

Safeguarding Policy:
Keeping Learners Safe

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1. Introduction

At Merseyside Police, we take our responsibility to ensure the safety of our staff seriously. We are committed to working together to create an optimal learning experience, and to ensure the highest levels of learner safety and wellbeing. For the purpose of this document, a 'learner' is defined as anyone within the police force undertaking structured learning. The learning environment includes those in the extended police family undertaking learning on police premises or on behalf of Merseyside Police at other sites.

2. Rationale

This policy is to inform everyone connected with Merseyside Police, and with whom it subcontracts with, of our position regarding the safeguarding of learners as part of an apprenticeship or other type of learning programme.

This document reflects the following key pieces of legislation and guidance:

[Keeping Children Safe in Education: Statutory Guidance for Schools and Colleges](#) – Dept for Education (September 2021)

[Working Together to Safeguard Children](#) - Dept for Education (July 2018)

[Education Act](#) (2011)

[Children Act](#) (2004)

[Safeguarding Vulnerable Group Act](#) (2006)

[Information Sharing Advice for Safeguarding Practitioners](#) (July 2018)

[In Harm's Way](#) – HMIC [2015]

[The Care Act](#) – UK Public General Acts (2014)

[Protection of Vulnerable Adults \(POVA\)](#) – Department of Health (2010)

[Prevent Duty Guidance for England & Wales](#) – Home Office (2015)

[Criminal Exploitation of Children & Vulnerable Adults: County Lines Guidance](#) – Home Office (September 2018)

[Work Based Learners & the Prevent Statutory Duty Guidance for Employers](#) – Dept for Education (2021)

[Criminal Exploitation of children and vulnerable adults: County Lines](#) – Home Officer (Feb 2020)

[Draft Online Safety Bill](#) - HRM Government (2021). Online Safety Bill (May 2021)

[Online Harms White Paper](#) - HRM Government - Joint Ministerial (December 2020)

The purpose of this policy and its supporting documents will be to:

- Provide protection for learners on both apprenticeship and other learning programmes taking place on police premises or on behalf of Merseyside Police at other sites.
- Provide staff, volunteers and contractors with guidance on procedure they should follow if they suspect a learner may be experiencing, or is at risk of harm or abuse.
- Provide staff and volunteers with training, guidelines and a code of conduct.

3. Intention

Merseyside Police recognises its legal and moral responsibility to safeguard the welfare of all learners, especially those that are, or may become vulnerable, by commitment to practice that protects them and looks to minimise potential harm. All individuals should have equality of access to the services they receive and be able to do so in an environment that is safe, secure, and supportive.

4. General Principles

Merseyside Police is committed to ensuring that learners feel comfortable and valued, within a safe learning space. We believe that:

- All learners have the right to learn and be in a safe, open and caring environment. Their welfare is paramount.
- All learners have the right to expect a person in a position of responsibility to listen to them when they need to express themselves.
- All learners regardless of any Protected Characteristics (age, disability, sex, race, religious belief, sexual orientation or identity, gender reassignment, marriage and civil partnership and pregnancy and maternity) have the right to equal protection from all types of harm or abuse and should be valued and respected as individuals.
- Bullying in any form is strictly unacceptable and will not be tolerated.
- Any unprofessional language or behaviour is strictly unacceptable.
- Working in close partnership with learners and collaborative companies/institutions is essential in promoting a safe learning environment.
- Adopting robust safeguarding guidelines through procedures and a [code of ethics](#) for learners, staff and contractors is essential.
- It is essential to share information about concerns with agencies that need it and involving learners (and the parents of anyone under 18 years) appropriately.
- Working in conjunction with partners, Occupational Health and our Health and Wellbeing strategy is essential.
- All learners must have a ready point of contact, referral, or support, such as a Designated Lead, assessor support and mentor support.

All behaviour must comply with the organisational standards and values and those described in the [Code of Ethics](#).

5. Statement of Policy

Safeguarding is a term used to describe the protection of the health, wellbeing, and human rights of all individuals. This policy applies to learners, however, under legislation, all parties involved in an apprenticeship must take reasonable action to minimise risks to apprentices as a matter of best practice. This should also apply to learners on other qualifications. This reasonable action should involve aspects of the apprentice / learner experience, both in and outside of the workplace, as well as during any attendance at College, University, or any other training centres. Safeguarding is primarily intended to keep children safe from a range of potential harm and looks at preventative action, not just reaction [[Keeping Children Safe in Education 2021](#)].

Merseyside Police extends its statutory responsibilities to adults at risk.

Safeguarding defines how we will respond to:

Child and Adults at Risk Protection

- Protection from maltreatment (abuse, neglect, exploitation, or victimisation) or risk of harm where the perpetrator is a member of the learner's family, the wider community, another learner, or a member of staff

Welfare Support Needs

- Responding to a learner (of any age) via either direct intervention, advice and guidance or signposting where an issue exists within their day to day lives (including the workplace) which could impact upon their ability to achieve.

Recruitment

- Recruiting staff that are committed to offering learners a safe, happy and healthy environment and who share in the belief that the welfare of the learner is paramount. All staff are required to participate in a vetting and security clearance process proportionate to their role. Vetting and security clearance is the subject of periodic review.

6. Who we Safeguard

The term 'child' means anyone who has not yet attained the age of 18 and the term 'adult at risk' is defined as someone who:

- is aged 18 or over and,
- at risk of abuse or neglect because of their status or need for care and support.

Even if the adult is not in receipt of any care or support, the fact that they may have a need for such support is enough to mean they are covered by the legislation if they face abuse or neglect. In addition to the legislative aspects of safeguarding, learners due to their status within the organisation may also be perceived to be at risk of harassment or compromise whilst participating within a programme of learning; such individuals will also be protected under the conditions of this safeguarding policy.

7. What are we Safeguarding from?

In line with [Working Together to Safeguard Children 2018](#), safeguarding is defined as:

- Protecting children from maltreatment.
- Preventing impairment of a child's health or development.
- Ensuring that children are growing up in circumstances consistent with the provision of safe and effective care.

Merseyside Police extends these principles to also cover adults at risk.

The following should therefore be considered when working with learners:

- Sexual abuse or inappropriate relationships
- Physical and emotional abuse or neglect
- Exploitation e.g. financial, sexual, forced marriage, trafficking
- Female genital mutilation
- Grooming behaviour
- Domestic violence
- Bullying – including cyber bullying, bullying in the workplace
- Radicalisation and/or extremist behaviour & British Values – See App 4
- The impact of new technologies on sexual behaviour e.g. sexting
- Teenage relationship abuse
- Substance misuse

8. Online Safety and the use of IT Systems, equipment, mobile devices and force information.

The Merseyside Police ICT Acceptable Use Policy outlines how all individuals using IT Systems, equipment, mobile devices and force information should understand their personal responsibilities. The policy is clear about what is regarded as unacceptable or inappropriate use.

Referrals should be made regarding any concerns about inappropriate use of technology to the Deputy Designated Safeguarding Lead or Assistant Safeguarding Leads via the dedicated e-mail address – academy.safeguarding@merseyside.police.uk.

9. Levels of Responsibility – See App 1 & 4

All staff, both internally and externally from partnership organisations, and volunteers have a duty to act to ensure that the welfare of the learner is paramount.

Where it is suspected that a learner is experiencing a safeguarding issue this should be immediately reported to the Designated Safeguarding Lead or Assistant Safeguarding Lead.

10. Designated Safeguarding Lead (DSL) and Assistant Safeguarding Leads (ASLs)

To ensure that our safeguarding and prevent arrangements are effectively implemented, monitored, and reviewed, we have appointed a Designated Safeguarding Lead (DSL) and two Assistant Safeguarding Leads (ASLs). The DSL is the Superintendent at The Academy and the ASLs are the Chief Inspector and the Assessment & Qualifications Manager at The Academy. The designated safeguarding lead has overarching responsibilities regarding safeguarding learners, and anyone associated with training. The DSL and ASLs will undertake a Level 3 Certificate in Safeguarding Adults and will refresh every 12-18 months. The DSL will review the contents of this policy on an annual basis.

11. Training for Staff – See App 2 & 3

All assessors, tutors, teachers, coaches, mentors, volunteers, line managers and anyone else with responsibility for aspects of learning programme delivery is required to undertake awareness training which ensures all have a shared understanding of how to report a disclosure or suspicion of abuse or risk of harm. Sgts, Inspectors and Staff equivalents who have direct responsibility for those delivering training to Apprentices and other learners will undertake the Level 2 Certificate in Safeguarding and will refresh every 12-18 months. This package will be mandatory. Other auxiliary staff including recruitment, trainers, tutor constables and team leaders will be expected to complete an online training package designed specifically for organisations working within FE and Apprenticeships. This will be mandatory and tracked to ensure that all staff in this section undertake the training.

All staff and volunteers should be made aware of this policy and the processes to follow if they become aware there may be a safeguarding issue.

Safeguarding will be discussed at relevant L&D team meetings and standardisation meetings.

12. Information and Support for Learners

All learners will receive safeguarding information during their induction. Where a learner is undertaking an Apprenticeship, safeguarding will be addressed directly with learners via the progress review process. Progress will be reviewed by the training provider at a minimum of 10-week intervals throughout their apprenticeship.

Learners will be treated sensitively and with dignity should a safeguarding incidence/concern occur, or an allegation of abuse be made. Staff will treat such matters confidentially, notifying colleagues only on a 'need to know' basis under the direct guidance of the Designated Safeguarding Lead.

Volunteers and parents can seek advice on child protection matters from the Designated Safeguarding Lead or the learning programme (inclusive of apprenticeships) leader. If you are unsure of any aspect of the policy, please seek advice from the DSL or one of the ASLs.

13. Confidentiality

Whilst respecting confidentiality and data protection, Merseyside Police cannot guarantee confidentiality in all circumstances. If we discover anything that we believe parents/carers,

social services or any other law enforcement agency should be informed of, we will do so believing it is in the best interests of the individual involved.

14. Responsibility for Implementation of this Policy

The Designated Safeguarding Lead is responsible for implementing and monitoring the Safeguarding Policy.

15. Monitoring and Quality Assurance

This policy will be reviewed annually by the PEQF Board to assess its implementation and effectiveness.

16. Access to Policy Documentation, Advice and Support

This Safeguarding Policy and a copy of the reporting form is made available to all internal staff via OneFile and Sharepoint. A redacted copy of the policy is available on the external Merseyside Police website:

[Contact Resolution Officer - Apprenticeship Entry Route | Merseyside Police](#)

[Police Constable Degree Apprenticeship \(PCDA\) | Merseyside Police](#)

[Apprenticeships | Merseyside Police](#)

17. Human Rights Articles Engaged

Article 3 - Freedom from torture and inhuman or degrading treatment.

Article 8 - Right to respect for private and family life.

Article 14 – Protection from discrimination.

18. Health and Safety at Work

The purpose of the policy is to protect the health and safety of all learners on apprenticeships and other learning programmes by ensuring their health and wellbeing.

Appendix 1

Reacting to Child Protection Disclosure, Incidents or Concerns

Staff should operate in line with the following process:

Recognition

- Recognition covers both disclosures of abuse and your personal concerns.
- Disclosure of abuse is likely to be direct.
- A concern that you have may arise from either a conversation or a change in the learner's behaviour.

Response

- Do not interview – just listen and clarify if necessary.

- Remain calm and listen carefully.
- Inform the person that the concerns must be recorded and passed on so that the issue can be dealt with.
- Reassure the person that they have done the right thing in reporting their concerns and that you will do everything you possibly can to help.
- Do not make unrealistic promises around confidentiality.
- Inform the person that the concerns need to be recorded and passed on so that they can be fully supported, but that only those people who need to know will be informed.
- If the issue relates to a crime tell them that we have a duty to record that and they may be asked more about it by a police officer.

Reporting

- If you feel confident to take appropriate action (e.g. referring the learner to welfare, occupational health), please do so.
- Report concerns immediately at the earliest opportunity using the processes details in Appendix 1 (a and b). Ensure that the Designated Safeguarding Lead (or Deputy) for learners is informed as soon as is practicably possible, but before the end of the working day.
- All disclosures of abuse must be urgently reported to the Designated Safeguarding Lead (or Deputy in their absence) for learners.
- Do not discuss the disclosure with anyone else. If there is an urgent requirement to inform others, please do so with discretion and in conjunction with your DSL.
- Safeguarding concerns can be sent directly to the academy.safeguarding@merseyside.police.uk inbox which is monitored by the Designated Safeguarding Lead and the Assistant Safeguarding Leads.

Recording

- Record precisely what has been alleged/happened – use the words of the learner.
- This should be scanned and emailed to the Designated Safeguarding Lead.
- Your record should use accurate quotation.
- If appropriate, include factual observations.
- Once reported it is the Designated Safeguarding Lead's responsibility to take any further decisions as to the actions which would follow.

Referral

- Only the Designated Safeguarding Lead and the Assistant Safeguarding Leads can make the decision to refer a complaint or allegation, having gathered and examined all the relevant information.
- Only the Designated Safeguarding Lead and the Assistant Safeguarding Leads should investigate a complaint, allegation, or suspicion of abuse. Actions of others could be construed as unjustified interference which could jeopardise any investigation and any possible subsequent court case.

- The DSL and ASLs are responsible for informing any delivery partners to whom the safeguarding concern is relevant. For example, where the learner is part of the Police Constable Degree Apprenticeship, the DSL or ASLs would inform Liverpool John Moores University as the learners training provider. A list of our delivery partners and relevant programmes can be found in Appendix 1c. The DSL or ASLs will ensure that the learner is aware that their information may be shared where relevant and appropriate.

In an emergency/risk to life situation

- Do anything necessary to make sure the person is safe; this could include medical attention or ringing 999.
- Where possible, consult with your Designated Safeguarding Lead, but do not delay if this would place the individual at increased risk.

Appendix 1a

Recording Form for Learners Safeguarding Concerns		
Staff and volunteers are required to complete this form and e-mail to the DSL and ASL if they have a safeguarding concern about a learner on any programme. Send to: academy.safeguarding@merseyside.police.uk		
Full name of learner	Date of birth/age	Your name and job role
Nature of concern/disclosure		
Record precisely what has been alleged/happened – use the words of the learner and, if appropriate, include factual observations. Include where you were when the learner made a disclosure, what you saw, and what you said.		
Time & date of incident/disclosure:		
Was there an injury? Yes / No <small>Delete as appropriate</small>		Did you see it? Yes / No <small>Delete as appropriate</small>
Describe the injury:		
Was anyone else with you? Who?		
Please state what action you have taken [if any]		
Have you made the learner aware you will need to pass on this information? Yes/No <small>Delete as appropriate</small>		
Who are you passing this information to? Name:		
Position: Designated Safeguarding Lead		
Your signature:		
Time form completed:		
Date:		
Date & time form received by DSL:		

Action taken by DSL:

Full name:
Signature:
Date:

Further Action Agreed:

Full name:
Signature:
Date:

Follow up action by DSL:

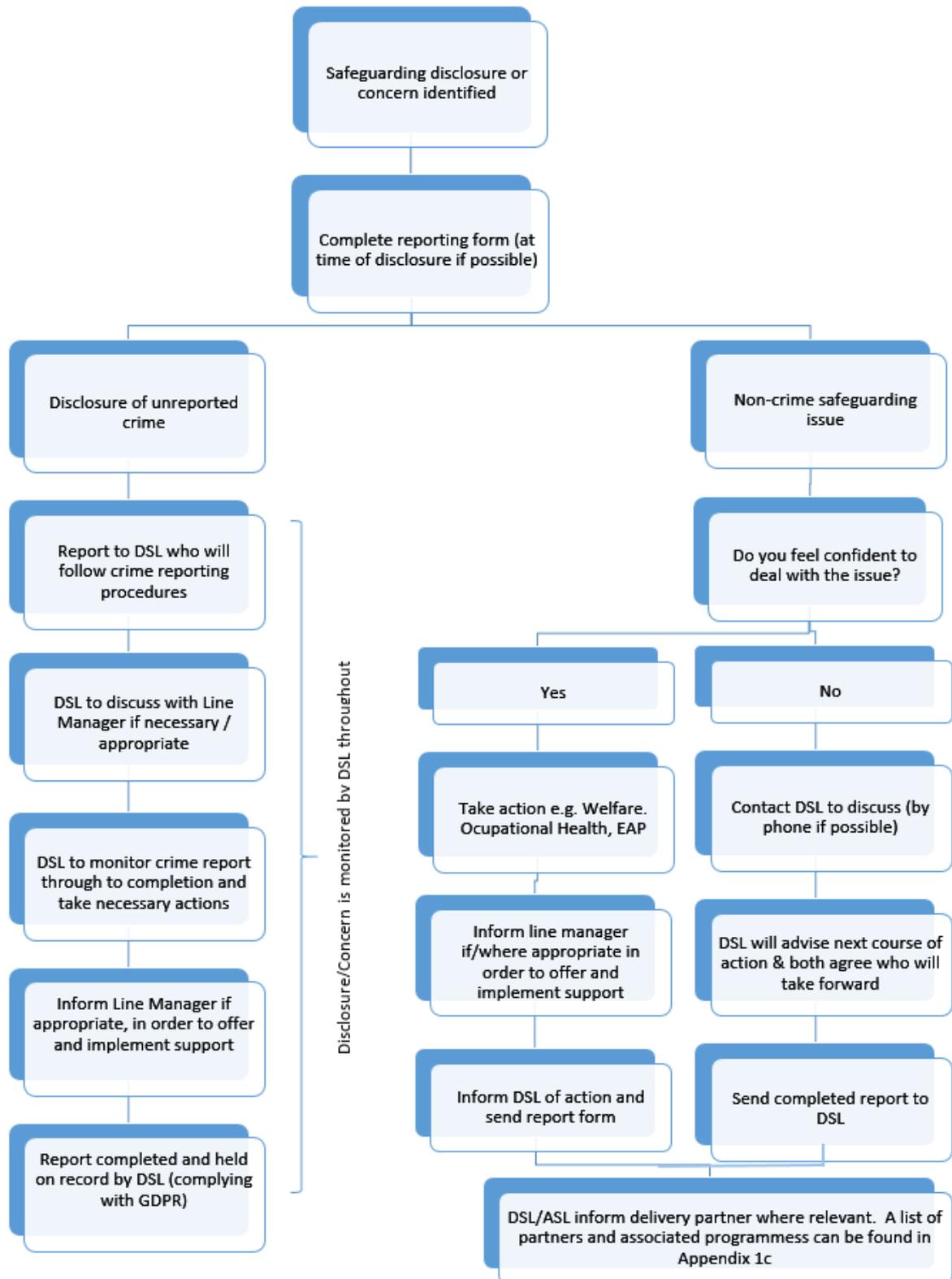
Full name:
Signature:
Date:

Follow up action by DSL:

Full name:
Signature:
Date:

Appendix 1b

Reporting process for safeguarding issues relating to learners – Delivery staff



Appendix 1c

If the learner is part of any of the below programmes, please ensure that you inform the relevant safeguarding contacts using the e-mails provided:

Programme of Learning	Training Provider	Safeguarding contact e-mail(s)
Level 6 Police Constable Degree Apprenticeship	LJMU	<i>Redacted</i>
Degree Holder Entry Programme	LJMU	<i>Redacted</i>

Appendix 2

Record Keeping

All records regarding welfare will be clear, use straightforward language, be concise, accurate in fact and stored confidentially and securely in line with the General Data Protection Regulations.

The General Data Protection Regulations are not barriers to sharing information for the purpose of safeguarding the individual. Any information shared will be shared in line with the [Information Sharing: Practitioner's Guide \[2018\] document](#).

Records of safeguarding issues relating to learners will be kept by the Designated Safeguarding Lead. These will be chronological, factual and kept in accordance with data protection regulations and Merseyside Police policy. Records will be destroyed after 3 years.

Appendix 3

Safeguarding Code of Conduct

Merseyside Police employees are expected to comply with the Code of Ethics, which outlines standards of professional and ethical behaviour. In addition, employees and volunteers involved in the delivery of apprenticeship training programme are expected to support the safeguarding concept by following the Safeguarding Code of Conduct:

- Staff should always be aware of the needs of learners and be vigilant for any possible signs of abuse or concerns about their general well-being.
- Ignoring abuse is not an option and will not be tolerated.
- All staff must report any concerns for the well-being of learners in accordance with this policy.
- Raise awareness of safeguarding and equip our learners with the skills needed to keep them safe.
- Ensure all individuals supporting the apprenticeship programme understand their responsibilities in being alert to the signs of abuse and responsibility for referring any concerns.
- Staff must follow the procedures for identifying, reporting and dealing with suspected cases of abuse or allegations of abuse
- The Designated Safeguarding Lead will develop effective links with relevant agencies and co-operate as required with their enquiries regarding safeguarding matters as required.
- The Designated Safeguarding Lead will share information internally and externally about vulnerable individuals whilst maintaining appropriate confidentiality.
- All meetings with learners should take place as openly as possible. If privacy is needed other staff should be aware of the meeting. This is appropriate where the learner is aged 16-18 or is a vulnerable adult in order to protect both parties.
- Staff should not have any unnecessary physical contact with learners. There may be occasions when physical contact is unavoidable, desirable or necessary, such as providing comfort, reassurance or for physical support. Physical contact should however only take place with the consent of the learner and the purpose of the contact should be made clear.
- Staff should never meet with a learner outside organised meetings or activities if they have not yet attained the age of 18. Please refer to '[Appropriate personal relationships and behaviours in the workplace](#)' policy for those aged 19 and over.
- Staff should be aware that on occasions, learners themselves can be responsible for abusing their peers.

Staff should never:

- Allow learners to use inappropriate language without challenging them (e.g. racist, sexist or homophobic comments), make suggestive comments in front of, about, or to a learner.
- Let allegations made by a learner go, without being addressed and recorded.
- Deter learners from making allegations through fear of not being believed.



- Jump to conclusions without checking facts.
- Rely on their own name and reputation to protect them (i.e. everyone, regardless of position should adhere to these guidelines).
- Discriminate favourably or unfavourably towards any learner.
- Accept or give gifts unless in compliance with the 'gifts and hospitality policy'.
- Develop a personal or sexual relationship with a learner if they have not yet attained the age of 18. Please refer to '[Appropriate personal relationships and behaviours in the workplace](#)' policy for those aged 19 and over.

Merseyside Police Training Academy hold their own code of conduct which is available by request.

Appendix 4

What is your Prevent duty?

As part of the safeguarding, Prevent duty and the Equality Act 2010 staff have a duty to demonstrate and help develop values which underpin an awareness of social and moral responsibility in modern Britain.

Complying with the Prevent duty includes promoting and exemplifying British values: i.e. democracy, rule of law, individual liberty, tolerance and mutual respect and different faiths and beliefs. This includes complying with the Equality Act 2010 by not discriminating against the following nine groups:

- age
- disability
- gender reassignment
- marriage and civil partnership
- pregnancy and maternity
- race
- religion or belief;
- sex
- sexual orientation

All Learning and Development staff must undertake Prevent duty training as identified or provided by Merseyside Police. Concerns might include:

All staff and volunteers are expected to uphold the values embedded within the Equality Act 2010 at all times. All staff and volunteers should use any relevant opportunities to promote the values of:

- democracy
- rule of law
- individual liberty
- tolerance
- mutual respect for different faiths and beliefs

Identification of concerns

Concerns might include:

- Expression of views which are against protected groups or individuals
- Third party reports of concerns about behaviour e.g. plans to travel abroad or extremist activities
- Evidence of discriminatory treatment of other groups or individuals
- Evidence of bullying behaviour or harassment



- Evidence of non-compliance with the providers expectations of behaviour
- Possessing, accessing extremist materials
- Evidence of family concern about vulnerability to extremism
- Expression of extremist views including on social media
- Use of extremist language
- Threats of violence

You will have regular direct contact with your learners and may get to know them well. You may witness activity and behaviour or receive information which other staff are not privy to. You should use your professional judgement to decide when concerns should be referred to the Designated Safeguarding Lead.

If in doubt report your concerns.