



# **Safeguarding Children and Young People in our education services Policy and Procedure**

***To be read in conjunction with the group  
safeguarding policy***

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Acis Group are a charity that supports people through services including housing, education and skills.

### 1.0 What this policy is about and why we need it

Across the group we have a standardised and consistent approach and position to safeguarding. But we recognise that the statutory and moral duty towards safeguarding the welfare of children and young people whilst receiving education and training with us has more requirements, and therefore have this policy in place that aligns to our group-wide policy and details more information about how that is applied in the context for children and young people who receive education from us.

We have a zero tolerance approach to abuse and other harmful behaviour within our learning hubs.

This policy outlines our approach to safeguarding for children attending our education programmes within education and skills. Any reference in the policy to a child, young person or learner applies to all those aged under 18.

Education and Skills (E&S) covers all our training, education, skills, employment, wellbeing and wider services across the group, primarily delivered through our subsidiaries, Community Learning in Partnership (CLIP), Riverside Access and Training Centre, Gainsborough (Riverside) and Plus Skills Development Limited (Skills Centre Plus).

Safeguarding and promoting the welfare of children is everyone's responsibility. Everyone who comes into contact with children, their families and carers have a role to play in safeguarding (KCSIE 2025). Where KCSIE is referenced within the policy, it is to be noted that the policy is referring to the most updated version of the guidance.

We have developed procedures in line with, and taking account of, guidance issued by the Department for Education, and other relevant bodies. We have incorporated child protection into the whole organisational approach to safeguarding and the term safeguarding is deemed to include child protection in all policies and procedures.

### 2.0 Who does this policy apply to?

This policy applies to all our teams working in our education and skills service area, volunteers supporting our delivery, learners 18 or under and their families, contractors or

partners delivering services on our behalf in this area, the group Board and any other third party organisation working in partnership with us.

Whilst overall responsibility for safeguarding children and young people is outlined in our Group safeguarding policy, for the purpose of clarity:

Our **Group Board** (monitored by the Enterprise Committee for this policy) has overall accountability for Safeguarding and is committed to ensuring that across the Group we have a clear approach, understanding of responsibility, and ownership of Safeguarding. Within the Enterprise Committee there is a nominated individual whom takes lead responsibility for safeguarding issues.

Our **Executive Leadership Team** as Directors of the Group have overall responsibility for safeguarding and ensures we have an understanding at all levels, including appropriate training, procedures and practices embedded and delivered to in all service areas. Our Director for Customer Excellence (DfCE) holds the lead role for the group, alongside the Director of Community Investment for education and skills.

Our **group safeguarding team** assumes day to day responsibility for Group wide Safeguarding activities, and ensures transparency, best practice and oversight at the relevant areas. We have representatives from within education and skills on this group. Within Education and Skills we have a named **Designated Safeguarding Lead** who is responsible for ensuring organisational compliance to this policy and its procedures. Along with **Deputy Designated Safeguarding Leads** across all our sites with coverage during all hours of operation.

Full detail of the roles and responsibilities for each of these teams is set out in appendix one.

### 3.0 Our policy is...

Outlined in the group safeguarding policy, we:

*recognise our duty of care to safeguard, protect and promote the welfare of children, young people and adults at risk from any form of abuse whilst working with us in any of our service areas. We are committed to ensuring safeguarding practice reflects statutory provision, contractual obligations, government guidance, and best practice.*

*will create a safe environment for people to thrive. To do this we will risk assess any venues used for events or training to ensure it is a safe space for all, free from risk of harm. We will use the different ways that we engage with customers (in their homes, in person, in communities, in classroom environments, or via virtual contact) to identify possible safeguarding issues and act on them.*

*have a zero tolerance approach to abuse. We will seek to ensure that any action taken is prompt, proportionate, and that it includes and respects the voice of those concerned.*

For children within our education setting we have a legal duty to ensure those children within our education setting on our programmes have a safe space to learn and where concerns are raised are supported and appropriate action taken.

This section outlines those key areas that are relevant specifically to education settings for young people, and shares our policy in these areas, the procedure and action that will be carried out, and the steps we will follow to ensure due process within the education setting.

## **Definitions of children and young people**

Our programmes are wide ranging. And it is important we clearly detail and understand our responsibilities in relation to all those who may use our services.

### *Children in Need of Protection and Early Help*

Some children and young people are in need because they are suffering or likely to suffer “Significant harm”. Where local authorities believe a young person is suffering, or likely to suffer, significant harm, they have a duty to make enquiries to decide whether they should take action to safeguard or promote the welfare of a young person, this can be done through contacting the early help team to share concerns and ensure the early identification of needs within families. Everyone should be aware of their local Early Help process and understand their role in it. Any child may benefit from early help, all everyone should be particularly alert to the potential need for early help for a child who:

- is disabled and has specific additional needs;
- has special educational needs (whether or not they have a statutory Education, Health and Care Plan);
- is a young carer;
- is showing signs of being drawn in to anti-social or criminal behaviour, including gang involvement and association with organised crime groups;
- is frequently missing/goes missing from care or from home;
- is at risk of modern slavery, trafficking or exploitation;
- is at risk of being radicalised or exploited;
- is subject to a Child Protection plan (s47),
- is in a family circumstance presenting challenges for the child, such as drug and alcohol misuse, adult mental health issues and domestic abuse,
  - has experienced multiple suspensions, is at risk of being permanently excluded from schools, colleges and in Alternative Provision or a Pupil Referral Unit,
  - has a parent or carer in custody, or is affected by parental offending,
  - Is misusing alcohol and other drugs themselves,
  - is at risk of so-called ‘honour’-based abuse such as Female Genital Mutilation or Forced Marriage,
  - is a privately fostered child.

All Education and Skills teams are trained to recognise the signs and symptoms of the above risks and as a result, will refer to the DSL or DDSL, which will lead to immediate action and any necessary referrals into external agencies.

### *Children in Need*

Children and young people who are defined as being “in need” under Section 17 of the Children Act 1989, are those whose vulnerability is such that they are unlikely to reach or maintain a satisfactory level of health or development, or their health and development will be significantly impaired, without the provision of service(s). A child with a disability is a child in need.

### *Care Experienced*

The most common reason for children becoming looked after is as a result of abuse and/or neglect. The Board of Directors and senior leaders will ensure that everyone has the skills, knowledge and understanding necessary to keeping looked after children safe. The appropriate people will have the information they need in relation to a child's looked after legal status (whether they are looked after under voluntary arrangements with consent of parents or on an interim or full care order) and contact arrangements with birth parents or those with parental responsibility. They will also have information about the child's care arrangements and the levels of authority delegated to the carer by the authority looking after him/her. The designated teacher/person for looked after children will have details of the child's social worker and the name of the virtual school head in the authority that looks after the child.

### *Children subject to Child Protection plans (s47),*

A child made the subject of a child protection plan, means that the network of agencies considers your child to be at risk of significant harm in one or more of the following four categories: neglect. physical abuse. sexual abuse. emotional abuse. A Section 47 Enquiry is initiated to decide whether and what type of action is required to safeguard and promote the welfare of a child who is suspected of, or likely to be, suffering significant harm.

### **Reducing the risk of harm to learners**

We recognise the risks that our learners face, both in and out of education and in order to support them in recognising risks themselves we have a number of mechanisms in place.

- Tutorial programme, covering key topics that raise awareness to risk and how to report concerns.
- Events, focusing on national and global campaigns such as Anti Bullying week.
- Clear reporting procedures and visual displays
- Learner induction activities
- Key themed weeks throughout the academic year with guest speakers
- Safeguarding week
- student voice
- Safeguarding training and regular refresher sessions for everyone

We have a zero tolerance to child-on-child abuse and all incidents will be taken seriously and dealt with in line with the severity and impact of the incident.

We recognise that child-on-child abuse does happen, and we will take all necessary steps to reduce the risk of harm to our learners. We will liaise with the Local Authorities, police and

parents where appropriate. We will ensure that there are full and comprehensive records of every incident and any necessary risk assessments, or site safety plans are completed..

Bullying, abuse in interpersonal relationships, physical abuse, sexual violence, sexual harassment, sexual activity without consent, consensual and none consensual sharing of nude and semi-nude images or videos, upskirting and initiation/hazing type violence and rituals will be taken seriously, with a zero tolerance approach to any incidents.

Such matters will be dealt with through our learner disciplinary process.

### **Missing from education**

We have a statutory duty to ensure those learners in our care for the provision of education are safe.

All learners should provide a minimum of two emergency contacts, all numbers provided should be checked as part of their initial 1 to 1 meeting (KCSIE).

Learners who do not attend (or their parents/carers) should be contacted within the first three hours. We do this by ringing the parents/guardians. Learners should make contact to inform us that they are ill or going to be absent. (If a learner is a young carer, has an EHCP or has significant mental health issues, the person dealing with the situation will need to use the emergency contact numbers to establish that the learner is safe).

The following steps must also be taken for learners with the above support needs. If attempts to contact a vulnerable learner are unsuccessful, where possible a home visit will be conducted. If we have significant concerns for the safety and wellbeing of the learner, we will need to contact Children's services to raise concerns and if no action is taken by them, we will need to contact the police. Each hub should follow guidance from its own Local Authority.

We must complete a full log of all action taken and responses received.

### **Mental Health support for learners**

We all have an important role to play in supporting the mental health and wellbeing of learners. Mental health problems can, in some cases, be an indicator that a person has suffered or is at risk of suffering abuse, neglect or exploitation (KCSIE).

Our tutors are well placed to observe day to day behaviour which may suggest a child or young person could be experiencing a mental health problem or be at risk of developing one. They are to follow appropriate processes around early help and intervention.

### **PREVENT: Radicalisation and Acts of Terrorism**

The Counter Terrorism & Security Act (2015) & The Prevent Duty Prevent is 1 of the 4 elements of CONTEST, the government's counter-terrorism strategy. It aims to stop people becoming terrorists or supporting terrorism. The Prevent strategy:

- responds to the ideological challenge we face from terrorism and aspects of extremism, and the threat we face from those who promote these views provides practical help to prevent people from being drawn into terrorism and ensure they are given appropriate advice and support.
- 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. The strategy covers all forms of terrorism, including far right extremism and some aspects of nonviolent extremism. The Home Office works with local authorities, a wide range of government departments, and community organisations to deliver the Prevent strategy. The police also play a significant role in Prevent, in much the same way as they do when taking a preventative approach to other crimes. The Home Office uses a range of measures to challenge extremism in the UK, including:
  - where necessary, preventing apologists for terrorism and extremism from travelling to this country
  - giving guidance to local authorities and institutions to understand the threat from extremism and the statutory powers available to them to challenge extremist speakers
  - funding a specialist police unit which works to remove online content that breaches terrorist legislation
  - supporting community-based campaigns and activity which can effectively rebut terrorist and extremist propaganda and offer alternative views to our most vulnerable target audiences - in this context they work with a range of civil society organisations
  - supporting people who are at risk of being drawn into terrorist activity through the Channel process, which involves several agencies working together to give individuals access to services such as health and education, specialist mentoring and diversionary activities.

This Act places a duty on education institutions to have due regard to the need to prevent people from being drawn into terrorism (the Prevent Duty). We are committed to supporting vulnerable learners through our policies and procedures and recognise that this can support our contribution to the Prevent duty. Training is available to for everyone as part of their induction, and it is revisited during the academic year. We actively promote awareness amongst the learners, through tutorial and key themed cross college events throughout the year.

#### *Contact with external services*

Referral for any issue concerning potential radicalisation to extremism should be managed as any other safeguarding referral, further information and advice can be obtained by emailing [ctp-em-prevent@linc.police.uk](mailto:ctp-em-prevent@linc.police.uk) or call 101 and ask for the Prevent Team.

#### **Teaching learners about safeguarding**

Everyone will teach learners about safeguarding, including online, through teaching and learning opportunities as part of providing a broad and balanced curriculum. This may include covering relevant issues through personal, social health and economic education (PSHE) and/or through sex and relationship education.

## **Safer Recruitment**

Safer recruitment and selection procedures we have in place provide robust recruitment which ensure that care is taken to protect young or vulnerable learners – this is outlined in our integrated recruitment policy.

The procedures apply to everyone, and they are reviewed regularly to take account of following principles:

- The post or role will be clearly defined.
- The key selection criteria for the post or role will be identified.
- Vacancies will be advertised widely in such a way as to ensure a diversity of applicants.
- Requirement of documentary evidence of academic and vocational qualifications.
- Obtaining of professional and character references.
- Verification of previous employment history including the explanation of any gap.
- We reserve the right to conduct online searches as part of our due diligence during our recruitment process.

## **When a child moves to setting or attends alternative provision**

Appropriate checks will be made when a child moves to from another school or alternative provider to our setting, including checks carried out on the individuals working at the setting and written confirmation from the former setting of any arrangements that may put the child at risk.

A record of contact details and address will be kept of any alternative provider, subcontracted provision or satellite sites the child may attend.

Regular reviews will be completed to ensure the alternative provider, subcontracted provision or satellite sites continue to be safe and meet the child's needs.

## **Filtering and Monitoring**

Our approach to filtering and monitoring uses both technology solutions and our people to be the physical monitoring on site day to day.

- **FILTERING** - The IT systems ensure appropriate filtering on all our networks, and across CLIP and Riverside there is a specific level to ensure adherence to policy and safety of our children and young people.
- **MONITORING** – Our IT systems give a level of reactive monitoring should concerns be raised, alongside regular summary monitoring reports for the management team and DSL to review and action preventative measures. This is complimented by our teaching team who have a responsibility when in a teaching setting (or within the centres as a whole) to keep monitoring activities, and should activity be seen on site to action appropriately, or raise a ticket with IT to receive a reactive monitoring report too review and action accordingly thereafter.

It is also the teaching team's responsibility to address this topic with the learners, discussing this within the classroom and giving more awareness. The curriculum each year is built to include online safety and should activity be seen on site this will be built into delivery plans in a responsive manner to address this knowledge gap.



Our filtering and monitoring policy outlines in more detail our IT solutions, and we have procedures in place for our teaching teams.

## **PROCEDURES**

### **Dealing with disclosure of abuse and procedure for reporting concerns**

Anyone may suspect that a learner is being abused or is at risk of harm. A learner may disclose to a member of the team that s/he is being abused. In these circumstances the following procedure should be followed:

#### *Significant concerns.*

Where someone has concerns about a learner but does not believe that they are being abused or are at risk of immediate harm, the team member should:

- Speak to the learner about the concerns, noting the main points carefully and making a note of the date, time and place.
- Seek advice from the on-duty DSL or DDSL regarding registering the concern
- Log the concern on MyConcern

#### *Reporting to DSL and the safeguarding team*

Everyone should report concerns, suspicions or disclosures of abuse immediately to the relevant person. Everyone must notify the on duty Designated Safeguarding Lead as soon as possible if a serious disclosure or suspicion being raised. If the DSL is unavailable it should be reported to one of the DDSL's. Concerns must be recorded using the MyConcern system.

#### *Contact with external services*

The DSL/DDSL must report the matter to Children's Social Care/ Adult Services or the police by phone immediately, followed up by written confirmation or email. as soon as possible.

### **Procedure for managing allegations of abuse against employees**

The whole organisation is required to comply with the detailed Local Safeguarding Children's Partnership Procedure for Managing Allegations against employees. These procedures apply to all education and skills teams, whether teaching, administrative, management or support, as well as to volunteers.

In rare instances, people who work in education institutions have been found responsible for child abuse. Because of their frequent contact with children and young people, they may have allegations of child abuse made against them. We recognise that an allegation of child abuse made against an employee may be made for a variety of reasons and that the facts of

the allegation may or may not be true. It is imperative that those dealing with an allegation maintain an open mind and those investigations are thorough and not subject to delay.

We recognise that the Children Act 1989 states that the welfare of the child is the paramount concern. It is also recognised that hasty or ill-informed decisions in connection can irreparably damage an individual's reputation, confidence and career. Therefore, those dealing with such allegations will do so with sensitivity and will act in a careful, measured way.

Anyone who receives an allegation about a colleague should follow the guidelines for dealing with disclosure. This procedure is followed for all permanent, temporary and supply team members. The allegation should be reported immediately to the Head of People Services or DSL. From here our safeguarding allegation against staff procedure will be followed, alongside our wider HR conduct policies.

### *Confidentiality*

We will make every effort to maintain confidentiality and guard against unwanted publicity while an allegation is being investigated or considered. The Education Act 2011 introduced reporting restrictions preventing the publication of any material that may lead to the identification of a teacher who has been accused by, or on behalf of, a learner from the same school or college (where that identification would identify the teacher as the subject of the allegation). The reporting restrictions will apply until the point that the accused person is charged with an offence, or until the Secretary of State or the General Teaching Council for Wales publishes information about an investigation or decision in a disciplinary case arising from the allegation. The reporting restrictions will also cease to apply if the individual to whom the restrictions apply effectively waives their right to anonymity by going public themselves or by giving their written consent for another to do so or if a judge lifts restrictions in response to a request to do so.

## **4.0 How we will monitor this policy**

In addition to the monitoring outlined in the group policy, we will:

- Ensure the policy will be available and parents will be made aware of the fact that referrals about suspected abuse or neglect may be made
- Link with the local LSP (Formerly LSCB) to make sure everyone is aware of training opportunities and the latest local policies on safeguarding
- Ensure that should learners leave us, if appropriate, their child protection file will be copied for any new school or college as soon as possible but transferred separately from the main learner file.

## **5.0 Procedures and other documents that link to this policy**

This policy has links to the following policies and procedures:

- Disciplinary Policy
- Learner Anti-bullying Procedure

- Equality and Diversity Policy
- Online safety policy and ICT Policy
- Filtering and monitoring on site procedure
- Procedure for managing allegations of abuse against employees
- Group recruitment policy
- Teaching and Learning Policy and accompanying procedures, including Behaviour and Exclusions

## **6.0 Links to other policies, legislation and regulations**

- The Education Act (2011) - requires local authorities and governing bodies of further education institutions to make arrangements to ensure that their functions are carried out with a view to safeguarding and promoting the welfare of children, young people and adults at risk. In addition, they should have regard to any guidance issued by the Secretary of State in considering what arrangements they may need to make.
- Keeping Children Safe in Education 2025 - sets out the safeguarding statutory responsibilities of schools and colleges, as well as good practice recommendations in relation to children. This covers the relevant legislation; the responsibilities of the Board of Directors; safer recruitment practice; recruitment and vetting checks; dealing with allegations of abuse or misconduct against staff; and also checklists, flowcharts and examples.
- Working Together to Safeguard Children (2023)- provides statutory guidance on the roles and responsibilities of agencies working together to safeguard children/young people. In addition, it sets out the framework for the formation of Local Safeguarding Partner's (formerly LSCB) and details the allegation management process. This includes providing a coordinated offer of early help when additional needs of children are identified and contributing to inter-agency plans to provide additional support to children subject to child protection plans. Access is allowed for children's social care from the local authority and, where appropriate, from a placing local authority, for that authority to conduct, or to consider whether to conduct, a section 17 or a section 47 assessment. Safeguarding arrangements take into account the procedures and practice of the local authority as part of the inter-agency safeguarding procedures set up by the Local Safeguarding Partner's (LSP)
- Safeguarding Vulnerable Groups Act (2006) - introduces a vetting and barring scheme to identify those who are permitted to work with children, young people and adults at risk. Implementation began in Autumn 2008. There will eventually be a single list for children and young people, and an aligned but separate list for adults, replacing the Protection of Children Act (PoCA) list, the Protection of Adults at risk (PoVA) list, List 99 and the Court Disqualification Order scheme. A remodelling review was undertaken following ministers' decision in June 2010. The review that was published in February 2011 and recommended merging the Criminal Records Bureau (CRB) and Independent Safeguarding Authority (ISA) into a new non-departmental public body that could administer a proportionate central vetting service. The new scheme would retain the best features of the vetting and barring service, but would not require registration or monitoring, and would only cover those who have regular or close contact with vulnerable groups, defined as 'regulated activity' in legislation. The Disclosure and Barring Service (DBS) has been introduced to help employers make safer recruitment decisions and prevent unsuitable people from working with vulnerable groups, including children.

- DfE Statutory Guidance (2014) - provides guidance on making arrangements to safeguard and promote the welfare of children under section 11 of the Children Act 2004. The guidance plays an important role in embedding this responsibility in the work of key agencies which have contact with children and young people.
- Protection of Freedoms Act (2012) Part 5 - Safeguarding vulnerable groups, criminal records etc covers the reduction in scope of the definition of regulated activity, new services provided by the DBS, and disregarding convictions and cautions for consensual gay sex.
- Mental Capacity Act (2005) - provides a way in which people who may need help to make decisions can get that help from someone who can be trusted to act in their best interests. Mental Capacity under the Act means being able to make your own decisions. The Mental Capacity Act and its Code of Conduct contain a set of rules, procedures and guidance. The Act applies in full to those aged 18 or over, the entire Act except making Power of Attorney or Making a Will applies to 16 and 17 year olds. The Act only applies to those under 16 in very limited circumstances and these would have to be determined by a Court..
- **General Data Protection Regulation** This guidance has been updated to reflect the General Data Protection Regulation (GDPR) and Data Protection Act 2018.

## 7.0 When this policy will be reviewed

In line with the group wide policy review – or sooner if need dictates.

## 8.0 Jargon Buster

### *Significant Harm*

The concept of significant harm is the threshold that justifies compulsory intervention into family life in the best interests of the child or young person and gives local authorities a duty to make enquires as to whether to take action (Section 47, Children Act 1989). Our Safeguarding Policy promotes the welfare of a young person who is suffering, or likely to suffer significant harm. The Act also gives powers to the Police to take emergency action to protect a young person from significant harm.

### *Abuse*

“Abuse” relates to the mistreatment of an individual’s human and civil rights by any other person or persons and may consist of single or repeated acts. Incidents of abuse can be either to one person or more than one person at a time. Abuse and/or harmful behaviours can be either deliberate or the result of negligence, ignorance, lack of training, knowledge or understanding. Somebody may abuse or neglect an individual by inflicting harm or by failing to prevent harm.

Everyone should be aware that abuse, neglect and safeguarding issues are rarely stand-alone events that can be covered by one definition or label. In most cases, multiple issues will overlap with one another (KCSIE). Everyone should be aware that safeguarding incidents and/or behaviours can be associated with factors outside of the classroom.

Everyone, but especially the designated safeguarding lead (and deputies) should consider whether children are at risk of abuse or exploitation in situations outside their families. Extra-familial harms take a variety of different forms and children can be vulnerable to multiple harms including (but not limited to) sexual exploitation, criminal exploitation, and serious youth violence (KCSIE).

Everyone should be aware that abuse does happen and that where there are any concerns, no matter if they appear low level – they should be reported to the safeguarding team.

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

Within the context of this policy abuse and harmful behaviours are defined through the following main categories:

- **Physical:** this may involve hitting, slapping, pushing, kicking, shaking, throwing, poisoning, burning or scalding, drowning, suffocating, misuse of medication, inflicting inappropriate physical sanctions, or otherwise causing physical harm to a child, young person or vulnerable adult including fabricating the symptoms of, or deliberately causing the individual ill health (DfE 2014, DoH 2000).
- **Emotional/Psychological:** this is the persistent emotional ill-treatment of a child, young person or vulnerable adult such as to cause severe and persistent adverse effects on their emotional development. This may involve the imposition of age or developmentally inappropriate expectations resulting in fear, exploitation or corruption. This may also include interactions that are beyond a child's developmental capability as well as overprotection and limitation of exploration and learning, or preventing the child participating in normal social interaction. It may involve seeing or hearing the ill-treatment of another. It may involve conveying that they are worthless or unloved, inadequate, or valued only insofar as they meet the needs of another person. Threats of harm or abandonment; humiliation; blaming; intimidation; coercion; harassment; verbal abuse, bullying (including cyberbullying) and being prevented from receiving services or support are all forms of emotional abuse (DoH 2000). Some level of emotional abuse is involved in all types of maltreatment of a child, although it may occur alone.
- **Sexual:** such as rape, sexual assault or sexual acts occurring through force or enticement and which a child, young person or vulnerable adult could not have consented to, or to which they were pressurised into consenting. The activities may involve physical contact, including penetrative (e.g. rape or buggery) or non-penetrative acts such as masturbation, kissing, rubbing and touching outside of clothing. They may include non-contact activities such as involving the child, young person or vulnerable adult in looking at, or in the production of, pornographic material, watching sexual activities or encouraging them to behave in sexually inappropriate ways or grooming a child in preparation for abuse (including the internet). Sexual abuse is not solely perpetrated by adult males. Women can also commit acts of sexual abuse, as can other children. (DoH 2000).
- **Neglect or Acts of Omission:** this includes the persistent failure to meet a child, young person or vulnerable adult's basic physical and/or psycho-social needs, and which are likely to result in a serious impairment of the individual's health or development. This may include failing to provide adequate food, shelter and clothing, or educational services and/or neglect of, or unresponsiveness to, a child, young person or vulnerable adult's basic emotional needs (DoH 2000).
- **Financial or Material:** this may include theft, fraud, and exploitation, pressure in connection with money or material possessions. This may also include loss of jewellery or personal property, loss of money from a wallet or purse (DoH 2000).
- **Discriminatory:** this may include abuse, bullying and harassment based on the individual's age, sex, disability, religion, race or sexual orientation (DoH 2000).
- **Specific Issues and Further Information:** specific advice should also be sought in relation to specific situations including forced marriage, the effects of domestic violence on young people, female genital mutilation, children and young people who

sexually abuse or who are exploited and those affected by drug and alcohol abuse in families.

- Abuse of Trust: under the Sexual Offenders Act 2003 it is an offence for a person over 18 to have a sexual relationship with a young person under 18 where that person is in a position of trust in respect of that young person, even if the relationship is consensual. This includes teaching and a range of support staff within educational establishments.
- Radicalisation: The process by which a person comes to support terrorism and forms of extremism leading to terrorism (Prevent Strategy.Gov.uk).
- Online Abuse: any type of abuse that happens on the web, whether through social networks, playing games online or using mobile phones (NSPCC 2015) The institution uses an appropriate filter and monitoring system in place, which both learners and employees cohorts are aware of. We have a whole group approach to online safety where learners and employees are regularly updated about processes in place. Where learners have been asked to work from home, they have been provided with advice and guidance around online safety. Refer to Online safety policy.
- Child Sexual Exploitation (CSE) & Child Criminal Exploitation (CCE): Both CSE and CCE are forms of abuse and both occur where an individual or group takes advantage of an imbalance in power to coerce, manipulate or deceive a child into sexual or criminal activity. Whilst age may be the most obvious, this power imbalance can also be due to a range of other factors including gender, sexual identity, cognitive ability, physical strength, status, and access to economic or other resources. In some cases, the abuse will be in exchange for something the victim needs or wants and/or will be to the financial benefit or other advantage (such as increased status) of the perpetrator or facilitator. The abuse can be perpetrated by individuals or groups, males or females, and children or adults. This can be a one-off occurrence or a series of incidents over time, and range from opportunistic to complex organised abuse. It can involve force and/or enticement-based methods of compliance and may, or may not, be accompanied by violence or threats of violence. Victims can be exploited even when activity appears consensual and it should be noted exploitation as well as being physical can be facilitated and/or take place online (KCSIE).
- Female Genital Mutilation: FGM is the total or partial removal of the external female genitalia for non-medical reasons (NSPCC 2015). Whilst all staff should speak to the designated safeguarding lead (or deputy) with regard to any concerns about female genital mutilation (FGM), there is a specific legal duty on teachers. If a teacher, in the course of their work in the profession, discovers that an act of FGM appears to have been carried out on a girl under the age of 18, the teacher must report this to the police (KCSIE).
- Honour Based Abuse : So-called 'honour'-based abuse (HBA) encompasses incidents or crimes which have been committed to protect or defend the honour of the family and/or the community, including female genital mutilation (FGM), forced marriage, and practices such as breast ironing. Abuse committed in the context of preserving 'honour' often involves a wider network of family or community pressure and can include multiple perpetrators. It is important to be aware of this dynamic and additional risk factors when deciding what form of safeguarding action to take (KCSIE).
- Domestic abuse: witnessing domestic abuse is child abuse, Teenagers can suffer domestic abuse in their relationships (NSPCC 2015).

- Child trafficking: Is a type of abuse where children are recruited, moved or transported and then exploited, forced to work or sold (NSPCC 2015)
- Harmful sexual behaviour: Children or young people develop sexual behaviours that harm themselves or other (NSPCC 2015).
- County Lines Criminal exploitation of children is a geographically widespread form of harm that is a typical feature of county lines criminal activity: drug networks or gangs groom and exploit children and young people to carry drugs and money from urban areas to suburban and rural areas, market and seaside towns (KCSIE).
- Child on child abuse - Children can abuse other children and can take many forms. This can include (but is not limited to) bullying (including cyberbullying); sexual violence and sexual harassment; physical abuse such as hitting, kicking, shaking, biting, hair pulling, or otherwise causing physical harm; sexting (also known as Youth Produced Sexual Imagery) and initiating/hazing type violence and rituals (KCSIE).
- Homelessness Indicators that a family may be at risk of homelessness include household debt, rent arrears, domestic abuse and anti-social behaviour, as well as the family being asked to leave a property (KCSIE).
- Sexual violence and sexual harassment between children in schools and colleges Sexual violence and sexual harassment can occur between two children of any age and sex. It can also occur through a group of children sexually assaulting or sexually harassing a single child or group of children (KCSIE).
- Up skirting The Voyeurism (Offences) Act, which is commonly known as the Upskirting Act, came into force on 12 April 2019. 'Upskirting' is where someone takes a picture under a person's clothing (not necessarily a skirt) without their permission and or knowledge, with the intention of viewing their genitals or buttocks (with or without underwear) to obtain sexual gratification, or cause the victim humiliation, distress or alarm. It is a criminal offence. Anyone of any gender, can be a victim (KCSIE).
- Serious Violence – everyone should be aware of indicators, which may signal that children are at risk from, or are involved with serious violent crime. These may include increased absence from school, a change in friendships or relationships with older individuals or groups, a significant decline in performance, signs of self-harm or a significant change in wellbeing, or signs of assault or unexplained injuries. Unexplained gifts or new possessions could also indicate that children have been approached by, or are involved with, individuals associated with criminal networks or gangs (KCSIE).

## 9.0 Further information

### *Use of personal devices in relation to safeguarding*

In terms of our compliance with GDPR, we have legitimate interest in using a personal device to capture data as it enables us to evidence the work of our learners. If you are using a personal device to film/ take photos of learners, then you must adhere to the following points as they are paramount in ensuring the safeguarding of everyone. It is important to note that anyone found to be in breach of the requirements will face disciplinary action under failure to safeguard.

- Your device is password protected.
- Any data must be uploaded to the correct systems within seven days.
- All data on the personal device must be deleted.

- You must not share any photos / videos with learners or their parents/ carers/siblings from your personal device.
- You must not show the photos / videos to learners from your personal device.
- You must not upload any photos / videos to another personal device in your home or a memory stick.
- You must not upload any photos/ videos to your own social media sites.
- Where possible please use a group device.



## **Appendix One – Safeguarding Responsibilities within Education and Skills**

Additional to group wide responsible roles, within education and skills we have key roles with clear accountability:

**Group Board** – delegated to Enterprise Committee (a sub-group of the board with overall responsibility for all enterprise services, including education and skills)

The Board is committed to ensuring that we:

- raise awareness of issues relating to safeguarding and promotes the welfare of all learners
- provide a safe environment for everyone, including children, young people and adults at risk
- identify those who are suffering or at risk of suffering significant harm and takes appropriate action to ensure they are kept safe
- have procedures for reporting and dealing with allegations of abuse against team members and volunteers
- operates safe recruitment procedures
- designates a member of the team within education and skills with sufficient authority to take ownership of lead protection for safeguarding
- remedy any weaknesses and areas for improvement relating to safeguarding that are brought to their attention
- ensure all employees receive appropriate safeguarding and child protection training which is regularly updated
- ensure that online safety is a central theme within safeguarding

All Board members are required to undertake safeguarding training at the point of induction to ensure they understand the importance of their strategic role as well as their legislative responsibilities.

### **Designated Lead from Enterprise Committee (Board-level responsible person)**

The designated person will be a member of the enterprise committee and is responsible for liaising with the Director of Community Investment, and Designated Safeguarding Lead for education and skills regarding safeguarding matters including:

- Ensuring that we have policies and procedures appropriate to our settings and aligned to those in the areas we work.
- Ensuring that a review of the Group and service area specific Safeguarding policy is carried out annually.
- Ensuring that the group is given an annual update on compliance to the policy. The update should include a report on training during the year.

The designated lead shall receive appropriate training in order to carry out these duties effectively.

### **Designated Lead from the Executive Leadership Team (ELT) (Director-level responsible person)**

Within our structure, our Board delegate much of the activities to our Executive Directors. The designated lead from ELT is responsible for:

- Chairing our safeguarding steering group, and ensuring group-wide collaboration and support for all safeguarding matters
- Strategic oversight of safeguarding matters and in particular
- overseeing the liaison with external agencies in connection with any allegations with senior members of the team that also have lead responsibility. This will include providing information and ensure good communication between the parties but will not involve investigation of any kind.

**Designated Safeguarding Lead (DSL) and Deputy Designated Safeguarding Lead (DDSL)** are those with lead responsibility across our sites for day-to-day management of safeguarding issues.

The DSL has responsibility to lead on raising awareness across Education and Skills about safeguarding, and to promote a safe and caring environment for learning. They have received the appropriate training as required by the Local Safeguarding Partner's and will ensure their knowledge on safeguarding issues remains current.

The Designated Safeguarding Lead (DSL) is responsible for;

- Overseeing the referral of cases of suspected abuse or allegations
- Giving advice and support on matters relating to safeguarding
- Maintaining a proper record of any safeguarding referral, complaint or concern received
- Ensuring that parents/carers of children, young people and adults at risk are aware of our safeguarding policy
- Liaising with agencies as necessary
- Liaising with previous providers to ensure that appropriate arrangements are made for them
- Ensuring there is liaison with employers and training organisations providing learner placements to ensure proper safeguarding arrangements are in place
- Ensuring that all teams receive training about safeguarding matters and our procedures
- Work as part of the safeguarding team, supporting each other, dealing with cases appropriate to their expertise and sharing knowledge, learning and best practice where possible
- Work with the safeguarding team to review cases quarterly, providing reports annually to enterprise committee
- Reporting any changes in procedure required to the Operations Manager – Education and Skills as soon as possible. In the absence of the DSL, a DDSL will carry out the responsibilities of the DSL. In the absence of both of these, the Operation Manager and/or Director of Community Investment will carry out their responsibilities. All will be trained to the required standard.
- Dealing with individual cases, including attending case conferences and review meetings as appropriate, liaising with and supporting Social Workers and other agencies
- Consulting with statutory safeguarding agencies or police

- following any referral
- To follow up all referrals and disclosures made directly by learners or via our people in accordance with the policy, the guidelines and procedures and, as appropriate, to the specific circumstances of the referral. This will involve:
  - Receiving information from, and offering advice to, our teams, volunteers, children and young people, adults at risk, parents and carers, employers about concerns relating to vulnerable adult or child protection issues
  - Assessing this information promptly, and supporting teams/DDSL's as appropriate
  - Maintaining secure records of this information and ensuring these are stored in group safeguarding files.
  - To be trained in safeguarding as required by the Local Safeguarding Partners (LSP formerly LSCB) and receive regular refresher training
  - To maintain confidentiality regarding safeguarding cases at all times. Referrals to external support agencies will only be made by members of the designated safeguarding team

The Deputy Designated Safeguarding Lead (DDSL) is responsible for:

- Working with the DSL on matters of safeguarding
- Working as part of the safeguarding team, supporting each other, dealing with cases appropriate to their expertise and sharing knowledge, learning and best practice where possible
- Being available to provide advice and support on issues relating to safeguarding, policy, procedures and record keeping
- Being available to listen to children, young people and vulnerable adults studying at any site
- Receiving information from any team members, volunteers, children, parents and/or carers who have safeguarding concerns and record it.
- Being able to assess information promptly and carefully, clarifying and obtaining more information about the matter as appropriate.
- Recording rigorous reports and/or statements.
- Be on the on-duty rota for DSL covering point of contact support across education and skills weekly.

Everyone will receive training to familiarise them with safeguarding issues and our policy and procedures, with refresher training at least every two years. All E&S teams receive a safeguarding induction as part of their induction process before commencing their post. This also covers online safety and appropriate use of IT. Everyone who comes into contact with children are to read and sign that they have read and understood Part 1 and Annex B of Keeping Children Safe in Education along with any updates that take place thereafter.

All E&S teams should know what to do if a child tells them he or she is being abused or neglected. For those that do not have direct contact with children and young people, will read and sign that they have read and understood the condensed version of KCSIE part 1 Annex A.