


SAFEGUARDING POLICY AND PROCEDURE

Captiva Learning Limited

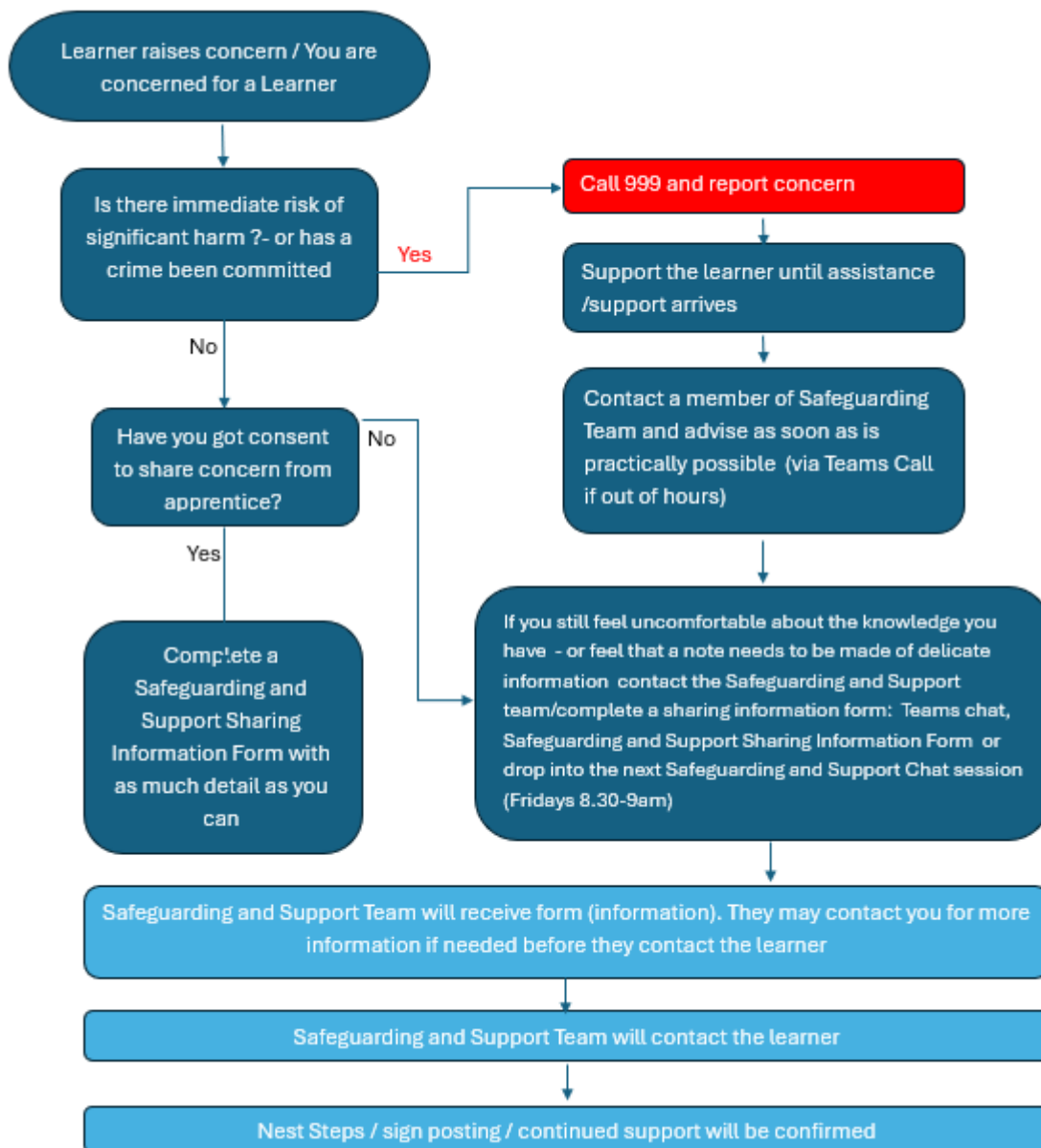
Last Review Date:	5 th September 2025	By:	Jason Oster Captiva Chief Operating Officer
Approval Date:	8 th September 2025	By:	Captiva Governance Board
Next Review Date:	7 th September 2026		
Signed:		Jason Oster Captiva Chief Operating Officer	

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This document will be reviewed annually unless a change of policy or regulation necessitates an interim review. The review will be led by a member of the senior leadership team, or a senior manager, and will involve external advisors or experts where required. The updated document will be reviewed by the senior leadership team initially, then by the Captiva Governance Board before being authorized for publication by the Chair of the Board.

Safeguarding Reporting Procedure



Captiva staff are trained in, and have a clear understanding of, good safeguarding practices as well as what factors may make apprentices vulnerable to a range of safeguarding concerns.

Staff and apprentices are encouraged to raise any questions or concerns, and we make it safe to do this by providing a range of mechanisms for voicing the concerns.

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Safeguarding Policy

Through developing practice, collaboration, research and dissemination, Captiva Learning Limited (Captiva) seeks to ensure that everyone in our care receives support and protection to meet their individual needs. Captiva's Apprenticeships Governance Board fully endorses this policy and guidance.

This policy has been developed to bring together the key principles of safeguarding, the PREVENT duty, equality and diversity and health and safety. It applies to all staff, including senior managers, the Apprenticeships Governance Board, volunteers and seasonal workers, agency staff, apprentices or anyone working for and on behalf of Captiva. Captiva is committed to fulfilling its legal responsibility and obligation to fulfil the Prevent duty statement and procedure. Full details of our PREVENT procedure can be found in Appendix A of this document.

All staff are required to commit to upholding and supporting this Policy and the associated procedures as part of their employment terms.

The term 'apprentice' used in this policy refers to apprentices and apprentices of Captiva.

Our Commitment

- Captiva promotes the welfare of every apprentice and to commit to keeping them safe;
- Captiva is committed to practise in a way that protects every apprentice;
- Captiva believes that apprentices should never experience any form of abuse, discrimination, harassment or victimisation;
- Captiva protects apprentices who receive our services. This includes the children of apprentices who use our services and any siblings of apprentices;
- Captiva will protect apprentices from radicalisation and extremism by responding swiftly where apprentices are vulnerable to these issues;
- Captiva will provide staff and volunteers with regular updates and annual training on safeguarding and PREVENT using the resources provided by the DfE and other accredited sources;
- Captiva will record and check the details of all visitors to all our premises;
- Captiva will protect apprentices from disinformation, misinformation and conspiracy theories that may cause harm or undermine their educational development;
- Captiva will ensure all staff receive training on emerging online safety risks including AI-generated content, deepfakes, and digital manipulation;
- Captiva recognises that ignoring abuse is not an option and all staff must report any concerns for the wellbeing of apprentices in accordance with this policy;

- The well-being of those at risk of harm will be put first and the adult actively supported to communicate their views and the outcomes they want to achieve. Those views and wishes will be respected and supported unless there are overriding reasons not to;
- Any actions taken will respect the rights and dignity of all those involved and be proportionate to the risk of harm;
- Captiva also commits to keeping a Safeguarding and PREVENT action plan/risk register and regular meetings will be held with the safeguarding team on a fortnightly basis whereby the Safeguarding Lead will chair and confidential minutes taken and stored securely.

Commitment

Our commitment is to:

- Promote fundamental British values, including freedom of speech and the rights to be safe and listened to, by creating an environment that encourages every apprentice to raise any concerns;
- Encourage apprentices to develop a sense of autonomy and independence in their learning and development;
- Enable all apprentices to have the self-confidence and the vocabulary to resist inappropriate approaches;
- Work with employers to build their understanding of and commitment to the principles of safeguarding and PREVENT duty, including the monitoring of IT usage;
- Liaise with other statutory agencies to ensure legislative procedures are current;
- Liaise with external agencies to train and support staff and apprentices where required;
- Train staff in the monitoring of IT usage.

The Statutory Framework

The Children Act 1989 placed a duty on local authorities to investigate situations where a child is at risk of significant harm. Schools, colleges and providers had a legal obligation to work with investigating agencies acting on behalf of children in need. Guidance was published in 'Safeguarding Children in Education' (2004). It set out the requirements to provide a safe learning environment, identify young people suffering, or likely to suffer, significant harm, and take appropriate action in full partnership with other local agencies. It encompassed wider issues such as health, safety, drug/substance abuse and bullying as well as the contribution made to safeguarding in relation to individual children and underpinned our common law duty of care.

This was replaced and extended in January 2007 by 'Safeguarding Children and Safer Recruitment in Education', which includes more specific guidance (including some statutory requirements) relating to the recruitment and vetting of staff. The responsibility for making sure appropriate arrangements are in place lies with Captiva. Staff members are responsible for carrying out their duties in compliance with the arrangements set out by Captiva, who are not the investigating agency. This function is carried out by local authority Children's Services, or other agencies with statutory powers. The Children Act 1989, and subsequent legislation and guidance, are concerned with the emotional, physical or sexual abuse or neglect of children, defined as under the age of 18.

However, it is recognised that children acquire degrees of legal capacity (for example, the ability to give informed consent) and maturity prior to their eighteenth birthday, and that there are apprentices over 18 who continue to be vulnerable due to a learning difficulty and/or disability.

Children are defined in the Children Act 1989 and 2004, as a person under the age of 18 years. The Safeguarding Vulnerable Groups Act 2006 (updated 2018) defines vulnerable adults. All adults aged 18 and over have the potential to be vulnerable (either temporarily or permanently) for a variety of reasons and in different situations. An adult may be vulnerable if he/she:

- Has a learning or physical disability;
- Has a physical or mental illness, chronic or otherwise, including an addiction to alcohol or drugs;
- Has a reduction in physical or mental capacity;
- Is in the receipt of any form of healthcare;
- Is detained in custody;
- Is receiving community services because of age, health or disability;
- Is living in sheltered or residential care home;
- Is unable, for any other reason, to protect himself/herself against significant harm or exploitation.

This policy and related procedures are driven by the following legislation and guidance:

Core Legislation:

- The Children Act 1989;
- The Children Act 2004;
- Safeguarding Vulnerable Groups Act 2006;
- Protection of Freedoms Act 2012;
- Care Act 2014;
- Counter Terrorism and Security Act 2015;
- Modern Slavery Act (2015);
- General Data Protection Act (2018);
- Online Safety Act (2023);
- Children's Wellbeing and Schools Bill (2024);
- Human Rights Act(1998).

DfE Guidance:

- Keeping Children Safe in Education 2025;
- Working Together to Safeguard Children 2023;
- What to do if you are worried a child is being abused 2015;
- Keeping Apprentices Safe 2015;
- Working together to improve school attendance (now statutory guidance);
- Data Protection guidance for schools (DfE, 2024).

Prevent and Counter-Terrorism:

- Prevent Duty Guidance for England and Wales (2015);
- Channel Duty Guidance: Protecting vulnerable people from being drawn into terrorism 2015;
- Terrorism (Protection of Premises) Act 2025.

Specific Safeguarding Areas:

- Multi-agency guidance on FGM (2016);

- Information sharing: advice for practitioners providing safeguarding services (2018);
- Children missing in Education (2016);
- Child sexual exploitation: definition and a guide for practitioners (2017);
- Sexting in schools and colleges: responding to incidents and safeguarding young people (UKCCIS) (2016);
- Sexual violence and sexual harassment between children in schools and colleges (2018);
- Generative AI: product safety expectations (DfE, 2025).

Recognising Our Context:

Captiva Learning recognises that it works with adult apprentices in the workplace which provides different challenges to working with children and young people directly. However, a large proportion of our apprentices are adults who are working in education settings working with young people who may be impacted by policies and procedures of safeguarding children and young people, hence the need for our staff to receive appropriate training in this area.

We recognise that the Captiva learner population are all over the legal age of 18 years. As such, the learner population are self-advocating adults who are presumed to have mental capacity and the right to make their own decisions, including decisions that others might consider unwise. All adults aged 18 and over have the potential to be vulnerable, either temporarily or permanently, for a variety of reasons and in different situations. Vulnerability is not fixed and can change due to circumstances including learning or physical disabilities, mental health challenges or cognitive impairment, substance misuse or addiction, social isolation or financial hardship, being subject to coercive control or domestic abuse, immigration status or language barriers, caring responsibilities that create stress or isolation, or major life transitions or trauma.

The consent of the adult learner should normally be gained before a referral to the Safeguarding team is made. However, information may be shared without consent when there is an immediate threat of serious harm to the apprentice or others, when there are concerns about harm to children in the apprentice's care, when required by law such as terrorism, money laundering or FGM reporting duties, when the apprentice lacks mental capacity to consent and sharing is in their vital interests, or when there is evidence of serious crime that poses risk to others. In cases of immediate danger, anyone recognising the immediate threat of harm should contact emergency services immediately.

Assessing when a self-advocating adult no longer has full mental capacity is the responsibility of the Safeguarding team and layered with nuances. The Delivery team who work with learners on a daily basis are trained to discuss any concerns about a learner on an informal basis with a member of the safeguarding team where no express permission is given. The majority of referrals made to the Safeguarding team are of 'low-level' in terms of adult Safeguarding and instead are often concerning personal wellbeing, early signs of mental ill health and providing pastoral advice and guidance in nature.

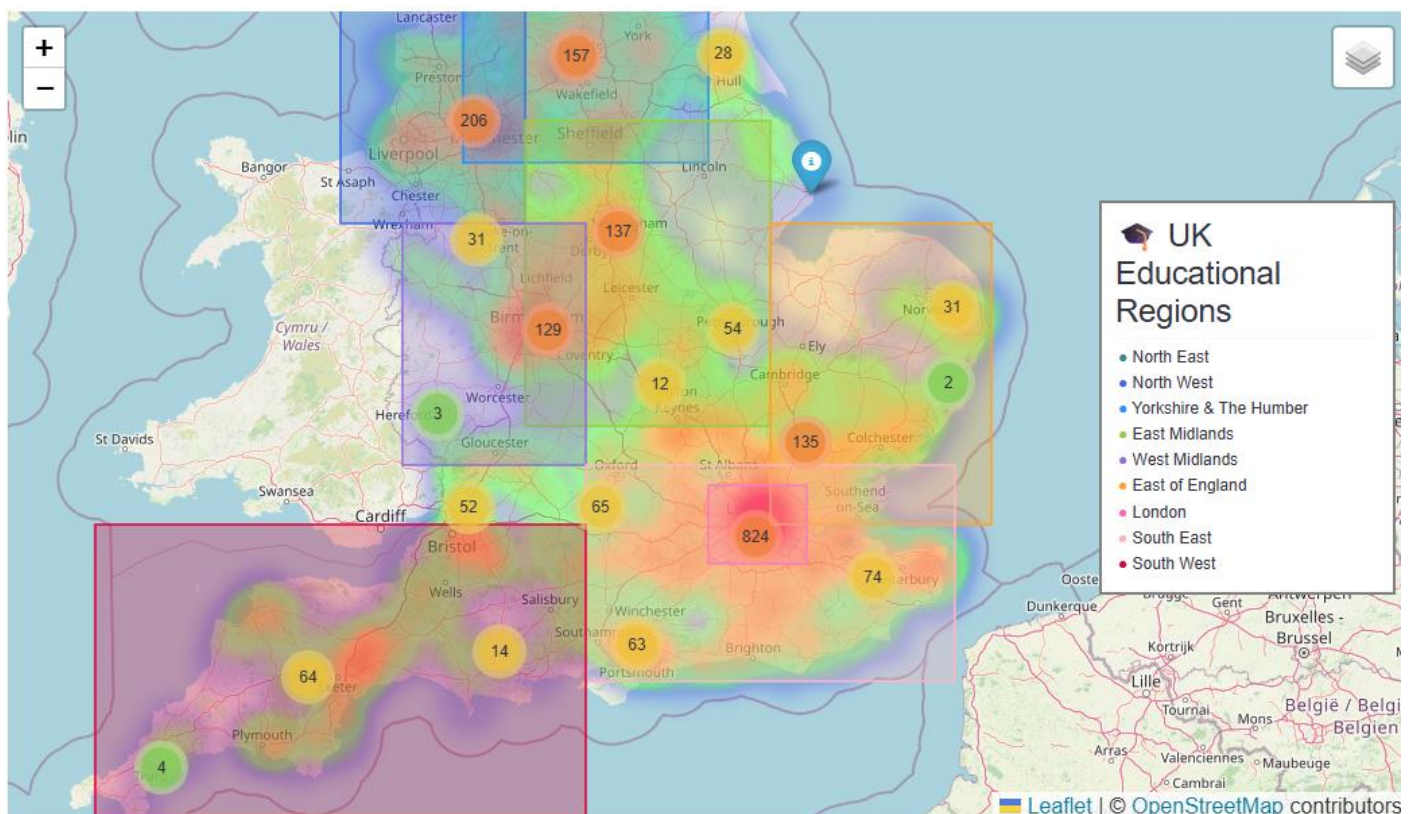
We recognise that the relationship with employers is important for apprentice success, however apprentice confidentiality and consent are paramount. Apprentices control what information is shared with their employer and consent must be freely given and can be withdrawn. Information may be shared without consent only where there is immediate risk of serious harm to the apprentice, children in their care, or others. We will work with apprentices to help them communicate with employers where appropriate and employers are made aware of our confidentiality obligations during onboarding.

Our Learners (September 2025)

Understanding Our Learner Distribution for Targeted Safeguarding and Prevent Support

This heat map visualizes the geographical distribution of our apprentices' workplaces across the UK, providing crucial intelligence for our safeguarding and Prevent strategies. By identifying areas of high learner concentration, we can ensure our safeguarding resources are strategically aligned with local safeguarding partnerships, Adult Safeguarding Boards, and Channel panels in the regions where we have the greatest responsibility. This data enables us to build stronger relationships with local authorities, understand regional safeguarding risks and trends, and ensure our Designated Safeguarding Lead and team maintain current knowledge of local procedures and contact networks. Areas showing higher concentrations of learners will receive prioritised attention for local safeguarding training updates, partnership engagement, and resource allocation, ensuring we can respond effectively to concerns while respecting the local context and expertise of regional safeguarding services.

Captiva views this geographical awareness as essential for our adult education context, where learners may face location-specific risks such as county lines exploitation, regional extremist activity, or local patterns of domestic abuse and modern slavery.



Roles and Responsibilities

The Designated Safeguarding Lead will:

- Report recommendations for changes to Captiva's safeguarding and PREVENT policy and procedures, taking into account legislative changes including KCSIE 2025, Online Safety Act 2023, and emerging digital safeguarding guidance, to the Captiva Governing Body;
- Undertake regular and appropriate training for this role;
- Make the decision to investigate any allegations or concerns about abuse, neglect and exploitation, ensuring appropriate risk assessments are completed;
- Address any immediate protection issues including coordinating emergency responses and safety planning with the Executive Team;
- Make the decision and support staff to refer to an appropriate statutory agency (police, local authority, social services and/or Channel) maintaining detailed records of decision-making rationale;
- Liaise with the local Safeguarding Boards across all geographical areas where apprentices are located;
- Ensure employees are trained on Safeguarding Legislation and Captiva's safeguarding procedures through a tiered training approach: monthly safeguarding updates for all learner-facing staff, annual comprehensive training for all colleagues, and mandatory formal external training every two years. Training must include recognition of disinformation, misinformation, conspiracy theories, AI-generated content risks, and adult safeguarding principles. Where legislation or this policy changes, additional training will be delivered to all staff;
- Ensure that all staff understand how to monitor IT usage by learners wherever possible, acknowledging that apprentices will use their own or their employers IT equipment;
- Source appropriate external training and networking for safeguarding best practice where required, accessing specialist providers including the Fellowship of Inspection Nominees, DfE Prevent Coordinators, and Safeguarding Network to ensure current sector-leading and education expertise.

Working with others:

- Liaise with the Captiva Senior Leadership Team, the Executive Leadership Team and the Captiva Governing Body to inform them about issues/ongoing enquires related to section 47 of the Children's Act 1989;
- Act as a source of support, advice and expertise for staff;
- Liaise with staff on matters of safety and safeguarding when deciding whether to make a referral by liaising with relevant external agencies;
- As required liaise with Local Authority Designated Officers (LADOs) for allegations against staff and with Adult Safeguarding Teams for adult protection concerns;
- Link with Local Adult Safeguarding Boards and Children's Safeguarding Partnerships across all areas where apprentices live and work;
- Contribute to the safeguarding training compliance and effectiveness across all staff groups and working with Head of People and Culture to ensure Safeguarding and Prevent training is reflected in the Single Central Register;

- Work with teachers and tutors to ensure child/vulnerable apprentice protection files are transferred to new college, training provider or other support services when appropriate.
- Ensure availability by telephone or Teams to deal with any incidents;
- Produce annual safeguarding reports for the Captiva Governing body including trends, training completion rates, and recommendations for improvement.

Ongoing development and raising awareness:

- Understand the assessment process for providing early help and intervention, through locally agreed common and shared assessment process for both adult and child safeguarding;
- Have working knowledge of local Adult Safeguarding Boards and Children's Safeguarding Partnership safeguarding board children's and apprentices;
- Develop staff awareness of policies and processes through regular briefings, case study discussions, and scenario-based training;
- Be alert to apprentices who may be vulnerable including those with learning difficulties, mental health needs, caring responsibilities, immigration concerns, or experiencing domestic abuse;
- Keep detailed, accurate, secure written records of concerns and referrals, including decision-making rationale;
- Ensure an open and listening culture that encourages sharing information, reporting and supports staff wellbeing;
- Conduct regular policy reviews and updates in response to new legislation, emerging threats, and lessons learned from cases;
- Understand PREVENT duty, providing advice and support to staff. All staff will receive annual refresher training as a minimum. In the case this policy is updated, or the legislation is updated, then additional mandatory training will be delivered to all staff;
- Ensure policies and procedures are known through discussion as part of the company's staff performance management process.

Designated Safeguarding Officers will:

- Report on best practice and recommendations for improvements to Captiva's Safeguarding Policy and procedures to the Safeguarding Lead;
- Make the decision to investigate any allegations or concerns about abuse;
- Address any immediate protection issues;
- Carry out any internal investigations regarding safeguarding;
- Make the decision to refer to an appropriate statutory agency (police, social services, local authority and/or Channel);
- Liaise with the local safeguarding board;
- Work closely with tutors to respond to any immediate welfare and/or safeguarding concerns;
- Work closely with the Safeguarding Lead to escalate immediate protection issues;
- Work with tutors and support teams to develop the confidence of all when speaking with apprentices regarding welfare, safeguarding, and PREVENT discussions;
- Undertake regular and appropriate training for this role;
- Keep up to date with safeguarding and PREVENT policy changes;
- Work to promote safeguarding and PREVENT best practice;
- Complete their Designated Safeguarding training by an approved training provider and refresher training as appropriate, but as a minimum every 2 years.

Managers will:

- Ensure that this policy is brought to the attention of all their employees;
- Ensure that the policy and associated procedures are implemented effectively;
- Ensure that risks are assessed and that appropriate risk reduction measures are developed for all work tasks and activities;
- Ensure their employees have appropriate instruction, training and development to enable them to fulfil their safeguarding and PREVENT responsibilities and to work safely;
- Monitor the performance of their own employees to ensure policy requirements and Company standards are being met;
- Ensure that all incidents of suspected or alleged abuse are reported;
- Set a good example and promote responsible attitudes among employees and apprentices.

All staff and volunteers will:

- Be alert to signs of abuse and extremism and take responsibility for referring concerns to Captiva's Safeguarding Team;
- Be prepared to listen to and take seriously the concerns of apprentices and carers;
- Abide by the codes of conduct for Captiva employees and volunteers;
- As part of the performance management process, ensure all staff have a good understanding of this policy, and their responsibilities under it;
- Promote the health, safety and welfare of apprentices;
- Promote this policy to all learners and employers;
- Maintain records as necessary;
- Set a good example to apprentices by their own behaviour.

Captiva will ensure that any relevant history of the apprentice, particularly in relation to potential indicators of abuse or neglect, is recorded confidentially within their records.

Safeguarding Definitions and Guidance

Safeguarding is defined as:

- Protecting children and vulnerable apprentices from maltreatment inside or outside the home, including online;
- Preventing impairment of children's and vulnerable apprentices' health or development;
- Ensuring that children and vulnerable apprentices are growing up in circumstances consistent with the provision of safe and effective care;
- Acting to enable all children and vulnerable apprentices to have the best life-chances;
- Providing help and support to meet the needs of children or vulnerable learners as soon as problems emerge.

Significant harm:

- Harm means ill treatment or the impairment of health or development, including impairment suffered from seeing or hearing the ill treatment of another. This is particularly relevant when children see, hear or experience domestic abuse and its effects;
- Development means physical, intellectual, emotional, social or behavioural development.
- Health means physical or mental health;
- Ill-treatment includes physical and sexual abuse and forms of ill treatment which are not physical. (s.31 (9) Children Act 1989 as amended by the Adoption and Children Act 2002).

Welfare: welfare is defined as a child or vulnerable apprentice in need of universal help from those already involved or from a single or multiple agency response.

Missing from education: children and young people and vulnerable apprentices who go missing from education will fail to achieve their full potential academically, and fail to achieve economic wellbeing in later life. They are also at a greater risk of physical harm, self-inflicted or inflicted by others, being sexually exploited and becoming involved in crime and anti-social behaviour, being employed illegally or abusing drugs and alcohol. In line with the duty under section 10 of the Children Act 2004, Captiva must take reasonable steps to monitor apprentices' attendance through a daily register. This is also completed for vulnerable apprentices. Attendance should be monitored closely, and poor or irregular attendance should be addressed.

ONLINE SAFETY :

Content Risks: All staff must be aware of the following online content risks:

- Pornography and sexual imagery;
- Violence and aggression;
- Hate speech and discrimination;
- Self-harm and suicide content;
- Extremist content and radicalisation materials;
- Disinformation - the deliberate creation and spread of false or misleading content, such as fake news;
- Misinformation - the unintentional spread of false or misleading content;
- Conspiracy theories that may undermine educational content or promote harmful ideologies.

AI and Digital Manipulation:

- All staff must be aware of risks associated with generative AI including deepfakes, manipulated images, and AI-generated harmful content;
- Filtering and monitoring systems must account for AI-generated content in accordance with DfE guidance on Generative AI: product safety expectations;
- Learners must be educated about identifying AI-generated content and understanding its potential misuse.

Virtual Learning Environment Protocols:

- All online learning sessions must use waiting rooms where technically possible;

- Screen recording policies must be clearly communicated to all participants;
- Chat functions must be monitored during live sessions;
- Privacy settings must prevent unauthorized recording or screenshot capture where possible;
- All participants must be verified before joining sensitive discussions.

Recognition of abuse, including neglect, bullying and cyber bullying

Recognising abuse, neglect or exploitation is not easy, and it is not the responsibility of staff, volunteers or apprentices to decide whether abuse has taken place or if there is significant risk. Captiva does however have a responsibility to act if staff or others think it may be happening.

Abuse, including neglect and exploitation, includes forms of maltreatment of a child or vulnerable apprentice. Somebody may abuse a child or vulnerable apprentice by inflicting harm, or by failing to act to prevent harm. Children and vulnerable apprentices may be abused in a family or in an institutional or community setting by those known to them or, more rarely, by a stranger for example via the internet. They may also be abused by an apprentice or apprentices, or by another child or children.

Types and signs of abuse

Throughout this policy, where applicable, 'abuse and neglect' has been updated to 'abuse, neglect and exploitation' to reflect current guidance from KCSiE 2025.

Child or vulnerable apprentice abuse: may be physical, sexual or emotional abuse.

Contextual Safeguarding : Children's, young people's and vulnerable apprentices' experiences of abuse and violence are rarely isolated events, and they can often be linked to other things that are happening in their lives and spaces in which they spend their time. Any response to peer on peer abuse therefore needs to consider the range of possible types of peer on peer abuse set out above and capture the full context of children's, young people's and vulnerable apprentice's experiences. This can be done by adopting a 'contextual safeguarding' approach and by ensuring that our response to incidents of peer on peer abuse takes into account any potential complexity.

Significant harm: ill treatment or the impairment of health or development (compared with the health or development which might be expected of a similar child/apprentice).

Physical abuse: actual or likely physical injury to a child or vulnerable apprentice, or failure to prevent injury. This may involve hitting, shaking, throwing, poisoning, burning or scalding, drowning, suffocating or otherwise causing physical harm. Physical harm may also be caused when a parent or carer feigns symptoms of, or deliberately causes, ill health to a child or vulnerable apprentice they are looking after. This form of physical harm is recognised as fabricated or induced illness.

Sexual abuse: actual or likely sexual exploitation of a child or vulnerable apprentice, including prostitution involving forcing or enticing a child or vulnerable apprentice to take part in sexual activities without their consent or understanding. The activities may involve physical contact including penetration or non-penetrative acts. For example, it may also include involving the child looking at or being involved in the production of pornographic material or watching sexual activities or encouraging the victim to behave in sexually inappropriate ways. Can include grooming a child or vulnerable apprentice in preparation for abuse.

Emotional abuse: emotional abuse is the persistent emotional ill treatment of a child or vulnerable apprentice with the intent to cause severe and persistent adverse effects on the victim's emotional development. This includes children witnessing the ill-treatment of others, particularly relevant when children see, hear or experience domestic abuse and its effects.

Neglect: neglect is the persistent failure to meet a child or vulnerable apprentice's basic physical and/or psychological needs likely to result in the serious impairment of their health or development such as failing to provide adequate food, shelter and clothing, medical care or treatment or neglect of, or unresponsiveness to, their basic emotional/physical needs. It can include not protecting a child or vulnerable apprentice from emotional harm or danger.

Peer on peer abuse: peer on peer abuse is behaviour by an individual or group of individuals which can be a one-off incident or repeated over time. Peer on peer abuse is behaviour that intentionally hurts another individual or group either physically or emotionally.

The recent rise in popularity of online figures and subcultures that promote misogyny, homophobia, transphobia, domestic violence, and other problematic ideas present a very real threat to the safeguarding of young people. These influencers appeal most to teenage boys and men, with school students up and down the country celebrating them as role models.

It is more likely that girls will be victims and boys perpetrators, but all peer on peer abuse is unacceptable and will be taken seriously. Peer on peer abuse can take many forms including serious bullying (including cyberbullying), relationship abuse, domestic violence, child sexual exploitation, youth and serious youth violence, financial abuse, harmful sexual behaviour and/or gender-based violence. Peer on peer abuse is often motivated by prejudice against particular groups steered by a dislike for a person's:

- Race;
- Religion;
- Gender;
- Special educational needs or disabilities.

Or where a child:

- Is adopted or in care;
- Has caring responsibilities;
- Is suffering from a health problem;
- Is frequently on the move (e.g. those from military families or the travelling community);
- Is experiencing a personal or family crisis;
- Has actual or perceived differences, (e.g. physical or cultural differences).

These types of abuse rarely take place in isolation and often indicate wider safeguarding concerns. Abusive behaviour can happen to pupils in school settings, and it is necessary to consider what abuse is and looks like, how it can be managed, what support and intervention can be put in place to meet the needs of the individual, and what preventative strategies may be put in place to reduce further risk of harm.

There may be reports where the alleged incident is between two pupils from the same or different educational establishments but is alleged to have taken place away from the premises. The safeguarding principles, and our duty to safeguard and promote the welfare of the apprentice remain the same regardless of where the incident took place and regardless of whether the incident was online or offline.

Abuse is abuse and will never be tolerated or passed off as 'banter', 'just having a laugh', 'part of growing up' or 'boys being boys'. Equally, abuse issues can sometimes be gender specific, e.g. girls being sexually touched/assaulted and boys being subject to initiation/hazing type violence. Captiva will not dismiss abusive behaviour between children, young people and vulnerable apprentices as 'normal' and our thresholds for investigating claims and allegations are the same as for any other type of abuse.

Preventing violence and ensuring immediate physical safety is Captiva's first priority, but we also acknowledge that emotional abuse can be just as damaging, if not more so, than physical violence. Captiva recognises that abuse often involves an imbalance of power between the perpetrator and the victim. This could involve perpetrators of abuse having control over the relationship which makes it difficult for the victim to defend themselves. The imbalance of power can manifest itself in several ways: it may be physical, psychological (knowing what upsets someone), derive from an intellectual imbalance, or by having access to the support of a group, or the capacity to socially isolate. It can result in the intimidation of a person or persons through the threat of violence or by isolating them either physically or online.

Captiva also acknowledges that low level disruption and the use of offensive language can have a significant impact on its target. If left unchallenged or dismissed as 'banter' or 'horseplay', it can also lead to reluctance to report other behaviour.

Bullying and harassment: bullying can include a variety of behaviours from one individual/group to another individual/group such as name calling, offensive language, coercion, hitting, pushing, theft or damage to belongings, cyberbullying, spreading harmful messages, hate crime or mate crime, which is befriending someone with the intent to exploit them in some way.

Cyber bullying and e-safety: the safe and responsible use of technology is sometimes presented as primarily a child or vulnerable apprentice protection issue. While children, young people and vulnerable apprentices do need support to keep themselves safe online, the risks associated with the use of technology (e.g. internet, text or video messaging, email, chatrooms, social media networking sites) to embarrass, humiliate, threaten, intimidate or bully an individual in an attempt to gain power and control over them can extend to all apprentices and staff.

There is also the mismanagement of personal data, risks of financial scams, identity theft, grooming, and radicalisation.

Learning difficulty and/or disability: children or apprentices with a learning difficulty and/or disability may be especially vulnerable to abuse or bullying and may have difficulties in communicating this to staff. At Captiva, staff are skilled, experienced and they work closely with apprentices and their colleagues so they can identify signs at an early stage. Any reports of a apprentice with a learning difficulty and/or disability being abused or bullied will involve the Designated Safeguarding Lead at the very earliest opportunity.

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 because of an individual experiencing a significant level of personal, emotional trauma and/or stress.

Domestic violence: can be physical, emotional, sexual or neglect. This category also covers forced marriages and honour-based violence. Some apprentices may experience issues with drugs or alcohol to self-medicate or via dependence.

Female Genital Mutilation (FGM): victims of FGM are likely to come from a community that is known to practice FGM. Professionals should note that girls at risk of FGM may not yet be aware of the practice or that it may be conducted on them, so sensitivity should always be shown when approaching the subject.

The FGM mandatory reporting duty is a legal duty provided for in the FGM Act 2003 (as amended by the Serious Crime Act 2015). The legislation requires staff to report where, during their professional duties, they either are informed by a girl under 18 that an act of FGM has been carried out on her, or observe physical signs which appear to show that an act of FGM has been carried out on a girl under 18, and they have no reason to believe that the act was necessary for the girl's physical or mental health or for the purpose of labour or birth. For the purposes of the duty, the relevant age is the girl's age at the time of disclosure/identification of FGM (i.e. it does not apply where a woman aged 18 or over discloses she had FGM when she was under 18).

Forced marriage: one or both spouses do not consent to the marriage or consent is extracted under duress. Duress includes both physical and emotional pressure. A clear distinction must be made between a forced marriage and an arranged marriage.

In arranged marriages, the families of both spouses take a leading role in choosing the marriage partner but the choice whether to accept the arrangement remains with the young people.

Modern slavery: 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.

Risks/abuse related to family/cultural belief/faith: it is important to remember that many children and vulnerable apprentices are a part of a family. Some families have certain values and beliefs that can cause harm to a child or vulnerable apprentice. An example of this can include strong beliefs or a sense of honour or shame that can prevent people from seeking or accepting the help they need. A strong cultural or religious belief in the sanctity of marriage may dissuade people from leaving their partners, even if they are violent. In addition, many religions and cultures have strong beliefs around sex outside marriage, making it very hard for young, unmarried, pregnant women to get the help they need.

Differences in culture or religion between partners, or between parents and children, may also make it more difficult for individuals to understand and support each other. Where one partner perceives their faith and heritage to be superior to, or more important than, their partner's it can lead to a power imbalance and an erosion of the other partner's self-esteem.

In extreme cases children who are perceived as "disobedient" or "different" are believed to be possessed by a spirit controlling their behaviour. The children can be physically and emotionally abused to exorcise the spirit.

Sexting: this is when someone sends or receives a sexually explicit text, image or video. This includes sending 'nude pics' or 'rude pics' or 'nude selfies'. Pressuring someone into sending a nude picture can happen in any relationship and to anyone, whatever their age, gender or sexual preference. Once the image is taken and sent, the sender has lost control of the image and the image could end up anywhere. By having in their possession or distributing to others indecent images of a person under 18, many young people are not aware that they could be committing a criminal offence under the Sexual Offences Act 2003.

Any direct disclosure by an apprentice (male or female) will be taken very seriously. A child or young person who discloses they are the subject of sexual imagery is likely to be embarrassed and worried about the consequences. It is likely that disclosure is a last resort and they may have already tried to resolve the issue themselves. When an incident involving sexting comes to our attention, Captiva will follow the guidance as set out in the UKCCIS publication *Sexting in Schools and Colleges: Responding to incidents and safeguarding young people*.

Initiation/hazing: hazing is a form of initiation ceremony which is used to induct newcomers into an organisation such as a school or sports team. Hazing can also be used as initiation into a street or other 'gang'. There are several different forms, from relatively mild rituals to severe and sometimes violent ceremonies. The idea behind this practice is that it welcomes newcomers by subjecting them to a series of trials which promote a bond between them. After the hazing is over, the newcomers also have something in common with older or established members of the organisation or 'gang', because they have all experienced this as part of a 'rite of passage'. Many rituals involve humiliation, embarrassment, abuse and harassment.

Parental impact: the issues of parents and carers can have a significant impact upon a child or vulnerable apprentice's wellbeing. Some issues can include substance misuse, mental health and domestic abuse. It is also important to note that some children and vulnerable apprentices also misuse drugs or alcohol when experiencing trauma in their own lives and they may require support around both factors. It is fundamental that wherever a concern is held for a child or vulnerable apprentice that confidentiality is respected; however, if the concern must involve the parent or carer for safeguarding reasons, then it is good practice to work together and inform parents or carers of any referrals that may have to be made to support services.

Allegations against staff

Captiva recognises that whilst most staff and volunteers who work with children and vulnerable apprentices are committed to their wellbeing and care, there exists a range of abuse perpetrated by workers that, despite the best efforts and interventions, can still take place.

An allegation may relate to a member of staff including a volunteer who works with children who has behaved in way that has harmed a child, or may have harmed a child, possibly committed a criminal offence against or related to a child, or behaved towards a child or children in a way that indicates they may pose a risk of harm to children. Captiva will:

- Ensure that all apprentices and employers know how to complain about staff, which may include an allegation of abuse or neglect of statutory duties;
- Follow the guidance of the local safeguarding board when responding to any complaint that a member of staff or volunteer has abused a apprentice;
- Ensure each manager knows that the Designated Safeguarding Lead is to be made aware immediately of any allegation or complaint against a member of staff or volunteer;
- Respond to any disclosure by apprentices or employers that abuse by a member of staff may have taken, or is taking place, by first recording the details of any such alleged incident;
- Refer any such complaint immediately to the Local Authority's Designated Officer (LADO) to investigate;
- Co-operate entirely with any investigation carried out by the local authority and police;
- Use the Disclosure and Barring Service to its maximum value (DBS).

Responding to suspicions

Captiva is committed to responding promptly and appropriately to all incidents or concerns that may occur, and to working with statutory agencies in accordance with the procedures that are set down in 'What to do if you are worried a child is being abused.' (DfE 2014)

Captiva acknowledges that abuse or neglect of basic safety and welfare procedures for apprentices can take place and that this can take different forms: physical, emotional, and sexual, as well as employer's neglect of legal responsibilities and neglect of parental or statutory responsibilities (including where young people are in care of social services).

Captiva also acknowledges that this can take the form of 'virtual' or internet-based abuse or neglect.

Captiva recognises that when young people or vulnerable apprentices are suffering from physical, sexual or emotional abuse, or may be experiencing neglect, this may be demonstrated through the things they say (direct or indirect disclosure) or through changes in their appearance, their behaviour, or their play.

Where any member of staff has knowledge of, or a suspicion that, a child, young or vulnerable person is or has been suffering significant harm, they must refer their concern to the on-duty Designated Safeguarding Officer/Lead as soon as possible, but within 24 hours at the latest. The member of staff must make a dated record of the details of the concern on the safeguarding concern form and email Rebecca.Scullion@captivalearning.com for investigation and action; the person raising the concern must not retain any written information.

All allegations or suspicions must be taken seriously. The apprentice or staff member must be advised that this information cannot be kept confidential and will be passed on to the Designated Safeguarding Officer/Lead in Captiva in the first instance.

Support for staff

Where a member of staff finds a disclosure particularly distressing, they may wish to contact a member of the Safeguarding or HR Team for support. Captiva has an open-door policy for any staff who wish to discuss their concerns. Staff will need to be mindful that Captiva cannot, as with apprentices, give absolute confidentiality to any disclosures. All new joiners receive a Captiva induction which includes raising awareness of commitment towards safeguarding, details of the support services that can be offered and contact details for the Safeguarding Team. The understanding of all aspects of safeguarding and safe working practices is checked at each performance review and the opportunity to discuss any issues is given. Assessments are made to ensure that staff members' wellbeing is safeguarded in the workplace, and the HR Team ensures arrangements are in place prior to work related activity commencing, including:

- Health and safety checks of Captiva's and customers' premises, health and safety management arrangements are completed, including insurance details, young person risk assessments, and lone working policies;
- Captiva employees and customers are made aware of relevant Captiva policies;
- The requirements for DBS checks are assessed and the relevant processes undertaken where required.

Confidentiality

A good working relationship between staff and apprentices depends to a large extent on the establishment of trust. However, guarantees of absolute confidentiality should not be given. If a apprentice/staff member discloses to a member of staff, it is important that the boundaries of confidentiality and the need to pass on that information are explained. It is often easier to explain that you have a responsibility to pass on information on certain matters than to get into a situation where you break a confidence.

Disciplinary action

It is a criminal offence for a person over 18 in a position of trust to enter a sexual relationship with any apprentice under 18 years old, even if the relationship is consensual. If allegations are made against staff, the same procedures as outlined above must be followed. If a member of staff suspects abuse, whether sexual or otherwise, from another member of staff, the Designated Safeguarding Lead must be informed. Depending on the severity of the allegations outside agencies may be informed and/or the staff disciplinary procedure may be invoked.

Where a member of staff or a volunteer is dismissed from the delivery of services or internally disciplined because of misconduct relating to a apprentice, Captiva notifies the Disclosure and Barring Service (DBS) so that appropriate action is taken.

Safer recruitment processes

Captiva provides adequate and appropriate staffing resources and training to meet the needs of apprentices. All staff, volunteers and apprentices are informed that their job falls under the DBS requirements for an enhanced check under section 128 of the Education Skills Act 2008. HR will provide the applicant with more information about the level of check required.

There are 3 types of check:

- Standard: this checks for spent and unspent convictions, cautions, reprimands and final warnings;
- Enhanced: this includes the same as the standard check plus any additional information held by local police that's reasonably considered relevant to the workforce being applied for (apprentice, child or other workforce);
- Enhanced with list checks: this is like the enhanced check but includes a check of the DBS barred lists.

Checks will be made using an appointed third-party provider or using the update service.

Information sharing and record keeping

There may be some circumstances where the welfare or safety of an individual may take precedence over confidentiality. When sharing information there are 7 Golden Rules that Captiva will adhere to:

- The Data Protection Act is not a barrier to sharing information;
- Be open and honest;
- Seek advice;
- Share information, with consent, where appropriate;
- Consider safety and well-being;
- Ensure that information sharing is appropriate and secure;

- Records are made in a timely manner and as a matter of priority.

The Staff member who receives the allegation, or disclosure should make an immediate written record of the conversation, including the following information:

- Date and time of report;
- Name of Individual;
- DOB of individual;
- Nature of allegation;
- Any other information given, including siblings if relevant (their full names and DOB if possible);
- Confirmation that the apprentice/staff member has been advised of the next steps;
- The rationale for any decision made.

Records are held by the Designated Safeguarding Lead and stored on a secure area. Staff must take care not to influence the outcome either through the way they speak to or question apprentices.

Captiva continues to welcome the apprentice whilst investigations are being made in relation to any alleged abuse. The apprentice may choose to withdraw from learning activities whilst investigations take place.

Captiva follows the procedures as set by the local safeguarding board in relation to the delivery of services and designated roles and tasks in supporting the apprentice, family, and employer subsequent to any investigation.

All suspicions and investigations are kept confidential and shared only with those who need to know. Any information is shared under the guidance of the local safeguarding board and Local --Authority Designated Officer.

Record: when recording an incident, a safeguarding 'Sharing Information Form' (accessible via SharePoint /Safeguarding and Support folder) form must be completed. Whilst you can record observations, do not interpret or give opinion as this may bias the information provided and jeopardise any future investigation into the allegation. The safeguarding report form should be kept securely.

Report: any issues or concerns, allegations or suspicions relating to safeguarding must be taken seriously and reported to the Safeguarding Team.

Refer: where required, the Designated Safeguarding Lead or Deputy Designated Safeguarding Lead will refer or support you with guidance on next steps and/or signposting the relevant external agency.

Literature outlining the reporting processes including posters or pop-up banners as appropriate will be on display in learning environments to inform apprentices how they can raise their own concern directly with the Safeguarding and Support Team

Captiva abides by the DBS regulatory requirements in respect of requesting references and DBS checks for staff and volunteers.

New staff and volunteers are not given unsupervised access to young people or vulnerable apprentices pending return of a satisfactory DBS check.

Captiva will meet the DBS reporting requirements in respect of any person who is dismissed from our employment or resigns in circumstances that would otherwise have led to dismissal for reasons of apprentice protection concern.

Disclosure

Captiva strongly supports the principle of working in partnership with children, vulnerable adults, parents/carers and apprentices. This means seeking clear, explicit and informed consent from the individual(s) concerned for information about them to be shared with specified other individuals or agencies where consistent with the individual(s)'s best interests.

It is possible, however, to identify some circumstances in which sharing confidential information without consent will normally be justified in the public interest.

These are:

- When there is evidence that a child, vulnerable adult or apprentice is suffering or is at risk of suffering significant harm;
- Where there is reasonable cause to believe that a child, vulnerable adult or apprentice may be suffering or at risk of significant harm;
- To prevent significant harm arising to children and young people or serious harm to apprentices, including through the prevention, detection and prosecution of serious crime;
- For this purpose, serious crime means any crime which causes or is likely to cause significant harm to a child or young person or serious harm to an apprentice.

SUPPORT AND WELLBEING SERVICES

Captiva provides comprehensive safeguarding and support service including:

- confidential safeguarding support through our Designated Safeguarding Lead and Safeguarding and Support Team;
- signposting mental health and wellbeing resources and referral pathways;
- signposting financial advice and support services;
- academic support and reasonable adjustments for learning differences through our Additional Learning Needs Tutor;
- signposting specialist support for those experiencing domestic abuse, harassment, or exploitation.

You have the right to:

- access support services confidentially;
- have your personal information handled in accordance with data protection laws and our Privacy Policy;
- withdraw from support services (except where there are immediate safety concerns);
- be treated with dignity and respect regardless of your personal circumstances.

Support service contact information is displayed in the virtual learning environment (Canvas) and provided during orientation.