# Safeguarding and Prevent Policy & Procedure

November 2026

# Safeguarding and Prevent Policy & Procedure

## Contents


Introduction....3
Background and general principles....4
What are we safeguarding from?....5
What is Prevent Duty?....6
Who is responsible for safeguarding?....6
Child and adult at risk protection....7
Safer Recruitment....8
Information and support for learners and employees....9
Reacting to safeguarding or prevent disclosure or incidents....10
Involving external agencies....11
Local Risk Assessments....14
Appendix 1 – Photographs of Learners....15-16
Appendix 2 – Misconduct of learners....16
- Purpose....16
- Process....16
- Possible Outcomes....17
- Definitions....17
- Misconduct....17

Appendix 3 – Drugs and alcohol....18
Appendix 4 - The Five R's- Handling a disclosure from a person under 18....20
Appendix 5 - Sexual Harassment....21-22
Appendix 6 – Hot Topics and Safeguarding & Wellbeing newsletters....22

## Introduction

The purpose of this statement is to inform everyone connected with Realise Training Group (the Company) of our position with respect to the safeguarding of learners and the Prevent Duty. Learners includes anyone we're training and supporting through our programmes including apprentices, trainees and adult learners. However, it can include a learner who has not yet started their programme with us but we are aware of their needs.

Realise believe that it is always unacceptable for a learner to experience abuse of any kind and recognises its responsibility to safeguard the welfare of all learners by commitment to practice that protects them, looks to minimize potential harm and keep them safe. All staff have access to this policy through internal communication tools, including Blink and are made aware of the policy, how it can be accessed and what it means to them and their role both at initial employment then throughout the year through training (see below for more details).

Realise recognise that:

- The safety and wellbeing of learners is paramount.
- All learners, regardless of age, disability, gender, racial heritage, religious belief, sexual orientation or identity, have the right to equal protection from all types of harm, abuse and radicalisation.
- Working in partnership with learners and with other agencies is essential in promoting a safe environment and the Prevent Duty.

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

- Provide protection for the learners and customers on Realise programmes regarding safeguarding and Prevent Duty.
- Provide employees with guidance on procedures they should adopt if they suspect a learner may be experiencing, or be at risk of, harm, abuse or radicalisation.
- Provide employees with training, guidance and a code of conduct
- Ensure all services and staff operate within the required legal framework that surrounds Safeguarding and Prevent including the Prevent Duty Guidance.

The policy applies to all employees, including senior managers and the board, paid employees, volunteers, learners, or anyone representing Realise.

We will seek to safeguard all learners by:

- Valuing them, listening to them, and respecting them
- Effective reporting and recording systems.
- Adopting safeguarding recommendations
- Sharing information about concerns with appropriate authorities, and involving learners and their parents or carers appropriately
- Safer recruitment practices
- Contextualizing safeguarding by offering welfare support services via links to support in the person's local area.
- Applying industry best practice
- Having an appropriately trained and skilled Designated Safeguarding Lead and team of deputies, each with different specialisms to support our

learners
- Implementing robust IT use and support policies including e-safety measures
- Sharing and promoting our Safeguarding and Prevent Policy to learners, including through appropriate induction training to each of our programmes.

We are committed to reviewing our policy and practice annually with updates and reviews as and when required in-between this, should legislation and or best practice change during the year,

## Background and general principles

Realise is committed to safeguarding and promoting the wellbeing of learners and expects all learners and employees to share this commitment. This policy outlines how Realise will meet this commitment and the legal requirements to fulfil its duties.

We expect our Delivery Partners to comply with relevant legislation and best practice relating to Safeguarding and Prevent Duty, including protecting learners from radicalising influences.

This Policy supports Realise role in safeguarding and Prevent Duty. It states how the organisation will work in conjunction with other agencies to recognise and manage suspicions, allegations and findings of abuse or radicalisation of adults and children at risk which may occur on Realise premises or in their workplace.

Safeguarding at Realise is effective as recognised by our 'Good' status following Ofsted inspection in July 2023.

### What is safeguarding?

Safeguarding is intended to keep children and adults at risk safe from a range of potential harm and looks at preventative action, not just reaction. Realise are committed to displaying, promoting and delivering the safeguarding message within its centres, with its learners and all employers and Delivery Partners.

It means promoting the welfare of children and adults and having policies and procedures in place which define how we will seek to protect our learners. Safeguarding defines how we will respond to.

### Child and Adult at Risk Protection

- Protection from maltreatment (abuse, neglect, exploitation, radicalisation or victimization etc.) where the perpetrator is a member of the wider community, another learner or an employee

### Wellbeing support needs

- Preventing the impairment of health and development and the promotion of support for individual needs.
- Enabling young people to have optimum life chances and enter adulthood successfully.
- Helping learners to access the help they need to enable them to achieve their full potential.
- Providing support and guidance linked to mental health issues and risks. This is often via links to support in their local area

## Who are we safeguarding?

Realise's safeguarding arrangements are to protect all our learners, employees, and stakeholders:

- 'Child' means anyone under the age of 18
- 'Young person' means anyone aged 14 to 17
- An adult at risk means a person, aged 18 or over, living in certain situations, detained in custody, supervised in the community or receiving specific services.

Realise are mindful that a number of other situations may render a person 'vulnerable' such as
- victims of domestic abuse, migrants, living in a drug-misusing family, living in areas of high crime, being likely to face racism or having caring responsibilities.

## What are we safeguarding from?

This is not an exhaustive list and there may be other situations and circumstances that arise.

- Radicalisation and/or extremist behaviour and extremist terrorist groups
- Local area or population issues such as gang activity, serious crime and county lines
- Sexual abuse, sexual harassment or inappropriate relationships, including abuse within the family
- Child on Child or Peer on Peer* abuse, such as sexual harassment (see separate section about this)
- Distribution of inappropriate peer images/ Sexting
- Upskirting
- Child Criminal Exploitation
- Child Sexual Exploitation
- Physical and emotional abuse or neglect
- Exploitation including county lines, forced marriage, financial exploitation, child sexual exploitation and up-skirting.
- Bullying, including cyber bullying, bullying in the workplace and prejudice-based bullying
- Unsafe activities and environments including those online or cyber environments e.g. AI-generated content and deepfakes
- Unsuitable housing/homelessness
- Domestic abuse - Including where children see, hear, or experience its effects
- Drug and alcohol misuse
- Racist, disability and homophobic or transphobic abuse
- Prejudice-based harm and discrimination
- Gender based violence - Violence Against Women and Girls (VAWG)
- Modern Slavery
- Accidents (road, home, in the workplace)
- Suicide and mental health matters
- Self-harm
- Bereavement
- Fabricated or induced illness
- Crime

- Forced Marriage
- Honour based violence
- Female Genital Mutilation
- Breast Ironing

*A while ago Keeping Children Safe in Education amended the former terminology 'peer on peer abuse' to 'child on child abuse'. However, we have concerns that our employees and learners will not read further if we limit the terminology to 'child on child abuse', so we have kept the 'peer on peer' terminology alongside the 'child on child' terminology. This terminology will be used in our policy, training and other resources too.

- Risks linked to technology and social media, including online bullying, grooming, radicalisation, accessing and generating inappropriate content for example, sexting and revenge porn. Use of AI and updated guidance on online safety and AI-related risks.

Following changes to Keeping Children Safe in Education 2026 we are giving additional information and training about:

- Signs of domestic abuse that may be affecting children and young people
- Misogyny, Misandry and harmful sexual behaviour
- Mental health, self-harm and suicide prevention

## What is the prevent duty?

In 2015 the government published the Prevent Duty guidance as part of their overall counter- terrorism strategy. As a result, Realise recognises their responsibility to have a "due regard to the need to prevent people from being drawn in to terrorism" (Counter Terrorism and Security Act 2015) focusing on the 3 key objectives

- Prevent people from being drawn in to terrorism and ensure they are given the appropriate advice and support.
- Respond to the ideological challenge of terrorism and the threat we face from those who promote it.
- Work with sectors and institutions where there is a risk of radicalisation we need to address.

The aim of the Prevent Duty is to reduce the threat of terrorism in the UK by stopping people becoming terrorists or supporting it and focuses on the need to prevent people from being drawn into terrorism. Realise understands it has a legal responsibility to fulfil the Prevent Duty Statement.

### Who is responsible for safeguarding?

The Working Together to Safeguard Children Guidance 2020 states that 'Whilst it is parents and carers who have primary care for their children, local authorities, working with partner organisations and agencies, have specific duties to safeguard and promote the welfare of all children in their area. The Director of Children's Services and Lead Member for Children's Services in local authorities are the key points of professional and political accountability, with responsibility for the effective

delivery of these functions.' In light of this, Realise are committed to supporting all employees to understand the requirements placed upon them by this act.
This is done through a variety of ways including information, advice and guidance, mandatory training and support resources.

At Realise, the Board accepts overall responsibility for Safeguarding and Prevent Duty and as a result is committed to reviewing the Realise policy and practices annually. The Safeguarding policy and process and the management of the Safeguarding Team is the responsibility of Kim Curtain, the Safeguarding & Wellbeing Manager who is the Designated Safeguarding Lead.

However, safeguarding is everyone's responsibility at Realise, we are all responsible for creating a culture of safeguarding and promoting this in every role, every day.

The Director with overall responsibility for Safeguarding is the Chief Learning Officer- Lesley Rimmington. Any concerns about poor practice by the DSL, or their deputies should be referred to the Chief Learning Officer.

The Safeguarding and Prevent Policy is actively and positively promoted to all staff, ensuring commitment from all, at all times by:

- Having a clear and accessible policy in place that staff are aware of
- A Designated Safeguarding Lead (DSL) and team of deputies
- Awareness raising activities by DSL and Deputies including 'knowing who to contact' and attending team meetings to promote the effective implementation of the policy
- Adopting industry best practice technology to support and aid reporting (Tootoot app) an online tool for staff and learners to report safeguarding concerns
- Hot topics of key issues for all learners
- Trend analysis and reporting with monthly updates to the Board.
- Including Safeguarding and Prevent Duty as a standing agenda item at key meetings across Realise including monthly Senior Leadership Team sessions, led by the Chief Learning Officer.
- Mandatory training for all staff that is renewed annually to keep them up to date and aware of the current risks related to Safeguarding and prevent, how to implement the policy and how to protect learners and employees.

As per statutory guidance within Keeping Children Safe in Education September 2026, all Senior Leaders, board members and those with responsibility for governance have read in full, understand and follow the legislation. In addition to this, all employees who come into contact with learners have read and understood part 1. Evidence of this is stored and reviewed on PeopleHR and LearnAmp as this is mandatory training.

## Child and adult at risk protection

The Designated Safeguarding Lead (DSL) is the 'Designated Person' with lead responsibility for safeguarding all learners. The Safeguarding and Wellbeing Manager is supported by the Chief Learning Officer, who is also the Senior Leadership Safeguarding Lead on the Board.

The Designated Safeguarding Lead is also supported by a trained team of

Safeguarding & Wellbeing Deputies who are all trained as Designated Safeguarding Leads, qualified as mental health first aiders, have completed training on the Prevent Duty and also in specialist areas that enables Realise to be best prepared to support a wide range of instances. This network of employees are in place to offer immediate response to safeguarding matters on the ground.

The Safeguarding Team members are:

Kim Curtain – Safeguarding & Wellbeing Manager (Designated Safeguarding Lead for the Company, Mental Health First Aider)

Nola Beehl – Partnership Manager for Early Years (Lead Safeguarding Deputy for the Company, Mental Health First Aider)

Nicola Balmforth – Trainer in Early Years (DSL trained, Safeguarding Deputy for the Company, Mental Health First Aider)

Emily-Jayne Hennessy – Webinar Trainer in Early Years (DSL trained, Safeguarding Deputy for the Company, Mental Health First Aider)

Adam Kolaszynski – Systems and Experience Manager (DSL trained, Safeguarding Deputy for Smart Energy, Mental Health First Aider)

Rachel Lutz-Hall – Functional Skills Tutor - (DSL trained, Safeguarding Deputy for the Company, Mental Health First Aider)

Charlotte Gregory – Trainer in Business Skills (DSL trained, Safeguarding Deputy for the Company, Mental Health First Aider)

James Chambers our Talent Advisor in the HR People Team is also Mental Health First Aid trained and is our Men's Mental Health Champion.

Where it is suspected that a learner is experiencing abuse, experiencing mental health concerns, being drawn into radicalisation or has any other wellbeing issue, this should be immediately reported via the Tootoot platform where the Designated Safeguarding Lead will triage and allocate the case to the relevant deputy who is deemed the most appropriate to deal with the instance, or they may deal with it themselves. Realise is committed to protecting its learners from abuse and continuously improves its systems, processes and policies to reflect this.

There may be low-level concerns that, while not meeting the threshold for formal investigation on their own, contribute to a broader picture of potential concern. This should include an assessment of any transferable risk to children the individual works with.

In these instances, the DSL will seek advice from the LADO in the learners local area.

The Designated Safeguarding Lead also provides generic safeguarding advice and support to other employees and delivery partners and consults with external agencies, including Safeguarding Children Partnerships, Government Prevent coordinators, Safeguarding Adults Partnerships, the Care Quality Commission, Ofsted and the Police and Adult and Child Social Care.

## Training for employees

Realise are committed to preparing its employees on how to recognise abuse or the signs of radicalisation ensuring effective implementation of the policy.

All employees are required to undertake a mandatory safeguarding and Prevent Duty training programme this will be delivered during induction to new employees regardless of job role. It is expected that employees will undertake refresher training every year enabling an up-to-date knowledge and awareness of Safeguarding and Prevent Duty as well as how to effectively implement this policy.

Further to mandatory training the Designated Safeguarding Lead is available to offer generic and specific information, advice and guidance to employees around safeguarding and wellbeing matters either by phone or by email.

Training and CPD related to Safeguarding and Prevent is planned and recorded in the Realise LMS system LearnAmp and reviewed by the board on a monthly basis ensuring effective implementation of the policy.

## Safer Recruitment of Employees

In line with the updated statutory guidance Keeping Children Safe in Education September 2025, Realise are committed to safe recruitment for all positions across the business and practices safer recruitment activities throughout the recruitment processes. It is a criminal offence for barred individuals to work with children or adults at risk in regulated activity and Realise are committed to seeking the relevant DBS check when recruiting to such roles. All DBS checks will be undertaken in accordance with the recommendations by the Disclosure and Barring Service and the Realise Recruitment & Selection policy section 4 - Employment of Ex-Offenders The requirement to undergo such a check will be highlighted to applicants at an early stage.

All employees involved in recruitment of new employees are required to undertake mandatory Safer Recruitment training, delivered through LearnAmp.

The Safeguarding & Wellbeing Manager monitors the Safer Recruitment practices, DBS checks, references and the Single Central Record (SCR).

Three references are taken for every new employee and Social Media checks are carried out by the recruitment team to check suitability of applicants.

DBS checks are renewed every 3 years.

## Support for employees

It is recognised that to enable employees to meet their safeguarding and Prevent responsibilities they may, at times themselves, require additional support. Realise operate an open-door policy and whilst the first port of call is always the line manager. Employees may wish to seek additional personal support from the HR People team, Senior Managers, Able Futures or the Employee Assistance Programme.

Specific advice on safeguarding and well-being issues can be sought from the Designated Safeguarding Lead who is Mental Health First Aid trained. In 2025 we also introduced a Men's Mental Health Champion – James Chambers our Talent Advisor in the HR People Team who is also Mental Health First Aid trained.

We have Menopause support in place for our employees, a Menopause Support Coffee Break is held every month, as an online Teams meeting. Where employees can attend and discuss the subject. Signposting and support is shared on our Menopause Support Blink chat group.

## Out-of-hours support

Learners can access support out of the normal working hours of the company by looking on our Realise website. Welfare support - Realise

## Counselling support for learners

The usual advice for learners is that they contact their G.P. for access to counselling and medication. Learners may also make contact via Tootoot or speak to their main contact who may then raise an incident on their behalf in Tootoot, seeking advice. We have a partnership with Able Futures too, who are run by Access to Work, who deliver expert mental health support, free of charge, for any person who is employed, nine months of support is given. Paid for by the DWP.

## Absence from training

If a learner is absent from a training session and has not informed the trainer, the trainer must call the learner or speak to their employer, to find out what has happened and whether they are attending. If the learner cannot be contacted via phone or email, then the next of kin should be called so they can do a welfare check on the learner. If the learner is an adult and we do not have next-of-kin details, we may decide to call the police to do a welfare check.

The absence of a learner could be a safeguarding concern indicator.

## Safeguarding & Wellbeing Deputies

The network of Safeguarding & Wellbeing Deputies and Manager work closely together to ensure support is available across this team. Meetings are held quarterly to ensure a consistency of approach, sharing of good practice and reflection on themes and disclosures to ensure that support is constantly strengthened and improved and that the deputies are fully supported. The Safeguarding & Wellbeing Manager has regular catch ups with their Deputies to ensure they are coping with the extra role they are doing and that they are supported in dealing with difficult situations. Guidance and support with dealing with incidents is given and temporary relief from their safeguarding duties can be applied.

The Safeguarding Team members are:

Kim Curtain – Safeguarding & Wellbeing Manager (Designated Safeguarding Lead for the Company, Mental Health First Aider and Menopause Champion)

Nola Beehl – Partnership Manager for Early Years (DSL trained, Lead Safeguarding Deputy for the Company, Mental Health First Aider)

Nicola Balmforth – Trainer in Early Years (DSL trained, Safeguarding Deputy for the Company, Mental Health First Aider)

Emily-Jayne Hennessy – Webinar Trainer in Early Years (DSL trained, Safeguarding

Deputy for the Company, Mental Health First Aider)

Adam Kolaszynski – Systems and Experience Manager (DSL trained, Safeguarding Deputy for Smart Energy, Mental Health First Aider)

Rachel Lutz-Hall – Functional Skills Tutor - (DSL trained, Safeguarding Deputy for the Company, Mental Health First Aider)

Charlotte Gregory – Trainer in Business Skills (DSL trained, Safeguarding Deputy for the Company, Mental Health First Aider)

## Information and support for learners

All learners will receive Safeguarding and Prevent Duty information during their induction and initial meeting, including access to the Tootoot platform to report safeguarding, radicalisation or mental health risks and disclosures. Tootoot provides a safe and secure online platform to raise, record, monitor and track investigations or concerns. Their Realise main contact has the responsibility to ensure that they understand how safeguarding and confidentiality operates within Realise as a part of the induction process.

Learners can expect a confidential service (within the bounds of Child Protection) when making contact with wellbeing support and an initial response within 1 working day. All contacts will be investigated and actions agreed appropriately.

Learners can expect that they will be treated sensitively and with dignity should a safeguarding incident or concern occur. Realise requires its employees to treat such matters confidentially, notifying colleagues only on a 'need to know' basis.

Most learners prefer to discuss any safeguarding or wellbeing concerns with their main contact rather than submitting a concern directly through Tootoot. This approach is perfectly acceptable.

In these situations, the main contact is responsible for creating a Tootoot incident report on the learner's behalf, clearly outlining the concerns that have been raised. This enables the Safeguarding Team to review the information and provide appropriate advice, guidance, and signposting to relevant support services.

The Safeguarding Team will add relevant website links and resources to the Tootoot incident report. Once these have been provided, the main contact must copy and share this information with the learner using their preferred method of communication.

This information should be passed on to the learner within 24 hours of the Safeguarding Team adding the resources to the report.

## Sharing of Information

Realise work to the following Confidentiality Statement with our learners:

"It is important that you feel safe and confident to discuss any issues that you may have with a member of the Realise team. For this reason, any information that you share will not be discussed outside of the employees who can directly help and support you, unless you tell us that either you or others are at risk of harm. In such cases we may have to share this information with external agencies such as

Safeguarding Children and Adults Partnerships, the Care Quality Commission, Ofsted, Child and Adult Social Care or the Police. This will only be passed on with your knowledge."

## Reacting to safeguarding or prevent disclosure or incidents

### Accusations of abuse

Should one of our learners working in our Early Years & Education or Health & Social Care sectors be accused of abuse, this should be raised via Tootoot by the learners' main contact or the learner themselves. The Safeguarding & Wellbeing Manager will give advice and guidance and they will be supported throughout this process as innocent until proven guilty, until the outcome of investigations by the relevant authorities. The safeguarding team will ensure the main contact has read our 'Accusations of abuse against a learner' policy and the 'Learner Briefing' that goes with this has been passed on to the learner.

Should an accusation of abuse be aimed at a Realise employee by a learner, this must be reported to the HR People team, the Chief Learning Officer and the Safeguarding & Wellbeing Manager. They will liaise with the Chief People Officer and decide whether the individual will be suspended pending further enquiry.

Any allegations relating to allegations about a Realise employee, made by a learner will not be investigated but referred to the local LADO in the learner's area.

### Low-level concerns

There may be low-level concerns that, while not meeting the threshold for formal investigation on their own, contribute to a broader picture of potential concern. This should include an assessment of any transferable risk to children the individual works with.

In these instances, the DSL will seek advice from the LADO in the learner's local area.

### Investigations relating to an employee (Person of Trust)

An investigation may need to be led by the Chief Learning Officer and the Chief People Officer, with the Safeguarding & Wellbeing Manager supporting. Any findings may need to be given to the relevant authorities, such as the police or Safeguarding children and adults partnerships. In certain cases, the Disclosure & Barring Service may need to be informed if an employee is found by the relevant authority to have committed a criminal offence. The DBS would make the decision as to whether the employee should be barred from working with children or adults at risk. Full cooperation will be given by us to any of the aforementioned authorities.

### Disclosures

Learners may not feel able to disclose to anyone about what is happening to them for a number of reasons – threats, fear of punishment, guilt, shame, thinking that they will not be listened to or believed and an inability to communicate. The behaviour and attitude of our employees should be non-judgmental and one of vigilance, openness and confidentiality (within the bounds of child protection law), in order to create a culture consistent with safeguarding practices. Disclosures must

be reported via Tootoot to enable support and guidance to be provided where required.

Realise expects employees to be mindful of the support available to learners and seeks to encourage learners to access this at appropriate times throughout their time with us.
Employees will actively avoid making safeguarding a 'tick box exercise'.

### Risk Assessments

Realise recognise that it is necessary to undertake safeguarding risk assessments and that safeguarding should be considered alongside other standard assessment of risk processes.

At times it will be appropriate to assess the risk of individuals or specific groups of learners. Such circumstances should be advised to the Designated Safeguarding Lead, in advance of the learner commencing, for a risk assessment to be undertaken, mitigations to be agreed, and where necessary, actioned.

## Involving external agencies

### Referral

The Designated Safeguarding Lead or their Deputy are responsible for referral of incidents or allegations of abuse to Safeguarding Children (LADO) and Adults Partnerships, including Child and Adult Social Care, the Care Quality Commission, Ofsted, the Disclosure & Barring Service and sometimes the police or in cases of radicalisation to the Channel Programme as appropriate. The above-mentioned services have the lead role in coordinating the multi-agency approach to safeguard adults and children at risk and may ask for attendance by employees of Realise to POT (Position of Trust) /strategy meetings or for written evidence of incidents.

### Reporting to the Police

Realise will report all incidents involving drugs to the police and seek their advice and possible involvement. The police will always be involved in the disposal of suspected illegal drugs.

Realise will refer to the police incidents of the following type:

- assault (whether physical or psychological)
- sexual assault and rape
- grooming
- theft, fraud, or other forms of financial exploitation
- certain forms of discrimination, whether on racial or gender grounds or other forms of prejudice

There may be other incidents we need to report, not listed above.

Whether to involve the Police will be a matter for the Chief Learning Officer and Chief People Officer or, in urgent situations, another member of the Board, if necessary, in consultation with the Realise legal representatives.

### Recording of incidents

All incidents should be fully and accurately recorded as any notes may be used in subsequent court proceedings, strategy meetings and for safeguarding partnerships records. Incidents should be recorded on the Tootoot platform against the related case where only approved employees can access it.

The Safeguarding & Wellbeing Manager and their Deputies have been trained in responding to reports, storage of reports in Tootoot and confidentiality and sharing of information.

## Behaviours

### Social Media

Realise recognise that there are notable benefits to using social media as communication and promotional tools as well as potential negative effects in terms of reputation and safeguarding. In order to use social media in a safe and professional way, Social Media guidance is provided to employees via the Social Media policy. This provides guidance on how Realise expects them to operate when using social media. Owing to the Safeguarding implications surrounding the misuse of social media formats, any activities undertaken outside the boundaries of the guidance will be dealt with as a disciplinary matter.

### Weapons and violent behaviour

Realise recognises that there is a possibility that employees, learners, clients or visitors may come into contact with violent or aggressive behaviour and that this contact may lead to personal harm. In such an instance, it is the policy of Realise to support victims and deal with these situations and any consequences with sensitivity and compassion. Occurrences of violent or aggressive behaviour must be reported immediately to the most senior person on site so that the appropriate action can be taken.

All incidents will be investigated and treated with the utmost seriousness and may lead to disciplinary action or the involvement of the police.

Learners and employees can expect to be able to learn and work in a safe environment and therefore all weapons and/or objects that are carried with the purpose of being used as a weapon are banned from Realise premises. Any learner, employee or visitor found to be in possession of a weapon will be asked to leave the premises and the relevant disciplinary action will be taken. Owing to the level of risk posed by the presence of a weapon on site it is likely that such an instance will result in permanent dismissal from programme and company premises. Where relevant the Police will be contacted to enable weapons to be confiscated and the relevant actions to be taken.

### Radicalisation, Extremism & Prevent Duty

In respect of safeguarding individuals from radicalisation, Realise works to the Prevent Duty element of the Government's Counter Terrorism Strategy, and where deemed appropriate, seeks external support for learners through referrals to the Channel Programme. This programme aims to work with the individual to address their specific vulnerabilities, prevent them becoming further radicalised and possibly entering the criminal justice system because of their actions. Realise follows all statutory legislative requirements and guidance with regards to the Prevent Duty

and ensures all staff have appropriate training and support to be able to protect learners and employees from radicalising influences, ensure learners and employees are resilient to extreme narratives and know how to identify changes in behaviour of learners and employees.

It is recognised that radicalisation can occur to an individual from any section of society and is not particular to any racial, ethnic or social group. It is further recognised that in many instances the process of radicalisation is essentially one of grooming by others.

Possible signs of radicalisation include an individual:

- becoming increasingly extreme regarding another section of society or government policy
- becoming increasingly intolerant of more moderate views
- expressing a desire/intent to take part in or support extremist activity.
- being observed downloading, viewing or sharing extremist propaganda from the web
- they become withdrawn and focused on one ideology.
- changing their appearance, their health may suffer (including mental ill health)
- becoming isolated from family, friends, peers or social groups

The Department for Education has provided Government Prevent Coordinators who operate nationally. The Designated Safeguarding Lead and their Deputies are able to contact them for guidance and support if concerns are raised regarding radicalisation and extremism.

A list of the Government coordinators can be found on the Hub on Blink.

As part of mandatory training, all employees, regardless of role, undertake Government Home Office Prevent training and will refresh this every year in line with guidance.

Safeguarding Deputies must complete Prevent Duty training with the Education Training Foundation.

Realise monitor the use of data processed on its IT systems (Servers, laptops, desktops, tablets, and mobile phones). This may include (except where precluded by local privacy laws) examination of the content stored within emails (via DLP policies and regular expression rules in Microsoft 365 and Barracuda email gateway), data files of any user, and examination of the access history, including website viewed (using Sophos and Microsoft 365 Defender).

By default, web filtering policies block: Adult content, legal liability (Child abuse, criminal activity, Hate & intolerance, Hacking, illegal drugs, illegal software, school cheating, self-harm and weapons). Any site meeting a blocked category is automatically blocked and an alter logged. Only authorized admins have the ability to view, create, amend or delete data quarantined by the DLP and web filtering policies.

All data for safeguarding incidents comply with Data Protection Act 2018 and UK GDPR to comply with DPA/UKGDPR requirements.

## Local Prevent Duty Risk Assessments

To assess the risks across every area where we are working in the UK. The Safeguarding and Wellbeing Manager has linked with every Government Prevent Coordinator in each region.
This means we have awareness of local risks across each region as we receive regular updates from them directly about risks relating to radicalisation and extremism. The Safeguarding & Wellbeing Manager and Lead Deputy also attend the regional Prevent meetings in the areas they cover.

Local risks and offers of support for current events that may be affecting our learners are put onto OneFile as a OneFile broadcast, so every learner sees this when they open OneFile.

### Making a Channel Referral

When the Safeguarding team are made aware of an issue relating to radicalisation and extremism, the Safeguarding & Wellbeing Manager or their Lead Deputy will contact the Government Prevent Coordinator in the region where the person lives. Following changes to the process an online referral form will then be completed so that it can be risk assessed. Following this contact, we will be linked to the Special Branch department who is dealing with it.

Referrals may be made to the Channel Programme at the relevant local authority or police. This is a confidential, multi-agency safeguarding programme that supports people who are vulnerable to radicalisation. The programme is about early intervention to protect vulnerable children and adults who might be susceptible to being radicalised, which, left unsupported, could lead to terrorist related activity.

### Removal from programme

For learners, in general this should be seen as a final step only after all other strategies have been applied, or the offence is very serious, such as supplying an illegal drug. Where a learner is mandated by a third party such as Job Centre Plus, the learner will be referred back. If it is a learner who is employed such as an Apprentice, this will be discussed with their employer.

If a learner working in our care sectors is found to be guilty of abuse following investigation by the relevant authorities, we would remove them from programme.

## Governance

Realise board has the overall and final responsibility for this Policy, supported by the Chief Learning Officer and Safeguarding & Wellbeing Manager, who will control the coordination, implementation and monitoring of the Policy throughout the Company.

This Policy will be reviewed at least annually by the Chief Learning Officer and Safeguarding & Wellbeing Manager and approved by the board.

The Safeguarding & Wellbeing Manager will actively assess any improvements that can be made and propose these changes to the Chief Learning Officer.

At the board's sole discretion, any updates or additional processes may be implemented; these updates or additional processes will be incorporated into this Policy in the annual review period. Updates will be cascaded throughout the Company.

In December 2025 Realise Training renewed their GOLD standard, Leaders in Safeguarding accreditation and LiS said:

“A positive, supportive culture exists throughout the organisation which supports and promotes safeguarding very effectively.”

“Realise have invested well in training a large number of staff to become mental health first aiders. This has further strengthened the positive culture.”

“The statutory information sharing protocols involved in safeguarding are understood very well by the staff and safeguarding team at Realise. This ensures learners remain safe and receive the best help and support to meet their needs.”.

“Statutory safeguarding partners hold the Realise safeguarding team in positive regard for their knowledge, skills and experience.”

## Appendices

### Appendix 1 – Photographs of Learners

At Realise we understand the possible risks around using photographs of individuals. Because of this we believe we need to safeguard our learners.

### What are the risks?

The most highly publicised and worrying risk is that a child or young person who appears in photographic form or on a website may become of interest to a sex offender. Locating people through the internet has become extremely easy, using widely available software, so if there is a picture and the name of an education provider or workplace and the full name of the child, young person or adult then it could be quite easy to find out someone’s exact location or address which could then put them at risk. There are also other specific groups of children, families, and employees whose safety could be put at risk if identified e.g., families fleeing domestic abuse. We may not always be aware of who these vulnerable groups may be.

1) Permission for photos to be used for completion of my programme

Name: .....

I am over the age of 18 YES / NO

I give permission for the use of my photograph as evidence in completion of any training/work.

Signed:.....Date:...../...../.....

Please print this page only, ensure Learner completes it and keep for your records.

2) Permission for photo's to be used for marketing

purposes Name: ..... I am over the age of 18

I give permission for the use of my photograph to be used for marketing purposes by Realise's Marketing Dept.

Signed:.....Date:...../...../.....

Please print this page only, ensure Learner completes it and keep for your records

3) Parent/Guardian permission for the use of photographs, videos and voice

recordings Delete where applicable.

I hereby give permission for my son / daughter to use photographs, videos and voice recordings for completion of their programme.

Young person's Name: .....

Young person's age.....

Signed: .....I am their Parent / Guardian

Date: ...../...../.....

Please print this page only, ensure Parent/Guardian completes it and keep for your records.

## Appendix 2 – Misconduct of learners

There are occasions where there are incidents that arise with learners where other learners or employees are put at risk by behaviour. This can occur in particular contracts due to the nature of the people we are supporting.

In these cases, we will have to carry out a safeguarding risk assessment of the circumstances on a case-by-case basis.

The following will be considered:

1. The age, maturity of the learners involved and whether they have particular needs or disabilities

2. The circumstances of the situation and who was involved

3. The background and circumstances of the learner

Support services will be contacted e.g., Social Workers, Police and Safeguarding Children and Adults Partnerships as necessary, following child and adult protection procedures.

To be absolutely fair and set clear boundaries for all, in a group/classroom situation, acceptable classroom behaviour will be discussed and agreed from the start.

Learners will be encouraged to agree what is expected and acceptable behaviour in a group situation, these should reflect our Realise behaviours and our British Values.

The Tutor/Facilitator will remind the learners of the agreed behaviour. We will try very hard to retain every learner on programme, if possible, in order for them to achieve their objectives but will need to consider the safety and wellbeing of all other learners and employees when making decisions.

## 1. Purpose

The purpose of this High-Risk Appendix is to provide a transparent process when dealing with matters of potential misconduct and gross misconduct so that if problems arise with learner conduct, the manager can take a fair and reasonable course of informal and/or formal action to resolve issues and aid improvement.

The procedure is based upon the principles of fairness, equality and reasonableness, as underpinned by legislation. The procedure shall be applied with these principles in mind.

## 2. Process

The misconduct is considered as minor in cases where it is an isolated incident of misconduct which falls short of the standards expected. First offence and minor in nature i.e. failure to follow employees' instructions, behaviour issues with minimal consequences and no previous incidents. The matter should be dealt with under the informal stage of the process. If formal action might be considered as the next step, then this should be made clear to the employee at the earliest opportunity.

Employees should make and retain notes of any issue raised and discussed informally, including any agreed outcomes and support.

## 3. Possible Outcomes

Following an incident the learner will be informed of the possible consequences in writing within 3 working days after the incident.

Formal action will be either:

1. First Written warning
2. A Final Warning
3. Removal from programme

The warning will inform the learner what further consequences could be considered if further misconduct occurs.

## 4. Definitions

A particular type of misconduct may be treated as misconduct or gross misconduct depending on the facts of the case.

## 5. Misconduct

The following are examples of misconduct although this is not intended to form an exhaustive list:

1. Disruptive behaviour
2. Failure to comply with reasonable and legitimate instructions.
3. Inappropriate use of equipment

4. Non-engagement

## Gross Misconduct

Gross misconduct may lead to removal from programme.

The following list provides some examples of offences which are usually regarded as gross misconduct although this is not intended to form an exhaustive list:

1. Unauthorised possession of goods belonging to Realise and its employees
2. Theft
3. Verbal abuse
4. Threatening behaviour
5. Physical violence
6. Serious disorderly conduct and behaviour
7. Bullying
8. Victimisation
9. Unlawful and/or serious harassment of other learners, visitors or employees
10. Sexual harassment of learners, visitors or employees
11. Deliberate unlawful and/or serious discrimination.
12. Gross or deliberate misuse of property on Realise premises or hired premises.
13. Serious misuse of IT resources such as deliberately accessing internet sites for personal use which contain pornographic, offensive, extremist or obscene material. I have an arrangement with the Head of I.T., who reports to me weekly if there have or have not been, any risks of this nature across the business.
14. Conduct seriously and detrimentally affected due to alcohol, drugs or substance misuse
15. Substance abuse on Realise premises or hired premises.
16. Deliberate and serious damage to property
17. Causing loss, damage, or injury through gross negligence

In cases where several misconduct issues occur together or in close proximity, this can amount to gross misconduct.

## Appendix 3 – Drugs and alcohol

Drug and alcohol misuse - This applies to all areas of Realise premises and all employees, learners and visitors, it;

- Covers all drugs and focuses on alcohol, tobacco, cannabis, volatile substances and Class A drugs
- Clarifies the legal requirements and responsibilities of Realise.
- Reinforces and safeguards the health and safety of learners and others who attend Realise premises
- Clarifies Realise approach to drugs for all employees, learners, parents or carers, external agencies and the wider community
- Enables employees to manage drugs on Realise premises and any incidents that occur, with confidence and consistency, and in the best interests of those involved
- Reinforces the role of Realise in contributing to local and national strategies

Drug definitions - A drug can be defined as 'a substance people take to change the way they feel, think or behave' (United Nations Office on Drugs and Crime).

This policy refers to:

- All illegal drugs
- All legal drugs including alcohol, tobacco, volatile substances, and poppers.
- All over the counter and prescription medicines

Realise stance on drugs and alcohol - Illegal drugs and alcohol have no place on Realise premises.

Realise do not permit the use of tobacco on the premises other than in the designated smoking areas.

## How is the policy applied?

Employees must send a clear message, through direct discussion with learners that the possession, use or supply of illegal and other unauthorised drugs or alcohol on Realise premises is unacceptable. Realise employees must ensure that the Drug and Alcohol Policy is understood by learners, parents, or carers.

Realise employees should be aware of the impact that parental or family members' misuse of drugs can have on learners. Employees should be alert to behaviour that might indicate that a learner is experiencing difficult home circumstances and act accordingly, raising an incident on Tootoot.

## Suspicion of drugs or alcohol misuse on Realise premises.

Learners or employees will be asked to leave the premises should it be suspected that they have misused or are carrying drugs or alcohol.

Learners or employees will be asked to leave the premises should it be suspected that they are involved in drug dealing or taking drugs on Realise premises.

Where a learner or employee refuses to leave the police should be called. They should be notified of this action before it is taken.

If a person is suspected of having been in possession of or be dealing in illegal substances employee should inform both the Manager responsible and the Safeguarding and Welfare Manager for appropriate follow up actions to be agreed.

## Discovery of drugs and alcohol

If it is known or suspected that a person on a Realise site is in possession of an illegal substance the Police should be contacted for a search to be undertaken. The Manager responsible and, where this involves a learner or employee the Safeguarding and Welfare Manager must also be advised.

Where illegal substances or substances that are thought to be illegal are found, employees should raise the issue with their manager. The manager should secure the items to prevent an offence from being committed, the suspected illegal drug should be stored in a secure location and the police called immediately and asked to collect it without delay. A second witness should be present throughout; this is for the safety of all parties.

If a person is found to be in possession of illegal substances employees should inform both the Manager responsible and the Safeguarding and Wellbeing Manager for appropriate follow up action to be agreed.

Following the involvement of the police, they will feedback on whether any further investigation will be required.

If formal action is to be taken, the person should attend the local police station. Arrest and interviews should not normally take place on Realise premises. Where a person is under 18 an appropriate adult should always be present during the interview, preferably a parent/carer, the Safeguarding & Wellbeing Manager will contact the parents or carer. Referral to the police will be the responsibility of the relevant Manager on site. This Manager should also contact the Safeguarding & Wellbeing Manager to make them aware of the details of the incident.

In the case of the discovery of either illegal drugs or alcohol, for persons under the age of 18 parents/carers must always be informed unless this would jeopardise their safety.

## Employee conduct and drugs or alcohol

An employee may be deemed unfit for work if they pose a risk or potential risk to the health and safety of learners and colleagues as a result of drug or alcohol misuse. Such circumstances will be dealt with in accordance with the disciplinary procedure.

The Realise management team operates an open-door policy and employees wishing to seek advice on personal issues can do so via HR, their line Manager or the Employee Assistance Programme.

## Employees with key responsibilities

The Safeguarding and Wellbeing Manager has overall responsibility for all drug issues involving learners within Realise where drug incidents involve employees this will be the responsibility of the HR People Team.

## Disposal of drug paraphernalia

If there is an instance of drug finding, the relevant Manager responsible should inform the police and professional disposal will be arranged. The area should then be appropriately secured until the items are removed. Realise employees should not attempt to dispose of the item themselves.

## Reporting to the Police

Realise will report all incidents involving drugs to the police and seek their advice and possible involvement. The police will always be involved in the disposal of suspected illegal drugs.

# Appendix 4 - The Five R's- Handling a disclosure from a person under the age of 18.

## 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 a learner's behaviour

## Response

- Is the learner reporting a concern or a suspicion? Is this a disclosure from an individual alleging abuse to themselves or to another? Find out whether you are dealing with an allegation against a member of staff, a fellow learner, or another person. What, precisely, is alleged to have happened? Detailed clarity is vital.
- Remain calm and listen.
- Do not ask leading questions, probe with questions or make judgements about the person or situation
- Inform the person that the concerns must be recorded and passed on to your Safeguarding & Wellbeing Manager via Tootoot so that the issue can be dealt with (normal rules for confidentiality do not apply when a child or young person is at risk of harm).
- Reassure the person that they have done the right thing in telling you and that you will do everything you possibly can to help
- Do not make unrealistic promises

## Reporting

- If it is a clear case or disclosure of abuse this must be reported on our safeguarding reporting system Tootoot.

- DO NOT DISCLOSE THIS WITH ANYONE ELSE
- Report any concerns as soon as practicably possible, but before the end of the working day.

### Recording

- Use Tootoot to record precisely what has been alleged/happened - use the exact words of the learner. Your record should use accurate quotation.
- If appropriate, include factual observations.
- Once you have reported concerns using this process it is the Safeguarding and Wellbeing Manager's responsibility to take any further decisions as to the actions which would follow. This may or may not directly involve you.

### Referral

- Only the Designated Safeguarding Lead/Lead Safeguarding Deputy/Chief Learning Officer/Safeguarding Deputies can make the decision to refer a complaint or allegation having gathered and examined all relevant information
- Only the Designated Person or their Deputies should investigate a complaint, allegation or suspicion of abuse. Actions carried out by others could be construed as unjustified interference which could jeopardise an investigation and any possible subsequent court case
- No Realise employee is in a position to decide whether abuse has taken place

## Appendix 5 – Sexual Harassment and Sexual Assault

There has recently been an increase in sexual harassment and sexual assaults across Britain, especially affecting young people.

In order to help our learners feel safe we have written some advice and guidance as a Hot Topic which is available for our employees as a LearnAmp module with a knowledge test included and for learners as a Vimeo video recording. Our employees will be able to have discussions on the subject (and many others) and can set the learner to complete watching the video as a task.

This includes:

- Definitions of sexual harassment and sexual assault
- Types of sexual harassment
- The effects of these on the victim
- If you are being sexually harassed at work
- If you are treated badly because of your reaction to sexual harassment.
- The reporting process.
- The support we can offer.

If any learner discloses this to their main contact or raises an incident on Tootoot about this the Safeguarding & Wellbeing team will find local support links available in their area. This will be given to the learner to access themselves. This guidance

will include a variety of support available to ensure the learner has a choice to meet their needs.
Depending on the nature of the incident and the severity of it, advice will be given about contacting their GP or hospital and about reporting it to the police.

If any Realise employee is witness to or made aware of sexual harassment by any of their Realise colleagues against a learner or another colleague, this must be reported immediately to the HR People Manager or the Safeguarding & Wellbeing Manager.

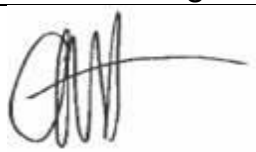
## Appendix 6 – Hot Topics and Newsletters

### Hot Topics

We changed the way we cover the Hot Topics which are to be used with our learners by our learner facing employees. We used to use PowerPoint presentations and sent out a subject every month. Now we have a bank of Hot Topics so that learners or employees can choose one that is relevant or suitable for their learners. We have created these as LearnAmp modules for our employees and as videos for our learners stored on Onefile in the resources section in the learner welfare folder.
Our learner facing employees set both as a task by our learner facing employees. Learners then write a learner journal entry about what they learned, what they liked or didn't like and how they have used the information in there in their own life or their workplace.

### Safeguarding & Wellbeing monthly newsletters

We introduced newsletters in July 2022, written by the Safeguarding & Wellbeing Manager and their Deputies. They have been very well received.
We have recently changed the format of our newsletters which are no longer a pdf but now a Link to a website. These are sent to our employees via the Blink feed and email to our employers via email and our learners via OneFile.
Our employees send the feedback from the learners to the Safeguarding & Wellbeing Manager in order for us to measure their impact and improve them. Our learners are invited to suggest ideas for articles every month.

| | |
|---|---|
| Version Control Number | Realise-05-PD-14 |
| Version | 12 |
| Last Review Date | 05/11/2026 |
| Next Review Date | 05/11/2027 |
| Policy Owner | Kim Curtain - Safeguarding and Wellbeing Manager |
| Signed by Chief Executive Officer | <br>Gregg Scott Realise Chief Executive Officer |