

Civil Nuclear Constabulary Learner Safeguarding Policy and Procedure



Location: General

Document Type: Policy and Procedure

Department: Corporate Learning and Development

Topic: Learning

Document Reference Number: CNC-CUL-POL-CLD-LNR-0333

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Review by: 17 December 2026

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Printed by: Stuart Rodgers on 17/12/2025

Policy Statement

1. The purpose of this policy is to set out the Civil Nuclear Constabulary's (**CNC's**) position on safeguarding learners and to inform everyone connected with the CNC, including subcontractors or collaborators, of the learner safeguarding policy with regard to our commitment to safeguard all individuals involved in the learning environment.
2. All staff and officers at the CNC have a duty to identify learners who may be at risk of experiencing harm or abuse at work, home, through online networks or in relationships and take appropriate action to ensure their safety.
3. All individuals have a duty to act to ensure the welfare of those within the learning environment is paramount. Where it is known, or suspected, that a learner is experiencing safeguarding issues, this should be reported immediately to the Designated Safeguarding Lead (**DSL**). All individuals within the learning environment have a personal and professional responsibility to ensure they understand safeguarding requirements and the processes to follow if they become aware of a safeguarding issue.
4. Learners will be treated sensitively and with dignity should a safeguarding incident/concern occur, or an allegation of abuse be made. The CNC will treat such matters confidentially, notifying others on a 'need to know' basis under the direct guidance of the DSL. Whilst respecting individual confidentiality and GDPR regulations, the CNC must act and cannot guarantee confidentiality in all circumstances. If it is believed to be in the best interest of the learner involved, we may need to contact certain individuals or organisations.
5. All learners are reminded that they must abide by the Police Code of Ethics and conduct themselves accordingly whilst on and off duty.
CNC believe that:
 - All learners have the right to learn in a safe, open and caring environment and that their welfare is paramount.
 - All learners have the right to expect colleagues to listen to them.

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- All learners, regardless of any protected characteristic(s), have the right to equal protection from all types of harm or abuse and should be valued and respected as individuals.
- Bullying in any form is strictly unacceptable and will not be tolerated.
- Working in close partnership with learners and collaborative companies/institutions is essential in promoting a safe learning environment.
- Adopting robust safeguarding guidelines through procedures and a code of conduct for learners, staff and contractors is essential.
- It is essential to share information about any concerns raised with appropriate agencies or support networks.
- Working in conjunction with partners, Occupational Health and Wellbeing and the CNC Health and Wellbeing strategy is essential.
- All learners must have a ready point of contact, referral or support.
- All learners are expected to abide by the Code of Ethics and CNC values.

6. This policy should enable consistent and effective decision making. Where operational or managerial circumstances require any decision making that would adversely affect adherence to this policy, in line with the police service 'Code of Ethics', if an officer/police staff member believe that they need to make a decision that steps outside of policy and procedure they should do so, if:

- The officer/police staff member raises the matter at the earliest opportunity (and ideally before any such decision is made) with their line manager declaring their intended (or actual) course of action if notification is made after the decision is taken.
- Produces, in a timely manner, a signed and dated written explanation of why it is/was deemed necessary to step outside of policy and procedure. Maintain an adequate record of this written rationale for audit purposes appropriate to the circumstances/contravention.
- In the event that the officer/police staff member feels unfairly treated they should report this to the Designated Safeguarding Lead at the earliest opportunity.

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Purpose

7. The CNC is committed to:

- 1) Creating a safe and secure environment for all its learners.
- 2) Identifying and eliminating or managing any risks to health, safety and wellbeing of learners in any of its activities.
- 3) Identifying a 'Safeguarding Lead' who has the responsibility for overseeing the implementation of the policy.
- 4) Making the response to, and reporting of, a safeguarding concern as easy as possible for any employee.

Scope

8. All police staff and officers who interact with learners, including those working under contract to CNC, must be aware of, and are required to comply with, all relevant policy and associated procedures.

Procedure

Roles and Responsibilities

9. As stated above, all employees have a responsibility to ensure the safety and security of those in a learning environment.

There are three ways a safeguarding concern can be reported to the DSL:

- a) You may self-refer if you feel your learning is at risk because of bullying, marginalisation, neglect, abuse, radicalisation or any other negative/undue influence.
- b) You may report any concerns to a trainer/training manager/line manager or other trusted colleague, who can themselves refer your report to the DSL.
- c) Anyone can refer a learner with or without having received disclosure if they feel it is appropriate to do so. If you can, you should discuss the referral with the learner beforehand, but it is accepted it may not always be appropriate or practical.

10. Anyone receiving disclosure of a safeguarding concern should treat it in the strictest confidence. In Appendix One you will find a guide to reacting and reporting safeguarding concerns.

11. The reporting template can be found at Appendix Two.

12. The CNC DSL is the Head of Operational Training, who is responsible for overseeing the receipt, risk assessment, action and resolution of safeguarding reports, record keeping and weeding, and policy review. The DSL will work with a Human Resources

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Case Management Advisor (**HR CMA**) and, if necessary, Occupational Health & Wellbeing and/or Health & Safety, to address concerns raised.

13. Reports will be received into the dedicated email inbox which will be monitored by the Human Resources CMAs. Following risk assessment with the DSL, they will be responsible for routing the report to the most appropriate recipient to investigate depending on the nature and potential outcomes. They will ensure the DSL is kept informed at all stages and will manage the process through the Oracle-based HR Case Management System.
14. It is likely that an HR CMA will coordinate the investigation, with assistance from the DSL if required. They will acknowledge receipt of a safeguarding report within five working days and aim to conclude matters quickly, seeking advice as required from the appropriate subject matter experts (eg Neurodiversity Lead). Timescales will vary due to the inherently unpredictable and potentially complicated nature of safeguarding reports. In the event of a protracted investigation, the HR CMA will provide regular updates every month.
15. It may be necessary for senior managers or departments such as Vetting, Security or Professional Standards to become involved, but that will be managed on a case-by-case basis.
16. Officers and staff are responsible for carrying out their duties in a way that actively safeguards and promotes the welfare of all learners. They must also act in a way that protects them from wrongful allegations as far as possible.

Anonymity

17. The aim of investigating a safeguarding report is to establish whether a learner may be at risk of harm and to mitigate/act against that in the most appropriate manner. Therefore, the CNC cannot guarantee anonymity during any investigation of a safeguarding report. Personal details will be handled in the strictest confidence in accordance with HR people policies and will only be disseminated to persons directly involved in the investigation who need to know.

Prevent

18. Prevent is about safeguarding and supporting those vulnerable to radicalisation.

Prevent has 3 clear aims:

1. Respond to the ideological challenge we face from terrorism and aspects of extremism, and the threat we face from those who promote these views.
2. Provides practical help to prevent people from being drawn into terrorism and ensure they are given appropriate advice and support.
3. Works with a wide range of sectors (including education, criminal justice, faith charities, online and health) where there are risks of radicalisation that we need to deal with.

19. The aim of Prevent is to reduce the threat to the UK from terrorism by stopping people becoming terrorists or supporting terrorism. Delivery of Prevent is grounded in early

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intervention and safeguarding. Prevent addresses all forms of terrorism and we continue to prioritise according to the threat posed to our national security. The allocation of resources will be proportionate to the threats we face. The most significant of these threats is currently from terrorist organisations associated with Al-Qaeda, Daesh, terrorists associated with extreme right-wing ideologies and lone actors inspired by such organisations. This list is not exhaustive.

20. Risk and threat to the UK is subject to constant review and updated accordingly. The UK Government remains absolutely committed to protecting freedom of speech. But preventing terrorism will mean challenging extremist (and non-violent) ideas that are also part of a terrorist ideology, including instances of unclear, mixed or unstable ideology. Prevent also facilitates interventions to stop people moving from extremist activity to terrorist-related activity. The Counter-Extremism Strategy defines extremism as 'the vocal or active opposition to our fundamental values, including democracy, the rule of law, individual liberty, and respect and tolerance for different faiths and beliefs. We also regard calls for the death of members of our armed forces as extremist.
21. The CNC have a clear legal responsibility to fulfil the prevent duty statement and protect its staff from material and ideologies that delivered without context or explanation could be viewed by a person and started on the path to radicalisation.
22. When any member of staff is spoken to in a professional development manner, the CNC will demonstrate that the speaker influence will not be of a radicalising nature.
23. The CNC will offer context to all training where extremist narratives are delivered so to ensure that any narrative is balanced. They will offer support and guidance to all staff to help build resilience to any form of radicalisation.
24. CNC along with colleagues from Counter Terrorism Policing will work to support any member of staff who raises a concern around a person's vulnerability to radicalisation.

Support Available to Learners

Apprentice Policy Pack

Safeguarding Reporting

Staff Associations (CNP Federation, Prospect, Superintendent's Association)

Employee Assistance Programme – confidential advice & support 24/7

Safecall

Line Managers

Human Resources

Occupational Health & Wellbeing – including neurodiversity workplace needs assessments

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Monitoring of IT Usage

25. Monitoring helps the CNC to protect information and business assets as well as safeguard employees.

There are two types of monitoring in operation at CNC:

- Protective Monitoring - the systematic assessment of transactional data using analytical tools for the purpose of monitoring IT operations and raising security, performance or reputationally damaging activity alerts across all CNC owned computer equipment, services and networks.
- Targeted (Ad Hoc) Monitoring - in response to a particular problem or concern

26. The CNC has the ability to monitor and record all computer-based activity conducted using any CNC owned computer equipment, services (on premise or cloud based) and its networks. This includes the ability to perform estate-wide searches for pre-determined key words across both Outlook and MS Teams Chat.

27. The CNC undertakes protective monitoring activities which includes but is not limited to:

- Recording all MS Teams or similar chat (IM) messages, email messages and internet activities
- Recording user activity, log on and log off times and the modifying of data
- Recording printer activities including copying, scanning and printing
- Network analytical tools with active monitoring and alerting software
- Regular key word searching of CNC's MS Azure cloud-based storage using predetermined key words which have been agreed may cause concern for bullying, harassment and reputational damage to CNC
- Data storage capacity in private SharePoint libraries and OneDrive
- Use of CCTV
- Use of automated software
- Social media activities (both official CNC and personal accounts)

The CNC has distinct IT Monitoring policy and procedures and these should be referred to for further detail.

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Monitoring Compliance

28. This policy will be reviewed every year in the light of any national policy or procedural change, or due to changes to law or CNC strategy or at such other times as may become necessary. Any review will take into consideration feedback/lessons learned from issues reported to and dealt by HR or the Designated Safeguarding Lead.

Equality, Diversity and Inclusion Statement

29. [Equality, Diversity and Inclusion Statement](#)

Human Rights and Equality

30. This policy will be implemented considering due regard for the needs of individuals protected under Equality Act 2010. It was evaluated under the CNC Human Rights and Equality Impact Assessment Procedure and was confirmed as being ACCEPTABLE.

Broken links

31. If you find links within this document that are broken, please report them via the [Report Broken Links](#) email or post a message in the [Broken Links Teams site](#).

Related Policies/Procedures/Forms

CNC Prevent Delivery Plan

CNC Non-Home Office Policing Apprenticeship Procedure

Grievance Resolution Policy

Grievance Resolution Procedure

Police Officer Misconduct Policy & Procedure

Disciplinary Policy (Police Staff)

Employee Monitoring Policy

Employee Monitoring Procedure

Care Act 2014

Protection of Vulnerable Adults Scheme

Neurodiversity Policy

Policy & Procedure Implemented (Date): July 2024

Review Date: January 2027

Policy Owner: Inspector Stuart Rodgers

Approved by Chief Superintendent Sheree Owen (Training Division Commander)

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Printed by: Stuart Rodgers on 17/12/2025

Signed: *Sheree Owen*

Date: 01 January 2025

This document is: Revised

If revised, please complete table below:

Version No.	Date	Summary of Changes	Author(s)
2	06/2024	Addition of appendices and minor wording changes	Insp. Stuart Rodgers
3	12/2025	Review of document (no changes)	Insp. Stuart Rodgers

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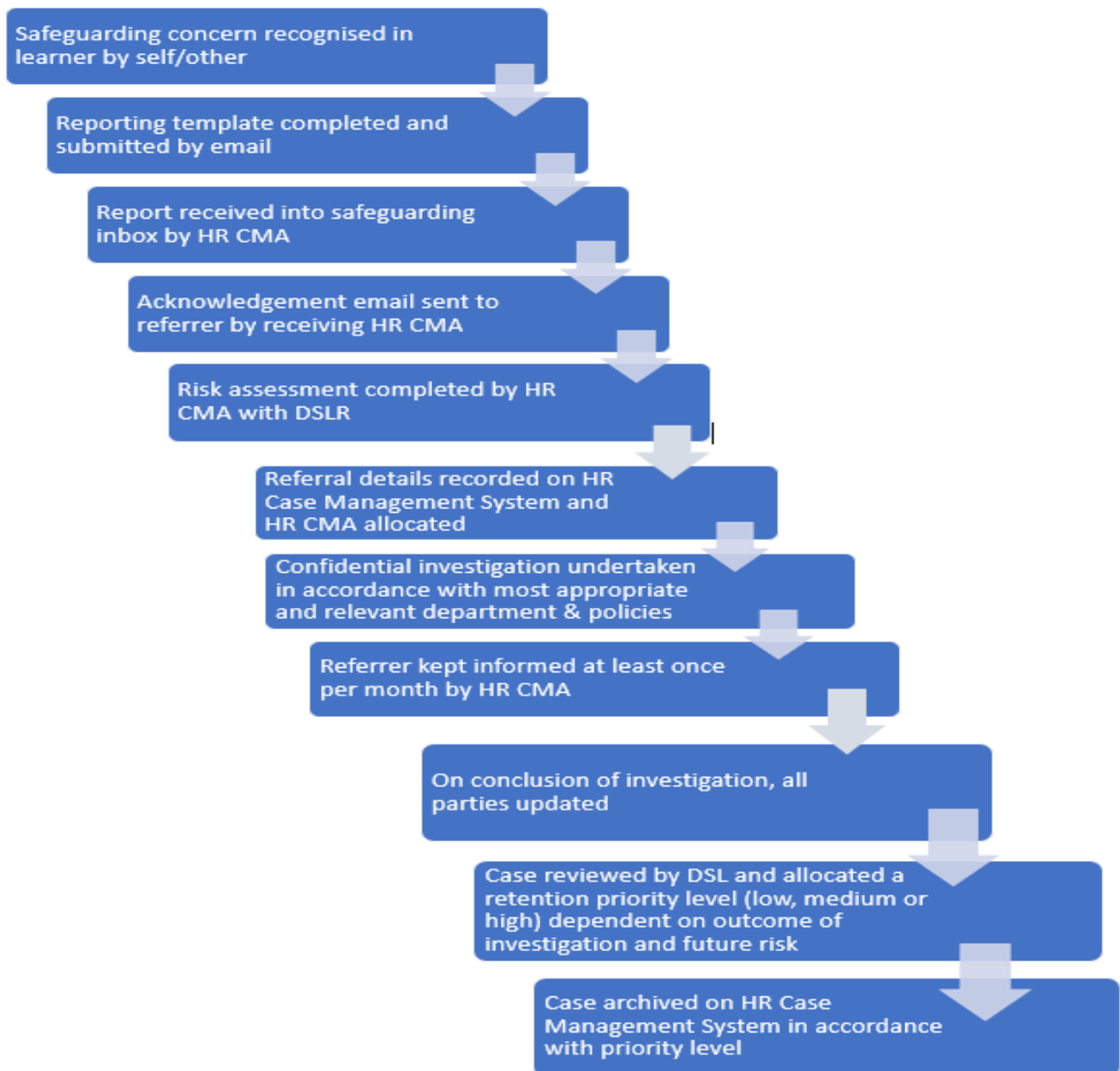
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Flow Chart



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Appendix One: Reacting to Disclosure

Recognition

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

Response

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

Reporting

- If you feel the matter is an urgent and/or criminal matter, contact the DSL directly to discuss your concerns. If out of hours, contact the Force Incident Manager.
- If you feel confident to take appropriate action (e.g. referring the learner to Occupational Health), please do so.
- Report concerns at the earliest opportunity using the template in Appendix Two.
- Do not discuss the disclosure with anyone else. If there is an urgent requirement to inform others, please do so with discretion and in conjunction with the DSL.
- Safeguarding concerns can be sent directly to the dedicated email inbox: learner.safeguarding@cnc.police.uk which is monitored by HR.
- Record precisely what has been alleged/happened – use the words of the learner.
- This should be scanned and emailed to the inbox along with the reporting template.
- Your record should use accurate quotation.
- If appropriate, include factual observations.

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Appendix Two: Reporting Template

Once complete, send this form to learner.safeguarding@cnc.police.uk

[Reporting Template - Learner Safeguarding](#)

Appendix Three: Record Retention Timescales

This retention policy dictates how the records must be kept and for how long and provides for regular reviews to ensure each individual's information is only retained for as long as it remains appropriate. This will ensure compliance with the law in terms of its duties under the Data Protection Act 1998, Freedom of Information Act 2000, Human Rights Act 1998, and its obligations under the Public Records Act 1958, and will promote efficiency in terms of eliminating the holding of unnecessary/redundant information (in all its forms).

The retention periods detailed below apply to the categories outlined according to the criteria described in each case and are to be applied only when the evidence on each record has been fully assessed in accordance with this policy. The initial assessment will be undertaken by the DSL and will take place after the date of the last final action on each case.

Priority Level	Explanation	Record Retention Duration
Low Priority and/or Risk	It is assessed that the concerns reported have been satisfactorily dealt with. The outcome is safe and the level of future risk is low for the individual and the Constabulary. The investigator has resolved all issues and the individual is satisfied.	Three years
Medium Priority and/or Risk	It is assessed that the concerns reported have been satisfactorily dealt with, but it is recognised they or similar concerns may reoccur. The immediate outcome is safe but requires periodic monitoring. The level of future risk is medium for the individual and/or the Constabulary and intervention by the employer may be required.	Five years

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	<p>The investigator has done all they reasonably can to address what was reported and any other issues arising.</p> <p>The individual is satisfied or has registered concerns that cannot be reasonably addressed.</p>	
<p>High Priority and/or Risk</p>	<p>It is assessed that, while the reported concerns have been dealt with, the outcome is not considered to be viable long-term. It is likely there will be a recurrence or other concerns recognised and that intervention will be required. The current outcome is safe, but the level of future risk is high for the individual and/or the Constabulary.</p> <p>The individual may be unsatisfied with the outcome and/or still feel some level of vulnerability. The case may need to be actively monitored.</p> <p>The matter may have been referred to the police or other authority.</p>	<p>Ten years</p>

Appendix Four: Definitions

Learner: The term ‘learner’ is for any officer or police staff member that has not yet been confirmed in rank or post and is studying towards an award or accreditation, including those on an apprenticeship. Those who are confirmed in rank or post but completing an apprenticeship will be classified as a learner for the purposes of this policy and for the duration of their apprenticeship.

Vulnerable Adult: The term ‘vulnerable adult’ means a person, aged 18 or over, who is or may be in need of community care services by reason of disability, age or illness; and is or may be unable to take care or unable to protect him or herself against significant harm or exploitation.

Physical abuse: may involve hitting, shaking, throwing, poisoning, burning or scalding, drowning, suffocating, or otherwise causing physical harm. Physical harm may also be caused when a parent or carer fabricates the symptoms of, or deliberately induces, illness in a child.

Emotional abuse: may involve conveying to young people that they are worthless or unloved, inadequate. It may involve serious bullying (including cyberbullying), causing young people frequently to feel frightened or in danger, or the exploitation or corruption of

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children or vulnerable adults. Some level of emotional abuse is involved in all types of abuse though it may occur alone.

Sexual abuse: involves forcing or enticing a young or vulnerable person to take part in sexual activities, not necessarily involving a high level of violence. The activities may involve physical contact, including assault by penetration (for example, rape or oral sex) or non-penetrative acts such as masturbation, kissing, rubbing and touching outside of clothing. They may also include non-contact activities, such as looking at, or in the production of, sexual images or watching sexual activities, or grooming a child or vulnerable person in preparation for abuse (including via the internet). Sexual abuse is not solely perpetrated by adult males. Women can also commit acts of sexual abuse, as can other children and young people.

Neglect: is the persistent failure to meet a child's or vulnerable adult's basic physical and/or psychological needs, likely to result in the serious impairment of their health or development. Neglect may occur during pregnancy as a result of maternal substance abuse. Neglect may involve a parent or carer failing to provide adequate food, clothing or shelter.

Discriminatory Abuse: includes behaviour towards a student that is racist, sexist, based on a person's disability and other forms of harassment.

Financial or Material Abuse: is stealing possessions or money from a child or vulnerable adult or bullying to force them to hand over money or possessions. Also, includes theft, fraud, exploitation, pressure in connection with wills, property or inheritance of financial transactions, or the misuse or misappropriation of property, possessions or benefits.

Institutional abuse/Poor practice: is inappropriate or disrespectful or insufficient care, which affects the whole setting and denies or restricts dignity, choice or fulfilment of persons at risk.

Non-Contact Abuse: are abusive acts which do not involve actual physical contact; pornographic or violent films, sexual acts performed in front of the victim, violent acts with the abused present.

Risk to self and/or others: may include but is not exclusive to severe self-harm, suicidal tendencies or potential risk of harming others, which may or may not include children. This may be as a consequence of an individual experiencing a significant level of personal, emotional trauma and/or stress. Self-harm is a term that covers a range of behaviours used as a coping mechanism where an individual harm themselves by psychically inflicting pain or excess to deal with emotional pain.

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Sexual Exploitation: is a form of sexual abuse where a child or young person are sexually exploited for money, power or status. It can involve violent, humiliating and degrading sexual assaults. Consent cannot be given (under the age of 18 years) even where a young person believes they are voluntarily engaging in sexual activity with the person who is exploiting them. Sexual exploitation does not always involve physical contact and can happen on-line.

Sexting: generally refers to the sending of sexually explicit images via text, email, or through social networking sites. For example, this could be a picture of a boy or young man exposing himself or a young woman in a state of undress. "Sexting" is more common than you may think and has been found to be commonplace amongst children and young people. Young people (under 18) texting intimate pictures of themselves via social media are committing a criminal offence (distribution of child pornography) and can face police action even if their actions are entirely voluntary.

Online Abuse: is any type of abuse that happens on the web, whether through social networks, playing online games or using mobile phones. Children and young people may experience cyberbullying, grooming, sexual abuse, sexual exploitation or emotional abuse.

Forced Marriage: forcing a person into a marriage is a crime in England and Wales. A forced marriage is one entered into without the full and free consent of both parties and where violence, threats or any other form of coercion is used to cause a person to enter into a marriage.

Honour Based Violence: or so-called honour-based violence (HBV) encompasses crimes which have been committed to protect or defend the honour of a family and/or community, including female genital mutilation, forced marriage and practices such as breast ironing. All forms of HBV are abuse and should be handled and escalated as such.

Female Genital Mutilation (FGM) is a mandatory reporting duty and comprises all procedures involving partial or total removal of the external female genitalia or other injury to the female genital organs. It is illegal in the UK and a form of child abuse. Section 5B of the Female Genitalia Mutilation Act 2003 (as inserted by section 74 of the Serious Crime Act 2015) places a duty upon teachers/tutors to report to the Police where they discover that FGM appears to have been carried out on a child under 18 years.

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