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| <b>Policy owner</b>          | Kirstie Grace                            |
| <b>Signature</b>             |                                          |
| <b>Position</b>              | Apprentice Liaison Officer & DSL         |

## **Safeguarding Policy**

### **Policy Statement**

This policy has been updated in line with Keeping Children Safe in Education, September 2025. 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 2025
- 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 extra familial harms.
- Embedding a culture of reflection and transparency where all low level concerns about staff conduct are recorded and reviewed in line with KCSIE 2025 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, 2025 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.

## **Sexting**

Sexting is when you send a sexual message, photo or video to someone else. This could be a picture of you, but sometimes people send pictures and videos of other people. These messages could be to a friend, boyfriend, girlfriend, or those online. Sexting includes:

- 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/ 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 can abuse other children (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

### **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 or misappropriation of property, possessions or benefits.

### **Discriminatory Abuse**

Is an action that denies social participation or human rights to categories of people based on prejudice. Rebus Training Ltd does not tolerate discrimination on any grounds. There are 9 protected characteristics, which include:

- 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. DBS checks are carried out and subsequently each year following to ensure this suitability still.
- Named DSL and deputies for the centre. These are:
  1. DSL, Kirstie Grace
  2. Safeguarding Deputy, Jon Grocock

All named persons above have completed level 4 higher safeguard training, which is refreshed every 2 years. All other staff complete their renewals (level 1) every 3 years.

- Staff know how to raise a concern if they have a suspicion and the process for reporting a concern is displayed in the apprenticeship office. Staff understanding of the process is reviewed regularly via tri monthly emails and at 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 with each apprentice group as part of their programme which cover a variety of topic areas, to include safeguarding, mental health awareness, online safety and gambling. These talks take place either through external speakers or through tutor led discussions. For apprentices who do not attend the centre, 3 monthly progress reviews take place with apprenticeship liaison officers to 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 the 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.

### **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 contact the absent apprentice 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, provided the apprentice has given permission to the emergency contact to be contacted.

For JTL apprentices where contact with the apprentice cannot be made, the training officer is contacted by telephone. If contact with either the apprentice or training officer cannot be sought, for apprentices under 18, this process is repeated until contact is made.

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, grooming and sexting. 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 2025 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 elements delivery programme where we encourage external speakers to come into centre and deliver these sessions. Dangers of online, include:

- Hackers
- Phishing
- Identity theft
- Scamming
- Viruses
- Illegal activity such as sexting
- Grooming
- Radicalisation.

### **Filtering and Monitoring**

Rebus Training will ensure that its IT filtering and monitoring systems are reviewed and risk assessed at least annually. The review will:

- Evaluate the effectiveness of current systems in preventing access to harmful or inappropriate content

### **Use of Artificial Intelligence and Emerging Technologies**

Any digital or AI driven tools adopted by Rebus Training will be risk 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 actively encouraged to use Rebus laptops 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. Laptops provided for apprentice use are set up using child

settings. This prevents access to certain online content and from downloading any unauthorised files. Laptops are also periodically cleared of histories and monitored regularly.

### **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. Whereby there are new staff, they 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, the staff intranet and staff development days. Whereby there are any updates to policies, this is 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. Staff are required to read "Keeping Children Safe in Education, Part 1," updated in September 2025 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 and volunteers 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 and procedure, 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.

### **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 who is 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. E Learning on Safeguarding Children and protecting them from abuse as well as PREVENT online training is completed within the first 4 weeks before they start at the company.

Further training on any changes and updates to policies and procedures is carried out on staff development days or can include any hot topics at any such time. This training can 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 from Solvendis and newsletters from the DfE. These updates can be shared with centre staff.

### **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. 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:

- Relevant training providers (JTL) as appropriate
- 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](mailto:kirstie@rebustraining.co.uk)

#### **Safeguarding Deputy -**

Jon Grocock - 01782 976555 - [jon@rebustraining.co.uk](mailto: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**

John Hanlon - 01782 233857

For contact details for other authorities follow the link to the National LADO directory: [LADO Directory – national-lado-network.co.uk](http://national-lado-network.co.uk)

### **Staffordshire Safeguarding Children Board**

Staffordshire County Council's First Response Service:

Phone: 0300 111 8007

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:**

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 board**

<https://www.cheshirewestscp.co.uk/>

Office hours: 0300 1237047

Out of hours: 01244 977277

### **Cheshire East Safeguarding Children's Partnership**

<https://www.cescp.org.uk/homepage.aspx>

Telephone: 0300 1235012

### **Stoke-on-Trent Counter Terrorism**

Shahzad Tahir, Community Cohesion Manager, 01782 238771

[Shahzad.Tahir@stoke.gov.uk](mailto:Shahzad.Tahir@stoke.gov.uk)

Iftikhar Ahmed, Community Cohesion Officer, 01782 235778/07826891844

[iftikhar.ahmed@stoke.gov.uk](mailto:iftikhar.ahmed@stoke.gov.uk)

### **Cheshire Counter Terrorism**

Anti-terrorist hotline on 0800 789 321

### **Department for Education**

Prevent Regional HE/FE Co-ordinator - West

Midlands Alamgir Sheriyar

[alamgir.sheriyar@education.gov.uk](mailto:alamgir.sheriyar@education.gov.uk)

### **Information Sharing & Confidentiality**

Rebus Training staff should never give absolute guarantees of confidentiality to children and vulnerable adults wishing to tell them about something serious. They should however guarantee that they will only pass on information to the minimum number of people who must be told in order to ensure that the proper action is taken to protect the child/vulnerable adult. Staff who are involved in a disclosure should ensure that they listen carefully and only write down exactly what they have heard and not make any judgements or assumptions.

### **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 notes as soon as possible, writing down exactly what was said, using the child/vulnerable adults' own words. All notes should be timed, dated and signed by the member of staff on the Learner Concern Record (SG2 002) which should be passed to the Designated Safeguarding Lead, or their deputy. Under no circumstances must the apprentice sign the Learner Concern Record. All concerns will be recorded on the Safeguarding Log (SG3 001). All records will be securely stored and only accessible by authorised staff

### **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**

Allegations of abuse, or concerns raised against members of Rebus Training staff, will always be treated seriously. The allegation must always be referred to the Designated Safeguarding Lead who will follow the Safeguarding Procedure in the same way as for other safeguarding allegations. The Designated Safeguarding Lead will take the appropriate steps to ensure the safety of the child or vulnerable adult, and any others who may be at risk. If the allegation or concern is against the Designated Safeguarding Lead, it should be reported to the safeguarding deputy. 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 2025, 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](#).

### **Reporting to the Independent Safeguarding Authority (ISA)**

Rebus Training has a statutory duty to make reports and provide relevant information to the Independent Safeguarding Authority (ISA) where there are grounds for believing, following an investigation, that an individual is unsuitable to work with children or vulnerable adults, or may have committed misconduct. The responsibility for reporting cases to the ISA lies with the Designated Safeguarding Lead. The Independent Safeguarding Authority makes barring decisions for Section 142 of the Education Act (formally known as List 99), The Protection of Children Act List (PoCA) and the Protection of Vulnerable Adults List (PoVA).

### **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, including the filtering and monitoring risk assessment, to reflect new or amended legislation and guidance. This will include, but not limited to:

- Keeping Children Safe in Education 2025
- 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.

