

SAFEGUARDING PROCEDURE

Policy Document Purpose Statement

This document sets out the policy supporting safeguarding for Babcock International Group (BIG) at Devonport Royal Dockyard Ltd (DRDL).

Application

The objective of this document is to provide a framework to ensure young people and adults learn and work in a safe environment whether at work, in college, at home or in the wider community.

Interpretation

Further guidance on the use or interpretation of this policy may be obtained from the responsible post holder.

Legislator / Regulatory Compliance

Compliance with relevant current Health and Safety legislation, Data Protection Act and other legislation / regulations named within the body of the document.

Publication Restrictions

A version of this document is available to view on the Babcock International Group website.

Name of document: Safeguarding and Child Protection

Policy Author (Post title): Designated Safeguarding Lead

Post Title responsible for review: Designated Safeguarding Lead

Version Number: 3

Approved by: Safeguarding Management Group

Date of first approval: 06/09/2021

Date of review / publication: 01/09/2024

Date of next review: 01/09/2025

SAFEGUARDING AND CHILD PROTECTION POLICY

List of Contents

1. Purpose of the Policy
2. Applicability / Scope
3. Statutory Obligations
4. Definitions
5. Policy Principles
6. Responsibilities
7. Other Individuals on Babcock sites
8. Multi-agency Working
9. Staff training
10. Safer Recruitment and Selection
11. Safeguarding Types and Themes

Page 1 of 18	Revision 4 (Sept 2024)	HR(DRDL)-WI-001
UNCONTROLLED WHEN PRINTED <i>It is the responsibility of the user to ensure they are working with the latest revision</i>		Printed: 22/07/2024

- 12. Safeguarding and Child Protection Procedure
 - 13. Early Help
 - 14. Special Educational Needs and Disabilities
 - 15. Apprentices and Adults Potentially at Greater Risk of Harm
 - 16. Safeguarding in Partnership for Apprentices
 - 17. On-line Safety and E-Safety
 - 18. Whistleblowing
 - 19. Supervision
 - 20. Policy and Procedures Update
 - 21. Confidentiality
 - 22. Equality and Diversity
 - 23. Related Documents
- Appendix A – Designation and Contacts – Internal and External

Appendix B – Forms of Abuse

Appendix C – Signs and Indicators of Potential Abuse

Appendix D – Intervention Framework

1 Purpose of the Policy

1.1. The aim of this policy is to keep children, young people and adults safe by providing a framework to ensure a safe environment for them to learn and work, whilst contributing to the prevention of harm or abuse and the protection of those individuals who are identified as suffering or likely to suffer harm from any such risk to their safety, health or well-being, whether in work, college, at home or in the wider community.

2. Applicability / Scope

2.1. The policy set out in this document (and associated procedures) applies solely to the Babcock International Group's site at Devonport Royal Dockyard, Plymouth, Devon, UK.

2.2. Our policy and procedures apply to all staff, apprentices, visitors, contractors, volunteers and staff from partner organisations working on our sites, including those organisations using or hiring sites or facilities.

2.3. Everyone has the right to be protected against risk to their safety, health and well-being and everyone has the responsibility to safeguard others against such risks.

3. Statutory Obligations

3.1. BIG has a statutory duty under Section 175 of the Education Act (2002) and must have in place arrangements for carrying out its duties with a view to safeguarding and promoting the welfare of children, young people and adults who may be at risk of harm or abuse. This policy sets out a framework for those arrangements and should be read in conjunction with the associated BIG policies and procedures listed, the web links provided and various appendices attached, including our Safeguarding Procedures that link to the Local Authority Safeguarding Procedures.

3.2. This policy considers, amongst others, the following publications, including recent / relevant guidance and legislation in this area:

3.2.1. Keeping Children Safe in Education (KCSIE): Statutory guidance for schools and colleges. (Department for Education, September 2024) [Keeping children safe in education - GOV.UK \(www.gov.uk\)](https://www.gov.uk/government/publications/keeping-children-safe-in-education)

Page 2 of 18	Revision 4 (Sept 2024)	HR(DRDL)-WI-001
UNCONTROLLED WHEN PRINTED <i>It is the responsibility of the user to ensure they are working with the latest revision</i>		Printed: 22/07/2024

3.2.2. Working Together to Safeguard Children: A guide to inter-agency working to safeguard and promote the welfare of children. (Her Majesties Government, July 2018)

<https://www.gov.uk/government/publications/working-together-to-safeguard-children--2>

3.2.3. The Care Act (2014). Statutory guidance: Care and support statutory guidance updated June 2020 that provides a detailed guidance on all aspects of implementing the requirements contained in Part 1 of the Care Act (2014) to local authorities, the NHS, police and other partner organisations. (Department of Health and Social Care) [Care Act 2014 \(legislation.gov.uk\)](https://www.legislation.gov.uk)

3.2.4. The Prevent Duty: Departmental advice for schools and child care providers (Department for Education). [Prevent duty guidance: England and Wales \(2023\) - GOV.UK \(www.gov.uk\)](https://www.gov.uk/government/publications/prevent-duty-guidance)

3.3. BIG policy and procedures are in accordance with those set out on the South West Child Protection Procedures website [Welcome to the South West Child Protection Procedures \(trixonline.co.uk\)](https://www.welcometothesouthwestchildprotectionprocedures.co.uk) and the guidance issued by the various local multi-agency safeguarding partnerships and boards.

3.4. Key staff role abbreviations:

3.4.1. DSL – Designated Safeguarding Lead.

3.4.2. DDSL – Deputy Designated Safeguarding Leads

3.4.3. SMG – Safeguarding Management Group

4. Definitions

4.1. A child is defined as any young person under the age of 18 years.

4.2. Safeguarding and promoting the welfare of children is defined in KCSIE (2024) as: protecting children from maltreatment; preventing impairment of children's mental and physical health or development; ensuring that children grow up in circumstances consistent with the provision of safe and effective care; and taking action to enable all children to have the best outcomes.

4.3. An adult who may have safeguarding needs is defined in The Care Act (2014) as an adult who:

4.3.1. has needs for care and support (whether or not the local authority is meeting any of those needs) and;

4.3.2. is experiencing or at risk of abuse or neglect and;

4.3.3. as result of those care and support needs, is unable to protect themselves from either the risk of or the experience of abuse or neglect;

5. Policy Principles

5.1. Babcock International Group will ensure that:

5.1.1. safeguarding and promoting the welfare of children, young people and adults at risk of harm or abuse is everyone's responsibility and is child-centred / person-centred, ensuring that everyone is acting in the best interests of the child, young person or adult at risk of harm or abuse.

5.1.2. the safety and well-being of children, young people and adults are paramount in all areas of its operations, including safeguarding our staff / apprentices and raising their awareness, to safeguard themselves and others.

Page 3 of 18	Revision 4 (Sept 2024)	HR(DRDL)-WI-001
UNCONTROLLED WHEN PRINTED <i>It is the responsibility of the user to ensure they are working with the latest revision</i>		Printed: 22/07/2024

5.1.3. all children and adults, regardless of age, culture, disability, gender, language, racial origin, religious belief and or sexual identity can exercise their right to protection from harm or abuse when engaged in work-related activity or settings and receive support where they may disclose concerns about their broader lives in the community or at home.

5.1.4. all suspicions and allegations of abuse will be taken seriously and responded to swiftly and appropriately, with due regard to appropriate levels of privacy and the dignity of those concerned.

5.1.5. all staff will be made aware of key safeguarding principles/practice through appropriate training and are required to report any disclosures, concerns or allegations in line with our procedures and the statutory guidance.

5.1.6. best practice is used in safer recruitment when recruiting staff/volunteers to ensure their suitability to work with children, young people and adults who may be at risk of harm, abuse or neglect and appropriate levels of assurance are sought from others who visit/use our sites.

5.1.7. all those involved with safeguarding adopt a multi-agency approach, working in partnership with other key statutory, non-statutory and voluntary sector organisations to support and protect children, young people and adults at risk of harm, abuse or neglect through information sharing and the sharing of best practice to improve safeguarding within our communities.

5.1.8. all staff understand the benefits of early help and intervention and are particularly alert to the potential need for early help.

5.1.9. everybody adheres to all statutory responsibilities placed upon them and they maintain professional curiosity, appreciative enquiry and an attitude of it could happen here.

6. Responsibilities

6.1. The Governing Body of BIG DRDL

6.1.1. The Governing Body of BIG DRDL are responsible for the management of safeguarding in accordance with the statutory guidance set out in Part Two of KCSIE (2024) and related guidance or legislation.

This includes that:

- BIG has a safeguarding policy and associated procedures in place that are in accordance with statutory requirements and local authority guidance and that these are published and reviewed annually or where required due to changes in policy, ensuring that any deficiencies or weaknesses regarding safeguarding arrangements are remedied without delay.
- Effective training is in place for all staff, appropriate to their roles, and it complies with the statutory requirements and takes account of local authority guidance.
- The DRDL Board receives and considers regular safeguarding update reports.
- BIG operates 'safer recruitment procedures' for relevant roles in accordance with statutory requirements and guidance.
- Allegations or concerns against staff are dealt with in accordance with statutory guidance and local authority procedures.
- A senior manager is appointed to the role of Designated Safeguarding Lead (DSL). The Designated Safeguarding Lead will take responsibility across DRDL for BIG for child protection and safeguarding.
- BIG contributes to multi-agency working in line with statutory guidance.
- Ensure that staff have the skills, knowledge and understanding to keep safe the vulnerable apprentices and adults as defined in sections 13, 14 and 15.

Page 4 of 18	Revision 4 (Sept 2024)	HR(DRDL)-WI-001
UNCONTROLLED WHEN PRINTED <i>It is the responsibility of the user to ensure they are working with the latest revision</i>		Printed: 22/07/2024

6.2. The Designated Safeguarding Lead (DSL).

6.2.1. The DSL has ultimate lead responsibility for safeguarding and child protection with responsibilities set out in Annex B of KCSIE (2024). Activities may be delegated to appropriately trained DDSL but lead responsibility remains that of the DSL. The DSL is responsible for ensuring:

- Publication and correct implementation of the policy and procedures and reviewing the effectiveness of them annually in a written report to the DRDL Board.
- Safeguarding training, appropriate to role, is in place for all staff and is delivered in line with national and local guidance.
- Completion of external and internal audits related to the effectiveness of safeguarding
- Oversight of the recording and passing on to external agencies, where appropriate, any disclosures received and liaising with the Local Authority Designated Officer (LADO) on any staff related matters, where required.
- The appointment of DDSL who are appropriately trained and supported.
- Documents relating to safeguarding are managed and secured in accordance with statutory guidance and legislation.
- That the Safeguarding Management Group (SMG) receives appropriate safeguarding information and advice in all cases where allegations of abuse have been made against a member of staff.
- Effective liaison and working with the Local Authority Safeguarding Children's Partnership / Boards and the Safeguarding Adult Boards and other agencies in keeping with 'Working Together to Safeguard Children' (2018).
- That robust risk assessment processes are in place where individuals pose a risk to themselves or others.
- They attend Tier 3 Safeguarding training every two years and other safeguarding related continuous professional development to keep up to date with policy and best practice developments.
- Those who use BIG premises or provide site based service to apprentices are aware of this safeguarding policy and associated procedures and agree to abide by these via a 'Letter of Assurance' or 'Letter of Understanding' that will be held with our Single Central Record.
- Providing senior management, information on safeguarding incidents and trend analysis for service development and reporting.
- Chair Safeguarding Team meetings which will occur regularly throughout the year.

6.3. Deputy Designated Safeguarding Leads (DDSL)

6.3.1. The DDSL is responsible for safeguarding as set out in Annex B of KCSIE (2024), including:

- Receiving, recording and passing on to external agencies, where appropriate, disclosures concerning harm, abuse or neglect in accordance with BIG and local authority procedures.
- Liaising with the DSL, as appropriate.
- Contributing to safeguarding training for all staff.
- Working with colleagues to raise the awareness of safeguarding amongst the staff and encouraging concerns to be reported.
- Attending Tier 3 Safeguarding training every two years and other safeguarding related continuous professional development to keep up to date with policy and best practice developments.
- Supporting and advising colleagues with potential safeguarding concerns about apprentices or vulnerable adults.
- Effective and secure record keeping.

Page 5 of 18	Revision 4 (Sept 2024)	HR(DRDL)-WI-001
UNCONTROLLED WHEN PRINTED <i>It is the responsibility of the user to ensure they are working with the latest revision</i>		Printed: 22/07/2024

➤ Liaising and working with the different local authorities and other agencies in accordance with statutory guidance.

6.4. The Safeguarding Management Group (SMG)

6.4.1. Where an allegation of abuse is reported that implicates a member of staff, governor or volunteer, the SMG will be convened and is responsible for responding quickly and appropriately to allegations of abuse made against staff/volunteers in line with the statutory guidance set out in Part Four of KCSIE (2024) and Local Authority procedures, overseeing any investigation or external reporting related to this.

6.4.2. The SMG will comprise of:

- The Designated Safeguarding Lead
- The Deputy Designated Safeguarding Lead(s)
- The HR Director of DRDL
- The UK HR Director

6.5. All Staff Members

6.5.1. All staff members working in Regulated activity are responsible for:

- Reading and understanding Keeping children safe in education: Statutory guidance for schools and colleges Part 1: Information for all school and college staff (Department for Education, September 2024)
- Providing a safe environment in which children, young people and adults at risk of harm, abuse or neglect can learn.
- Being prepared to identify children, young people and adults at risk of harm, abuse or neglect, who may benefit from early help and understand the early help process and their role in it, together with the completion or assisting with the completion of a risk assessment or support plan where required.
- Following the framework described in Appendix D, together with the correct referral process and procedure. Know where to go and what to do if they have any safeguarding concerns.
- Attending safeguarding and child protection training and updates as required, on induction and as a refresher at least once every 12 months.
- Reading and familiarising themselves with associated policies via the BIG website.
- Reading safeguarding newsletters and associated guidance when published.
- Being aware of how to make referrals to children's social care and adult's social care for statutory assessments via the local authority multi-agency safeguarding units, along with the role they might be expected to play in such assessments.
- Promoting awareness of safeguarding issues/support amongst apprentices, colleagues and other stakeholders.
- Protecting themselves by being familiar with and adhering to the Staff Professional Code of Conduct, safer working practice and other key safeguarding standards.
- Wearing their staff ID badge always when working on site.
- Reporting to a DSL or DDSL, any welfare concerns that they may have or may need support with.
- Reporting to the Human Resource Manager/Advisers any potential criminal charges or personal issues that may have a bearing on their on-going 'suitability' to work in an educational environment with children, young people and adults at risk of harm, abuse or neglect.
- Reporting to the DSL, or Director of Human Resources any concerns they may have about the conduct of colleagues in relation to Safeguarding and / or Professional Staff Code of Conduct.

Page 6 of 18	Revision 4 (Sept 2024)	HR(DRDL)-WI-001
UNCONTROLLED WHEN PRINTED <i>It is the responsibility of the user to ensure they are working with the latest revision</i>		Printed: 22/07/2024

➤ Maintaining an appropriate level of confidentiality whilst at the same time liaising and sharing information with relevant professionals.

6.5.2. All staff members working in non-regulated activity are responsible for:

- Providing a safe environment in which children, young people and adults at risk of harm, abuse or neglect can learn.
- Being prepared to identify children, young people and adults at risk of harm, abuse or neglect, who may benefit from early help and understand the early help process and their role in it.
- Attending safeguarding and child protection training on induction and receiving updates as required.
- Reading and familiarising themselves with associated policies via the BIG website.
- Reading safeguarding newsletters and associated guidance when published.
- Promoting awareness of safeguarding issues/support amongst colleagues and other stakeholders.
- Protecting themselves by being familiar with and adhering to the Staff Professional Code of Conduct and key safeguarding standards.
- Wearing their staff ID badge always when working on site.
- Reporting to a DSL or DDSL, any welfare concerns that they may have or may need support with.
- Reporting to the DSL, DDSL or HR team any potential criminal charges or personal issues that may have a bearing on their on-going 'suitability' to work in an educational environment with children, young people and adults at risk of harm, abuse or neglect.
- Reporting to the DSL, or HR team any concerns they may have about the conduct of colleagues in relation to Safeguarding and / or Professional Staff Code of Conduct.
- Maintaining an appropriate level of confidentiality whilst at the same time liaising and sharing information with relevant professionals.

6.6. Apprentices/Learners

6.6.1. Apprentices are responsible for:

- Maintaining vigilance and a pro-active approach to the safety and welfare of themselves, their peers and others on site.
- Reporting any concerns to any trusted member of staff with whom they feel comfortable discussing these concerns.
- Abiding by BIG learner code of conduct which is designed to safeguard all those on Babcock sites or using Babcock facilities, including the IT network.
- Behaving in a way that does not compromise them or lead to allegations of a criminal or safeguarding nature.

7. Other Individuals Working on BIG Sites

7.1. Visitors to Babcock sites must be directed to sign in and collect a visitor's badge/lanyard that must be visible always while on site. They must be collected from the reception area, accompanied always by a member of staff and returned to reception to sign out and hand in their badge/lanyard.

7.2. Contractors and tenants operating on BIG premises are to be provided with a copy of the BIG Safeguarding Policy and agree to:

- Maintain vigilance and a pro-active approach to the safety and welfare of themselves, their colleagues and others on site.

Page 7 of 18	Revision 4 (Sept 2024)	HR(DRDL)-WI-001
UNCONTROLLED WHEN PRINTED <i>It is the responsibility of the user to ensure they are working with the latest revision</i>		Printed: 22/07/2024

- Report any concerns to the Designated Safeguarding Lead or Deputy Safeguarding Leads whose details can be found within this policy.
- Abide by BIG contractor guidelines
- Behave in a way that does not compromise them or lead to allegations of a criminal or safeguarding nature.

8. Multi-agency Working

8.1. As a training provider, BIG will work with any relevant safeguarding partners and other statutory and non-statutory agencies when required.

9. Staff training

9.1 All new staff will be made aware of Safeguarding through the induction process

9.2 All staff will receive Safeguarding updates through TOFs and/or all staff communication channels

9.3 Staff acting in Regulated activity will also receive annual Safeguarding training

9.4 DSL and DDSL will hold the required level of Safeguarding qualification and maintain CPD

10. Safer Recruitment and Selection

10.1. BIG will select and recruit for applicable roles in accordance with the statutory guidance set out in Chapter 3 of KCSIE (2024), which details Safer Recruitment.

10.2. The recruitment policy and procedures ensure that all appropriate measures are applied in relation to everyone working in BIG at DRDL, including staff, volunteers and staff employed by external partners / contractors.

10.3. The Director of Human Resources will ensure that a single central record is maintained of all pre-appointment checks.

11. Safeguarding Types, Themes and Specific Safeguarding Issues

11.1. In accordance with 6.5.1, all staff must read and familiarise themselves with the different types of harm and abuse, together with various safeguarding themes and specific safeguarding issues outlined in Part One and Annex A of KCSIE (2024). A summary of these types and themes are at Appendix B of this policy, together with possible signs and indicators at Appendix C.

11.2. Guidance for dealing with an incident of Peer on Peer/Child on Child abuse, including Sexual Harassment / Violence, can be found within the Anti-bullying and Harassment Policy. Abuse is abuse and this type of abuse will never be tolerated or passed off as “banter”, “just having a laugh” or “part of growing up”.

11.3. The Governments Counter Terrorist Strategy (CONTEST) places a specific duty on the Group to prevent radicalisation and extremism. BIG’s PREVENT (Extremism & Radicalisation) policy and procedures, which focusses on the Prevent referral process and Channel, and must be read alongside this policy.

12. Safeguarding Procedure

12.1. The procedure for reporting a safeguarding or child protection concern is outlined in this document, following the intervention framework provided at Annex D, although a direct referral should be made to the local authority safeguarding unit or the police when:

Page 8 of 18	Revision 4 (Sept 2024)	HR(DRDL)-WI-001
UNCONTROLLED WHEN PRINTED <i>It is the responsibility of the user to ensure they are working with the latest revision</i>		Printed: 22/07/2024

12.1.1. it may not always be appropriate to go through all stages sequentially because there is immediate danger or risk of harm. Before doing so, basic facts should try to be established. However, it will be the role of social workers and the police to investigate cases and make a judgement on whether there should be a statutory intervention and/or a criminal investigation.

12.1.2. a member of staff has concerns about the safety or welfare of a child and feel they are not being acted upon by their manager or named DSL or DDSL.

12.1.3. there is a specific legal duty to report to the police if they discover that an act of female genital mutilation (FGM) appears to have been carried out on a girl under the age of 18.

12.2. Record, in writing, all concerns and discussions, the decisions made and the reasons for those decisions, which should be passed to the DSL or DDSL at the earliest opportunity.

12.3. Allegations of abuse, or other safeguarding concerns, raised against a member of staff, including volunteers, should be dealt with in accordance with part four of KCSIE and the procedure outlined in the Safeguarding and Child Protection Procedure.

13. Early Help

13.1. Early help means providing support as soon as a problem emerges at any point in a child's or adult's life. Staff should be particularly alert to someone who:

13.1.1. is disabled and has specific additional needs;

13.1.2. has special educational needs (whether they have a statutory Education, Health and Care Plan or not);

13.1.3. is a young carer;

13.1.4. is showing signs of being drawn in to anti-social or criminal behaviour, including gang involvement and association with organised crime groups;

13.1.5. is frequently missing / goes missing from care or from home;

13.1.6. is at risk of being radicalised or exploited;

13.1.7. is in family circumstances presenting challenges, such as drug and alcohol misuse, mental ill health and domestic abuse;

13.1.8. is misusing drugs or alcohol themselves;

13.1.9. Has returned home to their family from care; and

13.1.10. Is a privately fostered child.

13.2. It is important that staff try to identify early help and support needs during the recruitment, interview and enrolment process, carrying out risk assessments and creating support plans where required.

13.3. If there is no pre-existing local authority partner agency involvement or it is felt that the individual case does not require a social worker, then an early help referral can be made directly to the local authority early help teams or by contacting the local authority safeguarding units as detailed in Appendix B although it is important to do this with the support and assistance of the DSL or DDSL.

13.4. The role of staff in a statutory assessment is detailed in Chapter 1 of Working Together to Safeguard Children (2018). Staff may be required to act as the lead professional for an early help

Page 9 of 18	Revision 4 (Sept 2024)	HR(DRDL)-WI-001
UNCONTROLLED WHEN PRINTED <i>It is the responsibility of the user to ensure they are working with the latest revision</i>		Printed: 22/07/2024

assessment or be asked to participate in such an assessment. Whatever the case they will need to work closely with other practitioners to decide whether the individual would benefit from coordinated support from more than one agency.

14. Special Educational Needs and Disabilities

14.1. Apprentices and adults with special educational needs (SEN) and disabilities can face additional safeguarding challenges. These can include:

14.1.1. assumptions that indicators of possible abuse such as behaviour, mood and injury relate to the child's disability without exploration;

14.1.2. being more prone to peer group isolation than other children;

14.1.3. the potential for children with SEN and disabilities being disproportionately impacted by behaviours such as bullying, without outwardly showing any signs; and

14.1.4. communication barriers and difficulties in overcoming barriers.

14.2. Consideration must be given to extra pastoral support for apprentices with SEN and disabilities.

15. Apprentices and Adults Potentially at Greater Risk of Harm

15.1. There are groups of apprentices and adults who may be at greater risk of harm, abuse or exploitation. BIG will seek to identify early, those apprentices and adults who may be at greater risk for one or more of the following reasons:

15.1.1. Apprentice or adult has a social worker and/or are on a Child in Need or Child Protection Plan.

15.1.2. Apprentice is a looked after child, who is subject to a care order or a previously looked after child.

15.1.3. Apprentice or adult is a care leaver, who is no longer subject to a care order.

15.1.4. Apprentice or adult is a young carer or young parent.

15.1.5. Apprentice or adult requires mental health support.

15.2. Consideration must be given to the assessment and implementation of extra pastoral support and protection in collaboration with relevant social workers and other professionals / agencies as required and based on the needs and wishes of the apprentice.

16. Safeguarding in Partnership for apprentices

16.1. Apprentices will be made aware of Safeguarding through knowledge sessions undertaken with their Apprenticeship Training Provider, as well as through regular discussions with their Apprentice Development Managers.

17. On-line Safety and E-Safety

17.1. BIG will endeavour to both filter and monitor all computer and on-line usage in a responsible and transparent way to ensure and maintain the safety of all staff.

17.2. All staff must accept, agree and adhere to the acceptable use policy and any other related on-line and e-safety policies.

Page 10 of 18	Revision 4 (Sept 2024)	HR(DRDL)-WI-001
UNCONTROLLED WHEN PRINTED <i>It is the responsibility of the user to ensure they are working with the latest revision</i>		Printed: 22/07/2024

17.3. Training and education will be given to apprentices on how to stay safe on-line and the four areas of risk:

17.3.1. content: being exposed to illegal, inappropriate or harmful material;

17.3.2. contact: being subjected to harmful online interaction with other users; and

17.3.3. conduct: personal online behaviour that increases the likelihood of, or causes, harm.

17.3.4. commerce: - risks such as online gambling, inappropriate advertising, phishing and or financial scams

18. Whistleblowing

18.1. All concerns raised about poor or unsafe practice and potential failures in relation to the safeguarding regime will be taken seriously and acted upon through the whistleblowing policy.

[Whistleblowing-Policy-June-2023.pdf \(babcockinternational.com\)](#)

18.2. Where a staff member feels unable to raise the issue or concern with the leadership team or Trade Union or feels that a genuine concern is not being addressed, it is suggested that they get free, confidential advice from the independent whistleblowing charity Public Concern at Work, who can help with the decision whether and/or how to raise the concern. This can be done by contacting the charity by telephone on 020 7404 6609 or email helpline@pcaw.co.uk. Further information can be found on the Public Concern at Work website www.pcaw.co.uk which includes guidance on whistleblowing legislation.

18.3. Staff may also use other whistleblowing channels such as the NSPCC or OFSTED whistleblowing helplines:

18.3.1. Telephone: NSPCC on 0800 028 0285 or OFSTED on 0300 123 3155

18.3.2. Email: help@nspcc.org.uk or whistleblowing@ofsted.gov.uk

19. Supervision

19.1. Supervision for safeguarding staff will be provided through regular pre-arranged meetings. Additional supervision for individuals or groups can be provided on request or as needed.

19.2. Supervision will be provided by the direct line manager or delegated to another manager if required. Access to more specialised counselling or supervision is available through human resources and/or occupational health.

20. Safeguarding Policy and Procedure Updates

20.1. The Safeguarding Policy will be reviewed, updated and approved by Safeguarding Management Group on a biennial basis or more frequently if there are changes to national or local guidance.

20.2. Safeguarding procedures and supporting guidance will be reviewed on a regular basis, at least annually and as part of national/local case reviews and “learning lessons” data and in the light of feedback from staff or apprentices.

21. Confidentiality

21.1. The Data Protection Act (2018) and General Data Protection Regulations (GDPR) do not prevent, or limit, the sharing of information for the purposes of keeping children safe. Fears about

Page 11 of 18	Revision 4 (Sept 2024)	HR(DRDL)-WI-001
UNCONTROLLED WHEN PRINTED <i>It is the responsibility of the user to ensure they are working with the latest revision</i>		Printed: 22/07/2024

sharing information must not be allowed to stand in the way of the need to promote the welfare and protect the safety of children, young people and adults at risk of harm, abuse or neglect.

21.2. Staff should never promise that they will not tell anyone about an allegation or disclosure, as this may ultimately not be in the best interests of the child, young person or adult at risk of harm or abuse.

21.3. All suspicions, allegations and investigations will be kept confidential and shared only with those who need to know in accordance with GDPR and Data Protection Act (2018), following government advice and guidance⁵, using the 7 golden rules:

21.3.1. Remember that the General Data Protection Regulation (GDPR), Data Protection Act 2018 and human rights law are not barriers to justified information sharing but provide a framework to ensure that personal information about living individuals is shared appropriately. ⁵ Information sharing: Advice for practitioners providing safeguarding services to children, young people, parents and carers (Her Majesties Government July 2018)

<https://www.gov.uk/government/publications/safeguarding-practitioners-information-sharing-advice>

21.3.2. Be open and honest with the individual (and/or their family where appropriate) from the outset about why, what, how and with whom information will, or could be shared, and seek their agreement, unless it is unsafe or inappropriate to do so.

21.3.3. Seek advice from other practitioners, or your information governance lead, if you are in any doubt about sharing the information concerned, without disclosing the identity of the individual where possible.

21.3.4. Where possible, share information with consent, and where possible, respect the wishes of those who do not consent to having their information shared. Under the GDPR and Data Protection Act 2018 you may share information without consent if, in your judgement, there is a lawful basis to do so, such as where safety may be at risk. You will need to base your judgement on the facts of the case. When you are sharing or requesting personal information from someone, be clear of the basis upon which you are doing so. Where you do not have consent, be mindful that an individual might not expect information to be shared.

21.3.5. Consider safety and well-being: base your information sharing decisions on considerations of the safety and well-being of the individual and others who may be affected by their actions.

21.3.6. Necessary, proportionate, relevant, adequate, accurate, timely and secure: ensure that the information you share is necessary for the purpose for which you are sharing it, is shared only with those individuals who need to have it, is accurate and up-to-date, is shared in a timely fashion, and is shared securely.

21.3.7. Keep a record of your decision and the reasons for it – whether it is to share information or not. If you decide to share, then record what you have shared, with whom and for what purpose.

22. Equality and Diversity

22.1. Equality, Diversity and Inclusion is taken into consideration with regards to all BIG policies and procedures

23. Related Documents

- Prevent (radicalisation & extremism) Policy
- The Apprentice Disciplinary Policy and Procedure
- Code of Conduct - Apprentice
- Safer Recruitment Policy and Procedure

Page 12 of 18	Revision 4 (Sept 2024)	HR(DRDL)-WI-001
UNCONTROLLED WHEN PRINTED <i>It is the responsibility of the user to ensure they are working with the latest revision</i>		Printed: 22/07/2024

- Code of Conduct
- Disciplinary Procedure
- Anti-bullying and Harassment Policy
- Drugs and Substance Misuse Policy
- Whistleblowing Policy and Procedure
- Babcock Principles

APPENDIX A – DESIGNATION AND CONTACTS – INTERNAL AND EXTERNAL

1. Key Internal Contacts

Gareth Kenward: gareth.kenward@babcockinternational.com 07542 863803

Nicola Monger: nicola.monger@babcockinternational.com 07858 369053

Sarah Blazey: sarah.blazey@babcockinternational.com 07860 757174

Kerry Cardew: Kerry.cardew@babcockinternational.com

2. DESIGNATED POSITIONS

Safeguarding Management Group Members (SMG):

Gareth Kenward, Sarah Blazey, Nicola Monger, Kerry Cardew

Designated Safeguarding Lead (DSL)

Gareth Kenward

Deputy Designated Safeguarding Lead (DDSL):

Sarah Blazey and Nicola Monger

3. Key External Contacts

3.1. Local Authority arrangements may vary when referring allegations of abuse or general safeguarding concerns about young people under the age of 18 years or in the case of adults at risk of harm under the definition of the Care Act 2014. You should refer to the Local Authority Multi-Agency Safeguarding Unit, Local Safeguarding Children Partnerships (SCP) or Boards (SCB) or Safeguarding Adults Board (SAB) for contact details, advice and the referral process.

3.2. Allegations against professionals (teachers, social workers, care/childcare workers etc.) working with children or adults should be made to the relevant LADO (Local Authority Designated Officer) in accordance with the Safeguarding and Child Protection Procedure.

APPENDIX B – FORMS OF ABUSE

Keeping Children Safe in Education (2024) and other government guidance identifies several categories of abuse. Safeguarding themes of concern that are specific to our age group include:

- Child & Adult Exploitation (Sexual, Criminal, Gangs etc)
- Sexting, Revenge pornography or other inappropriate use of social media.
- Emotional abuse
- Domestic abuse
- Controlling or coercive relationships/abuse
- Neglect or self-neglect.
- Mental Ill health, self – harm and / or suicidal ideation.
- Hate crime or Hate related incidents

Page 13 of 18	Revision 4 (Sept 2024)	HR(DRDL)-WI-001
UNCONTROLLED WHEN PRINTED <i>It is the responsibility of the user to ensure they are working with the latest revision</i>		Printed: 22/07/2024

- Peer on peer abuse, including bullying, initiation / hazing. This can be direct / indirect and off-line / online
- Sexual violence or harassment.
- Radicalisation
- Child Trafficking and Modern Slavery
- Grooming
- Female Genital Mutilation

All staff responsible for the management of safeguarding have undertaken various specialist training and learning lessons workshops on the above and can provide support, together with contacts in specialist support agencies. These and other types of abuse can relate to either a child under the age 18 years or to an adult at risk of harm, abuse or neglect.

Physical Abuse

This is anything that causes physical harm, injury or illness. Physical harm may also be caused when a parent or carer fabricates the symptoms of, or deliberately induces illness in a child / young person.

Emotional/Psychological Abuse

This is the persistent emotional ill-treatment of a vulnerable person such as to cause severe and persistent effects on their emotional development.

Sexual Abuse

This involves forcing or enticing a child/young person or adult who is vulnerable to take part in sexual activities. The activities may involve physical contact or non-contact, such as involving children/young people/adults in looking at, or in the production of, pornographic materials or watching sexual activities, or encouraging them to behave in sexually inappropriate ways.

Neglect

This is the persistent failure to meet the child/young person/ adult (who is vulnerable) basic physical and/or psychological needs, likely to result in the serious impairment of the individual's health or development.

Self-Neglect/Harm

This is not a direct form of abuse, but staff need to be aware of it in the general context of risk assessment/risk management and to remember that they may owe a duty of care to a child/young person or adult at risk of harm, abuse or neglect, who places themselves at risk in this way. A refusal to engage with services does not override a duty of care to support individuals and they should continue to be encouraged to access support.

Domestic Abuse/Teenage Relationship Abuse

Abuse can be either in the form of being personally abused within a relationship or for a child or young person to witness this within their home, perhaps involving parents/carers.

Financial or Material Abuse

This includes theft, fraud, exploitation, pressure in connection with wills, property, enduring power of attorney, or inheritance or financial transactions, or the inappropriate use, misuse or misappropriation of property, possessions or benefits.

Page 14 of 18	Revision 4 (Sept 2024)	HR(DRDL)-WI-001
UNCONTROLLED WHEN PRINTED <i>It is the responsibility of the user to ensure they are working with the latest revision</i>		Printed: 22/07/2024

Discriminatory Abuse

This includes racist, sexist, or other forms of abuse that are based on a person's protected characteristics and other forms of harassment, or similar treatment. This can be viewed by a victim as hate crime and the Police can prosecute on this basis.

Sexting and Revenge Porn

New legislation came into force in April 2015 to prevent sexually explicit photographs or videos being shared or posted to cause harm or distress to the person subject of the material. The new law includes uploading to the internet, sending by text, email or messaging platforms, as well as simply showing someone a physical or electronic image.

Radicalisation

This is a process by which a person comes to support terrorism and/or forms of extremism leading to them committing acts of violence or the support of violence by others in a group. Young people and adults who may be vulnerable are often targeted by groups. They may be drawn into association with these groups through internet chat rooms, possibly motivated by a wish to belong or to make a stand or a difference. Read PREVENT (Radicalisation & Extremism) Policy.

Exploitation

Exploitation occurs where an individual or group takes advantage of an imbalance of power to coerce, manipulate or deceive another person into sexual, criminal or gang related activity in exchange for something the victim needs or wants and/or for the financial advantage or increased status of the perpetrator or facilitator. The victim may have been exploited even if the activity appears consensual. Child sexual exploitation does not always involve physical contact: it can also occur using technology.

Female Genital Mutilation (FGM)

This is an unacceptable and illegal (in the UK) form of abuse and violence towards girls and women involving female circumcision or mutilation of the female genital. There have been incidences of FGM in the South West including Devon and Cornwall.

Peer on Peer abuse / Sexual Violence and Harassment

Peer on peer abuse occurs when a young person is exploited, bullied and / or harmed by their peers who are the same or similar age. 'Peer-on-peer' abuse can relate to various forms of abuse (not just sexual abuse and exploitation), and crucially it does not capture the fact that the behaviour in question is harmful to the perpetrator as well as the victim. Research suggests that girls and young women are more at risk of abusive behaviours perpetrated by their peers; however, it can also affect boys and young men. Specific attention should be given to individuals with learning difficulties or disabilities, LGBTQ and those who are from different communities.

APPENDIX C – SIGNS AND INDICATORS OF POTENTIAL ABUSE

1. Overview Signs of abuse can be many and varied but can also be innocent indications of a transition to adult life. However, they should always be considered as potential causes for concern and followed up / monitored in a sensitive way, with appropriate records dated and kept securely. Welfare concerns may arise in many different contexts (Contextual Safeguarding) and can vary greatly in terms of their nature and seriousness. Abuse can occur in a family or in an institutional or community setting, by those known to victim or by a stranger, including, via the internet. Extra-familial harm takes a variety of different forms including (but not limited to) sexual exploitation, criminal exploitation and serious youth violence. In the case of female genital mutilation, children may be

Page 15 of 18	Revision 4 (Sept 2024)	HR(DRDL)-WI-001
UNCONTROLLED WHEN PRINTED <i>It is the responsibility of the user to ensure they are working with the latest revision</i>		Printed: 22/07/2024

taken out of the country to be abused. They may be abused by an adult or adults, or another child or children. An abused child will often experience more than one type of abuse, as well as other difficulties in their lives. Abuse and neglect can happen over a period of time but can also be a one-off event. Abuse and neglect can have major long-term impacts on all aspects of a victim's health, development and wellbeing. The DSL and DDSL are trained and experienced in exploring such issues in a confidential and supportive way and can assist colleagues in this or provide guidance and support. They can also seek external, specialist advice and/or make referrals to statutory agencies.

2. Possible indicators of abuse

- Behaviour changes, extreme behaviours both introvert as well as extrovert.
- Excessively withdrawn, fearful, or anxious about doing something wrong
- Don't want to change clothes in front of others or participate in physical activities.
- Regularly missing from education, poor attendance and poor punctuality.
- Concerned for younger siblings without explaining why.
- Shy away from being touched or flinch at sudden movements.
- Physical injuries, including bruises, particularly if reasons for these do not appear plausible or if injuries are repeated or self-harm is suspected
- Emotional distress, fear, unwillingness to go home
- Expressed fear of, or strong effort to avoid individuals without an obvious reason
- Sudden changes in behaviour, e.g. becoming very withdrawn or aggressive
- Significant loss/increase of weight or poor hygiene or appearance
- Hungry at work with no money to buy food or borrowing money to buy food
- Poorly dressed or equipped for work
- Sudden changes of living circumstances, e.g. moving out of home to live elsewhere
- Sudden acquisition of jewellery, gifts from older girl/boyfriends
- Alcohol abuse or substance misuse.
- Displaying knowledge or interest in sexual acts inappropriate to their age
- Asking others to behave sexually or play sexual games out of context
- Physical sexual health problems, including soreness in the genital and anal areas, sexually transmitted infections or underage pregnancy
- Expression of radicalised views to others – racism, extreme political views, animal rights, religious ideology etc.
- Expression of Interest in weapons, explosives etc.
- Talking about travelling abroad to conflict zones such as Syria
- Parents or carers who humiliate their child, for example, by name-calling or making negative comparisons or blaming their problems on their child.
- Parents who are dismissive and non-responsive to practitioners' concerns.

Further signs / indicators specific to children can be found at:

What to do if you're worried a child is being abused: Advice for practitioners (March 2015)

Appendix D – Intervention Framework

1. The following framework should be used when determining levels of responsibility for safeguarding intervention. The framework is adapted from the local authority threshold tool and continuum of needs model that can be found at: [The Devon Children and Families Partnership \(DCFP\)](#)

Page 16 of 18	Revision 4 (Sept 2024)	HR(DRDL)-WI-001
UNCONTROLLED WHEN PRINTED <i>It is the responsibility of the user to ensure they are working with the latest revision</i>		Printed: 22/07/2024

2. Levels of Vulnerability and Need

2.1.1. Level 1

2.1.2. Apprentices or adults with no additional needs, who make good overall progress in all areas of universal development and receive appropriate universal services.

2.1.3. Apprenticeship Development Manager (ADM) provides normal pastoral and welfare support, signposting to services as required and log with DSL and DDSL.

2.2. Level 2

2.2.1. Additional needs of the apprentice or adult are being met or could be met through universal services. There is no risk of maltreatment and a low risk of harm.

2.2.2. Apprenticeship Development Manager (ADM) to facilitate pastoral and welfare support through support plan in consultation with, and assistance from, DSL or DDSL. ADM to support / assist a referral to external service in consultation with parents / guardians.

2.3. Level 3

2.3.1. Apprentices or adults experiencing a situation or circumstance where there is a perceived risk of maltreatment or harm to themselves.

2.3.2. Any member of staff who has concerns about the treatment or risk of harm to an apprentice must complete a 'Safeguarding Concern / Disclosure' form and refer to the Designated or Deputy Designated Safeguarding Lead (DSL/DDSL). The DSL / DDSL will assess the concern / disclosure to determine if this is a level 4 concern / disclosure or level 3.

2.4. Level 4

2.4.1. Apprentices or adults experiencing maltreatment or significant harm, or where there is a high likelihood of significant harm where protection or prevention measures are needed immediately.

2.4.2. Any member of staff who has concerns about the maltreatment, abuse or significant risk of harm to an apprentice must complete a 'Safeguarding Concern / Disclosure' form immediately and refer to the Designated or Deputy Designated Safeguarding Lead. The Designated Safeguarding Lead or Deputy will assess the concern / disclosure and then administer the referral in accordance with local authority processes.

2.4.3. The DSL / DDSL will create a Safeguarding Log with concern, chronology and outcomes.

Procedure for reporting a Safeguarding concern:

If you are made directly aware of a safeguarding concern:

- listen carefully and stay calm;
- do not interview the individual, but question normally and without pressure, in order to be sure that you understand what they are telling you;
- do not put words into the individual's mouth;
- reassure the individual that by telling you, they have done the right thing;
- inform the individual that you must pass the information on, but that only those that need to know about it will be told. Inform them of to whom you will report the matter;
- note the main points carefully;
- make a detailed note of the date, time, place, what the individual said, did and your questions etc;

Page 17 of 18	Revision 4 (Sept 2024)	HR(DRDL)-WI-001
UNCONTROLLED WHEN PRINTED <i>It is the responsibility of the user to ensure they are working with the latest revision</i>		Printed: 22/07/2024

- pass, by hand, or other secure method of delivery (not e-mail) such detailed notes into the care and control of the Designated Staff Members. The Designated Staff Members shall store the notes in a secure and central location and will use them to assist in the identification of possible patterns of concerns; and
- in the event of the risk of significant or immediate harm to the individual staff should contact the Police or the appropriate Local Authority service. Staff should not investigate concerns or allegations themselves, but should report them immediately to the Designated Staff Members.