

Apprenticeship Delivery

Safeguarding Policy

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1.0 Introduction

The Chartered Institute of Building (CIOB) are passionate about safeguarding our apprentices. Not only do we have a statutory duty to ensure that we safeguard and promote the welfare of children, young people and adults at risk of harm, but also a moral duty. This policy and procedure focuses on how we:

- recruit and train our staff, trainers and consultants
- support our apprentices
- deal effectively with allegations against staff.

The Safeguarding Policy for the CIOB reflects the importance of our responsibility to safeguard and promote the welfare of all our apprentices and staff by protecting them from physical, sexual, or emotional abuse, neglect and bullying. We are committed to providing a caring, friendly, and safe environment for all our apprentices so that they can learn in a relaxed and secure atmosphere. We believe every apprentice should be able to participate in all learning and social activities in an enjoyable and safe environment and be protected from harm.

This policy is applicable to all staff, apprentices, visitors, contractors, volunteers, service providers and subcontractors who may be working with children (those under 16), young adults (those aged 16-24) and vulnerable adults (as defined in section 59 of the Safeguarding Vulnerable Groups Act 2006 and/or those persons aged 18 and over who by reason of mental or any other disability, age or illness are or may be unable to look after themselves or are or maybe unable to protect themselves against harm or exploitation) whom the CIOB encounters through any of their programmes.

2.0 Aims of the Policy

The aims of this Policy are to:

- Identify the expectations of staff in relation to safeguarding.
- Ensure relevant and effective safeguarding practices are in place.
- Ensure the right of every apprentice and applicant to learn within a safe environment.
- Promote awareness to staff of the need to safeguard children, vulnerable adults and all people and to recognise that safeguarding is everyone's responsibility.
- Ensure that the fundamental rights and needs of our applicants and apprentices are observed.
- Prevent abuse through the pastoral support offered to all apprentices and applicants, raising awareness of different types of abuse and children in need issues.
- Provide guidelines for staff in handling matters relating to actual or suspected child and vulnerable adult abuse.
- Ensure staff act professionally.
- Deter potential unsuitable individuals from applying to the CIOB by demonstrating our attentiveness and vigilance in relation to safeguarding through our website and job advertisements.
- Reject at interview stage anyone where we have doubts about suitability.
- Prevent the risk of abuse by ensuring procedures and standards are in place.

3.0 Reference

Throughout this policy and procedure, reference is made to 'children and young people'. This term is used to mean those under the age of 18. Safeguarding and promoting the welfare of children is defined as: protecting children from maltreatment; preventing impairment of children health or development; ensuring that children grow up in circumstances consistent with the provision of safe and effective care; and keeping action

to enable all children to have the best outcomes (Keeping Children Safe in Education 2024).

Reference is made throughout to 'adults at risk of harm'. Adults who are at risk of harm are defined as people aged 18 years or over who may need, or receive, community care services by reason of mental health or other disability, age or illness and who may be unable to take care of themselves or protect themselves against significant harm or exploitation (No Secrets, Department of Health. March 2000). The procedure will be applied, with appropriate adaptations, to all apprentices.

This policy has been created with reference to Working Together to Safeguard Children (2023), SET Procedures 2015 and Keeping Children Safe in Education (2024).

At the CIOB, we are fully committed to safeguarding and promoting the welfare of all apprentices and staff.

4.0 Objectives of the Policy

At the CIOB, all employees are expected to uphold and promote the fundamental principles of British values, including democracy, the rule of law, individual liberty, mutual respect and tolerance of those with different faiths and beliefs.

The principal objectives of this policy are that:

- All apprentices and staff will know that the CIOB has policies in place to keep them safe from harm and that the CIOB regularly reviews its systems to ensure they are appropriate and effective.
- All apprentices are aware of who and how to contact a member of the CIOB staff should they wish to disclose any information or concerns. Conversely, all staff are appropriately trained to recognise potential areas of concern that may occur with individual apprentices and the process to adhere to.
- The CIOB staff promote respect, tolerance, and diversity.
- Apprentices and staff are briefed during their Induction and as part of ongoing standardisation and training about how to stay safe when using the Internet and are encouraged to recognise that people are not always who they say they are online. They are taught to seek help if they are upset or concerned about anything they read or see on the Internet.
- Inappropriate websites are banned and cannot be accessed from the CIOB premises. The CIOB staff, contractors, associates, and volunteers undertake appropriate training to ensure that they are clear about their role and the parameters of their responsibilities including their statutory safeguarding duties.

The CIOB will:

- Provide a safe environment for children, young people, and adults at risk of harm to learn in.
- Identify those who are suffering or are likely to suffer significant harm.
- Have a system for identifying concerns in relation to abuse of adults at risk of harm and effective methods of responding to disclosures.
- Refer concerns that a child, young person or adult at risk of significant harm or might be at risk of significant harm to the appropriate referral agents.
- Work effectively with others as required by Working Together to Safeguard Children (2023).

- Take into account the interagency safeguarding procedures of the local authority Safeguarding Children's Board.

The CIOB will approve and review policies and procedures:

- Ensuring systems are in place and effective in relation to the identification of children, young people and adults at risk of harm, and procedures for reporting concerns are widely known.
- Ensuring effective procedures for reporting and dealing with allegations of abuse by members of staff or others who come into contact with apprentices.
- Ensuring safe recruitment of staff, ensuring staff are appropriately trained to discharge their duties in relation to safeguarding.
- In developing policies and procedures, the CIOB will take account of guidance issued by the Department for Education, Ofsted and other relevant bodies and groups including the Local Safeguarding Children Board.

5.0 Types of Abuse and Neglect

The CIOB uses the following as definitions of abuse for children, young people, and adults at risk of harm, and the CIOB operates a zero-tolerance operation on each of the below.

5.1 Abuse

A form of maltreatment. Somebody may abuse or neglect by inflicting harm, or by failing to act to prevent harm. They may be abused by an adult or adults or child or children. Physical abuse: a form of abuse which 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 fabricates the symptoms of, or deliberately induces, illness.

5.2 Emotional Abuse

Emotional abuse is the persistent emotional maltreatment of a child or adult at risk of harm such as to cause severe and persistent adverse effects on their emotional development. It may involve conveying to them that they are worthless or unloved, inadequate, or valued only in so far as they meet the needs of another person. It may include not giving them 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. These may include interactions that are beyond the developmental capability, as well as overprotection and limitation of exploration and learning, or preventing from participating in normal social interaction. It may involve seeing or hearing the ill-treatment of another may involve serious bullying (including cyber bullying), causing victims to frequently to feel frightened or in danger, or the exploitation or corruption of other. Additionally, 'revenge porn' has been identified as a specific criminal offence (Criminal Justice and Courts Act 2015).

The Act creates a new criminal offence of disclosing private sexual photographs and films without the consent of an individual who appears in them and with intent to cause that individual distress. Some level of emotional abuse is involved in all types of maltreatment, though it may occur alone.

5.3 Sexual Abuse

Sexual abuse involves forcing or enticing a child, young person, or adult at risk of harm to take part in sexual activities. It may not necessarily involve a high level of violence, whether

or not the child or adult may not be aware of what is happening. The activities may involve physical contact, including assault by penetration (for example, rape or oral sex) 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 (including via the internet). Sexual abuse is not solely perpetrated by adult males. Women can also commit acts of sexual abuse, as can other children.

5.4 Child Sexual Abuse Within the Family

Child sexual abuse within the family is that which occurs within the family environment. Abuse may involve relatives or others, such as foster carers or a parent's partner, who feel like family from a child's point of view. The family environment is a common context in which child sexual abuse occurs, accounting for almost half of all child sexual abuse offences reported to the police in England and Wales.

5.5 Peer on Peer/Child on Child Abuse

Peer-on-peer abuse includes but is not limited to: physical and sexual abuse, sexual harassment and violence, emotional harm, on and offline bullying and teenage relationship abuse. Peer on peer and child on child-on-child abuse can be motivated by perceived differences e.g. on grounds of race, religion, gender, sexual orientation, disability or other differences. It can result in significant, long lasting, and traumatic isolation, intimidation, or violence to the victim.

5.6 Up Skirting

Up skirting is a specific criminal offence under the Voyeurism (Offences) Act 2019. It typically involves taking a photograph under a person's clothing without them knowing, with the intention of viewing their genitals or buttocks for sexual gratification or causing humiliation, distress, or alarm. The revised version of Keeping Children Safe in Education lists up skirting as one example of peer-on-peer abuse.

5.7 Sexual Consent

Consent is an agreement between people to engage in a sexual activity. Consent means freely choosing to say 'yes' to a sexual activity. It's needed for any kind of sexual activity, from touching or kissing to intercourse. It's always clearly communicated – there should be no mystery or doubt. There are laws around who can consent and who can't. Without consent, any sexual activity is against the law and can be harmful.

5.8 Neglect

Neglect is the persistent failure to meet basic physical and/or psychological needs, likely to result in the serious impairment of health or development. Neglect may occur during pregnancy 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 from physical and emotional harm or danger
- ensure adequate supervision (including the use of inadequate caregivers)
- ensure access to appropriate medical care or treatment

It may also include neglect of, or unresponsiveness, to basic emotional needs. This also applies to adults at risk of harm for whom neglect is an often under reported or challenged concern.

5.9 Forced Marriage

This involves a young person, or adult at risk of harm, being forced into a marriage against their will.

5.10 Child Sexual Exploitation

Child sexual exploitation (CSE) is a form of sexual abuse that involves the manipulation and/or coercion of young people under the age of 18 into sexual activity in exchange for things such as money, gifts, accommodation, affection, or status. The manipulation or 'grooming' process involves befriending children, gaining their trust, and often feeding them drugs and alcohol, sometimes over a long period of time, before the abuse begins.

The abusive relationship between victim and perpetrator involves an imbalance of power which limits the victim's options. It is a form of abuse which is often misunderstood by victims and outsiders as consensual. Although it is true that the victim can be tricked into believing they are in a loving relationship, no child under the age of 18 can ever consent to being abused or exploited (Barnardo's 2012).

5.11 Children Who Run Away or Who are Missing From Home

There are no exact figures for the number of children who go missing or run away, but estimates suggest that the figure is in the region of 100,000 per year. Children may run away from a problem, such as abuse or neglect at home, or to somewhere they want to be. They may have been coerced to run away by someone else. Whatever the reason, it is thought that approximately 25 per cent of children and young people that go missing are at risk of serious harm. There are particular concerns about the links between children running away and the risks of sexual exploitation. Missing children may also be vulnerable to other forms of exploitation, to violent crime, gang exploitation, or to drug and alcohol misuse.

Although looked after children are particularly vulnerable when they go missing, the majority of children who go missing are not looked after and go missing from their family home. They can face the same risks as a child missing from local authority care.

5.12 Children at Risk of Exploitation

Children at Risk of Exploitation (CRE) tends to involve an individual or group taking advantage of an imbalance of social, economic or emotional power to manipulate, control or deceive a child into committing criminal activities. The child or young adult may receive 'something' (e.g. food, accommodation, drugs, alcohol, cigarettes, affection, gifts, money) in exchange for the criminal activity committed and so the child may have been criminally exploited even if the activity appears to be consensual.

Child Criminal Exploitation (CCE) does not require physical contact and may have been facilitated through the use of technology. Common examples of CCE include, but are not limited to, coercing children to steal or involving children in County Lines drugs networks.

5.13 Gang Culture/County Lines

County Lines is a form of criminal exploitation where urban gangs persuade, coerce or force children and young adults to store drugs and money and/or transport them to suburban areas, market towns and coastal towns (Home Office, 2018). This can occur through coercion, intimidation and (sometimes sexual) violence. It can happen in any part of the UK and is against the law and a form of child abuse.

5.14 Child Trafficking

Child trafficking involves the recruiting, moving, receiving, and harbouring of children with the purpose of exploiting them (Department for Education, 2011). Child trafficking is a form of modern slavery. Children are trafficked for:

- benefit fraud
- criminal activity
- domestic servitude
- forced labour
- forced marriage
- illegal adoption
- moving drugs
- selling pirated goods
- sexual exploitation
- unreported private fostering

5.15 Knife Crime

Knife crime is any crime involving a knife or sharp object such as razors, swords, axes, bayonets, forks, needles, arrows and broken glass bottles. Crimes include:

- carrying a knife
- owning a banned knife
- trying to buy a knife if the individual is under the age of 18
- threatening, injuring or fatally wounding someone with a knife

5.16 Domestic Violence

The Home Office defines domestic violence as, "Any incident or pattern of incidents of controlling, coercive or threatening behaviour, violence or abuse between those aged 16 years old or over who are or have been intimate partners or family members regardless of gender or sexuality. This can encompass, but is not limited to, the following types of abuse:

- emotional
- financial
- physical
- psychological
- sexual

Controlling behaviour is a range of acts designed to make a person subordinate and/or dependent by isolating them from sources of support, exploiting their resources and capacities for personal gain, depriving them of the means needed for independence, resistance and escape and regulating their everyday behaviour.

Coercive behaviour is an act or a pattern of acts of assault, threats, humiliation and intimidation or other abuse that is used to harm, punish, or frighten their victim. Children who live in households where domestic violence is taking place are seen to be highly vulnerable. There are other forms of abuse or behaviour that put children at risk; the links below provide useful information."

5.17 Female Genital Mutilation

This comprises all procedures that involve partial or total removal of the external female genitalia, or other injury to the female genital organs for non-medical reasons.

5.18 Intimate Image Abuse

An intimate image is any type of image, either photographic or video, of a person who is naked or engaged in a sexual act. Where this is considered as abuse is when an individual shares or publishes, or threatens to share or publish, an intimate image without consent.

Although the person in the image willingly took it or sent it to someone they trusted, their consent is still required for it to be shared.

5.19 Radicalisation

Some young people and adults at risk of harm may be vulnerable to radicalisation for the purpose of violent extremism. Concerns regarding radicalisation will be referred to Channel which is a multi-agency panel who will offer guidance and support with the aim of preventing activity which could be deemed as criminal. Full details of radicalisation can be found in the CIOB Prevent Policy.

5.20 Spiking

Spiking is when someone puts alcohol or drugs into another person's drink or body without their knowledge or permission. This includes putting:

- alcohol into someone's drink
- prescription or illegal drugs into someone's alcoholic or non-alcoholic drink
- prescription or illegal drugs into someone's food
- prescription or illegal drugs into someone's cigarette or vape

It can happen to anyone, anywhere and can be carried out by strangers or individuals known to young people and adults at risk of harm. People can also be a victim of 'needle spiking', which is injecting someone with prescription or illegal drugs without their consent.

5.21 Financial or Material Abuse

This largely applies to adults at risk of harm and relates to circumstances where any trust in relation to financial matters is abused. It includes:

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

5.22 Bullying

Bullying someone because of their age, race, gender, sexual orientation, disability and/or transgender will not be tolerated at the CIOB as the organisation operates a zero-tolerance approach. Bullying of this nature is also against the law.

Bullying can take many forms and includes:

- **Cyber:** All areas on internet, such as email and internet, chat room misuse. Mobile threats by text message and calls. Misuse of associated technology i.e. camera and video facilities, sexting (see 5.23 for further information).
- **Emotional:** Being excluded, tormented (e.g. hiding things, threatening gestures).
- **Online:** Online abuse is any type of abuse that happens on the web, whether through social networks, playing online games or using mobile phones. Children and young people and adults may experience cyberbullying, grooming, sexual abuse, sexual exploitation, emotional abuse, financial abuse, or identity fraud.
- **Physical:** Pushing, kicking, punching or any use of aggression and intimidation.
- **Racial:** Racial taunts, use of racial symbols, graffiti, gestures.
- **Sexual:** Unwanted physical contact, sexually abusive comments including homophobic comments and graffiti.
- **Verbal:** Name calling, spreading rumours, teasing.

5.23 Cyberbullying

This involves the use of electronic communication devices to bully people. These include mobile phones, tablets, iPods, laptops and PCs. Social media platforms such as Facebook, Instagram, Twitter and WhatsApp are used by cyberbullies to put out their communications. Children using social media unsupervised and vulnerable adults are particularly at risk if they are using social media, as they may be more emotionally and mentally susceptible to the abuse.

The types of cyberbullying that occurs include:

- Flaming is conducting online fights usually through emails, instant messaging or chat rooms where angry and rude comments are exchanged.
- Denigration involves others putting mean online messages through email, instant messaging, chat rooms, or websites set up to make fun of someone.
- Exclusion is when others intentionally leave someone out of a group such as instant messaging, friend sites, or other online group activities.
- Outing is the sharing of secrets about someone online including private information, pictures, and videos.
- Impersonation involves either one or more persons tricking someone into revealing personal information then sharing it with others.
- Harassment is repeatedly sending malicious messages to someone online.
- Cyberstalking is continuously harassing and denigration including threats of physical harm.
- Sexting is the sending, receiving or forwarding of sexually explicit messages, photographs or videos.

To reiterate, the CIOB operates a zero-tolerance policy against all types of abuse. Please see Bullying and Harassment Policy for more information.

6.0 Roles and Responsibilities

To ensure the policy is effectively maintained, the CIOB have a variety of roles with specific responsibilities.

6.1 Designated Safeguarding Lead (DSL)

Sara Brown is our Designated Safeguarding Lead (DSL) and is fully supported by our experienced safeguarding team (detailed on the following page) who are also available to support all individuals experiencing safeguarding concerns.

The DSL has a key duty to take lead responsibility for raising awareness across all employees relating to the welfare of children and young people in the company and of overseeing the referral of cases of suspected abuse or allegations.

Employees must remain vigilant at all times of the risk to apprentices of abusive behaviour from different sources including members of their family, other apprentices and employees. Any suspicion, allegation or incident of abuse from employees must be referred to a line manager (or another manager if appropriate) for full investigation.

If the alleged perpetrator of the abuse is another employee, the circumstances will be investigated fully under the Company's Disciplinary Procedure. If it is agreed to be a safeguarding matter, a written record of the date and time of the report will be made including the name of the person to whom the matter is reported and sent to the DSL within 24 hours.

If necessary, the Company will refer details of the circumstances to the Independent Safeguarding Authority.

The CIOB have created a list of key contacts with all regional Local Authority Designated Officer (LADO) details where we have apprentices placed in accordance with their retrospective area.

We are part of relevant mailing lists and we receive regular updates from them in regard to safeguarding and any applicable information is updated.

Concerns for the safety and well-being of children, young persons or vulnerable adults at risk of harm could arise in a variety of ways and in a range of different settings. For example, a child may report or display signs of abuse, someone may hint that a child is at risk or that a colleague is an abuser, an individual may witness or hear about abuse in another organisation. It is essential that all employees act quickly and professionally in all cases of suspected abuse.

Any allegation by a child, young person or vulnerable adult at risk of harm against a member of staff, another apprentice or volunteer should be reported immediately to the relevant individual who has responsibility under this policy. In dealing with such allegations, the CIOB has a duty of care to the individual and staff member, apprentice or volunteer against whom the allegation has been made.

6.2 Designated Staff with Responsibility for Protection from Abuse

In all cases where allegations are made against people who may constitute part of the children's workforce, the CIOB will consult with the LADO in retrospect within their area. They will offer advice regarding appropriate next steps in relation to referral and investigation and ensure that all cases are handled in accordance with safeguarding procedures.

6.3 CIOB Team with a Responsibility for Safeguarding

The following details are to be used for any enquires relating to safeguarding:

Name	Role	Contact
Sara Brown	Designated Safeguarding Lead	E: sbrown@ciob.org.uk T: +44 (0)1344 630825
Sandra Pankhurst	Deputy Safeguarding Lead	E: spankhurst@ciob.org.uk T: +44 (0)1344 630803
Christina Lattimore	Deputy Safeguarding Lead	E: clattimore@ciob.org.uk T: +44 (0)1344 630821

6.4 Responsibilities of the Team

The team are responsible for the following areas:

- Ensuring safeguarding and wellbeing concerns are recorded using the Safeguarding and Wellbeing Form.
- Thoroughly investigating any submitted Safeguarding and Wellbeing Forms.
- Ensuring cases of suspected abuse or allegations are appropriately referred to relevant agencies.
- Providing advice and support to staff, consultants and trainers on issues relating to safeguarding.

- Ensuring all records of any safeguarding referral, complaint or concern is kept, (even where that concern does not lead to a referral) by recording these on the Safeguarding Log.
- Ensuring all staff, consultants, trainers and apprentices have access to the Safeguarding and Prevent Policies.
- Ensuring safer recruitment practices are in place.
- Ensuring safer recruitment guidelines are applied to apprentices applying to courses which give access to working with children, young people and adults at risk of harm.
- Ensuring identification badges are issued to staff, consultants and trainers.

7.0 Responding to a Disclosure

Abused children, young adults and vulnerable adults at risk of harm are more likely to disclose details of abuse to someone they trust and whom they feel safe with. By listening and taking seriously what the child, young people or vulnerable adult at risk of harm is saying you are already helping the situation. The following points are a guide to help you respond appropriately.

7.1 Actions to be Taken by the Person Being Disclosed to

- React calmly so as not to frighten them.
- Avoid asking direct questions other than those seeking to clarify your understanding of what the person has said. They may be formally interviewed by the correct authority and they should not have to repeat their account on several occasions. Inappropriate and excessive questioning at an early stage may also impede the conduct of a criminal investigation.
- Take what the person is saying seriously, recognising the difficulties inherent in interpreting what is being said by a person who has a speech impairment or differences in language.
- Tell them they were not to blame, and they were right to tell someone.
- Reassure the child, young person or vulnerable adult but do not make promises of confidentiality which will not be feasible in the light of the developments. Explain to them that you will have to share your concerns with the Designated Safeguarding Lead who has the authority to act.
- Record in writing on the Safeguarding and Wellbeing Form all the details that you are aware of and what was said using the child, young adult or vulnerable adults' own words immediately.

7.2 How to Deal with Suspicions/Concerns of Abuse or Neglect

Key things to remember if a child, young adult or vulnerable adult at risk of harm tells you about possible abuse:

- Never promise confidentiality you will have to break it and, with it, the persons trust in you. Listen carefully and stay calm; you need to listen without making assumptions or judgements.
- Do not interview a child, young adult or vulnerable adult at risk of harm. Question normally and without pressure and only to be sure that you understand what you have heard. Never ask leading questions or act as an investigator. Do not put words into their mouth.
- Reassure them that by telling you, they have done the right thing. Inform them that you must pass the information on, but that only those that need to know about it will be told. Inform them of to whom you will report the matter.
- Find out what the child or adult at risk of harm would like to happen but make them aware that you may have to act against their wishes (e.g. they may ask you not to disclose to anyone else). For apprentices under the age of 18, wishes regarding action

to be taken will be noted, where possible. However, the learner will be made aware that this will not affect the final decision to make a referral.

- Note the main points carefully.
- Use the Safeguarding and Wellbeing Form to gather key information and as a record of your discussion.
- Do not investigate concerns or allegations yourself but report them immediately to the Designated Safeguarding Lead.
- Adult apprentices have the right to make their own choices where they are capable of doing so.

7.3 Confidentiality

Every effort should be made to ensure that confidentiality is maintained for all concerned in the safeguarding of children, young adults and vulnerable adults. Information should be handled and disseminated on a need-to-know basis only. This includes the following people:

- a Designated Child/Adult Safeguarding Lead
- the parents or carers of the person who is alleged to have been abused
- police/Social Care Services
- Senior Management where appropriate
- the person making the allegation
- the alleged abuser (and parents or carers if the abuser is a child or young person).

7.4 Reporting Female Genital Mutilation (FGM)

Female Genital Mutilation (FGM) is illegal in England and Wales under the FGM Act 2003 (the 2003 Act). It is a form of child abuse and violence against women. FGM comprises all procedures involving partial or total removal of the external female genitalia for non-medical reasons.

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 regulated health and social care professionals and teachers in England and Wales to make a report to the police where, in the course of 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 purposes connected with labour or birth.

For the purposes of the duty, the relevant age is the girl's age at the time of the 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). Complying with the duty does not breach any confidentiality requirement or other restriction on disclosure which might otherwise apply. The duty is a personal duty which requires the individual professional who becomes aware of the case to make a report; the responsibility cannot be transferred. The only exception to this is if you know that another individual from your profession has already made a report; there is no requirement to make a second.

Reports under the duty should be made as soon as possible after a case is discovered, and best practice is for reports to be made by the close of the next working day, unless any of the factors described below are present. You should act with at least the same urgency as is required by your local safeguarding processes.

A longer timeframe than the next working day may be appropriate in exceptional cases where, for example, a professional has concerns that a report to the police is likely to result

in an immediate safeguarding risk to the child (or another child, e.g. a sibling) and considers that consultation with colleagues or other agencies is necessary prior to the report being made. If you think you are dealing with such a case, you are strongly advised to consult colleagues, including your Designated Safeguarding Lead, as soon as practicable, and to keep a record of any decisions made. It is important to remember that the safety of the girl is the priority

7.5 Concerns about Individuals Who are Not Apprentices with The CIOB

For young people who are not apprentices of the CIOB, the referral must go back to the head of the organisation to which they are attached. The contact can be made direct or via one of the Designated Safeguarding Leads if they are on site.

Where there is no organisational contact available, the referral will be made direct to Children's Services. If there is a concern about a workplace this should be recorded on the Safeguarding and Wellbeing Form and reported immediately to a Designated Safeguarding Lead.

7.6 Reporting and Dealing with Allegations of Abuse Against Members of Staff

The procedures apply to all staff, consultants, and trainers whether teaching, administrative, management or support. Allegations of abuse against a member of staff can be defined as when a person has:

- behaved in a way that has harmed or may have harmed a child, young person or adult at risk of harm
- possibly committed a criminal offence against or related to a child, young person or adult at risk of harm
- behaved towards a child, young person, or adult at risk of harm in a way that indicates she/he is unsuitable to work with children, young people or adults at risk of harm.

Following an allegation of abuse against a member of staff, consultant or trainer the Designated Safeguarding Lead will inform the appropriate authority (LADO, Police, etc). The member of staff, consultant or trainer will either be suspended or not offered any further work until the outcome of the allegation is confirmed.

Tutors must inform a DSL if an apprentice does not show up to a session, 1-2-1 or review that they have booked, immediately. The DSL will then contact the apprentice and obtain reasoning for their absence. The DSL will make contact within 30 minutes of the report – if unsuccessful in contacting the apprentice, their emergency contact will be contacted to ensure the safety and wellbeing of the apprentice.

8.0 Recruitment and Selection

The CIOB aims to recruit and develop skilled and motivated staff who will deliver an outstanding service to the local community. An effective recruitment and selection process is a major contributor to this aim. The CIOB are committed to safeguarding and promoting the welfare of children and adults at risk of harm and expects its staff to share this commitment.

8.1 The Disclosure and Barring Service (DBS)

The Disclosure and Barring Service (DBS) was introduced on 1 December 2012 through the Safeguarding Vulnerable Groups Act 2006 and Protection of Freedoms Act 2012. Its purpose is to reduce the risk of harm to children and vulnerable adults.

All members of staff, consultants and trainers working in settings with children, young people or vulnerable adults at risk of harm present on site must have a current Enhanced DBS (within 3 years) and submit a copy to the Designated Safeguarding Lead. All members of staff, consultants and trainers working in settings with children, young adults or vulnerable adults present on site must have completed safeguarding training in the last year. This will be checked as part of occupational competency.

8.2 Recruitment and Vetting Checks Records

The Safeguarding Children and Safer Recruitment in Education guidance which came into force on 1st January 2011 recommends that, in addition to the various staff records which are kept as part of normal business, the CIOB will keep and maintain a single central record of recruitment and vetting checks (last updated 26 April 2012).

The CIOB will apply principals of Safer Recruitment to staff working with children, young adults and adults at risk of harm as part of their apprenticeships. It will be the employer/workplace's responsibility to ensure that their staff and volunteers have the relevant DBS disclosures. The CIOB will not undertake DBS checks for apprentices. All staff who participate in the recruitment process are required to undergo recruitment and selection process training. In addition, every interview panel must have at least one member who has received Safer Recruitment training.

Whilst it is a criminal offence to knowingly employ someone who is barred from working with children or adults at risk of harm in regulated activity, it is possible to allow such a person to work in controlled activity, subject to specific safeguards being in place. The decision whether to employ in controlled activity someone who is barred from working with children or adults at risk of harm in regulated activity will be made by the Directors of the CIOB. The CIOB reserve the right to take up references for all members of staff, consultants, or trainers. All members of staff, consultants and trainers working in settings with children, young people, or vulnerable adults present on site must have two references.

See Safer Recruitment and Selection Policy for more detail.

9.0 Websites

The following websites can be viewed in association with this policy.

9.1 Legal Acts

1. Criminal Justice and Courts Act 2015

[Criminal Justice and Courts Act 2015 \(legislation.gov.uk\)](https://www.legislation.gov.uk/ukpga/2015/2)

2. Voyeurism Offences Act 2019

[Voyeurism \(Offences\) Act 2019 \(legislation.gov.uk\)](https://www.legislation.gov.uk/ukpga/2019/11)

3. FGM Act 2003

[Female genital mutilation: resource pack - GOV.UK \(www.gov.uk\)](https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/214242/female_genital_mutilation_resource_pack.pdf)

4. Serious Crime Act 2015

[Serious Crime Act 2015 \(legislation.gov.uk\)](https://www.legislation.gov.uk/ukpga/2015/9)

5. Safeguarding Vulnerable Groups Act 2006

[Safeguarding Vulnerable Groups Act 2006 \(legislation.gov.uk\)](https://www.legislation.gov.uk/ukpga/2006/16)

6. Protection of Freedoms Act 2012
[Protection of Freedoms Act 2012 \(legislation.gov.uk\)](http://legislation.gov.uk)

9.2 Government Departments and Statutory Guidance

1. The Department for Education

[Department for Education - GOV.UK \(www.gov.uk\)](http://www.gov.uk)

2. Keeping Children Safe in Education

[Keeping children safe in education - GOV.UK \(www.gov.uk\)](http://www.gov.uk)

3. Safeguarding Children Who May Have Been Trafficked

[Safeguarding children who may have been trafficked - GOV.UK \(www.gov.uk\)](http://www.gov.uk)

4. No Secrets

[No Secrets: guidance on protecting vulnerable adults in care - GOV.UK \(www.gov.uk\)](http://www.gov.uk)

5. Working Together to Safeguard Children

[Working together to safeguard children - GOV.UK \(www.gov.uk\)](http://www.gov.uk)

6. The Disclosure and Barring Service

[Disclosure and Barring Service - GOV.UK \(www.gov.uk\)](http://www.gov.uk)

7. Safeguarding Children and Safer Recruitment in Education

[Safeguarding children and safer recruitment in education - GOV.UK \(www.gov.uk\)](http://www.gov.uk)