerns about potential welfare and safeguarding concerns. They routinely check in on learners and ensure all complete relevant welfare and safety-related activities and life-skills learning within their programme. All are aware of the indicators that there may be a safeguarding issue (Appendix E). If required, they follow the 5 R's Procedure (Recognise, Respond, Record, Report, Refer) (Appendix D). All have access to support and referral agencies, including the confidential free helpline available for learners, and can report any concerns via the Supportme@lifetimetraining.co.uk e-mail address. Allocated training and CPD are completed as directed by Lifetime.

The topic of safeguarding can be very sensitive due to the content, and may be difficult for people to discuss. If anyone has concerns over issues raised, a member of the Designated Safeguarding team is available to support. The Employee Helpline and Mental Health Champions are also available.

7. SAFER RECRUITMENT

Lifetime fully endorses the principles of Safer Recruitment. For a comprehensive list of actions applied when recruiting and employing individuals please refer to The Resourcing Policy Lifetime ensures that all appropriate checks are carried out on new staff who will work or come into contact with children and adults at risk in line with the Disclosure and Barring Service and Teacher Regulation Agency (TRA) requirements, KCSIE and The Children & Young People (Scotland) Act

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Lifetime reserves the right to do online checks as part of Safer Recruitment. All recruiting managers complete 'Safeguarding through Recruitment' training as part of their Manager onboarding programme. Since November 2023, Trust ID and Experian have managed these processes on behalf of Lifetime. See the Resourcing Policy for further details on Lifetime's recruitment procedures.

7.1. DISCLOSURE AND BARRING SERVICE CHECKS

The Disclosure and Barring Service (DBS) and Disclosure Scotland, which manage the Protecting Vulnerable Children (PVG) Scheme, are government agencies whose primary purpose is to help employers make safer recruitment decisions and appointments.

By conducting checks and providing details of criminal records and other relevant information, DBS/PVG checks help to identify applicants who may be unsuitable for certain work and positions, especially those involving contact with children (those less than 18 years old) or adults at risk.

Depending on the type and regularity of contact with children or adults at risk involved in a particular role, employers are entitled to make appropriate types of enquiries about the applicant's criminal record and seek a disclosure through either DBS or Disclosure Scotland.

In England, Lifetime can undertake six types of criminal records checks depending on the role applied for:

STANDARD DBS CHECK

This will be for positions that are included in the Rehabilitation of Offenders Act (ROA) 1974 (Exceptions) Order 1975.

This type of check contains details of an individual's convictions, cautions, reprimands or warnings recorded on police central records and includes both 'spent' and 'unspent' convictions that will be shown on a criminal records check.

ENHANCED DBS CHECK

This will be for positions included in both the ROA 1974 Exceptions Order and the Police Act 1997 regulations. This type of check contains the same details as the standard check, plus any information held locally by police forces that is reasonably considered to be relevant to the post applied for.

ENHANCED DBS & BARRED LIST CHECK (CHILD)

An enhanced check with information from the DBS's children's barred list is only available for those individuals engaged in regulated activity with children and a small number of posts as listed in the Police Act 1997 regulations.

ENHANCED DBS & BARRED LIST CHECK (ADULT)

An enhanced check with information from the DBS's adults barred list is only available for those individuals engaged in regulated activity with adults and a small number of posts as listed in the Police Act 1997 regulations.

ENHANCED DBS & BARRED LIST CHECK (CHILD AND ADULT)

An enhanced check with information from the DBS's children and adults barred list is only available for those individuals engaged in regulated activity with both vulnerable groups, including children and a small number of posts as listed in the Police Act regulations.

7.2. WHEN AND WHAT TYPE OF DBS CHECK IS APPROPRIATE

The Board, in consultation with the Head of Safeguarding and Health and Safety, are responsible for deciding which level of check is appropriate for a particular role and whether barred list checks are necessary. Even where a post has some contact with children or adults at risk, the definition of regulated activity may not be fully satisfied, but to safeguard our learners, any unsupervised contact with learners will result in an enhanced DBS check with the child barred list. The Safeguarding Vulnerable Groups Act 2006 (amended by the Protection of Freedoms Act 2012) defines what types of activities involving children and adults at risk are regulated and therefore require barring list checks. Appendix A specifies current posts at Lifetime that require DBS and/or barring list checks.

Regulated Activity – is a term that defines activities that an individual engages in, defined by the Disclosure and Barring Service. The criteria for regulated activity differ for adults and children:

Children

- Regular activity (once per week or 4 times over 1 month)
- Unsupervised activity
- Teaching, training, assessing, mentoring based activities in relation to non-work-related activities - working intensively and closely with a child
- Within specified settings

Adult

- Healthcare professionals – those whose role includes providing first aid
- Receiving or giving personal assistance to those due to age, illness or disability (going to the toilet/washing/nutritional advice)
- Providing social care - being subject to or assessing the need for health/social care
- Assisting in someone's personal affairs or allowing someone else to do so
- Assisting with cash, bills and shopping (allowing someone else to or shopping on someone's behalf)
- A person who transports or is transported because of their illness

SCOTLAND - PROTECTING VULNERABLE GROUPS SCHEME (PVG)

In Scotland, all employees engaging in regulated activity are obliged to have a membership of the Protecting Vulnerable Groups (PVG) scheme managed by Disclosure Scotland, which helps ensure people who are unsuitable to work with children and protected adults cannot do regulated roles with these groups. Regulated roles are roles that meet certain criteria. They often involve work with children or protected adults, or positions of power or influence over these groups.

For Scotland, there are 2 types of regulated work – work with children and work with protected adults. Regulated work is usually jobs including:

- Caring responsibilities
- Teaching or supervising children and/or protected adults
- Providing personal services to children and/or protected adults

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- Working directly with children and/or protected adults

There are 4 types of PVG application:

- PVG scheme disclosure (Join)
- PVG scheme disclosure (Existing)
- Confirmation of PVG scheme membership (Join)
- Confirmation of PVG scheme membership (Existing)

For further details, see <https://www.mygov.scot/pvg-scheme>.

In the UK, individuals must not engage in regulated activity with either children or adults at risk if they have been barred from doing so by either the DBS or PVG Scheme. How we meet our responsibility towards this is explained below. Further advice on types of DBS/PVG disclosure and the circumstances in which regulated activity applies can be obtained from the People Team.

Where Lifetime is recruiting for a role that requires a DBS/PVG check, the advert and further information during the interview process will clarify the type of check needed. Once the most suitable candidate for the position has been identified, the offer of appointment will be made subject to a satisfactory DBS/PVG check, right to work, references, and qualification checks. If the outcome of a DBS/PVG check has not been received from the appropriate authority before learner visits occur, all visits with learners under 18 will be supervised by a person whose DBS outcome has been received and approved. The Area Manager will oversee this supervision. Quality assurance of this process is in place.

As a DBS/PVG check forms part of our recruitment process, we encourage all candidates to declare anything relevant to the type of check required for the role. Once an offer has been made, candidates should inform us of any further details regarding convictions, including those that would normally be considered as spent, cautions, or reprimands.

As part of our safeguarding obligations, we will reapply for the appropriate types of DBS/PVG checks on a 3-year basis during employment with Lifetime Training. If someone is already part of the update service:

- DBS – we request an updated check for that number
- PVG – a short scheme record will be applied for

Some contractual requirements dictate an annual declaration from employees about conforming to any changes that may affect the outcome of their DBS/PVC check. Any changes will be risk assessed following the procedure set out in 7.5

Enhanced DBS Renewal Process

To maintain our commitment to safeguarding, Keeping Children Safe in Education and ensuring the safety of all individuals we work with, it is essential that all employees whose role requires regulated activity, hold a valid Enhanced Disclosure and Barring Service (DBS) certificate.

It is our policy to renew this check every three years. When an employee's DBS check is due for renewal, a reminder will be sent by the Talent Attraction Team to notify them of the upcoming expiry. Shortly after this reminder, the employee will receive an email to their work address from our DBS checking partner, containing a link to complete the renewal application.

It is the responsibility of the employee to complete the requested information within 28 days of receipt of the request from our DBS checking partner.

To support timely completion:

- A first reminder from our DBS checking partner will be sent after 7 days if the form remains incomplete.
- A second reminder from our DBS checking partner will be issued after 14 days.
- Employees have a total of 28 days to complete the DBS renewal form.

If the information has not been completed within 28 days, the DBS renewal request will be automatically cancelled, and the Talent Attraction Team will be notified of the non-completion.

Escalation Process Following DBS Renewal Cancellation

If a DBS renewal request is cancelled due to non-completion within 28 days, the following escalation process will apply:

1. Notification from the Talent Attraction Team
 - The employee will receive an email, advising them to contact the Talent Attraction Team to confirm next steps.
 - A new DBS renewal request from our DBS checking partner will then be issued to allow the employee to complete the required information within 5 working days
2. First Reminder
 - The employee has 5 days to complete the new DBS form following receipt of the new application information request from from our DBS checking partner.
 - If no action is taken after 5 days, a first reminder email will be sent.
3. Second Reminder
 - If there is no response or action within 3 days of the first reminder, a second reminder email will be sent, with the employee's line manager copied in.
4. Final Reminder and Disciplinary Action
 - If the DBS form remains incomplete after two reminders, a final reminder will be issued. This communication will clearly state that non-compliance will be treated as a disciplinary matter
 - Completing DBS renewals promptly ensures compliance with our safeguarding obligations and helps protect the wellbeing of the learners we support.

7.3 TEACHER PROHIBITION CHECKS

All roles that require teaching of under 18s will be subject to a teaching prohibition order check if where the applicant has QTS and/or has worked in School/ College environment as a teacher previously. Declaration is requested at Interview stage and confirmation also requested with teaching.status@education.gov.uk If you are barred from working as a teacher by the Teacher Regulation Agency you are not to be appointed to a role that requires teaching

7.4 CONFIDENTIALITY

Information provided in a disclosure report must be kept confidential and, on a need,-to-know basis. Such information will be handled following Lifetime's Statement on the Secure Storage, Handling, Use, Retention and Disposal of Disclosures and Disclosure Information, Appendix B. Any other information regarding offences must be kept securely and in accordance with Lifetime's Data Protection Policy.

We recognise that job applicants and our employees need to feel confident that information about their convictions will not be disclosed to colleagues unless there is a specific reason for doing so. Those involved in recruitment decisions should ensure that when appointing an individual with a conviction, they are

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advised as to whom within Lifetime knows of their conviction and the reasons why the information has been disclosed.

Disclosure Scotland, Experian and Trust ID, who facilitate our checks, have satisfactory privacy policies in place to align with our requirements.

If you would like further information on our disclosure process, please see Appendix C.

7.4. FAILURE TO DISCLOSE INFORMATION RELEVANT TO THE TYPE OF DBS/PVG/PROHIBITION OF TEACHING ORDER CHECK APPROPRIATE TO YOUR ROLE

Having a criminal record does not necessarily preclude an individual from working at Lifetime. The decision as to whether a person with a criminal record should be appointed, or an offer of employment withdrawn, or employment terminated will be taken only after careful and thorough consideration of the outcome of any DBS/PVC checks as well as the job and offence related factors as explained in 8.6.

Nonetheless, we request all employees to tell us about any information relevant to the type of DBS/PVG check appropriate for their role. This could mean, for example, that if your role requires a satisfactory Enhanced DBS/PVC and barring check, you need to tell us about any convictions, cautions or reprimands or being barred from working with children as soon as any of these have been issued. Failure to disclose information relevant to the type of DBS/PVG check appropriate to your role would be seen by Lifetime as a breach of trust and confidence. Such acts are considered gross misconduct, and you would be invited to a disciplinary hearing with a potential outcome of instant dismissal.

. If there is a failure to disclose information relevant to a Teacher prohibition Order would be seen by Lifetime as a breach of trust and confidence. Such acts are considered gross misconduct, and you would be invited to a disciplinary hearing with a potential outcome of instant dismissal.

7.5 EXPLORING THE RELEVANCE OF INFORMATION PROVIDED IN THE DISCLOSURE REPORT

As we explained in the previous section having a criminal record does not necessarily preclude an individual from working at Lifetime. The decision as to whether a candidate with a criminal record should be appointed, or an offer of employment withdrawn, will be taken only after careful and thorough consideration of the outcome of any DBS/PVG check, as well as the job and offence related factors as explained in section 8.6.

Similar to the recruitment process, a disclosure of a criminal record will not necessarily lead to termination of your employment with us and the decision will be taken only after careful and thorough consideration of the job and offence related factors. Any decision to terminate employment would follow our Disciplinary Policy (or Probationary Policy if you have not yet passed your probation).

A senior member of the People Team, with the Head of Safeguarding and Health and Safety, will make an initial assessment of the content of the disclosure report. If the report provides no evidence of convictions or any other relevant information, no further action will be taken. If the report confirms a conviction or any other relevant information, a senior member of the People Team, with the Head of Safeguarding and Health and Safety, will make an initial assessment of whether the information provided has any potential relevance to the post. If there is no potential relevance, no further action will be taken.

If the report confirms a potentially relevant conviction or any other potentially relevant information, further exploration will be required following the process outlined below.

7.6. EXPLORING A CONVICTION AND ITS RELEVANCE

All discussions relating to convictions must take place after the selection process has been completed and will involve the line manager and a senior member of the People Team, and the Head of Safeguarding and Health and Safety. As part of the decision-making process, they will normally meet with the individual to gain more information about the nature and circumstances of any conviction.

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The suitability for employment of a person with a criminal record will vary, depending upon the nature of the job and the details and circumstances of any convictions. The decision will be made based on a risk assessment to enable the applicant's criminal record and circumstances to be assessed in relation to the tasks they will be required to perform and the circumstances in which the work is to be carried out. The following job-related factors should be taken into account:

- Does the post involve direct contact with learners or the public?
- What level of supervision will the post-holder receive?
- What level of trust is involved? Will the nature of the job present any opportunities for the post-holder to reoffend in the place of work?
- Does the post involve any direct responsibility for finance or items of value?
- Does the post involve any contact with children or other vulnerable groups of learners or employees?

The assessment is also likely to include consideration of the following factors relating to the individual's offence(s):

- The seriousness of the offence(s) and relevance to the safety of other employees, learners, research subjects, the public, etc.
- The length of time since the offence(s) occurred.
- Relevant information offered by the person about the circumstances that led to the offence(s) being committed, for example, the influence of domestic or financial difficulties.
- The degree of remorse, or otherwise, expressed by the person and their motivation to change.
- Whether the offence was a one-off or part of a history of offending.
- Whether the person's circumstances have changed since the offence(s) was/were committed, making re-offending less likely.
- Whether the offence has since been decriminalised.

Following careful and thorough consideration of all these matters and consultation with a senior member of the people team and the Head of Safeguarding and Health and Safety, a decision will be made as to whether the individual should be appointed. If appropriate, we may seek further information from relevant bodies when reaching this decision. If the decision is not to appoint, a letter will be sent to the individual confirming the reasons for this decision.

The above process will also be followed in the event of a criminal conviction coming to light after the formal offer of employment has been made or during employment. In such cases, Lifetime would reserve the right to withdraw the offer of appointment where appropriate or terminate employment in line with Lifetime's Disciplinary Policy (or Probationary Policy if in probationary period).

7.7. LEARNER DBS/PVG CHECKS

Lifetime has a duty of care to ensure learners understand what a DBS/PVG check is and if it is required for their role; however, their employer is ultimately responsible for ensuring the necessary checks are in place. We do support employers to engage with the Disclosure Barring Service and/or Disclosure Scotland to fully understand their role and responsibilities.

Work-Based Learning - Each employer partner site undergoes a health and safety vetting process, including checking that the mandatory legislative DBS/PVG requirements are understood by the learner and employer in their specific sector. The learners' curriculum is contextualised to their work setting and reinforces the importance of the DBS/PVG process.

8. REPORTING A CONCERN - SEE APPENDICES D FOR PROCESS CHARTS

- a. If a learner raises a welfare or safeguarding concern/allegation to you, you must listen carefully and record what is said in the learner's own words, without making judgments or assumptions. If immediate safety is at risk, take necessary action to ensure they are safe - this may include staying with them until a responsible adult is present.

All details should be documented in the learner review and only shared with their manager if the learner agrees. If the learner consents, the issue must be reported to the Designated Safeguarding Team via supportme@lifetimetraining.co.uk. The learner's wishes must always be considered, including those under the age of 18. However, escalation is required without consent in some cases, depending on location and risk level.

Key Differences: England vs. Scotland

England:

- If the learner is under 18 and at risk of harm, concerns must be escalated even if they do not consent.
- This requirement aligns with "Working Together to Safeguard Children" (2023), which legally mandates reporting when there is a risk of harm to a child.

Scotland:

- There is no legal requirement to report a concern about a child's welfare.
- However, the National Guidance for Child Protection (Scottish Government, 2023a) states that all agencies must recognise and actively consider potential risks, even if the child is not the primary focus of involvement.
- In practice, Lifetime still expects concerns to be escalated where appropriate, based on risk and professional judgment, but there is a greater emphasis on informed decision-making rather than legal obligation. The focus is on ensuring prompt intervention to protect the child, overriding confidentiality when necessary. The Designated Safeguarding team will decide the appropriate course of action, and if a referral for early help intervention or to the local authority. (D1)
- If the individual is based in Scotland falls into the definition on protected/ vulnerable adult, whilst the responsibility lies with local authority, consideration should be given to referral and collaborative approach with local authority to support these individuals

- b. If a Lifetime team member has concerns over a learner: This might be through observation, alleged by others, or through discussions, they must follow the procedure set out in point (a) above.

- c. If a learner raises an issue/allegation with the coach/ tutor/ pathway planner/ EPA (?). (D1)

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- d. If a learner/parent has a concern/allegation about a member of Lifetime or Innovate staff: All learners are to be informed that if they or their parents have a concern over the conduct of a Lifetime employee, they are to contact the Head of Safeguarding and Health and Safety.
- e. If the learner informs the coach or another Lifetime employee, the Lifetime employee must report it to the Designated Safeguarding Team via supportme@lifetimetraining.co.uk or directly to a Designated Safeguarding Officer. Contact details are available in this policy (see section 4 above), the Learner Welfare section on Huddle, and the essential information section in Aptem. See section 9 for more details on how concerns over employees are managed, including low-level concerns (D2). The LADO may also be informed where relevant.
- f. If a parent/carer contacts you to report a concern about their child: Ensure you listen attentively and record the details accurately using the parent's exact words where possible. Ensure you have contact details for the parent or carer. Report the issue immediately to the Designated Safeguarding Team via supportme@lifetimetraining.co.uk. The Designated Safeguarding Team will determine the appropriate next steps. If an external referral (e.g. to social care or local safeguarding services) is required, they will manage this process and handle any necessary communication with the parent/carer. Be especially mindful of confidentiality laws. Learners who are aged 16 or over and employed are legally regarded as adults. This means that no information should be shared with parents or carers without the learner's explicit consent. Consent must be obtained before passing on any personal or safeguarding details (D1/2)
- g. If you observe a safeguarding issue taking place within the working practices of an employer's setting or during Lifetime group delivery sessions: If you witness a practitioner hitting a child, see improper restraint, or observe learners verbally or physically abusing each other, you must: act immediately to stop the behaviour; clearly express your concerns to the individual involved; ask them to leave the area; and inform them that their senior manager will be notified.

Take any necessary steps to ensure the safety of the child or adult at risk, which may include staying with them until a responsible adult is present. In all cases, inform the Designated Safeguarding team at Lifetime Training. Be aware of the difference between poor practice and a safeguarding concern, and respond accordingly (D3)

- h. If a learner reports unsafe practices or safeguarding issues to you within their working/learning environment: Advise the learner to use the organisation's in-house reporting or whistle-blowing procedures. If the concern relates to a Lifetime learner activity session, follow Lifetime's safeguarding reporting procedures. You can support the learner by helping them speak to the appropriate senior team member in their organisation if needed. Always report the incident to your Designated Safeguarding team, who will provide further guidance, offer support and signposting to the learner, and monitor the situation (D3).

Summary: Reporting Safeguarding Concerns

- This safeguarding policy is also available on Lifetime's external website. (D2)
- Do not share information with others or investigate concerns yourself.

- Report all concerns first to supportme@lifetimetraining.co.uk using the Disclosure Reporting Form (Appendix G).
- If an immediate response is needed, call a member of the Designated Safeguarding team right away.
- If it's outside working hours and the person is in immediate danger, call 999 (police and/or ambulance).
- The Designated Safeguarding Officer aims to respond within 24 hours (excluding weekends).
- Outside working hours, learners can access the 24/7 Learner Welfare Helpline at 0300 666 7247, which is also signposted via supportme.
- You are not expected to keep your mobile on 24/7 to answer learner calls.
- Do not share information with others or investigate concerns yourself.
- Report all concerns initially to supportme@lifetimetraining.co.uk using the Disclosure Reporting Form (Appendix G).
- The Designated Safeguarding team will assess the risk of significant harm and determine next steps, which may include (in all instances the safeguarding team will reach out to the learner directly to confirm requirements unless advised otherwise) :
 - Referring to support agencies,
 - Liaising with an employer
 - Liaising with a Parent
 - Reporting to police or local safeguarding authorities,
 - Informing the LADO (Local Authority Designated Officer) or DBS/PVG bodies.
- Be aware of any subcontractor arrangements; in some cases, safeguarding officers from partner organisations must be informed. For employer providers, their safeguarding officer leads the response, with Lifetime providing support as needed.
- If you believe a Designated Safeguarding Officer has not fulfilled their duty of care, contact the Head of Safeguarding and Health and Safety (section 4 of the policy).
- If still unsatisfied, escalate to the Quality Director.
- You may also raise the concern directly with the relevant external agency yourself if necessary.

(See Appendices D and E for the process of reporting)

9. MANAGING ALLEGATIONS AGAINST EMPLOYEES

The Department for Education guidance sets out procedures for managing safeguarding allegations or concerns against teaching staff, other staff, volunteers and contractors. In this guidance, training providers are now expected to respond to two levels of concern about staff behaviour:

- (1) Behaviour that meets a perceived 'harms' threshold and
- (2) Behaviour judged as a 'low level' concern that does not meet the 'harms' threshold.

Lifetime intends to create a culture in which all concerns (including allegations that do not meet the harms threshold) are shared responsibly and with the right person, recorded and dealt with appropriately. We aim to create and embed a culture of openness, trust and transparency in which our expected behaviours, as outlined in the staff Code of Conduct, are constantly lived, monitored and reinforced by all employees.

To further support our Code of Conduct and Safeguarding Policy around expected behaviours, Lifetime will:

Safeguarding Policy

- Ensure all team members are clear about what is appropriate behaviour through awareness and training.
- Create an environment where team members feel confident in sharing low-level concerns and are comfortable to self-refer. For example, where they have found themselves in a situation which could be misinterpreted, might appear compromising to others, and/or on reflection, they believe they have behaved in such a way that they consider falls below the expected professional standards.
- Address unprofessional behaviour and support the individual to correct it wherever possible.
- Ensure a responsive and proportionate handling of such concerns.
- Through case analysis, identify any business improvements required.

N.B Lifetime Training have a responsibility as the employer to manage behavioural concerns of its employees, but should a learners behaviour constitute either the harms threshold or that of a low level concern, appropriate information sharing may be applied to relevant parties such as an employer or the LADO, and our Learner Conduct policy may be applied

Whistleblowing Policy – all team members can report concerns through Lifetime’s Whistleblowing line, following the procedure detailed in the Whistleblowing policy (available via Huddle).

9A ALLEGATIONS THAT MAY MEET THE HARMS THRESHOLD

Lifetime will consider that behaviour meets the harms threshold if team members – including employees on temporary contracts, volunteers or contractors have:

- Behaved in a way that has harmed a learner or may have harmed them.
- Possibly committed a criminal offence against a learner.
- Behaved in a way that may pose a risk of harm to a learner.
- Behaved in a way that indicates they may not be suitable to work with learners.

Safeguarding allegations or concerns arising from the above should be reported to the Head of Safeguarding and Health and Safety. Where there are concerns/allegations about them, this should be referred to the People team.

If the allegation/concern identifies that a learner has been harmed, is at immediate risk of harm or is in an emergency situation, the Head of Safeguarding and Health and Safety (or People team as appropriate) will immediately contact Social Care Services and, if appropriate, the police. They will also ensure that:

- The learners affected are safe.
- Inform and support the person subject to the allegation as soon as possible.
- Conduct basic enquiries to establish the facts to help them determine whether there is any foundation to the allegation. They will collect as much evidence as possible by speaking directly to the person who raised the concern (unless raised anonymously), to the individual involved and any witnesses. The information collected will be reviewed against the employee code of conduct to determine what further action may need to be taken, including liaising with a senior member of the people team should the disciplinary policy need to be followed.

- If appropriate, liaise with the Local Authority Designated Officer to consider the allegation and agree on a course of action.
- If appropriate, conduct an internal investigation aligned with Lifetime's misconduct Policy.
- Work with the People team to implement any internal disciplinary procedures where required.
- Work with the People team to support the subject of the allegation.
- All relevant information will be shared with police/social care if appropriate.
- Any parent/ guardian/ employer will be informed and updated where required.

All concerns should be recorded in MILO Case Management System by the Head of Safeguarding and Health and Safety, Deputy or member of the People team.

9B. LOW-LEVEL CONCERNS THAT DO NOT MEET THE HARM THRESHOLD

A low-level concern is any concern about employees, including employees on temporary contracts, volunteers or contractors, who may have acted in a way that is inconsistent with Lifetime's Code of Conduct (including inappropriate conduct outside of work) but does not meet the harms allegations threshold. Examples of such behaviour could include, but are not limited to, offering personal favours to learners, being overly friendly, using inappropriate language or sharing personal information.

Lifetime will seek to identify and deal with inappropriate behaviour early to mitigate the risk of abuse. Low-level concerns should be reported to the Head of Safeguarding and Health and Safety (or a deputy). Where a low-level concern is raised about the Head of Safeguarding and Health and Safety, it should be reported to a senior member of the people team. The Head of Safeguarding and Health and Safety (or People team as appropriate) will collect as much evidence as possible by speaking directly to the person who raised the concern (unless raised anonymously), to the individual involved and any witnesses. The information collected will be reviewed against Lifetime's Code of Conduct (including inappropriate conduct outside of work) to determine what further action may need to be taken, including liaising with a senior member of the People team should the disciplinary policy need to be followed.

All concerns should be recorded in MILO Case Management System by the Head of Safeguarding and Health and Safety (or deputy).

Records will be reviewed periodically so that potential patterns of concerning behaviour can be identified and preventative measures reviewed and/or strengthened.

10 TRAINING AND EDUCATING EMPLOYEES

Each member of the safeguarding team holds at least a formal L2 Designated Safeguarding Officer qualification and undertakes regular CPD to keep updated with current legislation and safeguarding trends.

All team members undertake a Safeguarding Induction and/or completion of a L2 online course specifically for Safeguarding Young Vulnerable People and annual refresher training and CPD.

All new team members complete:

- IAO Level 1 Award in Principles of Safeguarding in a Learning Environment
- Qualification Number: 603/5287/5 as part of their L4 Assessor Coach qualification/EAT L3

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Training is continually reviewed to ensure it is appropriate, current and aligned with our mandatory duty of care. To comply with the government's Counter Terrorism and Security Act 2015, all staff undertake role-related Prevent training.

Annual CPD training covers formal procedures and emerging themes and is routinely updated by e-learning and e-bulletins, including Thrive. These cover all areas under the wider safeguarding agenda, including radicalisation, mental health issues, positive relationships, and staying safe on the internet and are used to support informed discussions with learners.

Key individuals in staff recruitment complete in-house Safer Recruitment training annually, including Hiring Right First Time.

11. EXPECTED BEHAVIOURS & KEEPING YOURSELF SAFE

This section extends the expected behaviours set out in Lifetime's Code of Conduct and should be considered alongside the Lifetime Group's universal expected behaviours. To maintain your and learners' safety, the following are strictly prohibited:

- Befriending learners and posting inappropriate comments and images on personal social media sites
- Distributing personal telephone numbers
- Visiting learners at home or transporting learners to and from locations (this includes travelling in a car with a learner driving)
- Directing sarcasm, insults, belittling or any other inappropriate or upsetting comments towards learners
- Encouraging, pressurising or having personal relationships with learners

It is also important to be mindful of the following when conducting yourself:

- Locations of one-to-one meetings with colleagues and learners. Is this a suitable, open environment, and do they feel safe for both parties?
- You will naturally build a rapport with learners, and they may see you as a confidante or counsellor, but you must always maintain professional boundaries. You are in a position of trust. If they need help, you must follow Lifetime's Safeguarding procedures.
- Do not promise to keep secrets or ask others to do so. You have a duty of care to report concerns as outlined in this document.
- Avoid spending time alone with learners in a closed environment. If this is unavoidable, for example, during a formal assessment/examination, ensure a member of the site staff is aware of where you are and monitors this.
- Be careful when giving learner advice, as this is based on your opinion. Focus support on information (facts) and guidance (signposting).
- Be mindful of any learners you acquire that, by default, create a conflict of interest, i.e. a partner or friend becomes a learner. Discuss appropriateness/alternative arrangements with your line manager.

- If a learner offers you gifts of any sort in recognition of the support shown to them throughout their programme, please refer to the Bribery Policy for the process to follow.
- If at any point you feel unsafe in a learner's company, inform the site manager, your line manager, the Head of Safeguarding and Health and Safety or a member of the Safeguarding team and leave the premises.

12. KEEPING LEARNERS SAFE

Lifetime offers an apprenticeship recruitment service which places potential apprenticeship learners into employment, therefore creating a duty of care to ensure employers are suitable to receive an apprentice.

To this end:

- A service level agreement is undertaken before an apprentice commences employment to clarify expectations concerning basic health and safety, and other employment requirements for the learner.
- An Employer Guide to Welfare is available to employers to help them understand Lifetime and their roles and responsibilities for safeguarding, health and safety and Prevent.
- Health and safety vetting is conducted during learner induction at new sites through a discussion between the coach, employer, and learner. This ensures the employer can provide a safe working environment and helps educate learners on workplace safety and personal welfare. It also supports compliance with key legislative requirements, such as DBS/PVC checks where needed. Health and safety are additionally addressed during learner enrolment and are included in the mandatory Life Skills e-learning modules.
- Learners are made aware of relevant policies, who the designated persons are, and how to report a concern during their induction to the programme. There is also a dedicated support site on the learner information portal/learning community to signpost information, advice, and guidance for a wide range of support needs. A direct email address allows learners to access support from the designated safeguarding team confidentially. They also have access via Aptem to an essential information guide, detailing both internal and external specialist support and emergency services., It also provides details of an external learner welfare assistance programme, which is a free 24-hour confidential helpline providing counselling and signposting to relevant and vetted experts.
- All learners complete a comprehensive, mandatory Life Skills Learning plan, including raising awareness and understanding across a range of welfare and safeguarding topics. A monthly e-bulletin, Thrive, also features relatable equality and diversity, welfare and safeguarding articles. This content aligns with the employee monthly newsletter to aid learner awareness and support discussions.
- Lifetime requires the contact details for the next of kin for all learners under 18 years, alongside relevant employer contact details.

Additional social needs identification and process is individualised support provided by Lifetime for all learners who are facing social, emotional, behavioural and mental health difficulties, making learning

Safeguarding Policy

more accessible through removing barriers to achieving successful outcomes. All learners are provided with additional quality time and learning support as and when needed.

Learners can either self-declare at the sign-up stage that they require support, or a coach can refer them. The process also supports safeguarding cases that require longer-term support

Additional welfare support for 16-19-year learners provides a 3-month support package including a bespoke workbook and workshops that develop employment expectations, build resilience, and increase awareness of important life skills such as, British values, radicalisation, online safety and keeping themselves safe, including from sexual harassment and extend to Relationship, Sex and Health Education content . Learners who don't attend can view the workshops on APTEM. All 19-year-olds have access to the workshop aspect.

Care leaver support and bursary access are available for learners residing in care or who are recent care leavers and are referred to the ASN team. They support them to check bursary eligibility, provide focused support and facilitate access to and guidance for use of bursary funding.

Online Safety is being aware of potential threats whilst engaging in activity via the internet and is based around the four key areas of e-safety: Conduct, Content, Contact and Commerce. These include security threats, protecting and managing personal data, online reputation management, and avoiding harmful or illegal content including content related to misogyny, disinformation, misinformation and conspiracy theories. Disinformation is the deliberate creation and spread of false or misleading content, such as fake news. Misinformation is the unintentional spread of this false or misleading content. All of the above can manifest as online abuse, bullying, threats, impersonation, grooming, harassment or exposure to offensive and/or violent content. All learners receive learning around online safety, including interactive Life Skills learning modules, remote-taught sessions, and a monthly e-bulletin, Thrive. Filtering systems, encryption and additional password protection are mandatory on all employee IT equipment and distributed learner devices to prevent misuse and access to illegal and unsuitable content. All users are subject to sampling to identify and investigate access attempts which contravene the following policies:

- Low-level concerns and behaviours that meet harms threshold – Safeguarding Policy
- Breaches of code of conduct - Disciplinary Policy
- Inappropriate use of IT system - Acceptable Use Policy

Child on Child Abuse/ Sexual Harassment and Violence between Children.

Following Ofsted's 2021 review into sexual abuse in schools, Lifetime introduced several measures to educate and support learners in recognising and reporting sexual harassment and abuse. Lifetime has a zero-tolerance policy and acknowledges that reported cases may not reflect the full extent of the issue. Learner-facing staff receive safeguarding training, including annual CPD, to help identify concerns, understand what learners may see as normal, and know how to respond to incidents in person or online. This includes harassment or abuse in the workplace, with peers and online. Concerns must be reported to the safeguarding team via supportme@lifetimetraining.co.uk, where a Designated Safeguarding Officer will provide support and coordinate any necessary internal or external actions. We have a zero-tolerance approach to sexual violence and sexual harassment, that it is never acceptable, and it will not be tolerated. It should never be passed off as "banter", "just having a laugh"

Where this affects a person aged under 18 Keeping Children Safe in Education 2025 pages 112-133 must be referred to for to support decision making in these areas about escalation and support signposting. For those aged over 18 it will also provide solid framework in which to assess need and next steps. We acknowledge that

Lifetime's Life Skills learning modules and e-bulletin, Thrive, reinforce learners' understanding of acceptable behaviours and how to identify and report concerns and is available to all learners. All 16-19-year-old learners have additional access to a taught session that covers sexual harassment, inappropriate behaviours, expected behaviours generally and in the workplace, support available, and how to report concerns. Those who can't attend have the resources added to their APTM account to explore at their own pace. This accompanies the 3-month additional social needs support that all 16-18-year-old learners are allocated. For more information on how to support learners please refer to Supporting practice in tackling child sexual abuse.

Further support for learners themselves can be found

Lucy Faithfull Foundation's 'Shore Space'. which offers a confidential chat service supporting young people concerned about their own or someone else's sexual thoughts and behaviours.

Children and young people with special educational needs, disabilities and/or health issues

Children and young people with special educational needs or disabilities (SEND) or certain medical or physical health conditions can face additional safeguarding challenges and exploitation both online and offline (see Appendix F for more detail). Any reports of abuse involving children and young people with SEND will therefore require close liaison with the Head of Safeguarding and Health and Safety (or a deputy) and an ALS team member.

A range of additional support can be sourced in KCSIE 2025

Children, young people and at-risk adults supported by a social worker

It is recognised that children, young people and adults who have or have had the support of a social worker may be more vulnerable and at risk. This support need is identified through learner disclosure, contact directly from a social worker, or may be highlighted on an EHCP. The DSO will have oversight of such learners; however, the main form of support will be provided by the specialist ALN/ ASN team, who will liaise directly with Child and Adult Social Services to ensure suitable support and collaboration are in place.

Physical Health

Physical health refers to the overall well-being and functioning of the body, encompassing everything from the absence of disease to the ability to perform daily tasks effectively. Where a learner discloses any physical health needs, they will be supported appropriately to access, progress and complete their learning programme. This may involve supporting learners' employers with adjustment awareness.

Mental Health

Mental health refers to emotional, psychological, and social well-being, affecting how individuals think, feel, and behave. There has been a noticeable rise in mental health concerns among learners, both as standalone issues and linked to other safeguarding concerns. Learners have access to a free Welfare

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Helpline offering expert counselling and tailored support. They are also encouraged to seek help from their employers, who often have strong support systems. Mental health education is part of all learners' training and is reinforced through regular content in the Thrive e-bulletin.

Learner Accidents

If a workplace accident occurs, the employer is primarily responsible for investigating, but Lifetime will also review the incident to ensure learner safety. If the accident happens outside the workplace under Lifetime's supervision, Lifetime takes full responsibility for the investigation. In both cases, the Lifetime team member must complete the Accident Reporting Form (found in Learner Welfare/Huddle) and send it to the Head of Safeguarding and the Health and Safety Manager.

Learner Risk Assessments

To ensure Lifetime supports the health and safety of all learners, in certain situations, Lifetime may risk assess support requirements for learners, for example, if a medical condition has been declared, has been subject to sexual harassment/violence, or is on bail.

Subcontractor Arrangements

Where Lifetime acts as a lead provider, providing funding to other companies, Lifetime will carry out relevant due diligence checks and provide appropriate training and guidance to subcontractors to ensure Lifetime's policies and procedures are continually adhered to. This will be monitored as part of Lifetime's governance process (see Subcontracting Quality Assurance Manual).

Where Lifetime acts as a subcontractor to other companies, we commit to upholding the policies and procedures of the training provider/college/employer which holds the funding. Lifetime will also attend any relevant training and updates as agreed, adhere to monitoring and audit requirements, and be aware of and adhere to any contractual regulations and service level agreements.

13. LEADERSHIP AND MANAGEMENT

A safeguarding governance report is presented monthly to the Board for review. The monthly Learner Experience Committee provides an update to the senior team, ensuring high-level focus on safeguarding and health and safety of learners, discussing trends, and identifying new initiatives and directives.

The effectiveness and impact of all welfare and safeguarding learning, support and interventions are monitored via ongoing learner, team and employer surveys. Monthly desktop audits and standardisation activities evaluate the effectiveness of learner welfare reviews, suitability of teaching and learning resources, levels of pastoral support provided, and the impact of interactions on learners' successful outcomes.

All Designated Safeguarding Officers and Designated Safeguarding Leads are subject to routine peer reviews and quality assurance monitoring.

14. ASSOCIATED POLICIES

- Equality and Diversity Policy
- Grievance Policy

- Disciplinary Policy
- Social Media Policy
- Prevent Policy
- Resourcing Policy
- Anti-Bribery Policy
- Code of Conduct
- Whistleblowing Policy
- Health and Safety Policy
- Learner Conduct Policy

Safeguarding Policy

APPENDIX A

LIST OF POSTS THAT REQUIRE AN APPROPRIATE TYPE OF PVG/DBS AND A BARRING LIST CHECK

LTG Post	No check required	Basic	Enhanced	Enhanced with child barred
Main learner-facing teams (e.g. Coaches, Pathway Planners, Learner Support Tutors, Apprenticeship Recruitment)				✓
Designated Safeguarding Officers, Designated Safeguarding Leads				✓
Potential to be learner-facing (Area Managers, Teaching Coaches, IQAs, Engagement Leads etc)				✓
Learner contact with potential influence (Desktop Enrolment etc)			✓	
Employees with access to CRM and Government contract information		✓		
Other support functions	✓			
Scotland - all learner-facing staff				Full PVG check – adult and child barred

APPENDIX B

STATEMENT ON THE SECURE STORAGE, HANDLING, USE, RETENTION AND DISPOSAL OF DISCLOSURES AND DISCLOSURE INFORMATION

GENERAL PRINCIPLES

As an organisation, Lifetime uses the Disclosure and Barring Service (DBS) and Disclosure Scotland to help assess the suitability of applicants for positions of trust and complies fully with each code of practice, regarding the correct handling, use, storage, retention and disposal of disclosures and disclosure information. Lifetime also complies fully with its obligations under the Data Protection Act and other relevant legislation for the safe handling, use, storage, retention and disposal of DBS and PVG disclosure information.

STORAGE AND ACCESS

Disclosure information is never kept on an applicant's personnel file and is always kept separately and securely, in lockable, non-portable storage containers with access strictly controlled and limited to those who are entitled to see it as part of their duties.

Handling

In accordance with section 124 of the Police Act 1997, disclosure information is only passed to those who are authorised to receive it in the course of their duties. The People Team is responsible for maintaining a record of all those to whom disclosures or disclosure information have been revealed. It is recognised that it is a criminal offence to pass this information to anyone who is not entitled to receive it.

Usage

Disclosure information is only used for the specific purpose for which it was requested and for which the applicant's full consent has been given.

RETENTION

Once a recruitment (or other relevant) decision has been made, Lifetime will retain disclosure information to cross-check 3-yearly DBS/PVG refresher disclosures. Throughout this time, the usual conditions regarding safe storage and strictly controlled access will prevail.

DISPOSAL

Once the employee leaves, Lifetime will ensure that any disclosure information is immediately destroyed by secure means, i.e. by shredding or confidential waste disposal. While awaiting destruction, disclosure information will not be kept in any insecure receptacle (e.g. waste bin or confidential waste sack). Lifetime will not keep any photocopy or other image of the disclosure or any copy or representation of the contents of a disclosure. However, Lifetime will keep a record of the date of issue of a disclosure, the name of the subject, the type of disclosure requested, the position for which the disclosure was requested, the unique reference number of the disclosure and the details of the recruitment decision taken.

APPENDIX C

DBS DISCLOSURE PROCESS

Lifetime use Experian and Trust ID, registered bodies responsible for authorising and processing applications for DBS checks, and First Standard for PVG checks in Scotland.

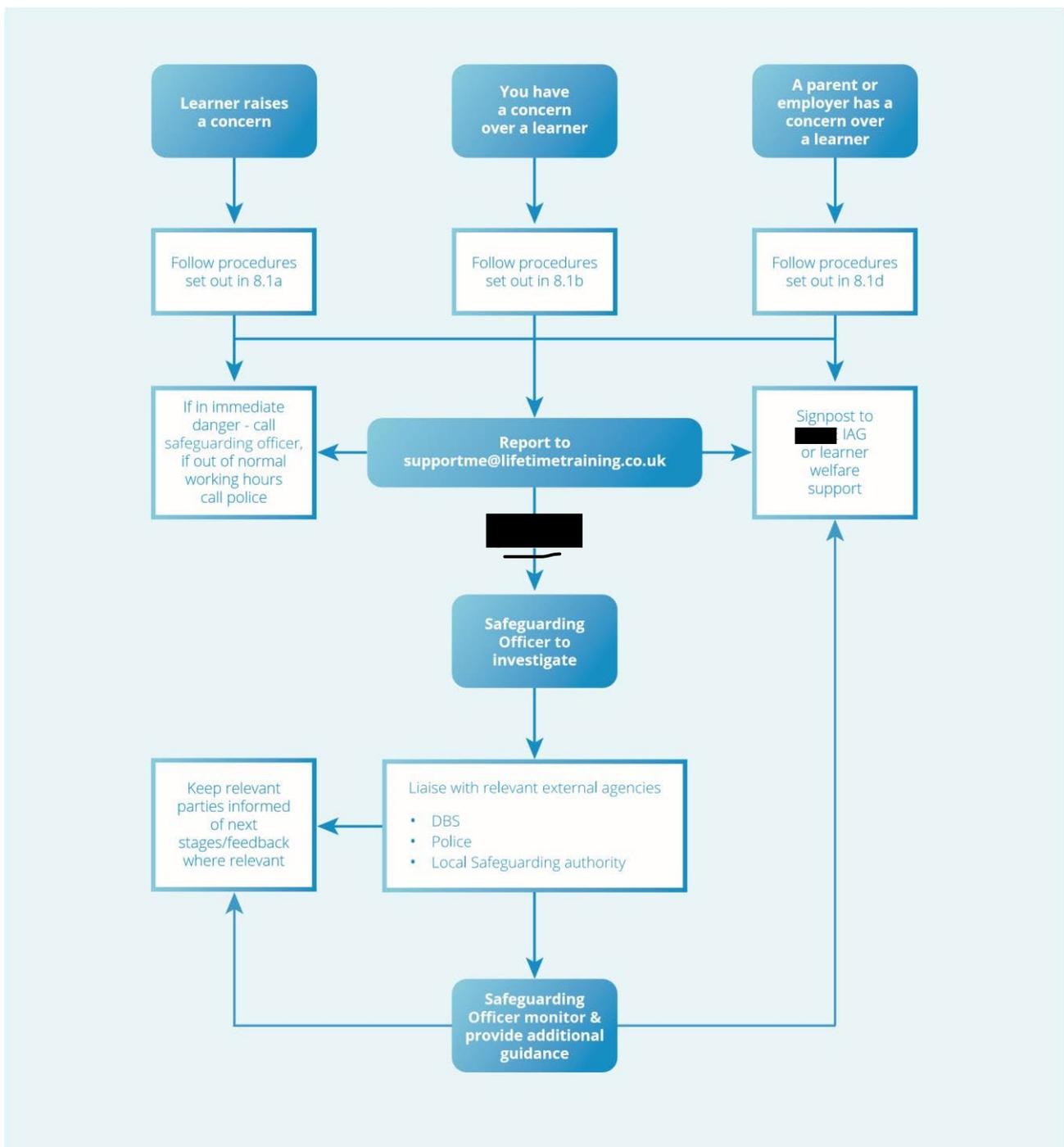
Potential candidates are told prior to and during interview stage that they will be subject to a DBS/PVG check and asked to declare anything at interview stage that they feel is relevant in this area.

Wherever possible, the DBS/PVG disclosure should be obtained prior to the individual commencing employment, but sometimes this may not be possible. In such cases the individual can commence employment but only on a supervised basis for those aspects of the job involving contact with children or adults at risk until such time as a satisfactory disclosure report is received.

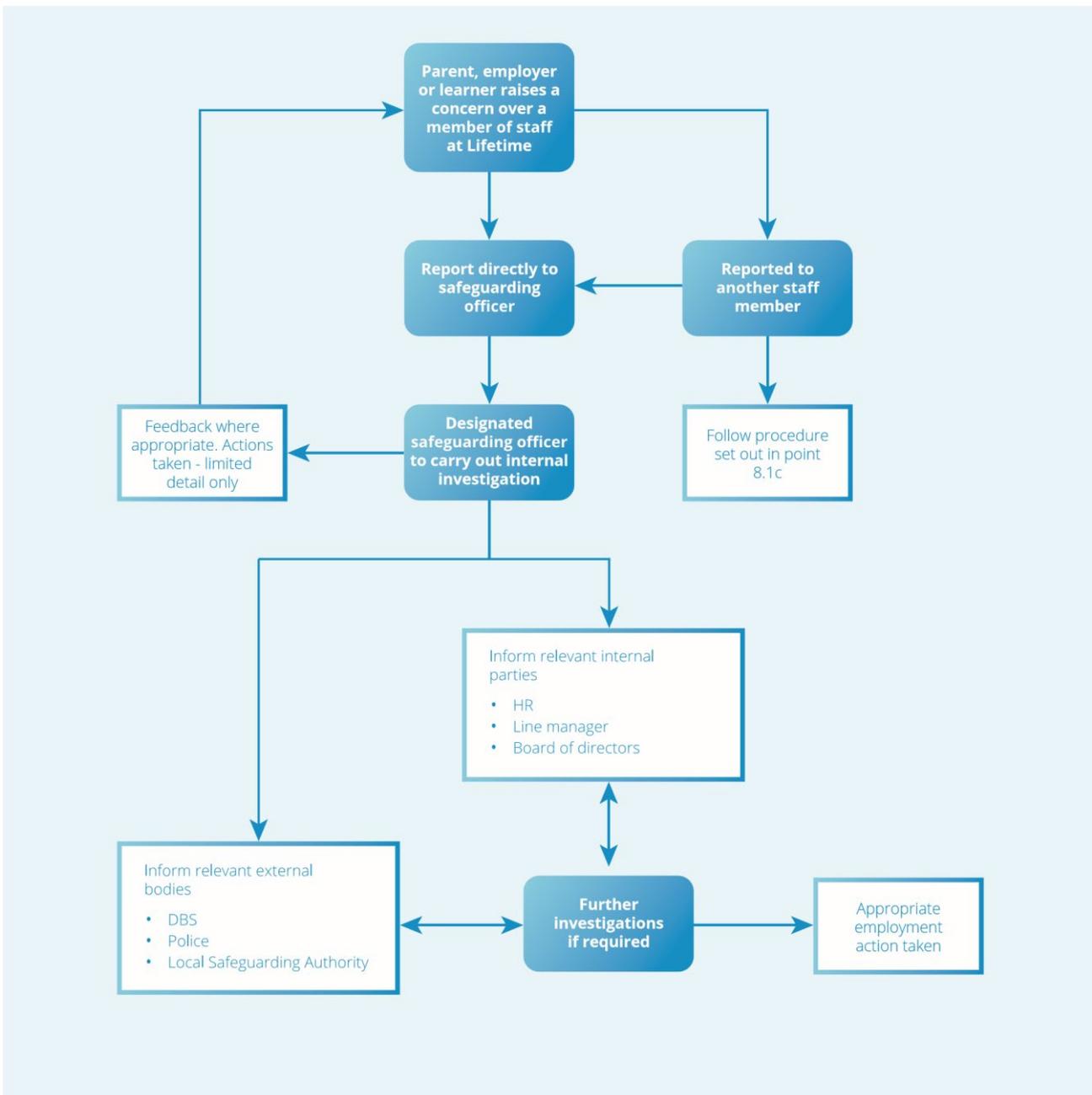
In some cases, an applicant may already have received a satisfactory disclosure report for their current or a previous position at Lifetime. It may be appropriate to use the existing report to assess suitability for the post, taking account of the date the report was produced and similarities between the two positions. A member of the People Team should be consulted in such cases.

Disclosure reports for applicants with a substantial record of overseas residence, including current UK residents and British nationals, may not include information on convictions from outside the UK. In most circumstances, however, a disclosure report should still be sought. The DBS/PVG can also offer guidance on the availability of criminal record checks in a variety of foreign countries, and the applicant can be requested to obtain the equivalent checks from the country in question, where available.

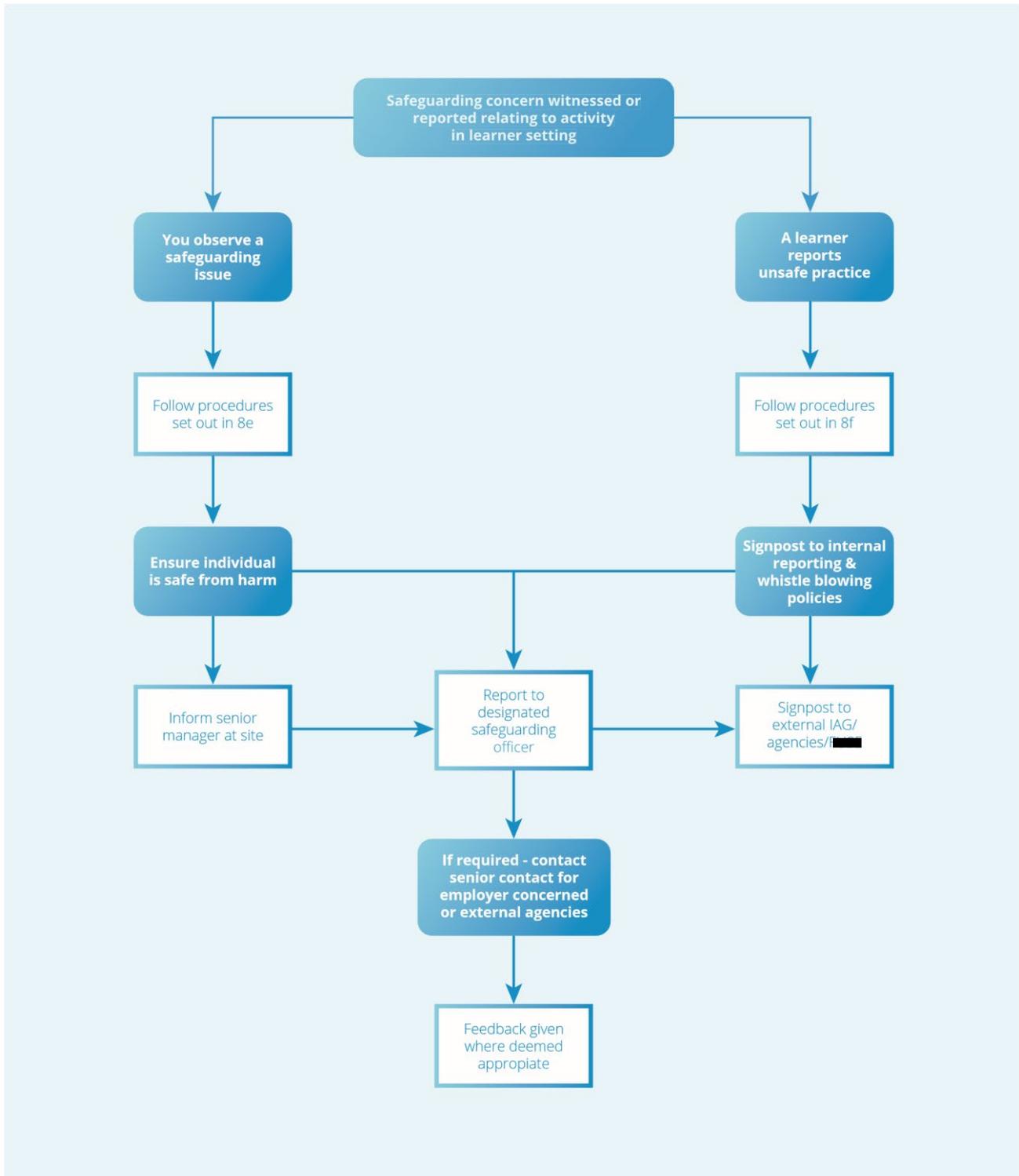
D1. LEARNER SAFEGUARDING CONCERNS



D2 PARENT, EMPLOYER OR LEARNER RAISES A CONCERN OVER LIFETIME TEAM MEMBER



D3. SAFEGUARDING CONCERN WITNESSED OR REPORTED RELATING TO ACTIVITY IN LEARNING SETTING



Recognition

Signs of abuse can be difficult to spot, as can a learner trying to find the right language to tell you about a concern. If you have any concerns over the welfare of the learner from what you have seen, heard, discussed with the learner or you have noticed changes in their behaviour which cause you safeguarding concerns, you must report it to the designated person. You do not personally have to believe the concerns in order to raise them, any concerns raised should be taken seriously. See appendix F for indicators of abuse to help.

Response

No report or concerns about possible abuse should be ignored. Your main role here is to listen and record with no judgements or leading questions; use open question to gather factual details – when did it take place, who said what, what happened? You must stay calm and not let the learner know if you feel panicked or shocked. Do not make any promises about what will happen next, but only that you will pass it onto the designated person within Lifetime, and that we will do everything we can to help. It is good practice to show support and reassurance but be mindful to maintain a situation where you do not put yourself at risk. It would also be useful to have information regarding current agency support – i.e. have the police already been informed, is the person receiving local authority or medical support?

Record

Ensure you record notes of the incident or disclosure as close to the time as possible. The notes should be dated and signed where possible. The notes should detail what you saw/heard or what was discussed with an individual, the names of those involved and the time, location and what action you took. Use the disclosure form where possible, but any form of notes will be acceptable.

Report

Report the concerns to the designated person, ensuring you have recorded all details as above. This communication can be face to face, via email, or phone call followed up by email. All communication and documents will remain confidential between the designated person and individual that has reported it, unless the designated person deems it appropriate to take further action and involve other agencies.

Referral

The designated person will then take the decision of what course of action should be taken. Only the designated person should be taking the decision to make referrals outside of the organisation.

APPENDIX F INDICATORS OF ABUSE

SAFEGUARDING ISSUE	DEFINITION	INDICATORS
PHYSICAL ABUSE	Deliberately causing physical harm	<ul style="list-style-type: none"> • Cuts, bruises, burns, • Wearing long-sleeved clothes • Pain • Cowering
NEGLECT	<p>The persistent failure to meet a person’s basic physical and/or psychological needs, likely to result in serious impairment of health or development.</p> <p>Neglect is when a parent or carer fails to provide adequate food, clothing, shelter (including exclusion from home or abandonment), medical care, or protection from physical and emotional harm or danger</p>	<ul style="list-style-type: none"> • Withdrawn • Weight loss • Fear of going home • Improper hygiene • Confusion • Inappropriate clothing
SELF-NEGLECT	Neglecting to care for one’s personal hygiene, health or surroundings and includes behaviour such as hoarding	<ul style="list-style-type: none"> • Poor diet and nutrition • Poor personal hygiene • Not taking prescribed medication • Substance misuse • Doesn’t always encompass all aspects of life.
PSYCHOLOGICAL ABUSE	Emotional abuse, threats of harm or abandonment, deprivation of contact, humiliation, blaming, controlling, intimidation, coercion, harassment, verbal abuse, cyber bullying, isolation or unreasonable and unjustified withdrawal of services or supportive networks.	<ul style="list-style-type: none"> • Withdrawn • Depression • Lack of confidence • Socially awkward • Easily manipulated
FINANCIAL ABUSE	Theft, fraud, internet scamming, coercion in relation to an adult’s financial affairs or arrangements, including in connection with wills, property, inheritance or financial transactions, or the misuse or	<ul style="list-style-type: none"> • Change in appearance • Having expensive gadgets • Having no money • Not eating properly

	misappropriation of property, possessions or benefits.	
SEXUAL ABUSE	Forcing or enticing a child or young person or any person to take part in sexual activities, whether or not the person is aware of what is happening, could also be indecent exposure or sexual harassment.	<ul style="list-style-type: none"> • Spending a long time in the toilet • Discomfort in sitting down • Inappropriate behaviour
ORGANISATIONAL ABUSE	Neglect and poor care practice within an institution or specific care setting, such as a hospital or care home, for example, or in relation to care provided in one's own home. This may range from one-off incidents to ongoing ill-treatment. It can be through neglect or poor professional practice as a result of the structure, policies, processes and practices within an organisation.	<ul style="list-style-type: none"> • Activity defined by a regime/task-oriented setting • Dismissive of complaints. • The learner may need to leave at certain times • Asks permission to do everything • Appears brainwashed
DISCRIMINATION	The unjust or prejudicial treatment of different categories of people, especially on the grounds of one of the protected characteristics	<ul style="list-style-type: none"> • Fearful of certain people • Avoids certain situations • Asked or expected to do more work or different work to peers
CHILD SEXUAL EXPLOITATION	Sexual abuse involves forcing or enticing a child or young person or any person to take part in sexual activities, whether or not the person is aware of what is happening, could also be indecent exposure or sexual harassment.	<ul style="list-style-type: none"> • Changes in behaviour • Changes in appearance • Increased sexualised behaviour/language • Signs of drug/alcohol or other substance abuse • Suddenly wearing and having access to expensive clothes, phones, gadgets etc
BULLYING (INC. CYBERBULLYING)	Behaviour by an individual or group repeated over time that intentionally hurts another individual or group either physically or emotionally. Can be face-to-face, via text or	<ul style="list-style-type: none"> • Withdrawn/nervous • Signs of physical and emotional abuse • Constant use of or fear of internet usage

	<p>social media exchanges, etc. Also includes prejudice-based, discriminatory bullying and can link to peer-on-peer abuse.</p>	
CYBERCRIME	<p>Cybercrime is criminal activity committed using computers and/or the internet. It is broadly categorised as either 'cyber-enabled' (crimes that can happen offline but are enabled at scale and at speed online) or 'cyber-dependent' (crimes that can be committed only by using a computer). Cyber-dependent crimes include:</p> <ul style="list-style-type: none"> • unauthorised access to computers (illegal hacking), for example, accessing a school's computer network to look for test paper answers or change grades awarded. • Denial of Service (DoS or DDoS) attacks or 'booting'. These are attempts to make a computer, network or website unavailable by overwhelming it with internet traffic from multiple sources; and, • making, supplying or obtaining malware (malicious software) such as viruses, spyware, ransomware, botnets and Remote Access Trojans with the intent to commit further offence, including those above. <p>Children, young people and at-risk adults with particular skills and interests in computing and technology may inadvertently or deliberately stray into cyber-dependent crime.</p>	
DOMESTIC ABUSE	<p>Domestic abuse is an incident or pattern of incidents of controlling, coercive,</p>	<ul style="list-style-type: none"> • Signs of physical or emotional abuse

	<p>threatening, degrading and violent behaviour, including sexual violence, in the majority of cases by a partner or ex-partner, but also by a family member or carer.</p>	<ul style="list-style-type: none"> • Shows signs of being controlled • Signs of injury and hiding pain • Withdrawn • Anxious around others • Low self-esteem • Lack of money • Feeling isolated from family and friends
DRUGS	<p>Alcohol, tobacco, illegal drugs, medicines or psychoactive substances</p>	<ul style="list-style-type: none"> • Smelling of substance • Changes in appearance • Regular hangover symptoms • Inability to concentrate • Lateness • Change in commitment levels
FABRICATED OR INDUCED ILLNESS	<p>Fabricated or induced illness (FII) is a rare form of child abuse. It occurs when a parent or carer exaggerates or deliberately causes symptoms of illness in a child and can cause significant harm both physically and emotionally. It can involve a well child being presented by a parent or carer as ill or disabled, or an ill or disabled child being presented with a more significant problem than they actually have.</p>	<ul style="list-style-type: none"> • Symptoms only appear when the parent or carer is present • the parent or carer does not let healthcare professionals see the child on their own • the parent or carer talks for the child, or the child refers to the parent or carer rather than speaking for themselves • the child has an inexplicably poor response to medicine or other treatment • the child's alleged symptoms do not seem plausible – for example, a child who has supposedly lost a lot of blood but does not become unwell • the parent or carer has a history of frequently changing GPs or visiting different hospitals for treatment, particularly if their

		views about the child's treatment are challenged by medical staff
FAITH ABUSE	Abuse linked to faith or belief is where concerns for a child's welfare have been identified, and could be caused by, a belief in witchcraft, spirit or demonic possession, ritual or satanic abuse features; or when practices linked to faith or belief are harmful to a child (including murder) can occur because of concerted efforts to 'excise' or 'deliver' evil from a child (or vulnerable adult).	<ul style="list-style-type: none"> • physical injuries, such as bruises or burns (including historical injuries/scaring) • reporting that they are or have been accused of being 'evil', and/or that they are having the 'devil beaten out of them' • Using words such as 'kindoki', 'djin', 'juju' or 'voodoo' - all of which refer to spiritual beliefs • Becoming noticeably confused, withdrawn, disoriented or isolated • Personal care deteriorating (eg rapid loss of weight, being hungry, turning up to school without food or lunch money, being unkempt with dirty clothes) • Attendance becomes irregular or suddenly leaves • Wearing unusual jewellery/items or in possession of strange ornaments/scripts.
FORCED MARRIAGE AND HONOUR-BASED ABUSE (LEGISLATION CHANGE 2023)	Forced marriage is illegal in the UK. This includes taking someone overseas to force them to marry (whether or not the forced marriage takes place), arranging a marriage for someone who lacks mental capacity (whether they're pressured to or not), or arranging a marriage for someone before they turn 18. Forcing someone to marry can result in a sentence of up to 7 years in prison	<ul style="list-style-type: none"> • Travel abroad recently • Talking about getting married/meeting men through family connections • Upholding religious duties
BREAST IRONING	The pounding and massaging of a pubescent girl's breasts,	<ul style="list-style-type: none"> • Unusual behaviour after an absence from school or

	<p>using hard or heated objects, to try to make them stop developing or disappear. It is typically carried out by the girl's mother who will say she is trying to protect the girl from sexual harassment and rape to prevent early pregnancy that would tarnish the family name, or to allow the girl to pursue education rather than be forced into early marriage</p>	<p>college, including depression, anxiety, aggression, withdrawal, etc.</p> <ul style="list-style-type: none"> • Reluctance in undergoing normal medical examinations • Some girls may ask for help, but may not be explicit about the problem due to embarrassment or fear • Fear of changing for physical activities due to scars showing or bandages being visible
GANGS AND YOUTH VIOLENCE	<p>Gangs where crime and violence are a core part of their identity. It can lead to increased anti-social behaviour and youth offending</p>	<ul style="list-style-type: none"> • May have expensive items • Change in behaviour • Bruises/cuts • Social activities change • Gang tattoos • Carrying weapons
PRIVATE FOSTERING	<p>Fostering arrangement without the consent of the local authority. There is a mandatory duty to report concerns of this nature to the local authority</p>	<ul style="list-style-type: none"> • Moving to different homes regularly • Not discussing family life • Abandonment characteristics
FEMALE GENITAL MUTILATION (FGM)	<p>Partial or total removal of female external genitalia or injury to another part of the female genitalia for non-medical reasons. There is a mandatory duty to report concerns of this nature concerning under-18s to the Police</p>	<ul style="list-style-type: none"> • Spending a long time in the toilet • Uncomfortable sitting down • Long trips away from home
GENDER BASED VIOLENCE	<p>Gender-based violence (GBV) in the UK refers to any act of violence committed against a person due to their gender, or violence that disproportionately affects one gender. It encompasses a wide range of behaviours, including domestic abuse, sexual violence, harassment, and other forms of</p>	<ul style="list-style-type: none"> • Changes in behaviour (more or less engaged, distant, withdrawn) • Appearing fearful or hyper-vigilant (alert and on edge) • Appearing agitated or quick tempered. • Changes in attendance/academic

	abuse, often rooted in societal inequalities.	<p>performance/motivation within classes.</p> <ul style="list-style-type: none"> • Appearing isolated. • Changes in appearance.
<p>RADICALISATION ALIGNS TO THE PREVENT STRATEGY, WHICH AIMS TO REDUCE THE THREAT TO THE UK FROM TERRORISM BY STOPPING PEOPLE FROM BECOMING TERRORISTS OR SUPPORTING TERRORISM. THE PREVENT STRATEGY HAS THREE SPECIFIC STRATEGIC OBJECTIVES:</p> <p>RESPOND TO THE IDEOLOGICAL CHALLENGE OF TERRORISM AND THE THREAT WE FACE FROM THOSE WHO PROMOTE IT</p> <p>PREVENT PEOPLE FROM BEING DRAWN INTO TERRORISM AND ENSURE THAT THEY ARE GIVEN APPROPRIATE ADVICE AND SUPPORT.</p> <p>WORK WITH SECTORS AND INSTITUTIONS WHERE THERE ARE RISKS OF RADICALISATION THAT WE NEED TO ADDRESS.</p>	<p>The process by which a person comes to support/partake in terrorism and extremism. Extremism is an ideology that is considered to be far outside the acceptable mainstream attitudes of society and includes opposition to fundamental British values.</p>	<ul style="list-style-type: none"> • Long trips away from home • Talking about being wronged by a state or political system • Strong views about changing life • Talk of harming others or damaging property in the pursuit of a cause
SEXTING	Exchange of self-generated sexually explicit images through mobile picture messages, including the sharing of nude and semi-nude images	<ul style="list-style-type: none"> • Withdrawn • Boasting • Hiding mobile phones
TEENAGE RELATIONSHIP ABUSE	Abuse in intimate personal relationships between peers, either physical, emotional, financial, or sexual, causing	<ul style="list-style-type: none"> • Withdrawn • Constantly responding to messages/calls

	<p>someone to engage in sexual activity without their consent (for example, forcing someone to strip, touch themselves sexually, or to engage in sexual activity with a third party).</p>	<ul style="list-style-type: none"> • Detect a control aspect • Physical signs of abuse
<p>TRAFFICKING AND MODERN DAY SLAVERY</p>	<p>Encompasses slavery, human trafficking, forced labour and domestic servitude. Traffickers and slave masters use whatever means they have at their disposal to coerce, deceive and force individuals into a life of abuse, servitude and inhumane treatment</p>	<ul style="list-style-type: none"> • Talking about travelling abroad • Talking about someone else having control over them • Moving homes regularly • Avoid eye contact and appear frightened • No identification documents • Physical or emotional abuse.
<p>GENDER REASSIGNMENT</p>	<p>In the Equality Act, gender reassignment means proposing to undergo, undergoing or having undergone a process to reassign your sex. To be protected from gender reassignment discrimination, you do not need to have undergone any medical treatment or surgery to change from your birth sex to your preferred gender.</p>	<p>The way gender dysphoria affects teenagers and adults is different to children.</p> <ul style="list-style-type: none"> • certain that gender identity conflicts with biological sex • comfortable only when in the gender role of preferred gender identity (may include non-binary) • a strong desire to hide or be rid of physical signs of biological sex, such as breasts or facial hair • a strong dislike of the genitals of biological sex • Feeling lonely or isolated

		<ul style="list-style-type: none"> • Pressure from friends, workmates, or family to behave in a certain way. • Signs of bullying and harassment for being different • Low emotional and psychological well-being
<p>CHILDREN WITH SPECIAL EDUCATIONAL NEEDS, DISABILITIES OR HEALTH ISSUES (REFER TO SEND CODE OF PRACTICE FOR MORE INFORMATION</p> <p><u>SEND code of practice: 0 to 25 years - GOV.UK</u></p>	<p>Special educational needs and disabilities (SEND) can affect a child or young person’s ability to learn. They can affect their:</p> <ul style="list-style-type: none"> • behaviour or ability to socialise, for example, they struggle to make friends • reading and writing, for example, because they have dyslexia • ability to understand things • concentration levels, for example, because they have attention deficit hyperactivity disorder (ADHD) • physical ability 	<ul style="list-style-type: none"> • Communication barriers • ALS or EHCP present • Declaration of challenges within the school in relation to learning • Extreme dislike/ anxiety around learning
<p>MENTAL HEALTH/MENTAL ILLNESS</p>	<p>Mental health is different from mental illness (also referred to as having a mental health disorder). Poor mental health and struggling to cope are also different from having a mental illness. A mental illness or mental health disorder is an illness that affects the way people think, feel, behave, or interact with others. There are many types of mental illnesses/ health disorders with different signs and symptoms.</p>	<ul style="list-style-type: none"> • Becoming more withdrawn • Changes in behaviour or personal appearance • Less punctual than normal, less interest • More tearful

<p>CHILDREN MISSING (OR ABSENT) IN EDUCATION</p> <p>(WHILE THIS AFFECTS 14-16-YEAR-OLDS IN COMPULSORY EDUCATION, THE RECENT LEGISLATION REQUIRING ALL CHILDREN TO STAY IN SOME FORM OF EDUCATION OR TRAINING TILL AGE 18 MEANS THAT WE SHOULD INVESTIGATE ANY LEARNERS WHO GO MISSING WITHOUT A TRACE WITHIN THIS AGE RANGE)</p>	<p>Children missing education are children of compulsory school age who are not registered pupils at a school and are not receiving a suitable education. Children absent from education could lead to children missing out on education; absences should be monitored. Children missing education are at significant risk of underachieving, being victims of harm, exploitation or radicalisation, and becoming NEET (not in education, employment or training) later in life.</p> <p>Learners who disengage are subject to Lifetime escalation supported by partnership interventions. Uncontactable learners are referred to the safeguarding team. Any learners aged under 18 who withdraw from learning are referred to the local authority.</p>	<ul style="list-style-type: none"> • Not showing up for visits with no explanation • Not contactable • Neither Lifetime nor the employer can get hold of them or know where they are
<p>SEXUAL HARASSMENT AND VIOLENCE (INCLUDING CHILD-ON-CHILD ABUSE)</p>	<p>Sexual violence and harassment can happen between any children, regardless of age or gender, and may involve individuals or groups. These behaviours can take place online or offline, and outside of work, be physical or verbal, and are never acceptable. They can severely impact a child's well-being and education. Sexual violence includes non-consensual sexual touching, rape, assault, acts without consent, upskirting – while classed as sexual harassment is a criminal offence . Sexual</p>	<ul style="list-style-type: none"> • Evidence shows that girls, children with SEND, and LGBT children are at greater risk. • OFSTED stated that although girls often view it as harassment, boys can view it as banter, • Sexual harassment can include sexual comments, such as telling sexual stories, making lewd comments, making sexual remarks about clothes and appearance and calling someone sexualised names

	<p>harassment involves unwanted sexual behaviour that can intimidate, degrade, or humiliate. Examples include sexual jokes or comments, physical acts, sexting, , and sharing sexual content without consent. All reports must be taken seriously, with appropriate support provided to victims and reported to the safeguarding team . More information can be located Keeping Children Safe in Education 112-143</p>	<ul style="list-style-type: none"> • Children who are the victims of abuse or harassment may avoid social interaction, be withdrawn, be self-conscious, and use sexualised language. • Sexual harassment should be deemed as taking place even if there are no reports of it, as many young people view it as behaviour that just happens and don't bother reporting it. • Observe and address inappropriate behaviours
<p>COUNTY LINES</p>	<p>County lines involve organised criminal gangs from major cities like Liverpool, London, Birmingham, and Manchester distributing drugs to smaller towns and rural areas. These gangs groom and exploit children and vulnerable people to transport drugs and money. Even if the young person appears to consent, it is still considered exploitation.</p> <p>Exploitation can involve coercion through force, enticement, violence, or threats, and is often driven by a power imbalance—based on age, gender, strength, status, or resources—between the exploiter and the victim. It can be carried out by individuals or groups, regardless of age or gender.</p>	<ul style="list-style-type: none"> • Signs of exploitation in young or vulnerable people may include regularly going missing, being found in unfamiliar areas, or suddenly having unexplained money, clothes, or mobile phones.

KEY DIFFERENCES BETWEEN SAFEGUARDING CHILDREN AND YOUNG PEOPLE IN ENGLAND AND SCOTLAND

- **Legal Duty:**
England requires mandatory reporting of children at risk (Working Together 2023). Scotland has no legal duty to report, but expects agencies to actively consider risks.
- **Guidance:**
England follows statutory guidance (Working Together). Scotland uses National Guidance for Child Protection focusing on professional judgment.
- **Consent and Reporting:**
England prioritises child safety over consent—concerns must be reported even without consent. Scotland emphasises consent and discretion, but action is taken if a child is at risk.
- **Information Sharing:**
England has clear rules allowing information sharing without consent to protect children. Scotland relies more on professional judgment and multi-agency collaboration.
- **Structures:**
England has defined roles like the Local Authority Designated Officer (LADO). Scotland uses multi-agency Child Protection Committees without a direct LADO equivalent.
- **Approach:**
England focuses on statutory thresholds and social care referrals. Scotland stresses early intervention, prevention, and collaborative approaches.

APPENDIX G DISCLOSURE RECORDING FORM

For office use only Case
N^o.

Learner Name

Location/Name of Site

DOB

Lifetime Staff Name

Date of Disclosure

Details of the concern

(Action) - For Safeguarding Team only