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Policy owner	Kirstie Grace
Signature	
Position	Apprentice Liaison Officer & DSL

Safeguarding Policy

Policy Statement

This policy has been updated in line with Keeping Children Safe in Education, September 2026. It reflects the changes to the guidance regarding online harms, including misinformation and disinformation, filtering and monitoring expectations, use of emerging technologies, (including AI tools) oversight of alternative provision and links to Working Together to improve attendance.

Rebus Training Ltd believes that children and young people should never experience abuse, neglect and exploitation of any kind and we have a responsibility to promote the welfare of all children and young people, to keep them safe and to practise in a way that protects them. Rebus Training, as a training provider for funded apprenticeships, recognises and accepts its legal duty under PREVENT legislation. We are committed to promoting the welfare of children and vulnerable adults as defined in:

- The Children's Act 2004
- Keeping Children Safe in Education, September 2026
- Working Together to Safeguard Children, December 2023
- Prevent Duty Guidance in England and Wales, 2023 (updated 6th March 2024)

We will ensure that this commitment to safeguarding applies to all areas of our operation, including our role as an employer, a deliverer of work-based learning (including sub-contracted provision) and an influencer of our employer base and collaborative partnerships.

The Designated Safeguarding Lead **Kirstie Grace** will have overall responsibility for ensuring the organisation meets its obligations within this area. The governance board will be responsible for the approval of the safeguarding policy.

Principles

Rebus Training LTD believes that children and vulnerable adults, given the right support, training and encouragement, can realise their true potential and make a valuable contribution to the community. All children and vulnerable persons, regardless of their protected characteristics, have the right to their protection from all types of abuse, neglect or exploitation.

Rebus Training's Safeguarding policy is based on the following principles:

- An ethos that promotes a positive, supportive and secure environment where learners feel valued as well as equipping them with the skills necessary to keep them safe.
- A culture of respect and tolerance between apprentices, as well as between staff and apprentices.
- Liaising with other agencies that can support learners, such as the local authority and any other external persons.
- All allegations and suspicions of abuse are to be taken seriously and responded to swiftly and appropriately.
- All concerns or suspicions of extremist views or radicalisation are to be taken seriously and responded to swiftly and appropriately.
- Recognising that safeguarding risks extend beyond the workplace or training

environment, including in online and extrafamilial harms.

- Embedding a culture of reflection and transparency where all low-level concerns about staff conduct are recorded and reviewed in line with KCSIE 2026 expectations.

There are 5 main elements to the policy, which are highlighted below:

- Ensuring that Rebus Training practises safe recruitment in checking the suitability of staff, both employed and self-employed, to work with young people and checking their suitability through routine monitoring.
- Raising awareness of safeguarding issues raised amongst staff.
- Implementing procedures for identifying and reporting cases or suspected cases of child abuse or signs of radicalisation.
- Supporting the young person/vulnerable adult who has been abused or is at risk of radicalisation through referral to the appropriate specialist agencies.
- Establishing a safe environment in which young people can learn and develop, where they are able to talk and be listened to.

Definitions

The following definitions apply throughout the policy and any associated procedures:

Child or Children

The Children's Act 1989/2004 defines a child as those under 18 years of age.

Vulnerable Adult/s

The Protection of Vulnerable Adults Scheme, 2004 defines a vulnerable adult as a person aged 18 or over who has a condition as detailed below:

- A substantial learning or physical disability
- A physical or mental illness or mental disorder, chronic or otherwise, including addiction to alcohol or drugs.
- A significant reduction in physical or mental capacity

Rebus Training LTD also recognises that an adult may not have any of the above but other susceptibilities to radicalisation.

Safeguarding

The action that is taken to promote the welfare of children and protect them from harm and maltreatment, whether this is within or outside of the home, including online. The updated Keeping Children Safe in Education, 2026 has also placed an emphasis on early help, so includes, "Providing help and support to meet the needs of children as soon as problems emerge."

Phishing

Phishing is the fraudulent practice of sending emails purporting to be from reputable companies in order to induce individuals to reveal personal information, such as passwords and credit card numbers.

Cyberbullying

Cyberbullying is the use of technology to harass, threaten, embarrass or target another person. Online threats and mean, aggressive, or rude texts, tweets, posts or messages all count.

Making or Sharing Nudes and Semi-Nudes

Making or sharing nudes and semi-nudes refers to the creation, sending or posting of nude or semi-nude images by young people under 18. This includes photographs, videos and livestreams and may include images taken by the child, taken by another person, digitally altered or wholly generated using artificial intelligence. All incidents involving such imagery require a safeguarding response, whether the sharing was consensual or non-consensual.

- Being partly or completely naked, or in your underwear.
- Posing in a sexual position
- Sending nudes
- Talking about sexual things you're doing or want to do
- Doing sexual things on a live stream

Artificial Intelligence

The application of computer systems able to perform tasks or produce output normally requiring human intelligence.

Misinformation

Misinformation is fake news that is created and spread by a mistake - by someone who doesn't realise that it's false.

Disinformation

This is fake news that is created and spread deliberately. The purpose is to often persuade people to think a certain way.

Conspiracy theories

A belief that an event or situation is the result of a secret plan made by powerful people.

Forms of Child Abuse, to include Bullying

Physical Abuse

Physical abuse may take many forms e.g. hitting, shaking, throwing, poisoning, burning or scalding, drowning or suffocating. It may also be caused when a parent or carer feigns the symptoms of, or deliberately causes, ill health to a child or vulnerable adult. This unusual and potentially dangerous form of abuse is now described as fabricated or induced illness.

Emotional Abuse

Emotional abuse is persistent emotional ill treatment causing severe and persistent effects on the child or vulnerable adult's emotional development and may involve:

- Conveying the message that they are worthless or unloved, inadequate, or valued only in so far as they meet the needs of another person
- Imposing developmentally inappropriate expectations
- Causing the child or vulnerable adult to feel frightened or in danger – e.g. witnessing domestic violence;
- Exploitation or corruption of children or vulnerable adults.

Sexual Abuse

Sexual abuse involves forcing or enticing a child or vulnerable adult to take part in sexual activities, whether or not they are aware of what is happening and includes penetrative and non-penetrative acts.

It may also include non-contact activities, such as looking at, or being involved in the production of pornographic materials, watching sexual activities or encouraging children or vulnerable adults to behave in sexually inappropriate ways.

Neglect

Neglect involves the persistent failure to meet basic physical and/or psychological needs, likely to result in serious impairment of the child or vulnerable adult's health and development. This may involve failure to provide adequate food, shelter, clothing or failure to protect from physical harm or danger, or failure to ensure access to appropriate medical care or treatment. It may also include neglect of basic emotional needs.

Bullying

Bullying involves deliberate hostility and aggression towards a person, physical pushing, kicking, hitting, pinching, verbal name calling, sarcasm, spreading rumours, teasing, ridicule, humiliation and ignoring individuals, racial taunts, graffiti and gestures, sexual and abusive comments and unwanted physical contact. Rebus Training should identify and deter any form of bullying behaviour. Bullying can escalate rapidly and can damage children or vulnerable adults significantly.

Peer on Peer abuse

Children/young people can abuse other children/young people (often referred to as peer on peer abuse).

This can happen both inside and outside of school or college and online. It is important that all staff recognise the indicators and signs of peer-on-peer abuse and know how to identify it and respond to reports. Signs could include:

- Absence from school or college
- Physical injuries which can't be explained
- Becoming withdrawn or a lack of self esteem
- Sudden changes in behaviour

Types of Peer-on-Peer Abuse can include:

- Sexual Harassment
- Sexual Violence
- Harmful sexual behaviour
- Upskirting
- sharing nude or semi-nude images
- Physical abuse
- Emotional abuse
- Coercive or controlling behaviour in relationships

We remain vigilant to any peer-on-peer abuse and in the event, this occurs, measures will be put into place which may include separating those involved and ongoing monitoring. Rebus Training will never dismiss peer-on-peer abuse as “banter” “part of growing up” or just a “relationship drama.”

Child Sexual Exploitation

Child sexual exploitation is illegal activity by people who have power over children and young people and use it to sexually abuse them. This can involve a broad range of exploitative activity, from seemingly “consensual” relationships and informal exchanges of sex for attention, accommodation, gifts or cigarettes, through to very serious, organised crime. Children and young people at risk of sexual exploitation are some of the most vulnerable in our society. Many have experienced abandonment or have suffered from physical and mental abuse.

Child Criminal Exploitation

Children being forced or manipulated into transporting drugs or money through county lines, working in cannabis factories, shoplifting or pickpocketing. They can also be forced into committing vehicle crime or threatening/committing serious violence to others.

Risk to self and /or others

This may include but is not exclusive to self-harm, suicidal tendencies or potential risk of harming others, which may or may not include children. This may be as a consequence of an individual experiencing a significant level of personal, emotional trauma and or stress.

Financial or Material Abuse

Including theft, fraud, exploitation, pressure in connection with wills, property or inheritance or financial transactions or the misuse of misappropriation of property, possessions or benefits.

Discriminatory Abuse

Discriminatory or prejudice-based harm can include racism, faith-targeted abuse and other forms of discrimination or prejudice. Such behaviour can affect a learner's welfare, wellbeing, mental health and willingness to seek help and may therefore constitute a safeguarding concern. Rebus Training Ltd does not tolerate discrimination on any grounds. The protected characteristics include:

- Sex
- Age
- Gender Reassignment
- Sexual orientation
- Maternity and Pregnancy
- Marriage and Civil Partnerships
- Disability
- Race
- Religion or belief

Forced Marriages

These are marriage relationships conducted without the valid consent of both parties, where duress is a factor. If there are concerns that a student is in danger of a forced marriage, the Designated Safeguarding Lead or nominee will follow government guidelines and contact will be made with the "Forced Marriage Unit". Arranged marriage is an entirely separate issue and must not be confused with forced marriage.

Female Genital Mutilation (FGM)

FGM is a form of abuse which has devastating physical and psychological consequences for girls and women. Since 1985, it has been a serious criminal offence under the Prohibition of Female Circumcision Act to perform FGM or to assist a girl to perform FGM on herself. The FGM Act 2003 tightened this law to criminalise FGM being carried out on UK citizens overseas and anyone found guilty of the offence, faces a maximum penalty of 14 years in prison.

Protecting Our Apprentices

To make sure our apprentices are safe when in the centre, at work, and in their own time, we have implemented a range of measures designed to educate, recognise, report and support, which include:

- A robust recruitment policy with a clear process to ensure only suitable staff are employed to work with children. Enhanced DBS checks are carried out, and subsequent update service checks each year following to ensure this suitability remains. A limited number of staff not involved in regulated activity receive a basic DBS every 3 years and self-declare each year between DBS checks.
- Named DSL and deputies for the centre. These are:
 1. DSL, Kirstie Grace
 2. Safeguarding Deputy, Jon Grocock

Both named persons above have completed level 4 higher safeguard training, which is refreshed every 2 years. All other staff complete their renewals every 2 years (Internal training by DSL).

- Staff know how to raise a concern if they have a suspicion and the process for reporting a concern is displayed on various noticeboards around the centre. Staff

understanding of the process is reviewed regularly with updates communicated through emails and staff development days.

- Staff know how to listen and record a disclosure from an apprentice while ensuring the anonymity of the individual other than to those people that need to know.
- Staff understand the actions they should take if they feel the concern has not been sufficiently acted upon and know that they are able to report their concern externally.

Promoting a culture of respect and tolerance

- Through the induction and onboarding, centre rules and expectations are explained to the apprentices. This addresses expected behaviour including use of inappropriate language along with what is considered unacceptable use of ICT facilities. Staff are also vigilant to the nature of conversations taking place within the centre, particularly at break times.

- Educate apprentices in what is acceptable behaviour and what the consequences of their action can lead to. Wider element sessions are carried out regularly with each apprentice group throughout their programme which cover a variety of topic areas, to include, but not limited to, safeguarding, mental health awareness, online safety and gambling. These talks take place either through external speakers, DSL delivered sessions or tutor led discussions. For apprentices who do not attend the centre, 3 monthly progress reviews take place with apprenticeship liaison officers and educate in key topics.

- Apprentices are taught that what they say or the actions they do, even if it is not intended to be harmful, can be seen differently by the victim and can cause serious harm.

- The Fundamental British Values are the same values that underpin the principles of Rebus Training. The wider elements programme is delivered throughout apprentices' academic year and is designed to engage and educate apprentices in situations that can affect their lives. British Values are promoted throughout the centre with posters in the classrooms and throughout display boards, linking Rebus values to British Values.

- Making sure apprentices and employers know who to contact at Rebus Training with any concerns as well as educating employers on safeguarding.

- At onboarding, employers are made aware where our policies and procedures are on our website and asked to review these and sign to confirm.

Rebus Training recognises that as a provider of learning, we play a significant part in:

- Prevention of harm to our learners by providing them with good lines of communication with trusted adults and an ethos of protection, both learning and at work.

- Establish and maintain an environment where children/vulnerable adults feel secure, are encouraged to talk and are always listened to.

- Ensure learners know who to speak to in learning and at work if they are worried or experiencing difficulties.

- Apprentices are advised when they start on a programme, that they can speak to any member of staff who they are most comfortable talking to if they have any concerns or need any support or advice. The contact details for the DSL and deputy are posted in the reception and canteen area in the centre. To check apprentice awareness, apprentices are asked in questionnaires if they know who they can speak to at Rebus Training.

- The safeguarding policy is clearly communicated to learners and employers at induction and throughout the learning programme. They are issued with safeguarding guidance (AO1 002), and they are asked to sign to confirm that they have read and understood the information. This document contains various contact information for Rebus Training as well as other specialist organisations where advice can be sought or concerns raised.

- We will ensure that all concerns are reported to external organisations including local authority Channel and Panel where needed.

All staff should be aware that safeguarding incidents and/or behaviours can be associated with factors outside the school or college/can occur between children outside of these environments including online. All staff, but especially the designated safeguarding lead and any deputies should consider whether children are at risk of abuse or exploitation in situations outside of the training centre. Extrafamilial harms take a variety of different forms and children can be vulnerable to multiple harms including, but not limited to, sexual exploitation, criminal exploitation, and serious youth violence.

Mental Health

At Rebus Training, we have a designated mental health and wellbeing officer, Rhiannon Gibson-Munro, who is readily available to discuss any concerns an apprentice may be experiencing. Staff are reminded that concerns about mental health should always be considered alongside possible safeguarding concerns, and referrals where appropriate.

Staff are trained to identify potential warning signs that an apprentice may be struggling with their mental health, which can include significant changes in behaviour, ongoing difficulty sleeping, withdrawing from social situations, no longer wanting to do things they usually like, and physical signs of self-harm or neglect.

Family Help and Support Before Statutory Intervention

Rebus Training recognises that children may benefit from support before statutory intervention. Staff should be alert to emerging needs and report concerns to the DSL or deputy. The DSL will consider whether the learner can be supported through internal services, community-based early help, targeted Family Help, or whether referral to local authority children's social care is required. Where Family Help or other early support is provided, the learner's circumstances will be kept under review. If concerns increase, the situation does not improve, or there is reasonable cause to suspect that a child is suffering or is likely to suffer significant harm, a referral to local authority children's social care will be made without delay. Staff must not assume that another professional will take action where safeguarding information needs to be shared.

Serious Violence and Weapons

Any concern that a child is carrying, using or threatening to use a weapon, is involved in serious violence, or is expressing an intention to cause serious harm must be reported immediately to the DSL or deputy. The DSL will assess the risk to the individual and others and will consider appropriate safeguarding, safety and support measures, including referral to children's social care and/or the police where required.

Apprentice Absence

A register is completed at the start of each class and at each session throughout the day. Any apprentice, regardless of age, who is absent at the start of each session (and has not given a reason for their absence) will be contacted by the admin team. Whereby the apprentice is aged 18 or over, they will be contacted in the first instance, followed by their employer if no contact is made. Where the apprentice is under 18, the admin team will continue to try and contact the absent apprentice, approximately every 15 minutes, followed by the employer. If they have not been able to make contact, then the apprentice's emergency contact is called, and this process will be repeated until contact is made. If no contact has been successful with apprentice, employer nor the emergency contact, then at 4pm, Rebus Training will contact the police to inform them of a potential vulnerability.

Rebus Training recognises that persistent absence can be a potential indicator of abuse, neglect or exploitation. All unexplained or repeated absences will therefore be reviewed by DSL Kirstie Grace or deputy Jon Grocock, to determine whether additional safeguard action is required.

Online safety

In recent years, with the advancement in technology, online activity has become an increasing threat to the safeguarding of children and vulnerable adults. Rebus Training is committed to ensuring the safety of the apprentices when they are engaging in online activity including, but not limited to, online gaming, accessing the internet, email and online purchasing.

With the increase in social media platforms children and vulnerable adults are at risk from other dangers such as cyberbullying and grooming. Children and vulnerable adults may expose themselves to danger, whether knowingly or unknowingly, when using the internet and other technologies. They may also be exposed to misinformation, disinformation and conspiracy theories which are now explicitly recognised in KCSIE 2026 as safeguarding harms. Additionally, some children and vulnerable adults may find themselves in activities which are inappropriate or possibly illegal.

Apprentices are educated on the various dangers through the wider element's delivery programme. Dangers of online, include:

- Hackers
- Phishing
- Identity theft
- Scamming
- Viruses
- Illegal activity such as making or sharing nudes and semi-nudes
- Grooming
- Radicalisation.

Safeguarding and IT Security: Managed Device Provision

Compliance with safeguarding frameworks and the Prevent Duty (Counter-Terrorism and Security Act 2015) is a statutory requirement. To support apprentices in safely conducting research and completing assignments, we utilise enterprise-enrolled Chromebooks managed centrally by our IT partner, Edge IT.

Apprentices operate on secure, isolated connections and are strictly prohibited from accessing our core internal computer networks. Edge IT enforces robust filtering and monitoring protocols across all learner devices to satisfy our legal obligations and ensure a safe digital environment.

Meeting the Prevent Duty (Risk Mitigation)

The Prevent Duty mandates that training providers take proactive steps to prevent individuals from being drawn into terrorism. Our managed device infrastructure addresses this through:

- **Enforced Web Filtering:** Edge IT maintains stringent, mandatory filtering that blocks access to adult content, known extremist sites, and radicalisation-related keywords. Safe Search is permanently enforced at the system level and cannot be disabled by the apprentice.
- **Extension and Bypass Control:** System settings prevent apprentices from installing VPNs, proxies, or "unblocker" extensions, ensuring that security filters cannot be bypassed to access restricted material.

Safeguarding and KCSIE Compliance

In strict alignment with the Department for Education's Keeping Children Safe in Education (KCSIE) guidance regarding "appropriate filtering and monitoring," we implement the following preventative measures:

- **Identity-Linked Monitoring:** Chromebook usage requires a specific user login linked to the central account, meaning web activity is traceable to the individual apprentice. If inappropriate or harmful content is suspected, safeguarding staff can identify the user and initiate a targeted welfare intervention.

Restricted Media Access: Device management automatically forces platforms like YouTube into "Restricted Mode." This utilises algorithmic filtering to hide mature or inappropriate content that could pose a safeguarding risk.

Filtering and Monitoring Oversight and Review

Rebus Training ensures that a review of the effectiveness of our filtering and monitoring systems is carried out at least once every academic year. This review is directly carried out by the Senior Leadership Team (SLT) member **G Jackson** responsible for filtering and monitoring, with the support of the Designated Safeguarding Lead (DSL) and our IT partner, Edge IT. The review process incorporates active checks to verify that filtering is working appropriately on internet-connected devices (Chromebooks). A formal record of these checks is kept to evidence compliance and ensure ongoing system effectiveness.

Use of Artificial Intelligence and Emerging Technologies

Any digital or AI driven tools adopted by Rebus Training will be assessed for safeguarding and data protection implications prior to use. Any such tools must comply with our filtering and monitoring systems and not expose apprentices to inappropriate or harmful content.

Apprentices are required to use Rebus laptops (Chromebooks) for research and assignment work. All session activity is monitored by tutors who are vigilant to the online risks. Laptops are assigned to learners to facilitate this monitoring process. The internet server for the centre incorporates a firewall that prevents malware and viruses from installing onto the ICT equipment. Apprentice laptops can only access the internet via this server. When apprentices receive the centre induction, they are instructed regarding acceptable use of the ICT facilities. To acknowledge that they understand the guidance given, they are required to sign an "Apprentice Laptop and Internet Use" agreement.

Promoting the Policy

The Safeguarding policy is published on the company website and as such promoted to interested parties including apprentices, parents, employers and staff. The safeguarding policy is included within the centre induction and also completed with all apprentices on their onboarding. New staff undergo an induction period which includes support and guidance on policies and procedures. All staff are required to complete a safeguarding quiz to confirm their understanding. Updates to the policy are communicated to centre staff through emails, website and staff development days. Any updates to policies, are communicated to staff via email and staff will need to confirm via email that they have understood. Tutors, assessors and apprenticeship liaison officers are regularly involved in delivering subjects through the wider element programme, covering topics such as British Values, online safety and mental health awareness.

Apprentices' understanding is monitored through progress reviews and questionnaires. It is imperative therefore that all staff remain committed to Rebus Training safeguarding policy. All staff are required to read "Keeping Children Safe in Education, Part 1,"

updated in September 2026 and are required to confirm via email stating they have read and understood the document. All staff members are expected to be aware of their duty to report concerns, the guidance for identifying child abuse, what to do if a child makes an allegation of child abuse, the indicators to look out for somebody at risk of extremism and issues around confidentiality.

Safe Recruitment policy and procedure

Rebus Training is committed to promoting and safeguarding the welfare of children, young people and vulnerable adults and as such, expects all staff to share this commitment. Rebus Training recognises that the effectiveness and safety of its recruitment policy and procedures play a major contribution to child protection by helping to deter, reject or identify those people who may be unsuitable for working with children. (See Safer Recruitment Policy, SRP 001) For any new staff starting at the centre, a safer recruitment checklist, SG1 003, is completed and this risk assessment remains in force until all criteria is met, such as references, DBS check, CV on file etc.

Volunteers: Rebus Training does not currently use the services of volunteers. Should this change in the future, robust safer recruitment checks including Enhanced DBS checks with Children's Barred List information for any volunteer engaging in regulated activity will be implemented in accordance with the latest Keeping Children Safe in Education (KCSIE) guidance.

Staff Training

Designated Safeguarding Lead and Deputy

The DSL and deputy have completed Level 4 Higher safeguard training as well as, Designated safeguarding lead training.

Any staff promoted to this role, will undertake within 3 months, the training above or equivalent at any such time.

Other staff

Initial training and guidance is carried out at induction with Designated Safeguarding Lead, Kirstie Grace. This includes, where to access the policy, procedures and recording forms, identifying key members of staff. Training on Safeguarding Children and protecting them from abuse as well as PREVENT online training is completed within the first 4 weeks of starting at the company.

In addition to formal safeguarding training, all staff will receive safeguarding and child protection updates, including online safety and filtering/monitoring responsibilities, as required and at least annually. Updates may be delivered through staff development days, briefings, emails, e-bulletins or other appropriate CPD. Training will take account of advice from local safeguarding partners and will include:

- Centre policies and procedures, and local and national government updates.
- Keeping Children Safe in Education
- Case studies and scenarios

There are also updates from external organisations such as Solvendis and newsletters from the DfE. These updates are shared with centre staff where appropriate.

Visitors to the Centre

Visitors to the centre can include, but not limited to, commercial course delegates, representatives from other organisations, guest speakers, prospective employers, apprentice applicants and parents/carers. Commercial course delegates sign in at reception each day they are in attendance before they are escorted to the classroom. A tutor is present while in the classroom and classrooms are locked when not in use. The canteen area is also protected by CCTV and monitored by reception staff and tutors. Guest speakers are also supervised while in centre and are asked to read through the centre induction and sign this to confirm they have understood.

Duty to Report

All members of staff at Rebus Training, including full time, part-time and self-employed are responsible for safeguarding and promoting the welfare of children and vulnerable adults. All staff that come into contact with children and vulnerable adults in their everyday work have a duty to safeguard and promote the welfare of children and vulnerable adults. Failure to comply with these responsibilities will be seen as a serious matter which may lead to disciplinary action.

Staff are expected to:

- Attend safeguarding training as required;
- Familiarise themselves with, and adhere to, the Safeguarding Policy and associated procedures;
- Safeguard and promote the welfare of children and vulnerable adults;
- Alert the Designated Safeguarding Lead if they have concerns about a child or vulnerable adult.

Reporting concerns – Safeguarding

The DSL and deputy are responsible for all investigations and the monitoring of concerns through to their conclusion within Rebus Training. The DSL and deputy are responsible for reporting concerns to external organisations such as the local authority and counter terrorism PREVENT teams as appropriate.

To report a safeguarding concern, follow the safeguarding process **SG2 001**. To report any concern, use the Learner Concern Form **SG2 002** and send it to the DSL for follow up.

Important Contacts:

Rebus Training

Designated Safeguarding Lead -

Kirstie Grace - 01782 976555 - 07591 201968 - kirstie@rebustraining.co.uk **Safeguarding**

Deputy -

Jon Grocock - 01782 976555 - jon@rebustraining.co.uk

External Contacts:

Local Authority Designated Officer - LADO

The LADO must be consulted when there are concerns that a person in a position of trust has:

- Behaved in a way that has harmed a child or may have harmed a child.
- Possibly committed a criminal offence against or related to a child.
- Behaved towards a child or children in a way that indicates they may pose a risk of harm to children.

Stoke On Trent LADO

- Talitha Thompson - 01782 235034
- Talitha.Thompson@stoke.gov.uk or LADO.sp@stoke.gov.uk

For contact details for other authorities follow the link to the National LADO directory: <https://national-lado-network.co.uk/>

Staffordshire Safeguarding Children Board

Staffordshire Families Integrated Front Door (SFIFD).

Phone: 0300 111 8033

Monday – Thursday 8:30am – 5:00pm Friday 8:30am – 4:30pm

Emergency Duty Service: (Out of Hours)

Telephone: 0345 604 2886 Mobile: 07815 492613

Stoke-on-Trent Safeguarding Referral Team:

Stoke-on-Trent Children's Advice and Duty Service (CHAD) / Integrated Front Door

Phone 01782 235100

Monday – Thursday 8:30am – 5:00pm Friday 8:30am – 4:30pm

Emergency Duty Team (Out of hours)

Telephone: 01782 234234

Cheshire West and Chester Safeguarding Children Partnership

Website: <https://cheshirewestscp.uk/>

Integrated Access and Referral Team (i-ART)

Office hours: 0300 123 7047

Monday – Thursday 8:30am – 5:00pm, Friday 8:30am – 4:30pm

Emergency Duty Team (EDT)

Out of hours: 01244 977 277

Cheshire East Safeguarding Children's Partnership (CESCP)

Website: <https://cescp.co.uk/>

Cheshire East Consultation Service (ChECS) / Together for Families

Office hours: 0300 123 5012

Monday – Thursday 8:30am – 5:00pm, Friday 8:30am – 4:30pm

Emergency Duty Team (Out of hours)

Telephone: 0300 123 5022

Stoke-on-Trent Counter Terrorism / Community Cohesion

Shahzad Tahir, Community Cohesion Manager

Phone: 01782 238771

Email: Shahzad.Tahir@stoke.gov.uk

Iftikhar Ahmed, Community Cohesion Officer

Phone: 01782 235778 / 07826891844

Email: iftikhar.ahmed@stoke.gov.uk

General email: prevent@staffordshire.pnn.police.uk

Cheshire Constabulary Prevent Team (Counter Terrorism Safeguarding)

Telephone: 01606 362121

Email: prevent@cheshire.pnn.police.uk

Counter Terrorism Security Adviser Email: ctsa@cheshire.pnn.police.uk

National Anti-Terrorist Hotline Phone: 0800 789 321

In an emergency, always call 999.

Department for Education

Prevent Regional HE/FE Co-ordinator - West

Midlands: Alamgir Sheriyar

alamgir.sheriyar@education.gov.uk

Information Sharing & Confidentiality

Rebus Training staff should never give absolute guarantees of confidentiality to children or vulnerable adults wishing to disclose something serious. Information will be shared only with those who need it for safeguarding purposes and in accordance with applicable data protection law. Data protection legislation does not prevent necessary and proportionate information sharing for the purpose of keeping children safe. Concerns about confidentiality or data protection must not delay action needed to safeguard a child.

Record Keeping

Any member of staff receiving a disclosure of abuse from a child/vulnerable adult, or noticing signs or symptoms of possible abuse, should make an accurate written record as soon as possible, using the learner's own words where appropriate. Records must include a clear and comprehensive summary of the concern, how it was followed up, actions taken, decisions reached, the rationale for those decisions and the outcome. This includes the rationale where a referral is considered but not made. Safeguarding records will be kept confidentially and securely.

Managing a Disclosure

All staff working in direct contact with learners must be alert to the signs of abuse. Anyone who suspects that abuse is taking place inside or outside of the setting including online, or to whom a learner discloses issues relating to safeguarding, should contact the Designated Safeguarding Lead immediately. Staff who are approached with concerns about a child or vulnerable adult, must bring the concerns raised to the attention of the Designated Safeguarding Lead immediately. The Designated Safeguarding Lead will develop effective links with relevant agencies and co-operate as required with any enquiries regarding child or vulnerable adult protection matters, including attendance at case conferences.

Allegations against staff

Any safeguarding concern or allegation about a member of staff, self-employed staff member, contractor or other person working on behalf of Rebus Training will be taken seriously, no matter how small. Where a concern indicates that a person may have harmed a child, may have

committed a criminal offence against or related to a child, may pose a risk of harm to children, or may otherwise meet the harm threshold, it must be reported without delay to the Managing Director or other designated senior Case Manager. The Case Manager will consider the circumstances and consult the Local Authority Designated Officer (LADO) where appropriate. Where the concern relates to the person who would normally act as Case Manager, or there is a conflict of interest, the concern must be reported to another appropriate senior manager and/or directly to the LADO. The DSL may support safeguarding arrangements for the child but should not automatically lead the staff allegation investigation.

Concerns that do not meet the harm threshold will be managed under the Low-Level Concerns section of this policy. If there is uncertainty about whether the threshold is met, LADO advice will be sought.

Rebus Training acknowledges its legal duty under the Safeguarding Vulnerable Groups Act 2006 to refer information to the Disclosure and Barring Service. We will make a referral if the two conditions are met:

Condition 1

The individual has been removed from regulated activity through:

- Dismissal or termination of contract
- Resignation (including where they resign before a disciplinary process is complete)
- Redundancy or retirement while an investigation is pending
- Permanent transfer to a non-regulated role

Condition 2

The reason for the removal of the above is because the individual has:

- Engaged in any action that has harmed a child or vulnerable adult or put them at risk of harm (physical, sexual, emotional abuse, or neglect)
- There is reasonable belief that the individual may harm a child or vulnerable adult in the future.
- They have been charged with or convicted of a serious automatic barring offence (serious crimes such as sexual assault, possession of indecent images of children, wilful neglect of a vulnerable person)

The Internal Reporting Process

Where a safeguarding allegation against a member of staff may meet the harm threshold, evidence gathering and any internal investigation will be directed by the appointed Case Manager and informed by LADO and/or police advice. Rebus Training will not undertake investigative action that could compromise a statutory safeguarding or criminal investigation. Relevant records, risk assessments and employment information will be retained securely, and any required DBS referral will be made when the statutory conditions are met.

Where there is a complaint against a member of staff there may also be criminal (police) investigations and/or a child/vulnerable adults protection investigation, carried out by Social Services.

Low Level Concerns

In accordance with KCSIE 2026, Rebus Training maintains a system for recording low level concerns - that is, concerns about staff behaviour that do not meet the threshold for formal referral but may indicate patterns of behaviour that require monitoring. All low-level concerns must be reported to DSL, Kirstie Grace. DSL will maintain a confidential log and review it regularly with the deputy/governance board, whilst encouraging early, open reporting without any fear of reprisal.

Whistleblowing

Rebus Training recognises that children and vulnerable adults cannot be expected to raise concerns in an environment where staff fail to do so. All staff should be aware of their duty to raise

concerns, where they exist, about the attitude or actions of colleagues. If a member of staff believes that a Safeguarding concern has not been actioned appropriately, they are expected to report it themselves to an external agency. *See reporting concerns.*

Disclosure and Barring Service (DBS) Referrals

Rebus Training will comply with its statutory duty to refer relevant safeguarding information to the Disclosure and Barring Service (DBS) where the legal referral conditions are met. This duty applies to all staff and is not avoided where an individual resigns or otherwise ceases regulated activity before an internal process is concluded.

Supporting Staff

Rebus Training are aware that safeguarding cases can be distressing and that staff who have been involved may find it helpful to talk about their experiences, in confidence, with our Designated Safeguarding Lead. Those staff requiring additional support have access to a free, confidential counselling service. It may also be noted that Rebus Training has a designated mental health champion, Rhiannon Gibson Munro, who can also be approached when you feel a need to talk in confidence.

Resignations

If, during the course of an investigation relating to safeguarding, an employee tenders his or her resignation, or ceases to provide their services, Rebus Training is not prevented from following up an allegation in accordance with these procedures. Every effort will be made to reach a conclusion in cases relating to the welfare of children or vulnerable adults, including those where the person concerned refuses to cooperate with the process.

Monitoring and Review

Rebus Training will undertake an annual review of this Safeguarding policy and associated procedures, to reflect new or amended legislation and guidance. This will include, but not limited to:

- Keeping Children Safe in Education 2026
- Working Together to Safeguard Children 2023
- Working Together to improve attendance 2024
- Prevent Duty Guidance, 2024

Staff will be informed of updates through staff briefings, email notifications and CPD sessions. Confirmation of understanding will be recorded.