

Safeguarding Policy

**ITE, ECF, NPQ, and School Trust
CEO Programmes**

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Safeguarding Policy

1. Introduction

- 1.1 Throughout this document, we will use the following definitions:
- Pupils: all children up to the age of 18 who many come into contact with facilitators, staff and participants involved in NIoT programmes in the schools they attend.
 - Participants: all adults on NIoT training programmes. At times we will refer to trainees separately. This will refer to self-funded trainees who are not employed by a school.
 - Facilitators: all adults with programme delivery responsibility who are **not** employees of the National Institute of Teaching (NIoT) or employees of Associate Colleges.
 - School: educational settings responsible for children, including those in the early years.
 - Associate College: these are partners of the NIoT designated under contract to deliver NIoT programmes. Associate Colleges may employ staff or facilitators to deliver programmes.
 - Regional Principal: central NIoT staff role. There are five NIoT Regional Principals: Regional Principal for the North and East, Regional Principal for the North and West, Regional Principals for the East, South and London, and Regional Principal for the South and West.
- 1.2 The National Institute of Teaching (NIoT) is committed to the safety and wellbeing of children, participants, facilitators, and staff in relation to the delivery of its programmes. We recognise that we have a social, moral and legal obligation to safeguard the wellbeing and safety of all involved in NIoT activities, whether programmes are conducted in person or online.
- 1.3 Programme content and programme delivery should reflect the NIoT values of inclusivity and integrity and be free from any form of bullying, harassment and/or prejudice. The NIoT single source of truth on Sexual Harassment and Sexual Misconduct, including reporting concerns for staff or students is available [here](#).
- 1.4 All individuals associated with NIoT programme delivery, whether facilitators or participants, should feel safe to raise any concerns, be confident that they will be treated seriously and that all reasonable steps will be taken to address those concerns.

2. Purpose

- 2.1 The purpose of this policy is to detail the NIoT's safeguarding procedure and responsibilities to ensure all safeguarding concerns and disclosures are handled appropriately. It also includes the NIoT procedure and responsibilities relating to the Prevent duty.
- 2.2 The policy is intended to provide:
- protection for pupils who may come into contact with participants, facilitators and staff whilst involved in NIoT programmes in the schools they attend.

- protection for participants on NIoT programmes and other groups as detailed in Section 3 below.
- Guidance to facilitators and staff involved in the delivery of NIoT programmes with regards to the procedures to follow if they have concerns that an individual may be experiencing, or be at risk of, harm.

3. Safeguarding in the NIoT Context

- 3.1 Safeguarding in the NIoT context refers to actions taken to protect anyone—children or adults—who interact with NIoT programmes from abuse, mistreatment and harm.
- 3.2 Safeguarding groups considered within this policy include:
- Children - anyone under the age of 18 whose school is involved in the delivery of an NIoT programme.
 - Vulnerable adults - i.e. anyone over the age of 18 whose school is involved in the delivery of an NIoT programme and who may, by reason of mental or other disability, age or illness, be unable to take care of themselves, or unable to protect themselves from significant harm or exploitation.
 - Other adults – any individual engaged in an NIoT programme as candidate, participant, employee or facilitator

4. The Prevent Duty

- 4.1 The Prevent duty requires specified authorities to help prevent the risk of people becoming terrorists or supporting terrorism. The UK government has delegated the function of monitoring authority for Higher Education Institutions to the Office for Student (OfS).
- 4.2 The NIoT has assigned the Chief Operating Officer with the role of Prevent Lead and will consider Prevent duties in line with safeguarding duties.
- 4.3 In the event that a member of the NIoT community is concerned that an individual is exhibiting extremist beliefs or behaviours and/or that they are at potential risk of being radicalised, they must share these concerns as per the safeguarding procedure described below.
- 4.4 The Prevent Lead dealing with the case will always discuss and agree any decision in relation to a potential Prevent referral with the relevant Designated Safeguarding Lead.

5. Scope

- 5.1 Safeguarding incidents considered within this policy:
- *Incidents involving children:*
 - NIoT programmes work with teachers and leaders and not directly with children. However, trainees work directly with children as part of their programme and are subject to the safeguarding policy of their placement school. In the case of other programmes run by the NIoT, no child should ever be left alone in the care of an individual representing the NIoT.

- As ECT, NPQ and School Trust CEO programme participants are full-time teachers and leaders in schools, they will have undergone the relevant safeguarding checks within KCSIE.
- All successful candidates for Initial Teacher Education undergo all safeguarding checks in line with KCSIE 2025.
 - Regarding instances where NIoT staff, participants or facilitators come into contact with children while working in a school:
- If said participants, staff or facilitators either 1) have a concern or 2) receive a safeguarding disclosure through a participant about a child, the staff, participant or facilitator must report the concern or disclosure to the Designated Safeguarding Lead (DSL) of the school in the first instance.
- *Incidents involving participants at NIoT events:*
 - The NIoT and its Associate Colleges are responsible for the safety and wellbeing of participants during training events and are committed to providing a safe and trusted environment.
 - Any incidents of abuse or mistreatment involving participants at such events are the responsibility of NIoT and its Associate Colleges and will be handled by the respective campus or Associate College's Designated Safeguarding Lead (DSL) depending on the venue.
 - If the relevant NIoT programme does not include an Associate College, incidents of abuse or mistreatment involving participants at NIoT events will be handled by the NIoT's Designated Safeguarding Lead in the region where the incident took place.
- *Safety and wellbeing of participants outside of NIoT events:*
 - NIoT staff or facilitators may become aware of concerns for the safety or wellbeing of a participant outside of an NIoT event. If these relate to trainees, then it is the responsibility of the NIoT or Associate College and should be reported to the Designated Safeguarding Lead for the campus or Associate College. If teachers or leaders are employed in schools, any concerns may be reported to the participant's school or employer following written consent from the participant.

6. Forms of abuse relevant to adults:

- 6.1 The following are forms of abuse relevant to adults. Although they are in no way exhaustive, they can act as a guide to readers of this policy:
- Discriminatory abuse - this includes discrimination on the basis of race, culture, language, religion, gender, age, sexuality or disability and includes hate crime incidents.
 - Organisational abuse - organisational abuse occurs when the systems, processes and/or management of these is failing to safeguard a number of adults leaving them at risk of, or causing them, harm.
 - Sexual abuse - any form of unwanted sexual behaviour, violence or harassment on the part of one person towards another.
 - Financial abuse - including theft, fraud, exploitation, the misuse of possessions or benefits and pressure applied in relation to financial transactions.
 - Radicalisation – such as the process where an individual develops extremist views and beliefs that support terrorism or other forms of harmful extremism
 - Domestic abuse - including violence from a spouse or partner.

7. NIoT Safeguarding responsibilities

- 7.1 The NIoT has contractual obligations with regards to the establishment, promotion and oversight of safeguarding and acts as a point of escalation for Associate Colleges, for programmes that involve Associate Colleges.
- 7.2 Notwithstanding such legal and contractual obligations, safeguarding is the responsibility of everyone, and it is imperative that everyone working on NIoT related activity plays their part in ensuring the wellbeing and safety of individuals in accordance with this policy.

7.3 **Associate College Designated Safeguarding Lead (DSL) Roles.**

In programmes involving Associate Colleges, they must nominate a DSL, who is to:

- ensure that safeguarding and the welfare of children, participants, facilitators, and associated employees is a fundamental element of any programme delivery.
- ensure all relevant staff are aware of this policy and the referral procedure.
- ensure all attendees at NIoT related events are aware of who the DSL is and how to contact them if required.
- attend DSL training and refresher training as required by Keeping Children Safe in Education (KCSIE) 2025. Training to include reference to both children, adults, and Prevent.
- ensure safeguarding training is provided to all facilitators and staff.
- ensure all safer recruitment procedures are in place to meet the requirements detailed in Section 10.
- deal with any disclosures or concerns, which relate to safeguarding children, vulnerable adults and other adults in the first instance.
- liaise with affected schools and local authorities when appropriate.
- ensure that written records of concerns are kept and passed onto the relevant school, even if there is no need to make an immediate referral.
- Document low level concerns and safeguarding incidents against participants, employees or facilitators
- be able to demonstrate that they have robust record keeping procedures in place i.e. safeguarding records are kept confidentially and securely.
- develop a safeguarding risk assessment where appropriate.
- report any relevant incident including low level concerns to the respective Regional Principal within 24 hours.
- Ensure all participants, employees and facilitators have been recruited in line with safer recruitment.

7.4 **Associate College Designated Deputy Safeguarding Lead (DDSL).**

In programmes involving Associate Colleges, Associate Colleges are also to nominate a DDSL, who is to:

- support the DSL to ensure that safeguarding and the welfare of children, participants, facilitators, and staff is a fundamental element of any programme delivery.
- respond to any safeguarding concerns should the DSL be unavailable.
- attend safeguarding training and refresher training as required by KCSIE. Training to include reference to both children, adults and Prevent.
- support the DSL in fulfilling their responsibilities.

7.5 **Regional Principal Safeguarding Roles**

In programmes directly delivered by staff and facilitators employed by NIoT, Regional Principals will be the Designated Safeguarding Lead (DSL) for the programme in a particular region. Regional Principals will:

- ensure that safeguarding and the welfare of children, participants, facilitators, and associated employees is a fundamental element of any programme delivery.
- ensure all relevant staff are aware of this policy and the referral procedure.
- ensure all attendees at NIoT related events are aware of the Programme Safeguarding Lead, DSL and DDSL including contact details.
- ensure the DSL attends safeguarding training and refresher training as required by Keeping Children Safe in Education (KCSIE) 2025. Training to include reference to both children and adults and Prevent.
- ensure safeguarding training is provided to all participants and staff facilitating programmes where appropriate, including maintaining a list of those trained.
- ensure all safer recruitment procedures are in place to meet the requirements detailed in Section 10.
- deal with any disclosures or concerns, which relate to safeguarding children, vulnerable adults and other adults in the first instance.
- liaise with affected schools and local authorities when appropriate.
- ensure that written records of concerns about a child are kept and passed onto the relevant school, even if no need to make an immediate referral.
- be able to demonstrate that they have robust record keeping procedures in place i.e. safeguarding records are kept confidentially and securely.
- develop a safeguarding risk assessment where appropriate.
- document any incidents securely and clearly including the resolution including low level concerns
- report any relevant incident to the NIoT Executive Director of Programmes via the referral form
- Appoint a deputy designated safeguarding lead to support them in the performance of their duties.

7.6 **Designated Deputy Safeguarding Lead for Campus (DDSL).**

In programmes that only involve NIoT campuses and not Associate Colleges, the Regional Principal as DSL will appoint a Deputy DSL who is to:

- support the DSL to ensure that safeguarding and the welfare of children, participants, facilitators, and staff is a fundamental element of any programme delivery.
- respond to any safeguarding concerns should the DSL be unavailable.
- attend safeguarding training and refresher training as required by KCSIE. Training to include reference to both children, adults and Prevent.
- support the DSL in fulfilling their responsibilities.

7.7 For programmes involving Associate Colleges, Regional Principals will support Associate College Leads for the programme. Where this is the case, Regional Principals will:

- ensure that safeguarding and the welfare of children, vulnerable adults and other adults (as defined in Section 3) is promoted across the Associate Colleges.

- ensure this policy is implemented and Associate College staff understand their responsibilities and duties.
- ensure Associate Colleges nominate a Designated Safeguarding Lead (DSL) and DDSL if appropriate.
- maintain an up-to-date list of Associate College DSLs.
- undertake appropriate training, which includes child and adult safeguarding.
- ensure Designated Safeguarding Leads (DSL) have undertaken appropriate training as required by Keeping Children Safe in Education (KCSIE) 2025, which includes child and adult safeguarding, and Prevent.
- ensure safer recruitment is a key component of any facilitator selection process and maintain an up-to-date list of such individuals.
- ensure and monitor that Associate Colleges follow safer recruitment practices and procedures fully for all candidates on ITE programmes.
- gain assurance from Associate Colleges that safer recruitment checks have been undertaken for all employees and facilitators as per their contract.
- monitor assurances from Associate Colleges that appropriate records are kept in line with legal requirements, including evidence of training.
- develop a safeguarding risk assessment where appropriate.
- report any relevant incident to the NIoT Executive Director of Programmes.
- prepare an annual report to the NIoT Executive Team in the summer term, detailing any suggested changes to the policy and its associated procedure.
- ensure any relevant serious incident is reported to the Charity Commission¹ after consultation with the Executive Director of Programmes.

7.8 **Responsibilities of the National Institute of Teaching Executive Leadership**

The Executive at NIoT will

- appoint and provide suitable training for Regional Principals.
- review and ratify this policy at least annually, ensuring any changes affecting this policy or associated procedures are reflected.
- provide advice should a safeguarding incident occur, drawing on their respective expertise.
- liaise with the Executive Director of Programmes to ensure any serious incident is reported to the Charity Commission

7.9 **Prevent Lead**

The Executive Prevent lead is the COO

- They are responsible for the annual review of policies that relate to Prevent, annual training of staff and communication of procedures relating to the reporting of concerns around radicalisation by staff, facilitators or participants
- They are responsible for acting upon concerns when raised, logging the concerns, liaising with LADO and other authorities and recording investigations and outcomes securely.

8. Reporting a Safeguarding concern

- 8.1 A safeguarding concern can be communicated to a facilitator, Associate College or member of NIoT staff verbally or using the [NIoT Safeguarding Referral Form](#). Any safeguarding concern or incident involving children should be immediately reported to

¹ Guidance on reporting a serious incident can be found at the following link:
<https://www.gov.uk/guidance/how-to-report-a-seriousincident-in-your-charity#protecting>

the child's school and handled according to the school's safeguarding policy, with support from NIoT staff as required.

- 8.2 The person who has the concern should use their judgement with regards to the seriousness of the concern. Concerns which are judged to be of the highest severity (i.e. a real threat to the safety of a child, a participant or another individual) should be shared with the police and/or the organisation of the individual concerned without delay. Concerns judged to be of a lower severity should be handled according to the procedures detailed below.

8.3 Participant disclosure to a facilitator, Associate College staff or member of NIoT staff concerning a child.

- The facilitator or staff member must inform the participant that they cannot promise confidentiality and will need to report the disclosure.
- The facilitator or staff member should complete the [NIoT Safeguarding Referral Form](#) as soon as possible after the disclosure.
- For programmes involving Associate Colleges, the [NIoT Safeguarding Referral Form](#) will be sent securely to the Associate College Designated Safeguarding Lead (DSL).
- For programmes directly delivered by NIoT, the form is sent securely to the Regional Principal Safeguarding Lead. If the concern involves a child, the school DSL will be informed immediately. The referral should be actioned in accordance with the school Safeguarding Policy. The two leads must agree a follow-up meeting to review the actions, which may include a risk assessment, taken by the school in response to the referral.
- If the concern relates to radicalisation, then the [NIoT Safeguarding Referral Form](#) will be sent to the Prevent lead.
- In programmes delivered by Associate Colleges, the Associate College DSL must notify the appropriate Regional Principal Safeguarding Lead that a referral has been generated, the name of the participant and their school/employer. The two leads must agree an update meeting and ensure all relevant parties are kept up to date. The referral and any subsequent update information should be held by the Associate College DSL only for so long as the matter remains open.
- When the school DSL confirms that the concern is closed, only the school should retain the relevant documentation but must inform the NIoT or Associate College DSL so that a low-level concern outcome can be documented.

8.4 Participant exhibiting behaviour or disclosing information that causes a facilitator or staff member to have cause for concern.

- The facilitator or facilitators should complete an [NIoT Safeguarding Referral Form](#) as soon as possible after the cause for concern occurs.
- The Referral Form will be sent securely to the Associate College Designated Safeguarding Lead (DSL) (in programmes delivered by Associate Colleges) or Regional Principal Safeguarding Lead (in programmes delivered directly by NIoT).
- If the concern is regarding a child, the Associate College DSL (in programmes delivered by Associate Colleges) or Regional Principal Safeguarding Lead (in programmes delivered directly by NIoT) will communicate the referral to the Designated Safeguarding Lead of the child's school. The referral should be actioned in accordance with the school's Safeguarding Policy. The two leads should agree a follow-up meeting to review the actions, which may include a risk assessment, taken by the school in response to the referral.

- If the concern is in regard to a participant staff member or facilitator, then section 8.5 should be followed
- In programmes delivered by Associate Colleges, the Associate College DSL should notify the Regional Principal Safeguarding Lead that a referral has been generated, the name of the participant and their school. The two Leads should agree an update meeting for a point after the Associate College and School Lead follow-up meeting.
- The referral and subsequent updates should be held by the Associate College Safeguarding Lead only for so long as the matter remains open.
- When the school Designated Safeguarding Lead confirms that that concern is closed, only the school should retain the relevant documents .An update must be provided to the Associate College or NIoT DSL to log as a low-level concern.

8.5 Disclosure or concern regarding a candidate, participant or facilitator.

- An [NIoT Safeguarding Referral Form](#) should be completed by the Associate College DSL (in programmes delivered by Associate Colleges) or Regional Principal Safeguarding Lead (in programmes delivered directly by NIoT) as soon as possible after the incident.
- The disclosure or concern should be actioned in accordance with this safeguarding policy and include informing the organisation in which the participant or facilitator is employed or placed (if a trainee).
- If the disclosure is in regard to a candidate or trainee on an ITE programme, then the ITE safeguarding procedure should be utilised.
- If the concern is related to the safety and welfare of a trainee, then the Student Support and Welfare Manager will triage the safeguarding referral form and will liaise with the DSL regarding next steps in supporting the welfare of the trainee.
- In programmes delivered by Associate Colleges, the Associate College DSL must notify the appropriate Regional Principal Safeguarding Lead that a referral has been generated, and a meeting should be arranged to discuss follow-up actions in response to the referral. In some cases, the follow-up action might include a risk assessment.
- All documentation should be retained securely and final outcomes logged when resolved.

8.6 Participant or Associate College facilitators disclosure or concern regarding a facilitator of the NIoT

- For programmes delivered by Associate Colleges, an NIoT Safeguarding Referral Form should be completed by the Associate College DSL as soon as possible after the incident and forwarded to the relevant Regional Principal Safeguarding Lead.
- For programmes delivered directly by NIoT, an NIoT Safeguarding Referral Form should be completed by the regional Principal Safeguarding Lead as soon as possible after the incident and forwarded to the Executive Director of Programmes.
- The disclosure or concern should be actioned in accordance with this Safeguarding Policy, including identifying the Lead for the investigation, until the outcome is reached
- This may involve the Lead informing the organisation in which the facilitator or facilitators of the Associate College is employed.
- In programmes delivered by Associate Colleges, the Associate College Safeguarding Lead must notify the Regional Principal Safeguarding Lead that a

referral has been generated, and a meeting should be arranged to discuss and agree further actions.

- In programmes delivered directly by the NIoT, the Regional Principal Safeguarding Lead should notify the Executive Director of Programmes that a referral has been generated, and a meeting should be arranged to discuss and agree follow-on actions. In some cases, the follow-up action might include a risk assessment.
- The Regional Principal Safeguarding Lead must retain the relevant documents and log the issue and outcome clearly

8.7 **A disclosure or concern is made against an employee of the NIoT**

- The disclosure/concern will be shared with the Executive Director of Programmes and the Head of People.
- An appropriate manager will be appointed to investigate the matter.
- If the investigation results in evidence of misconduct occurring, then the matter may progress to the Disciplinary Procedure.
- The Executive Director of Programmes and the Head of People will ensure the relevant documents and outcomes are appropriately retained and logged.
- If an individual feels it is inappropriate to raise an issue via the procedure detailed above, they can raise a disclosure or concern directly to the NIoT Executive Director of Programmes as the overall Designated Safeguarding Lead for NIoT or the NIoT CEO directly.

8.8 **Disclosure of sexual harassment or sexual misconduct from a trainee, participant or NIoT staff member**

- If a trainee, participant or staff member discloses sexual harassment or sexual misconduct at any point during their training, studies or work at the NIoT - direct the person towards the NIoT 'single source of truth' on sexual harassment and sexual misconduct.
- All appropriate information and guidance can be obtained on making a report of sexual harassment or sexual misconduct can be found [here](#).
- Trainees, staff members and participants can report their concerns regarding sexual harassment and / or sexual misconduct either anonymously or non-anonymously.
- Staff can obtain advice and support from the People Team: hr@niot.org.uk
- Trainees can obtain support and guidance from: studentsupport@niot.org.uk.

9. Potential action to take in response to a referral

9.1 The relevant DSL will determine the appropriate actions to take for the circumstance. This will be documented securely by the DSL including the outcome recorded. The following are all possible actions which could be taken by the NIoT in response to a referral:

- Referral to the Local Authority Designated Officer (LADO) where the concern was raised
- Discussion with person raising the disclosure or concern.
- Meeting with the person the concern has been raised about.
- Referral to Student Support and Welfare Manager

- Facilitated conversation between the person raising the disclosure or concern and the person the allegation has been made about.
- Removal of a participant or facilitator from an NIoT programme or group/cohort.
- Referral to the Fitness to Practice Procedure if on ITE programme
- Support for a person making a disclosure or concern in moving group/cohort (if a participant).
- Additional training for highlighted individuals, as deemed appropriate.
- Referral to external agencies, as appropriate, including Police, Social Care or the Teacher Regulation Authority (TRA).

10. Who to contact and when?

- 10.1 The table provides the contact details for senior leaders engaged in safeguarding. However, all referrals should be made on the Microsoft [NIoT Safeguarding Referral Form](#) in the first instance, and the relevant DSL will receive an alert. If you do not hear back from a member of the safeguarding team regarding your concern within 24 hours, then contact the relevant person below directly.

NIoT Safeguarding Role	When to contact	Contact details
National Institute of Teaching		
Designated Safeguarding Lead (DSL) for the Region.	In programmes directly delivered by the NIoT: When an individual first becomes aware of a safeguarding concern	<p>North and West: Sophie Backen s.backen@niot.org.uk 03316301352</p> <p>North and East: Tristan Kirkpatrick t.kirkpatrick@niot.org.uk 03316301348</p> <p>South and West: Jenny Sutton j.sutton@niot.org.uk 03316301356</p> <p>East, South and London: Shona Finlay mailto:mailto:s.findlay@niot.org.uk s.findlay@niot.org.uk 01924967502</p> <p>Gene Payne g.payne@niot.org.uk 01924967503</p>
Executive Director of Programmes and Designated	If any of the above individuals cannot be reached and you want to report a safeguarding concern	Reuben Moore, NIoT Executive Director of Programmes:

Safeguarding Lead for NIoT		r.moore@niot.org.uk 03316301293
NIoT Prevent Lead	If the concern relates to radicalisation. We use the definition used by government that radicalisation can happen when a person develops extreme views or beliefs that support terrorist groups or activities.	Amrit Singh a.singh@niot.org.uk
National Institute of Teaching CEO	If you feel it is not appropriate to raise an issue with any other individuals named above, the National Institute of Teaching CEO can be contacted.	Melanie Renowden, NIoT CEO: m.renowden@niot.org.uk
Student Support and Welfare Manager	If a concern relates to student wellbeing, mental health, welfare concerns or disabilities and additional needs.	Ruth Margrove, NIoT, Student Support and Welfare Manager: r.margrove@niot.org.uk
Associate Colleges		
Designated Safeguarding Lead (DSL)	When an individual first becomes aware of a safeguarding concern	Available via AC's websites. The NIoT contact details are above
Deputy Designated Safeguarding Lead (DDSL)	If you want to report a safeguarding concern and the DSL cannot be reached	Available via AC's websites. The NIoT contact details are above

11. Safer Recruitment

- 11.1 The NIoT and Associate Colleges have established a robust safer recruitment process to ensure all appropriate checks are carried out on staff and on participants on ITE programmes. Likewise, NIoT and Associate Colleges are committed to ensure safer recruitment is a key component of the selection and recruitment process for any external staff employed in the delivery of programmes or successful candidates of ITE.

- **Internal Staff**

All NIoT employees are recruited in line with KCSIE and these checks are:

- that they have the Right to Work in the UK
- verification of any essential Professional Qualifications
- verification of the mental and physical fitness to carry out the role
- a minimum of two suitable employment references
- a satisfactory online search
- an Enhanced DBS with child barred list
- an Overseas Check if appropriate

If this role is for an ITE Tutor, they will also be subject to a Prohibition Check.

- **External Facilitators**

Any external facilitators employed to deliver NIoT or Associate Colleges programmes will be required to provide written notification from their employer that the employer has carried out the checks on an individual, that the school would otherwise perform. Checks are the same as listed above.

- 11.2 Where facilitators are self-employed, the NIoT will support the Facilitator in undertaking the checks. It is the responsibility of the Faculty or Region to gather all necessary information and pass to the People Team.

12. Staff training

- 12.1 Staff training is key to ensuring the safety and wellbeing of children, participants, facilitators and associated employees. Training will ensure everyone connected with the delivery of NIoT programmes is equipped with the requisite knowledge and understanding of the signs and indicators of abuse and will ensure all staff know how to report a safeguarding concern.
- 12.2 As such, all staff who work directly with participants or in schools to support the delivery of NIoT programmes will be expected to complete tailored safeguarding training once a year. DSLs in NIoT and Associate college are to ensure training takes place and will be expected to participate in its delivery. In addition, any facilitator training will include an element of safeguarding training in relation to children and adults. Training is to be recorded by Associate Colleges and NIoT.

13. Safeguarding considerations for online learning

- 13.1 **Professional boundaries**
Facilitators engaging with participants online have a responsibility to model safe practices at all times and should always maintain appropriate professional boundaries and online systems must be approved e.g. MS Teams etc. Any behaviour which could be misinterpreted by others should be avoided and any such incident must be reported to the NIoT.
- 13.2 **Conduct and dress**
Staff engaging in online learning should display the same standards of dress and conduct that they display during a normal professional workday. The following points should be considered by staff, when delivering online lessons/meetings:
- ensure the background is appropriate i.e. photos, artwork, identifying features, mirrors. Ideally the backing should be blurred.
 - staff and participants should be in living/communal areas - not bedrooms.
 - wear suitable clothing - staff and participants should be fully dressed.
 - don't discuss anything personal to you or the participants.
 - be aware of displaying any overt emotions.

14. Record keeping

- 14.1 Robust records must be kept of all stages of any safeguarding concern, including low-level concerns, allegations or incidents including the outcome. Such records must be kept in line with statutory legal retention timelines and/or an organisation's Record Retention policy if specified as longer. Section 8 details which organisation should hold Referral Forms.
- 14.2 NIoT Regional Principals are to ensure that Safeguarding and Prevent training records are maintained by Associate Colleges.

15. Privacy and Confidentiality

- 15.1 Staff will be explicit at the beginning of a conversation with a participant or any NIoT facilitator who raises a safeguarding concern that confidentiality may not be possible. It will depend on the nature of the disclosure and its impact on the wellbeing and safety of the person(s) concerned. The individual raising the disclosure or concern will be informed when information has to be passed on and will be encouraged to do this for themselves whenever this is possible.
- 15.2 All parties should refrain from discussing the case with anyone other than people who may be deemed to have a legitimate need to know. By submitting a disclosure or concern, candidates, participants, employees and facilitators are giving permission for relevant staff with a legitimate business need to be informed of the concern; this may include external agencies.
- 15.3 In relation to safeguarding matters, the GDPR or UK Data Protection Act 2018 does not prevent, or limit, the sharing of information for the purposes of keeping children safe. Legal and secure information sharing between schools, children's social care and other local agencies is essential for keeping children safe and ensuring they get the support they need. Information can be shared without consent if to gain consent would place a child or other person at risk.

16. Related policies

- 16.1 The following NIoT policies should be read in conjunction with this policy and can be found on the NIoT Digital Platform:
- NIoT Complaints Procedure
 - NIoT Whistleblowing Policy
 - Fitness to Practise
 - Fitness to Study
 - ITE Safeguarding Procedure
 - Sexual Misconduct and Harassment Policy

Flow Chart for referral

