BALTIC APPRENTICESHIPS

SAFEGUARDING POLICY (POL040)

2026/2027

BE THE EXPERT
BE THE CUSTOMER
BE THE FUTURE

DOCUMENT REVISION CONTROL

REVISION HISTORY

Date	Owner	Version	Change Reference
01/09/2024	Debbie Park	V12	Annual renewal
17/09/2025	Debbie Park	V13	Annual Review incorporating KCSiE 2025 requirements
13/04/2026	Debbie Park	V14	Refence to AI harms and risks
28/08/2026	Debbie Park	V15	Annual Review incorporating KCSiE 2026 requirements and DSL change

REVIEWERS

Change Requested By	Change Actioned By	Date
Kristian Hudson	Debbie Park	17/09/2025
Debbie Park	Laura Jameson	13/04/2026

DISTRIBUTION:

Date	Distributed to	Version	Distribution Format
17/09/2025	All staff and key stakeholders	V13	Added to company SharePoint & website
14/04/2026	All staff and key stakeholders	V14	Added to company Sharepoint

Contents

Safeguarding Policy (including Prevent)

- **Safeguarding policy overview:** including definitions and safeguarding issues:
- **Learners at potential risk of harm**
- **Safeguarding responsibilities**
- **What should staff do if they have a concern** escalation process
- **What should learners do if they have a concern**
- **Filtering and monitoring**
- **Safer recruitment**

Appendices

- **Appendix A:** definitions:
- **Appendix B:** Safeguarding flowcharts:
- **Appendix C:** channel process:

Safeguarding Policy

Policy statement

Baltic Apprenticeships is committed to ensuring it meets all its statutory duties and responsibilities to all our learners including those under 18 (and those aged 18, 19 and 20 who have been looked after by a local authority at any time after the age of 16 or have a learning disability) and all adult learners. We will support them to keep safe, healthy and free from harm whilst attending learning programmes. Baltic Apprenticeships informs all learners of the processes to follow if they have any concerns.

All staff who have regular contact with learners are Disclosure and Baring Service (DBS) checked prior to commencement of employment. Baltic Apprenticeships staff recruitment procedures require information about past convictions and pending cases, taking up appropriate references, and checking previous employment histories.

Mandatory safeguarding Training is completed by all staff working with learners.

Scope

This policy and procedures apply and are mandatory for

- All Baltic staff
- Volunteers
- Agency workers
- Learners/apprentices
- All other users of Baltic

Reasons for this Policy

This policy exists to ensure that Baltic Apprenticeships implements appropriate arrangements and processes to ensure that its staff have the right resources, skills and training to protect children, young people and adults at risk of harm.

Safeguarding Culture

At Baltic Apprenticeships we are committed to ensuring our learners feel safe at work and in their learning. Our staff promote this culture throughout the learner journey, and this includes the education of learners in areas such as online safety and workplace behaviours as well as the message that sexual abuse and harassment are not acceptable or tolerated. Learners are made aware that any concerns they raise are taken seriously and that they will be supported when raising a concern.

Director Policy Approval

This Policy is approved and endorsed by the Board of Directors and Senior Leadership Team

Signed on behalf of the Directors	
Name	Antony Hobbs
Position	Managing Director
Date	1st September 2026

Policy promotion

This policy will be communicated and promoted through a variety of communication channels to all staff, learners, subcontractors and customers. These include Induction training (new staff and learners), refresher training (staff), specific and embedded learning during the training programme (learners), Staff and Learner Handbooks and the policy will be published on our website. The inclusion of this policy in our Staff Handbook ensures staff commitment to our culture and responsibilities and informs them of their terms and conditions.

Legal Framework

This Policy and associated procedures have been drawn up based on law and guidance:

- Children Act 1989 and 2004
- Working Together to Safeguard Children HM Government July 2018
- Keeping Children Safe in Education DfE September 2026
- PREVENT Strategy HM Government
- Counter Terrorism and Security Act 2015
- Prevent Statutory Duty guidance April 2021
- Channel Guidelines
- Care Act 2014
- Equality Act 2010
- Data Protection Act 2018

The Directors and Senior Management Team takes seriously all statutory responsibilities to safeguard and promote the welfare of children; and to work together with other agencies to ensure adequate arrangements are in place to identify, assess and support those young learners who are suffering harm.

Working In Partnership

Baltic Apprenticeships is aware of and has links to the Local police force Prevent Coordinators, DfE Prevent Co-ordinators and Channel Coordinators as well as Local Authority Safeguarding leads. We maintain a directory of local and regional contacts for our programme delivery areas across England. As part of the safeguarding links, we make use of the Tees Valley Safeguarding network for local insight and trends.

Linked Policies

- Bullying & Harassment
- Health and Safety
- Equality & Diversity
- Whistleblowing
- Pre-Employment (Recruitment)
- IT Acceptable Use
- Safer Recruitment Policy
- Trusted Contact Policy

Definitions

Legislation specifically relates to children and adults at risk as defined below, however Baltic Apprenticeships is committed to the safeguarding of all learners and the term learners is therefore used throughout this policy.

Definitions – Safeguarding Children

Safeguarding and promoting the welfare of children is defined in Keeping Children Safe in Education (2026) as:

- Providing help and support to meet the needs of children as soon as problems emerge
- Protecting children from maltreatment, whether that is within or outside the home, including online
- Preventing the 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
- Taking action to enable all children to have the best outcomes.

Definitions – Safeguarding Adults

An adult at risk of abuse or neglect is defined as someone who has needs for care and support, who is experiencing, or at risk of, abuse or neglect and as a result of their care needs - is unable to protect themselves. For the purposes of this policy, an adult is a person, aged 18 years and over who is at a greater risk of suffering abuse or neglect because of physical, mental, sensory, learning or cognitive illnesses or disabilities; and substance misuse or brain injury.

The Care Act 2014 describes Safeguarding as a means of protecting an adult's right to live in safety, free from abuse and neglect. It further states that it is about people and organizations working together to prevent and stop both the risks and experience of abuse or neglect, while at the same time making sure that the adult's wellbeing is promoted including, where appropriate, having regard to their views, wishes, feelings and beliefs in deciding on any action.

Definitions – Prevent Duty

The Prevent Duty, introduced as part of the Counterterrorism and Security Act 2015.
The aim of the Prevent Strategy is to reduce the threat to the UK from terrorism by stopping people becoming terrorists or supporting terrorism. Learners can be vulnerable to extremist ideology and radicalisation. Similar to protecting learners from other forms of harms and abuse, protecting them from this risk is part of Baltic Apprenticeships' safeguarding approach.

Radicalisation is defined as the process by which people come to support terrorism and extremism and, in some cases, to then participate in terrorist groups.

Extremism is the promotion or advancement of an ideology based on violence, hatred or intolerance, that aims to:

1. Negate or destroy the fundamental rights and freedoms of others; or
2. undermine, overturn or replace the UK's system of liberal parliamentary democracy and democratic rights; or
3. intentionally create a permissive environment for others to achieve the results in (1) or (2).

British Values – Democracy, Rule of Law, Respect, Tolerance and Individual Liberty.

Terrorism is an action that endangers of causes serious violence to a person/people, serious damage to property or seriously interferes with an electronic system. The use of threat must be intended to influence government or intimidate the public – this can be for the purpose of aiding a political, religious or ideological cause.

Safeguarding Issues

Safeguarding actions may be needed to protect learners from the following safeguarding issues and explanations and definitions can be found within ***Appendix A*** of this Policy.

- Physical abuse
- Emotional abuse
- Sexual abuse
- Neglect
- Bullying including Cyberbullying
- Children and the Court System/Family Members in Prison
- Children Missing from Education
- Child Sexual Exploitation (CSE)
- Child Trafficking and Modern Slavery
- Child Criminal Exploitation
- Domestic Abuse
- Drugs and County Lines
- Fabricated or Induced Illness
- Faith Abuse
- Gender-based Violence / Violence against Women and Girls (VAWG)
- Honor Based Violence
- Female Genital Mutilation (FGM)
- Forced Marriage
- Breast Ironing
- Mental Health
- Private Fostering
- Radicalisation and extremism
- Relationship Abuse
- Sexual Violence & Sexual Harassment
- Making or sharing of nudes or semi-nudes
- Trafficking
- Up skirting
- Youth Violence
- Peer on peer abuse
- Webcams and internet use
- Cybercrimes
- Online Safety
- Misinformation, disinformation and conspiracy theories
- AI Harms

For Adult safeguarding, the Care Act 2014 sets out the several types and patterns of abuse and neglect for adults at risk as:

- Physical Abuse
- Psychological Abuse
- Financial/Material Abuse

- Sexual Abuse
- Organisational Abuse
- Neglect
- Discriminatory Abuse
- Domestic Violence
- Modern Slavery
- Self-Neglect

Baltic Apprenticeships will take any concerns of this nature very seriously and concerns should be raised in the same way as any other concerns to the Safeguarding Team.

Learners at a potential greater risk of harm

Learners with a social worker

Due to safeguarding or welfare reasons, a learner may need or may have a social worker while at Baltic. With this a learner could be susceptible to having experienced trauma, leaving them vulnerable to further harm. Educationally this can lead to the learner facing barriers in learning, behaviour, attendance.

Local authorities should share with Baltic if a learner has a social worker, if so, this information will be recorded, and the Safeguarding team will monitor the leaner.

Looked after children

A looked after child is a child who has been in the care of a local authority for more than 24 hours. A looked after child can include:

- Those who live with foster parents
- Those who live in a residential children's home
- Living in a residential school or secure unit
- Children who are privately fostered

A child stops being looked after when they get adopted, return home with parents or turn 18. Local authorities still need to support a child from looked after status to a care leaver status – more information below.

If a learner wishes to notify Baltic of their situation, the Safeguarding team will investigate further support and liaise with the local authority.

Care leavers

Local authorities have continued responsibility to learners who have ceased to be a looked after child and become a care leaver, this support can continue up until a learner is 25 – should they require this. Authorities should stay in contact with learners by appointing a personal

adviser to develop a pathway plan which will describe how the learner will be supported in education/training.

If a learner decides to notify Baltic of their situation, the Safeguarding team can then look to support the learner further. If a learner disclosed their status, it is the responsibility of the Safeguarding team to conduct the care leaver bursary process with the learner.

Learners who require mental health support

As a priority, Baltic identifies the significant role we play in recognising and supporting learners with their mental health and wellbeing. Mental health problems could hinder a learner educationally and so the Safeguarding team are Mental Health First Aid trained to deal with any crisis which could happen.

Baltic has clear processes in place for supporting and identifying those with mental health problems including extra support, signposting and external support services.

If a learner is seeking professional external support this overrules the support Baltic's Safeguarding team can offer, we are not councillors or therapists. Mental health support and advice should come from a trained professional; this isn't our role as a training provider.

If a learner is at a risk of harm due to their mental health, Baltic has procedures in place to support and inform emergency services if needed.

Learners with LDD/SEND

A young person has a learning difficulty or disability if they have: a significantly greater difficulty in learning than most others of the same age. A child or young person has SEND if they have a learning difficulty or disability which calls for special educational provision to be made for them.

All staff need to be aware that these learners can have additional safeguarding challenges and can be impacted educationally by these. The Safeguarding team will log any learners who disclose an LDD and conduct additional support meetings to discuss adjustments Baltic could make.

Learners who having caring responsibilities including young carers

Learners with caring responsibilities may face additional safeguarding challenges and may be particularly affected educationally by these responsibilities. All staff should be alert to learners who have caring responsibilities and recognise that these can impact on attendance, performance and wellbeing.

The Safeguarding Team will ensure that any learner who discloses caring responsibilities is appropriately recorded and will arrange additional support meetings, where appropriate, to consider adjustments and support that Baltic can provide.

Early identification is essential to ensure that young carers receive the right support at the right time, staff should share concerns with the Safeguarding Team in line with the Baltic's safeguarding procedures so that the learner's needs can be assessed and appropriate support put in place.

AI harms

As part of our commitment to safeguarding apprentices, we recognise that Artificial Intelligence (AI) technologies present both opportunities and potential risks. Tools such as chatbots and content generators may expose learners to harms including misinformation and disinformation, abusive or inappropriate material, AI-generated harmful content, and deepfakes.

As the use of AI continues to grow, the Safeguarding team is committed to protecting learners from these risks and providing appropriate support where needed.

Learners are proactively educated on both the benefits and risks of AI, with our personal development curriculum designed to raise awareness of potential harms and equip them with the knowledge to stay safe before they encounter such risks.

We also recognise that using AI chatbots as a therapist or for mental health support can be a risk for learners as AI may give false, unhelpful and even dangerous advice. Staff and learners should raise this with the Safeguarding team so they can find the correct level of support.

The role of the Curriculum and Personal Development

Our programmes will provide a broad and balanced curriculum, delivered by skilled professionals, so that our learners are enriched and understand safeguarding topics including harm, risks of harm and online safety.

Our curriculum promotes respect, tolerance and diversity. Our learners are encouraged to share their views and recognise that they are entitled to have their own different beliefs which should not be used to influence others.

We will also aim to build students' resilience to radicalisation by promoting fundamental British values and enabling them to challenge extremist views.

Continuous learner discussions regarding Safeguarding

During every progress review, our coaches and learners will discuss safeguarding, explore their understanding of the topic including sources of support and assistance. Learners are reminded we have a statutory responsibility for their welfare and urged to come forward and share any welfare concerns they have; this includes anything safeguarding related. They are reminded of the routes in which to contact the Safeguarding team.

Responsibilities – Safeguarding is everyone's responsibility

Responsibility for Implementing the Policy - The Managing Director

- Has overall responsibility for the implementation of this Policy across Baltic Apprenticeships
- Has overall responsibility for liaison with the local authority or other agencies regarding allegations made against staff including any allegations concerning the Designated Staff

Management responsibilities - Baltic Managers have a responsibility to:

- Embrace a whole Baltic Apprenticeships approach to promoting and safeguarding the welfare of young people or adults at risk
- Ensure staff are aware of the policy and procedures and that they receive appropriate training and support to undertake their roles effectively
- Ensure this policy is implemented within their departments

Staff responsibilities - All Baltic staff have a responsibility to:

- Be aware of and implement the Baltic Apprenticeships policy and procedures on Safeguarding Young People and Adults at Risk.
- Read and understand part one of the Department for Education's statutory safeguarding guidance, Keeping Children Safe in Education.
- Promote a safeguarding ethos; provide a secure and supportive environment for all learners.
- If they work with young people or adults at risk undertake staff development appropriate to their role.
- In accordance with Keeping Children Safe in Education (2025) "Safeguarding and promoting the welfare of young people is **everyone's** responsibility. **Everyone** who encounters young people and their families and carers have a role to play in safeguarding young people. In order to fulfil this responsibility effectively, all professionals should make sure their approach is child centred. This means they should consider, at all times, what is in the **best interests** of the young person."
- All staff should be prepared to identify young people who may benefit from early help.

Designated Staff responsibilities

The Designated Staff responsible for safeguarding adults and children:

Designated Senior Leadership Lead – Ian Barrett, Director of Support Services	Contact: 07713 114730
Designated Safeguarding Lead – Natalie Ellwood	Contact: 01325 638142 safeguarding@balticapprenticeships.com
Safeguarding and Support Officer – Laura Jameson	Contact: 01325 638142 safeguarding@balticapprenticeships.com

The Designated Staff are responsible for:

- Promoting a whole Baltic Apprenticeships approach to safeguarding the welfare of adults at risk.
- Advising on induction and staff development arrangements for Baltic Apprenticeships staff.
- Liaising with Baltic Apprenticeships management, the local authority and other agencies in relation to policies, procedures and individuals.
- Gathering and reviewing information concerning cases of suspected abuse or allegations, making referrals to the relevant agencies.
- Contributing to strategy discussions as appropriate.
- Maintaining confidential records relating to safeguarding issues.
- Liaising with the Director of Support Services to inform him of any issues and on-going investigations.
- Reporting to the Board to ensure that the policy is updated and reviewed annually.

Additional Designated Staff Prevent responsibilities

- Promote the Prevent strategy and refer to Channel when necessary
- Implement and maintain a Prevent Risk Assessment and Action Plan
- Identify individuals at risk of being drawn into terrorism.
- Assess the nature and extent of that risk.
- Develop the most appropriate support plan for the individual concerned.

Care Act 2014 Responsibility (Local Authorities)

Baltic Apprenticeships recognizes its duties to:

i. Safeguard adults who have needs for care and support
ii. Safeguard adults who are experiencing, or are at risk of, abuse or neglect
iii. Safeguard adults unable to protect themselves from either the risk of, or the experience of abuse or neglect
iv. Promote well-being

v. Adhere to Local Authority Multi-Agency Policy and Procedures
vi. Comply with the Care Act Statutory Guidance 2017, Chapter 14 Safeguarding

DSL cover arrangements

Baltic will ensure that robust arrangements are in place to maintain continuity of safeguarding responsibilities whenever the Designated Safeguarding Lead (DSL) is unavailable due to illness, leave, or any other circumstance. A suitably trained Deputy DSL or other appropriately designated member of staff will provide safeguarding cover and have clear authority to respond to and manage safeguarding concerns. To support the timely reporting and monitoring of concerns, Baltic will maintain a confidential shared safeguarding mailbox which will be monitored regularly and by the designated safeguarding cover when the DSL is unavailable. All safeguarding concerns received through this system will be recorded, assessed and acted upon without delay, in accordance with Baltic's safeguarding procedures and statutory guidance.

What should staff do if they have a concern?

Safeguarding Referral Process (Escalation)

Confidentiality

Promises of confidentiality should not be given to learners as concerns and disclosures maybe referred to external agencies.

Confidentiality cannot be promised by staff as any concerns should be passed onto the Safeguarding team. Confidentiality can be broken if the following is present: A risk of harm to the leaner, a risk of harm to others and mention of crime – victim or perpetrator.

As part of keeping confidentiality, the Safeguarding team have created a Trusted Contact Policy to be transparent about the circumstances in which we will contact third parties with or without learner's consent using a serious harm criteria to make this judgement. This policy content has created using guidance from "Suicide-safer universities: sharing information with trusted contacts".

The Safeguarding team also have an 'Uncontactable learners process' which shows the steps taken when we are unable to contact a learner.

Staff responsibility

All staff have a responsibility to our learners to deal with concerns or disclosures about their wellbeing including actual or suspected abuse. Staff should read the staff safeguarding policy as part of the employee handbook. The following process applies to any learner.

In the safeguarding escalation we expect staff to follow the 5R's:

1. Recognize – Staff to understand the signs that could hint to potential harm and neglect.
2. Respond – If staff have a concern they will need to respond appropriately and do not ignore the situation. Staff do not need to have all the answers however the safeguarding procedure has examples of responses.
3. Report – Safeguarding concerns need to be reported to the Safeguarding team.

Safeguarding team responsibilities:

4. Record – Safeguarding team will record the concern as per the Safeguarding policy and procedures.
5. Refer – Safeguarding team will refer to external agencies or signposting information.

The Referral Process (escalation) – See appendix B for safeguarding flowchart

1. All staff have safeguarding responsibilities and must raise a concern with a Designated Safeguarding Lead.
2. If the learner is in crisis or at risk of harm, staff must contact the Safeguarding Officer by phone for immediate advice and guidance.
3. Staff must escalate any safeguarding concerns they have regarding a learner, including welfare to the Safeguarding Leads by completing the **Safeguarding Incident/concern form** - https://forms.office.com/e/5kdRfSGW8b

    - Even though formal Safeguarding referrals should be made using the above form, staff are still able to contact the team for advice and guidance.

4. The basis of a concern can be wide ranging and can include:

    - Risk of harm to a learner which includes - Risk to self and a risk from others.
    - Any mental health concerns
    - Physical, emotional or sexual abuse
    - External Factors e.g. Home/personal life concerns, financial issues, bereavement.
    - Harassment (including sexual).
    - Radicalistaion and extremism concerns
    - Any change in a learner which concerns you
    - If an employer raises any concerns
    - If a learner discloses any historical safeguarding events

5. The Safeguarding Leads records the details of the concern on the 'Safeguarding and Support' spreadsheet and in the Safeguarding confidential sharepoint.
.
6. The Safeguarding Leads immediately completes an investigation, provides advice and guidance and updates the referral source of the outcome within 3 hours of the referral.

7. The outcome decision lies with the Safeguarding Lead based on the facts presented and Legislative requirements.

8. Outcome decisions include:
    a. Local Authority Child Protection Referral
    b. Referral to the Police
    c. Referral to Channel
    d. Signposting to an external source of support
    e. No escalation action but monitor the incident, disclosure or concern

9. In the event that the outcome is to refer to an external body, as a national provider we will access current referral details from the relevant Local Authority website and follow the detailed referral process. This would be submitted with 24 hours of the outcome decision.

The Safeguarding Officers will maintain all Safeguarding Reports in a designated secure area with restricted access.

In the event of learner disclosure, the staff member can offer the learner the opportunity to speak directly to the Safeguarding Lead as an alternative to themselves. The Safeguarding Lead will follow the process above.

In the event a member of staff discovers that an act of Female Genital Mutilation appears to have been conducted on a girl under the age of 18 the staff member must report this to the police.

What should learners do if they have a concern?

If learners have any safeguarding issues, they can speak to their Coach or any member of Baltic staff they encounter. Learners can also use the Baltic 'Support and Report page' where they can directly send a concern to the Safeguarding team or log an anonymous concern. This will be picked up by the safeguarding staff and responded to within a suitable time frame.

Baltic staff are committed to the promotion of open conversations around safeguarding and wellbeing with learners and will encourage use of the resources available from the Safeguarding team. The team are available to contact for any concern during working hours

(Monday to Thursday between 8am and 4pm, and Friday between 8am and 1pm) via email at safeguarding@balticapprenticeships.com, via landline (01325 638142) for calls, and via mobile (07714765475) for calls, texts, and WhatsApp messages.

For out of hours support, learners are signposted to contact Samaritans (116 123) or Shout Text (85258) who offers advice, support, and guidance on everything from employment issues to mental health issues.

Concerns regarding staff members conduct including suspicion or allegation of abuse

Any suspicion or allegation of abuse by a member of staff must be reported to one of the Designated Safeguarding Officers who will communicate and report to the People department for investigation. In addition, a referral will be made to the Local Authority Designated Officer who will conduct investigation under Darlington Safeguarding Partnership procedures.

Making Protected Disclosures (Whistle Blowing Policy POL008)

Baltic Apprenticeships has arrangements in place for staff to make "protected disclosures" (or whistle blowing). These are set out in the Baltic Apprenticeships Staff Handbook (HR30) which is discussed and issued to individuals on appointment to the company. Staff should report concerns in confidence to their line manager. Where a member of staff is not satisfied with the explanation given, they can take it up with the appropriate organisation or body such as the Police or Social Services. Where an incident needs to be disclosed in respect of a learner's welfare, or suspected abuse it should be reported to one of the designated contacts for implementing the Baltic Apprenticeships Safeguarding policy.

The NSPCC whistleblowing helpline is available for staff who do not feel able to raise concerns regarding child protection failures internally.

- Staff can call: 0800 028 0285. This line is available from 8:00 AM to 8:00 PM, Monday to Friday and 9am-6pm on a weekend. Email contact: help@nspcc.org.uk.

Filtering and Monitoring

The Safeguarding and IT team will oversee joint responsibility for the filtering and monitoring of our IT systems.

Filtering and Monitoring will apply to staff onsite and those that work remotely. The purpose of this is to protect staff from harmful content online by blocking content on websites and detecting malicious websites. Filtering and Monitoring does not apply to our learners as they do not connect to our systems/internet.

The Safeguarding team will play an active role in monitoring activity of staff to ensure proper and acceptable internet usage throughout the business. If the system brings anything to our

attention, we may investigate further. For more information, please refer to the IT acceptable use policy.

Aims of Baltic Safeguarding team



Protecting learners from harm



Supporting learners mental and physical health



Making sure learners feel safe and supported



Encouraging learners to meet their full potential

Safer recruitment

Further information can be found in the Safer Recruitment policy.

New employee's

As a new Baltic employee staff will be subject to DBS checks depending on their engagement with learners. New staff, who require a check, will need to apply for a DBS however we do encourage sign-ups to the updated service. The Safeguarding team take responsibility for this process.

DBS checks

Staff who are on the updated service will be subject to checks every three years to see if any changes have occurred. Staff with a physical DBS will be asked to renew every three years to ensure good practice and updated records.

All staff will be asked to complete annual declarations every year to give the opportunity to update and disclose any changes.

External speakers

External speaker is used to describe any individual or organization who is not a member of staff or learner who has been invited to speak to staff/learners. External speakers are subject to checks under the 'Prevent' policy and to ensure that speakers have a DBS check when required.

External speakers have a guidance document and a code of conduct to follow whilst working with Baltic which sits in line with the main Safeguarding Policy.

Online searches

Candidates at the shortlisting process could be subject to an online search as part of our due diligence to Safer Recruitment.

Staff Training

During induction, all staff are required to familiarise themselves with the content of the policy and receive training on their responsibilities and how the policy will be implemented.

All staff will receive safeguarding training including:

- New staff onboarding training to include:
    - Mandatory online training:
        - NSPCC 'Safeguarding 16–25-year olds'
        - Government online Prevent training.
    - A safeguarding onboarding session with a member of the Safeguarding team
    - To confirm they have read part one of Keeping children safe in education.

- Staff receive additional training either through attendance at external events (Darlington College, Baltic CPD, North East Learning Provider Network), and/or speakers at company communication day events.
- Ongoing training takes place as a minimum annually when the policy is reviewed or updated and when statutory guidance changes including annual reading of part one of Keeping children safe in education.
- All staff will receive regular updates via email, bulletins and at staff meetings.
- Designated Safeguarding Leads will attend approved specialist training (DSL/DSO) as required for this role.

Safeguarding Contact Details

Safeguarding Officers will identify country wide contacts when safeguarding concerns are raised dependent upon the learner's geographical location.

Policy Review

The Safeguarding Policy will be reviewed as a minimum annually or when there is a change to legislation or guidance. Date of last review 1st September 2026.

Appendix A

Definitions

Staff should be aware that abuse, neglect and safeguarding issues are rarely standalone events that can be covered by one definition or label. In most cases, multiple issues will overlap with one another.

Abuse: a form of maltreatment of a child. Somebody may abuse or neglect a child by inflicting harm or by failing to act to prevent harm. Harm can include ill treatment that is not physical as well as the impact of witnessing ill treatment of others. This can be particularly relevant, for example, in relation to the impact on children of all forms of domestic abuse, including where they see, hear or experience its effects. Children may be abused in a family or in an institutional or community setting by those known to them or, more rarely, by others. Abuse can take place wholly online, or technology may be used to facilitate offline abuse. Children may be abused by an adult or adults or by another child or children. Children may also cause harm to other family members, often referred to as child to parent or care giver abuse.

Physical abuse: a form of abuse which may involve hitting, shaking, throwing, poisoning, burning or scalding, drowning, suffocating or otherwise causing physical harm to a child. Physical harm may also be caused when a parent or carer fabricates the symptoms of, or deliberately induces, illness in a child.

Emotional abuse: the persistent emotional maltreatment of a child such as to cause severe and adverse effects on the child's emotional development. It may involve conveying to a child that they are worthless or unloved, inadequate, or valued only insofar as they meet the needs of another person. It may include verbal abuse, such as persistent criticism, belittling, or name-calling, as well as not giving the child opportunities to express their views, deliberately silencing them or 'making fun' of what they say or how they communicate. It may feature age or developmentally inappropriate expectations being imposed on children. These may include interactions that are beyond a child's developmental capability as well as overprotection and limitation of exploration and learning or preventing the child from participating in normal social interaction. It may involve seeing or hearing the ill-treatment of another. It may involve serious bullying (including cyberbullying), causing children frequently to feel frightened or in danger, or the exploitation or corruption of children. Some level of emotional abuse is involved in all types of maltreatment of a child, although it may occur alone.

Sexual abuse: involves forcing or enticing a child or young person to take part in sexual activities, not necessarily involving violence, whether or not the child is aware of what is happening. The activities may involve physical contact, 13 including assault by penetration (for example rape or penetration with an object) or non-penetrative acts such as masturbation, kissing, rubbing, and touching outside of clothing. They may also include non-contact activities, such as involving children in looking at, or in the production of, sexual images, watching sexual activities, encouraging children to behave in sexually inappropriate ways, or grooming a child in preparation for abuse. Sexual abuse can take place online, and technology can be used to facilitate offline abuse. Sexual abuse is not solely

perpetrated by adult males. Women can also commit acts of sexual abuse, as can other children. The sexual abuse of children by other children is a specific safeguarding issue in education and all staff should be aware of it and of their school or college's policy and procedures for dealing with it.

Neglect: the persistent failure to meet a child's basic physical and/or psychological needs, likely to result in the serious impairment of the child's health or development. Neglect may occur during pregnancy, for example, as a result of maternal substance abuse. Once a child is born, neglect may involve a parent or carer failing to: provide adequate food, clothing and shelter (including exclusion from home or abandonment); protect a child from physical and emotional harm or danger; ensure adequate supervision (including the use of inadequate caregivers); or ensure access to appropriate medical care or treatment. It may also include neglect of, or unresponsiveness to, a child's basic emotional needs.

Specific Safeguarding Issues

Bullying, including Cyberbullying

Bullying is defined as 'the persistent intentional harming of another person with an unequal power relationship.' *(Bullying Intervention Group).*
Bullying is behaviour by an individual or group, repeated over time, that intentionally hurts another individual or group either emotionally or physically.
Bullying differs from banter because there is a deliberate intention to hurt or humiliate, there is an unequal power balance and it is usually persistent or systematic.
Examples of bullying can include:

- Verbal – threatening or intimidating behaviour, name calling, put downs and sexual and racist remarks
- Physical – kicking, punching, hitting, spitting, biting, tripping someone up and damaging belongings or Baltic Apprenticeships work
- Coercion – threats or forcing someone to do what they do not want to do
- Emotional – rejection or isolating tactics, staring or threatening looks, playing on fears or sensitivities, remarks about personal appearance
- Indirect – lies and rumour spreading, talking behind a person's back, using chatrooms or websites to spread or invite hatred
- Cyberbullying – an aggressive and intentional act conducted by a group or individual, using electronic forms of contact repeatedly over time
- Prejudice-driven bullying – when bullying is driven by negative attitudes towards another group of people or because the victim is seen as 'different' in some way. This can become more severe over time and can lead to hate crime. It can be related to race, religion or culture, special educational needs or disabilities, appearance or health conditions, sexuality or gender, perceived sexual orientation and any so-called perceived differences.

Children and the Court System and Children with Family Members in Prison

It is possible that some learners may be required to give evidence in criminal courts, either for crimes committed against themselves or for crimes they have witnessed. Giving evidence in court is distressing for anyone and learners may need to access support and assistance with this process.

It may be that learners may have a parent in prison or sent to prison. These learners are at risk of poor outcomes including poverty, stigma, isolation and poor mental health. Learners may need to access support to help to mitigate the negative consequences of this.

Child Missing from Education

A young person going missing from education is a potential indicator of abuse or neglect. Baltic Apprenticeships staff should follow Baltic Apprenticeships' procedures for dealing with learners that go missing from education, particularly on repeat occasions, to help identify the risk of abuse and neglect, including sexual exploitation, and to help prevent the risks of their going missing in future.

It is essential that all staff are alert to signs to look out for and the individual triggers to be aware of when considering the risks of potential safeguarding concerns such as travelling to conflict zones, FGM and forced marriage. Any concerns should be referred to a member of the Safeguarding Team.

As Baltic Apprenticeships is providing education for young people of compulsory school age Baltic Apprenticeships will work collaboratively with the relevant local authority to share information about the attendance and/or absences of that child.

Child Criminal Exploitation: County Lines

Criminal exploitation of children is a geographically widespread form of harm that is a typical feature of county lines criminal activity: drug networks or gangs groom and exploit children and young people to carry drugs and money from urban areas to suburban and rural areas, market and seaside towns. Key to identifying potential involvement in county lines are missing episodes when the victim may have been trafficked for the purpose of transporting drugs and a referral to the National Referral Mechanism should be considered.
Like other forms of abuse and exploitation, county lines exploitation:

- Can affect any child or young person (male or female) under the age of 18 years
- Can affect any vulnerable adult over the age of 18 years
- Can still be exploitation even if the activity appears consensual
- Can involve force and/or enticement-based methods of compliance and is often accompanied by violence or threats of violence
- Can be perpetrated by individuals or groups, males or females, and young people or adults

- Is typified by some form of power imbalance in favour of those perpetrating the exploitation. Whilst age may be the most obvious, this power imbalance can also be due to a range of other factors including gender, cognitive ability, physical strength, status, and access to economic or other resources

Child Sexual Exploitation (CSE)

Child sexual exploitation is a form of child sexual abuse. It occurs where an individual or group takes advantage of an imbalance of power to coerce, manipulate or deceive a child or young person under the age of 18 into sexual activity (a) in exchange for something the victim needs or wants, and/or (b) for the financial advantage or increased status of the perpetrator or facilitator. The victim may have been sexually exploited even if the sexual activity appears consensual. Child sexual exploitation does not always involve physical contact: it can also occur through the use of technology. Like all forms of child sex abuse, child sexual exploitation:

- Can affect any child or young person (male or female) under the age of 18 years, including 16- and 17-year-olds who can legally consent to have sex
- Can still be abuse even if the sexual activity appears consensual
- Can include both contact (penetrative and non-penetrative acts) and non-contact sexual activity
- Can take place in person or via technology, or a combination of both
- Can involve force and/or enticement-based methods of compliance and may, or may not, be accompanied by violence or threats of violence
- May occur without the child or young person's immediate knowledge (e.g., through others copying videos or images they have created and posted on social media)
- Can be perpetrated by individuals or groups, males or females, and children or adults. The abuse can be a one-off occurrence or a series of incidents over time, and range from opportunistic to complex organized abuse
- Is typified by some form of power imbalance in favour of those perpetrating the abuse. Whilst age may be the most obvious, this power imbalance can also be due to a range of other factors including gender, sexual orientation, cognitive ability, physical strength, status, and access to economic or other resources

Some of the following signs may be indicators of child sexual exploitation:

• Children who appear with unexplained gifts or new possessions
• Children who associate with other young people involved in exploitation
• Children who have older boyfriends or girlfriends
• Children who suffer from sexually transmitted infections or become pregnant
• Children who suffer from changes in emotional well-being
• Children who misuse drugs and alcohol

• Children who go missing for periods of time or regularly come home late
• Children who regularly miss school or education or do not take part in education

Child Trafficking and Modern Slavery

Child trafficking is child abuse. It is defined as recruiting, moving, receiving and harbouring children for the purpose of exploitation. It is a criminal offence under **Modern Slavery** legislation. A child is any person under the age of 18, and children cannot consent to being exploited.

Children can be trafficked into and out of the UK, and within the UK itself. They can be trafficked by parents, extended family members, known adults from a child's community or by strangers. Trafficking often involves organised international networks of criminal gangs.
Child trafficking is child abuse. It requires a child protection response and multi-agency working, irrespective of the child's immigration status or whether they have engaged in criminal activity.

Children can be exploited through:

- Sexual exploitation
- Criminal activity (e.g., cannabis cultivation, street crime, moving drugs, benefit fraud, immigration fraud)
- Domestic servitude
- Labor exploitation (e.g., restaurants, nail bars, agricultural work, factories)
- Illegal adoption
- Forced marriage
- Unreported private fostering arrangements (for any of the above exploitative purposes)

This is not an exhaustive list and children are often exploited in more than one way.

Domestic Abuse

The cross-government definition of domestic violence and abuse is:

Any incident or pattern of incidents of controlling, coercive, threatening behaviour, violence or abuse between those aged 16 or over who are, or have been, intimate partners or family members regardless of gender or sexuality. The abuse can encompass, but is not limited to:

• Psychological
• Physical
• Sexual
• Financial
• emotional

Exposure to domestic abuse and/or violence can have a serious, long lasting emotional and psychological impact on children. In some cases, a child may blame themselves for the abuse or may have had to leave the family home as a result. Domestic abuse affecting young people can also occur within their personal relationships, as well as in the context of their home life.

Drugs

The term 'drugs' is used to refer to all drugs:

- All illegal drugs (those controlled by the Misuse of Drugs Act 1971)
- All legal drugs, including alcohol, tobacco, and volatile substances
- All over the counter and prescription medicines

Baltic Apprenticeships has a strict no-tolerance policy to illegal drugs and alcohol. This means that all incidents will trigger the disciplinary process. Learners under the influence or in possession of them will be suspended whilst the matter is investigated.
Learners making disclosures about their own drugs misuse will be made aware of the support that is available from Baltic Apprenticeships through the Safeguarding and Welfare Officers and through external support agencies.

Fabricated or Induced Illness

Fabricated or induced illness (FII) is a rare form of child abuse. It occurs when a parent or carer, usually the child's biological mother, exaggerated or deliberately causes symptoms of illness in the child. In fabricated or induced illness, the parent may present the child as ill when they are healthy, deliberately induce symptoms of illness, manipulate test results, or exaggerate or lie about symptoms.

Some of the indicators of fabricated or induced illness, include:

- The medical history does not make sense
- Treatment is ineffective
- The symptoms disappear when the carer is not around, and
- They can be seen repeatedly by different professionals looking for different things

In all cases, the child's normal life is restricted. Cases of fabricated or induced illness are overly complex. Where fabricated and induced illness is suspected, referrals should be made without alerting the child's carer.

Faith Abuse

Faith abuse is child abuse linked to faith or belief.
Abuse can be separated into five different areas:

- Abuse as a result of a child being accused of being a 'witch'
- Abuse as a result of a child being accused of being possessed by 'evil spirits'
- Ritualistic abuse which is prolonged sexual, physical and psychological abuse
- Satanic abuse which is conducted in the name of 'satan' and may have links to cults
- Any other harmful practice linked to a belief or faith

The forms of abuse that follow fall into the four main categories below:

Physical Abuse - this can involve ritualistic beating, burning, cutting, stabbing, semi-strangulating, tying up the child, or rubbing chilli peppers or other substances on the child's genitals or eyes.

Emotional Abuse - emotional abuse can occur in the form of isolation. A child may not be allowed near or to share a room with family members and threatened with abandonment. The child may also be persuaded that they are possessed.

Neglect - in situations of neglect, the child's family and community may have failed to ensure appropriate medical care, supervision, education, good hygiene, nourishment, clothing or warmth.

Sexual Abuse - children who have been singled out in this way can be particularly vulnerable to sexual abusers within the family, community or faith organization. These people exploit the belief as a form of control or threat.

Child abuse linked to faith or belief is not confined to one faith, nationality or ethnic community. Examples have been recorded worldwide across various religions including Christians, Muslims and Hindus.

The number of known cases suggests that only a small minority of people who believe in witchcraft or spirit possession go on to abuse children.

Abuse may happen anywhere, but it most commonly occurs within the child's home.

Gender-based Violence / Violence against Women and Girls (VAWG)

Violence Against Women and Girls (VAWG) is the term given to all forms of violence and abuse experienced disproportionately by women and girls or experienced by them because of their gender and this term covers includes other specific safeguarding issues defined within this policy.

Gender-based violence and violence against women can include:

- Physical, sexual and psychological violence occurring in the family, within the general community or in institutions, including domestic abuse, rape, incest and child sexual abuse
- Sexual harassment and intimidation at work and in the public sphere; commercial sexual exploitation, including prostitution, pornography and trafficking
- Dowry related violence
- Female genital mutilation
- Forced and child marriages
- 'Honor' crimes
- Commercial sexual exploitation including activities such as pornography, prostitution, stripping, lap dancing, pole dancing and table dancing

- Sexual harassment and stalking

Homelessness

Being homeless or being at risk of becoming homeless presents a real risk to a learners welfare.

Indicators that a family may be at risk of homelessness include household debt, rent arrears, domestic abuse and anti-social behaviour, as well as the family being asked to leave a property.

Baltic Apprenticeships recognises that in some cases 16- and 17-year-olds could be living independently from their parents or guardians, for example through their exclusion from the family home, and will require a different level of intervention and support.

The Homelessness Reduction Act 2017 places a new legal duty on English councils so that everyone who is homeless or at risk of homelessness will have access to meaningful help including an assessment of their needs and circumstances, the development of a personalised housing plan, and work to help them retain their accommodation or find a new place to live. The following factsheets summarise the new duties. The new duties shift focus to early intervention and encourage those at risk to seek support as soon as possible before they are facing a homelessness crisis.
https://www.gov.uk/government/publications/homelessness-reduction-bill-policy-factsheets

Honour Based Violence (HBV)

So-called 'honour-based violence' encompasses crimes which have been committed to protect or defend the honour of the family and/or the community, including Female Genital Mutilation (FGM), forced marriage and practices such as breast ironing. All forms of so-called HBV are abuse (regardless of the motivation) and should be handled and escalated as such. If in any doubts, staff should speak to one of the Safeguarding Team.

Female Genital Mutilation (FGM)

Female Genital Mutilation (FGM) comprises all procedures involving partial or total removal of the external female genitalia or other injury to the female genital organs. It is illegal in the UK and a form of child abuse with long-lasting harmful consequences. Although the age of learners at Baltic Apprenticeships is such that they are not necessarily in the high-risk category for FGM, a learner may disclose that she is at risk of FGM, has suffered FGM or that a sister or family member is at risk. Baltic Apprenticeships staff need to be alert to the possibility of a girl being at risk of FGM, or already having suffered FGM. The new mandatory reporting duty for FGM, introduced via the Serious Crime Act 2015, came into effect on 31 October 2015. This duty requires Baltic Apprenticeships to report known cases of FGM in under 18-year-olds to the police.

Forced Marriage

A forced marriage is not the same as an arranged marriage. An arranged marriage has the families take a lead role in choosing a partner but both parties are free to choose whether to enter the marriage. Forcing a person into a marriage is a crime in England and Wales.

A forced marriage is without consent of one or both parties where violence, threats or any other form of coercion is used to cause a person to enter into a marriage. The pressure put on people to marry against their will can be physical (including threats, actual physical violence and sexual violence) or emotional and psychological (for example, A lack of full and free consent can be where a person does not consent or where they cannot consent (if they have learning disabilities, for example). Nevertheless, some perpetrators use perceived cultural practices as a way to coerce a person into marriage.

Breast Ironing

Breast Ironing**,** also known as "Breast Flattening," is the process whereby young pubescent girls' breasts are ironed, massaged and/or pounded down through the use of hard or heated objects in order for the breasts to disappear or delay the development of the breasts entirely. It is believed that by conducting this act, young girls will be protected from harassment, rape, abduction and early forced marriage and therefore be kept in education. Much like Female Genital Mutilation (FGM), Breast Ironing is a harmful cultural practice and is classified as physical abuse.

Mental Health

Mental health problems can include depression, anxiety, eating disorders, self-harm, suicidal tendencies and the potential risk of harming others.

Baltic Apprenticeships' Staff will ensure the most appropriate support is provided to help learners with any difficulties they may be experiencing that could have a negative impact on their Baltic Apprenticeships life. Learners can seek support for various issues such as:

- Relationship problems
- Family break-up/divorce
- Depression
- Study problems
- Anger Management
- Self-harming behaviours
- Feeling dissatisfied with life or self
- Domestic Violence/Abuse (past/present)
- Stress/Anxiety
- Bereavement
- Low self-confidence / self-esteem
- Issues with drugs or alcohol
- Suicidal thoughts

Private Fostering

Private fostering is when a child up to the age of 16 (or 18 if the child has a disability) is placed for more than 28 days in the care of someone who is not a close relative, guardian or someone with parental responsibilities.

Baltic Apprenticeships must notify the relevant local authority of a privately fostered arrangement that comes to their attention, to allow the local authority to check the arrangement is suitable and safe for the child.

Preventing Radicalisation

The Prevent Duty, introduced as part of the Counter-Terrorism and Security Act 2015. Came into effect for key bodies including schools, health bodies and police on 1 July 2015. The duty commenced for higher and further education institutions from the 18 September 2015.
The aim of the Prevent Strategy is to reduce the threat to the UK from terrorism by stopping people becoming terrorists or supporting terrorism. In the Act this has simply been expressed as the need to have "due regard to the need to prevent people from being drawn into terrorism." This includes not just violent extremism but also non-violent extremism, which can create an atmosphere conducive to terrorism and can popularise views which terrorists exploit.

Learners are vulnerable to extremist ideology and radicalisation. Similar to protecting learners from other forms of harms and abuse, protecting them from this risk is part of Baltic Apprenticeships' safeguarding approach.

Where deemed appropriate, Baltic Apprenticeships will seek external support for learners through referrals to the Channel Programme. This programme aims to work with the individual to address their specific vulnerabilities and prevent them becoming further radicalised.

Where deemed appropriate, Baltic Apprenticeships will seek external support for learners through referrals to the Channel Programme. This programme aims to work with the individual to address their specific vulnerabilities and prevent them becoming further radicalised.

What is Extremism?

Extremism is defined in the national Prevent Strategy as any vocal or active opposition to fundamental British values, including democracy, the rule of law, individual liberty, and mutual respect and tolerance of different faiths and beliefs. This also includes calling for the death of members of the armed forces. Prevent covers international and domestic terrorist threats, and includes the activities of far-right groups, and animal rights groups.

What is Radicalisation?

Radicalization refers to the process by which a person comes to support terrorism and extremist ideologies associated with terrorist groups.

There is no single way of identifying whether a person is likely to be susceptible to an extremist ideology. Background factors combined with specific influences such as family and friends may contribute to a person's vulnerability. Similarly, radicalisation can occur through many different methods (such as social media) and settings (such as the internet).
The following indicators identify factors that may suggest a young person or their family may be vulnerable to being drawn into extremism:

- Identity crisis - distance from culture religious heritage and uncomfortable with their place in the society around them

- Personal crisis - family tensions, sense of isolation, adolescence low self-esteem, disassociation from existing friendship groups and becoming involved with a new and different group of friends searching for answers to questions about identity, faith and belonging

- Personal circumstances e.g., migration, local community tensions, events affecting Country and region of origin, alienation from UK values having a sense of grievance that is triggered by personal experience of racism or discrimination or aspects of Government policy, unmet aspirations, perceptions of injustice feeling of failure, rejection of civic life, criminality, experiences of imprisonment, poor resettlement, reintegration, previous involvement with criminal groups

The process of radicalisation is different for every individual and can take place over an extended period or within a noticeably brief period. Potential indicators of radicalisation are listed below:

- Use of inappropriate language
- Possession or accessing violent extremist literature
- Behavioural changes
- The expression of extremist views
- Advocating violent actions and means
- Association with known extremists
- Articulating support for violent extremist causes or leaders
- Using extremist views to explain personal disadvantage
- Joining or seeking to join extremist organisations
- Seeking to recruit others to an extremist ideology

What is Channel?

Channel is a key element of the Prevent Strategy. It is a multi-agency approach to protect people at risk from radicalisation using collaboration between local authorities, statutory partners, the police and local community to:

- Identify individuals at risk of being drawn into terrorism.
- Assess the nature and extent of that risk.
- Develop the most appropriate support plan for the individual concerned.

Any prejudice, discrimination or extremist views, including derogatory language, displayed by learners or staff will always be challenged and where appropriate will be dealt with in line with the Student Disciplinary Policy and the Code of Conduct for staff.

Staff should use their professional judgement and discuss with a Designated Safeguarding Person if they have any concerns. Once assessed, and if appropriate, this will be referred into the Channel Panel Process.

Baltic Apprenticeships has an identified single point of contact (SPOC) in relation to Prevent which is the Vice Principal Staff and Learners and the Designated Safeguarding Lead and any concerns discussed with any member of the Safeguarding Team will be passed on and referred if appropriate.

To ensure compliance with the Prevent duty, all staff must make sure that they:

- Undertake training in the Prevent duty as identified by Baltic Apprenticeships to ensure they understand the factors that make people vulnerable to being drawn into terrorism and that they are able to recognize this vulnerability and are aware of what action to take.

- Exemplify British/Community Values into their work and practice and that opportunities in the curriculum are used to promote these values to learners.

Making or sharing of nudes or semi-nudes

Making, possessing and distributing imagery of someone under 18, which is indecent, is illegal. This includes imagery created by under 18s themselves. The relevant legislation is contained in the Protection of Children Act 1978 (England and Wales) as amended in the Sexual Offences Act 2003 (England and Wales).

Specifically, it is an offence to possess, distribute, show and make images of children. The Sexual Offences Act 2003 defines a child, for the purposes of indecent images, as anyone under the age of 18.

The type of incidents covered by this guidance are:

- A person under the age of 18 creates and shares sexual images of themselves with a peer under the age of 18.

- A person under the age of 18 shares sexual imagery created by another person under the age of 18 with a peer under the age of 18 or an adult.

- A person under the age of 18 is in possession of sexual imagery created by another person under the age of 18.

The sharing of sexual imagery of people under 18 by adults constitutes child sexual abuse and this should be reported to the police.

Handling Incidents

1. All incidents involving making or sharing of nudes or semi-nudes should be reported to the Safeguarding Team.

2. An initial review meeting will be held and subsequent interviews with the young people involved, if appropriate.

3. Parents should be informed at an early stage and involved in the process unless there is good reason to believe that involving parents would put the young person at risk of harm.

4. At any point in this process if there is a concern that a young person has been harmed or is at risk of harm, a referral should be made to children's social care and/or the police immediately.

An immediate referral to the police and/or children's social care will be made at this initial stage if:

1. The incident involves an adult.

2. There is reason to believe that a young person has been coerced, blackmailed or groomed, or if there are concerns about their capacity to consent, for example due to a learning difficulty.

3. What is known about the imagery suggests the content depicts sexual acts which are unusual for the young person's development age or are violent.

4. The imagery involves sexual acts and any child in the imagery is under 13.

5. There is reason to believe that a young person is at risk of harm owing to the sharing of imagery, for example, the young person is presenting as suicidal or self-harming.

If none of the above apply Baltic Apprenticeships may decide to respond to the incident without involving the police or children's social care. Although the sharing of sexual imagery is illegal, the National Police Chief's Council (NPCC) is clear that 'youth produced sexual imagery should be primarily treated as safeguarding issue' and the law was also created to protect children and young people and not to criminalise them.

The decision to respond to the incident without involving the police or children's social care will be made when the Designated Safeguarding Lead is confident that there is enough information to assess the risks to the young people involved and that the risks can be managed within Baltic Apprenticeships' pastoral support and disciplinary policy.

Relationship Abuse

Relationship abuse is a pattern of abusive and coercive behaviors used to maintain power and control over a former or current intimate partner. Abuse can be emotional, financial, sexual or physical and can include threats, isolation, and intimidation. Abuse tends to escalate over time.

The term 'relationship abuse' includes other specific safeguarding issues defined within this policy.

Sexual Violence and Sexual Harassment

Context

Sexual violence and sexual harassment can occur between two children of **any** age and sex. It can also occur through a group of children sexually assaulting or sexually harassing a single child or group of children.

The information below covers children of **all ages**, from the primary through secondary stage and into Baltic Apprenticeships. For the purposes of this advice, a child is anyone under the age of 18. Whilst the focus of the advice is on protecting and supporting children, Baltic Apprenticeships will of course protect any adult learners and engage with adult social care, support services and the police as required.

Children who are victims of sexual violence and sexual harassment will likely find the experience stressful and distressing. This will, in all likelihood, adversely affect their educational attainment. Sexual violence and sexual harassment exist on a continuum and may overlap, they can occur online and

offline (both physical and verbal) and are never acceptable. It is important that **all** victims are taken seriously and offered appropriate support. Staff should be aware that some groups are potentially more at risk. Evidence shows girls, children with SEND and LGBT children are at greater risk.

Staff should be aware of the importance of:

- making clear that sexual violence and sexual harassment is not acceptable, will never be tolerated and is not an inevitable part of growing up.
- not tolerating or dismissing sexual violence or sexual harassment as "banter," "part of growing up," "just having a laugh" or "boys being boys;" and
- challenging behaviors - (potentially criminal in nature) as dismissing or tolerating such behaviors risks normalizing them.

Sexual Violence

It is important that staff are aware of sexual violence and the fact children can, and sometimes do, abuse their peers in this way. When referring to sexual violence we are referring to sexual offences under the Sexual Offences Act 2003 as described below:

Rape: A person (A) commits an offence of rape if: he intentionally penetrates the vagina, anus or mouth of another person (B) with his penis, B does not consent to the penetration and A does not reasonably believe that B consents.

Assault by Penetration: A person (A) commits an offence if: s/he intentionally penetrates the vagina or anus of another person (B) with a part of her/his body or anything else, the penetration is sexual, B does not consent to the penetration and A does not reasonably believe that B consents.

Sexual Assault: A person (A) commits an offence of sexual assault if: s/he intentionally touches another person (B), the touching is sexual, B does not consent to the touching and A does not reasonably believe that B consents.

What is Consent?

Consent is about having the freedom and capacity to choose. Consent to sexual activity may be given to one sort of sexual activity but not another, e.g.to vaginal but not anal sex or penetration with conditions, such as wearing a condom. Consent can be withdrawn at any time during sexual activity and each time activity occurs. Someone consents to vaginal, anal or oral penetration only if s/he agrees by choice to that penetration and has the freedom and capacity to make that choice.

- A child under the age of 13 can never consent to any sexual activity
- The age of consent is 16
- Sexual intercourse without consent is rape

Sexual Harassment

When referring to sexual harassment we mean 'unwanted conduct of a sexual nature' that can occur online and offline. When we reference sexual harassment, we do so in the context of child-on-child

sexual harassment. Sexual harassment is likely to: violate a child's dignity, and/or make them feel intimidated, degraded or humiliated and/or create a hostile, offensive or sexualized environment.

Whilst not intended to be an exhaustive list, sexual harassment can include:

- Sexual comments, such as: telling sexual stories, making lewd comments, making sexual remarks about clothes and appearance and calling someone sexualized names
- Sexual "jokes" or taunting
- Physical behavior, such as: deliberately brushing against someone, interfering with someone's clothes (schools and Baltic Apprenticeships should be considering when any of this crosses a line into sexual violence - it is important to talk to and consider the experience of the victim) and displaying pictures, photos or drawings of a sexual nature
- Online sexual harassment. This may be standalone, or part of a wider pattern of sexual harassment and/or sexual violence

It may include:

- Non-consensual sharing of sexual images and videos
- Sexualized online bullying
- Unwanted sexual comments and messages, including, on social media; and
- Sexual exploitation; coercion and threats

Baltic Apprenticeships will manage any reports of child-on-child sexual violence and harassment in line with the DfE guidance 'Sexual Violence and Sexual Harassment between Children in Schools and Baltic Apprenticeships' May 2018.

Up skirting

The Voyeurism (Offences) Act, also known as the Up-skirting Act, came into
force in April 2019 - Up skirting is where someone takes a picture underneath someone's clothing without them knowing. This is not solely related to a skirt, this can be any clothing e.g., down blousing. The intention is to view someone's genitals or buttocks to obtain sexual gratification, or cause the victim humiliation, distress or alarm. It is now a criminal offence.

Youth Violence

Youth violence, serious or otherwise, may be a function of gang activity. However, it could equally represent the behaviour of a young person acting individually in response to his or her particular history and circumstances.

Serious youth violence can be defined as any offence of the most serious violence or weapon enabled crime, where the victim is aged 1-19, e.g., murder, manslaughter, rape, wounding with intent and causing grievous bodily harm.

Youth violence can be defined in the same way, but also includes assault with injury offences.

Peer on Peer Abuse

It is important to recognise that learners are capable of abusing their peers and be aware that safeguarding issues can manifest themselves via peer-on-peer abuse.
Peer on peer abuse is abuse young people may experience from their peers who are the same or a similar age and under the age of 18 years.

Peer on peer abuse can take various forms and can include the following safeguarding issues:

- Bullying (including cyberbullying)
- Child Sexual Exploitation
- Gender-based Violence
- Initiation/hazing type violence and rituals
- Physical Abuse
- Relationship Abuse
- Sexual Violence and Sexual Harassment
- Making or sharing of nudes or semi-nudes
- Youth and Serious Youth Violence

Staff need to be aware that abuse is abuse and should never be tolerated or passed off as 'banter' or 'part of growing up' and to recognise that there is a gendered nature of peer-on-peer abuse in that it is more likely that girls will be victims and boys the perpetrators.

Webcams - Safeguarding protocols for staff and learners

Baltic Apprenticeships deliver all training, support sessions, progress reviews and workshops using their online learning platform.

Learners and Baltic staff are not required to use webcams during training or workshops where these are delivered as group sessions. Webcams are not used during group delivery as they can impact on the connectivity and performance of the learning platform, and this can lead to an unequal learning experience for some learners.

Webcam use

Webcams are used for progress reviews, support sessions and exam invigilation and the following will apply to both staff and learners

- Suitable clothing to be worn, as per employer's dress code
- Computers should be located in an appropriate area, if working from home preferably not a bedroom unless this is the only quiet area in the house
- Backgrounds should be neutral, filters can be used
- Language must be professional and appropriate, including any family or work colleagues in the background

The following additional webcam requirements are required for remote exam invigilation

- The webcam must not be integrated into the PC/laptop so that a 360 degree sweep of the room can be made using the webcam
- The learner must be alone in the room, and no one should enter the room while the exam session is in progress
- During the exam, the webcam must show the learners face at all times, and they should be in the centre of the screen and remain in sight of the webcam at all times.

Safeguarding risks

Webcams are used to ensure Baltic staff can meet their safeguarding responsibilities as described above. However, it is also recognised that the use of webcams can bring safeguarding risks if staff or learners demonstrate inappropriate behaviour. These risks can include:

- Not maintaining professional standards
- Grooming behaviors
- Cyberbullying

For monitoring purposes all delivery, both with and without webcam use is recorded.

The Lucy Faithfull Foundation in collaboration with the Home Office, has developed 'Shore Space', an online resource which works to prevent harmful sexual behaviour. Shore Space offers a confidential chat service supporting young people who are concerned about their own or someone else's sexual thoughts and behaviour - https://shorespace.org.uk/

Cybercrimes

Cybercrime is criminal activity committed using computers and/or the internet. It is broadly categorised as either 'cyber-enabled' (crimes that can happen off-line but are enabled at scale and at speed on-line) or 'cyber dependent' (crimes that can be committed only by using a computer). Cyber-dependent crimes include:

- Unauthorised access to computers (illegal 'hacking'), for example accessing a school's computer network to look for test paper answers or change grades awarded
- 'Denial of Service' (Dos or DDoS) attacks or 'booting'. These are attempts to make a computer, network or website unavailable by overwhelming it with internet traffic from multiple sources, and,
- making, supplying or obtaining malware (malicious software) such as viruses, spyware, ransomware, botnets and Remote Access Trojans with the intent to commit further offence, including those above.

Children with particular skills and interest in computing and technology may inadvertently or deliberately stray into cyber-dependent crime.

If there are concerns about a child in this area, the designated safeguarding lead (or a deputy), should consider referring into the Cyber Choices programme. This is a 152 nationwide police programme supported by the Home Office and led by the National Crime Agency, working with regional and local

policing. It aims to intervene where young people are at risk of committing, or being drawn into, low-level cyber-dependent offences and divert them to a more positive use of their skills and interests.

Online Safety

The breadth of issues classified within online safety is considerable and ever evolving, but can be categorised into four areas of risk:

- Content: being exposed to illegal, inappropriate, or harmful content, for example: pornography, racism, misogyny, self-harm, suicide, antisemitism, radicalisation, extremism, misinformation, disinformation (including fake news) and conspiracy theories.
- Contact: being subjected to harmful online interaction with other users; for example: peer to peer pressure, commercial advertising and adults posing as children or young adults with the intention to groom or exploit them for sexual, criminal, financial or other purposes.
- Conduct: online behavior that increases the likelihood of, or causes, harm; for example, making, sending and receiving explicit images (e.g. consensual and non-consensual sharing of nudes and semi-nudes and/or pornography, sharing other explicit images and online bullying, and
- Commerce: risks such as online gambling, inappropriate advertising, phishing and financial scams.

Misinformation, disinformation and conspiracy theories

Keeping Children, Safe in Education makes it clear that misinformation, disinformation and conspiracy theories are safeguarding harms.

- A conspiracy theory is a proposed explanation of historical, current, or speculative events in terms of the significant causal agency of a relatively small group of persons – the conspirators – acting in secret
- Misinformation is incorrect, misleading, or false information that stems from error or misunderstanding.
- Disinformation is misinformation that has been spread deliberately.

AI harms

There is a wide variety of risks included under the umbrella of AI harms, this is ever evolving and we continue to educate learners and staff, but we must recognise the harm AI could pose to learners.

- Exposure to misinformation and disinformation generated by AI
    - Material can be used for spreading extremist ideology, conspiracy theories or hate narratives.
- Encountering abusive, harmful, or inappropriate content
- Risk of deepfakes and manipulated media
- Privacy breaches through sharing personal or sensitive information with AI tools
- Bias and discrimination embedded in AI-generated outputs
- Cyberbullying or exploitation facilitated through AI platforms
- Difficulty in distinguishing between real and AI-generated content

We also recognise that using AI chatbots as a therapist or for mental health support can be a risk for learners as AI may give false, unhelpful and even dangerous advice.

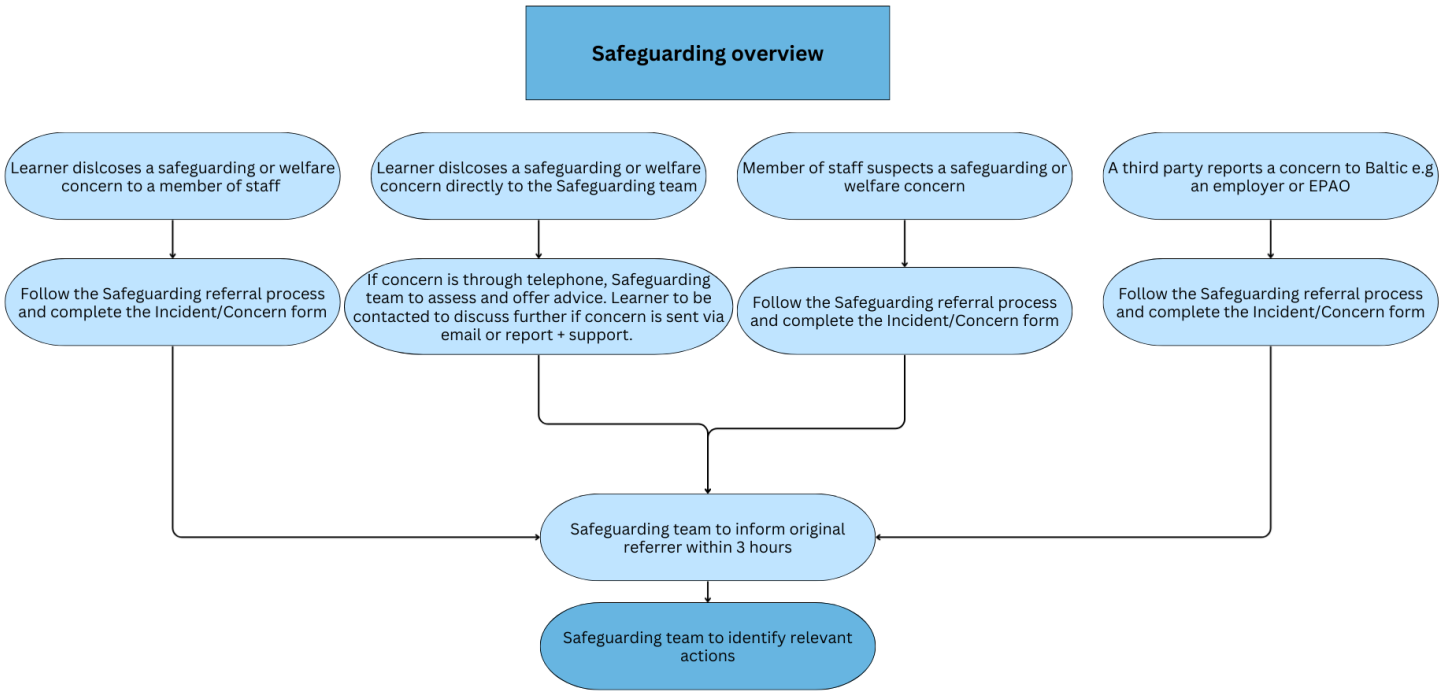
Types of Abuse and Neglect - Care Act 2014

Physical Abuse	**Financial or Material Abuse**
Including assault, hitting, slapping, pushing, misuse of medication, restraint or inappropriate physical sanctions.	Including theft, fraud, internet scamming, coercion in relation to an adult's financial affairs or arrangements, including in connection with wills, property, inheritance or financial transactions, or the misuse or misappropriation of property, possessions or benefits.
Sexual Abuse	**Psychological Abuse**
Including rape, indecent exposure, sexual harassment, inappropriate looking or touching, sexual teasing or innuendo, sexual photography, subjection to pornography or witnessing sexual acts, indecent exposure and sexual assault or sexual acts to which the adult has not consented or was pressured into consenting.	Including emotional abuse, threats of harm or abandonment, deprivation of contact, humiliation, blaming, controlling, intimidation, coercion, harassment, verbal abuse, cyber bullying, isolation or unreasonable and unjustified withdrawal of services or supportive networks.
Modern Slavery	**Discriminatory Abuse**
Encompasses slavery, human trafficking, forced labour and domestic servitude. Traffickers and slave masters use whatever means they have at their disposal to coerce, deceive and force individuals into a life of abuse, servitude and inhumane treatment.	Including forms of harassment, slurs or similar treatment; because of race, gender and gender identity, age, disability, sexual orientation or religion.
Organisational Abuse	**Neglect and Acts of Omission**
Including neglect and poor care practice within an institution or specific care setting such as a hospital or care home, for example, or in relation to care provided in one's own home. This may range from one off incidents to on-going ill-treatment. It can be through neglect or poor professional practice as a result of the structure, policies, processes and practices within an organisation.	Including ignoring medical, emotional or physical care needs, failure to provide access to appropriate health, care and support or educational services, the withholding of the necessities of life, such as medication, adequate nutrition and heating.
Self-Neglect	**Domestic Abuse**

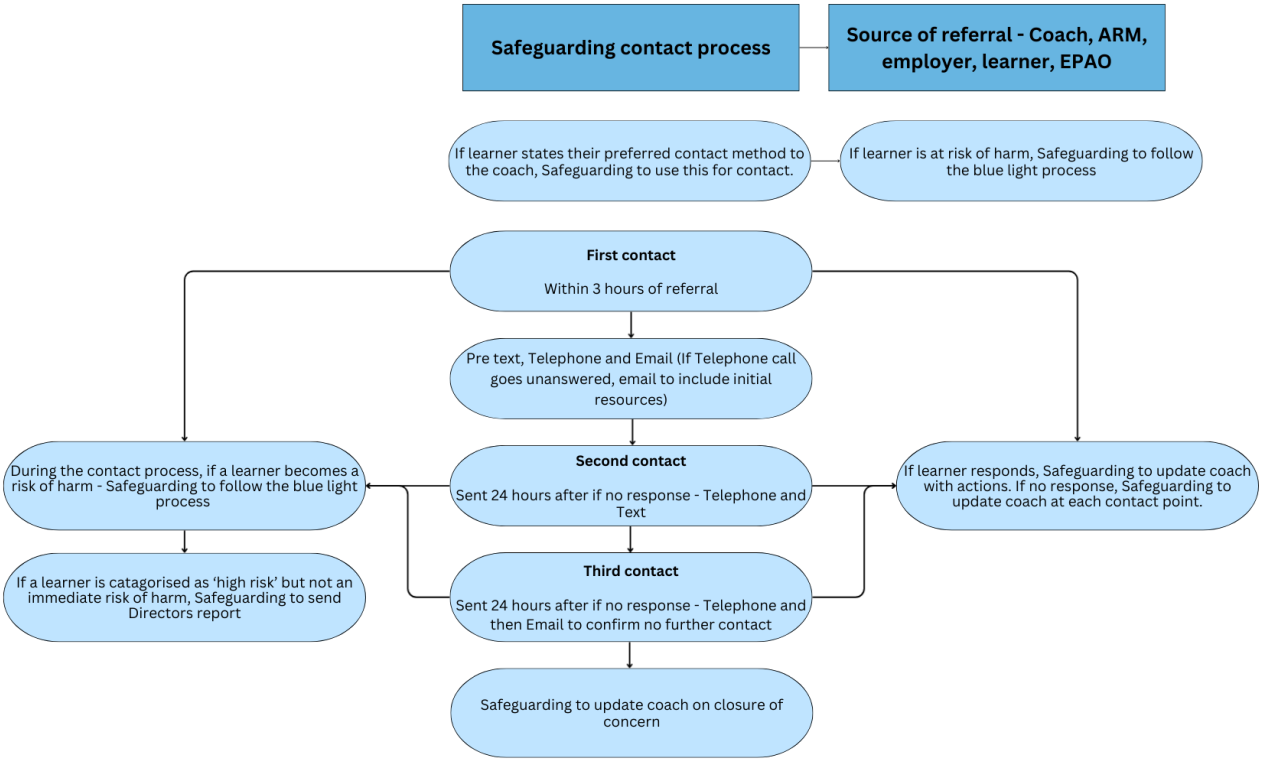
This covers a wide range of behaviour neglecting to care for one's personal hygiene, health or surroundings and includes behaviour such as hoarding.	Any incident or pattern of incidents of controlling, coercive, threatening behaviour, violence or abuse between those aged 16 or over who are, or have been, intimate partners or family members regardless of gender or sexuality. The abuse can be, but not limited to psychological, sexual, financial and emotional.

Appendix B – Safeguarding processes

Safeguarding reporting process



Safeguarding contact process



Appendix C

Channel Process

