

ELMHOUSE TRAINING

Learner protection and safeguarding policy and procedures



Approved by:	[GOVERNORS]	Date: [6.3.19]
Last reviewed on:	[6.3.19]	
Next review due by:	[7.3.2020]	

Contents

1. Aims.....	4
2. Legislation and statutory guidance.....	4
3. Definitions.....	5
4. Equality statement	5
5. Roles and responsibilities	6-7
6. Confidentiality	8
7. Recognising abuse and taking action	8
8. Notifying learners.....	17
9. Learners with special educational needs and disabilities.....	17-18
10. Mobile phones and cameras.....	18
11. Complaints and concerns about centre safeguarding policies	18
12. Record-keeping	18
13. Training.....	19
14. Monitoring arrangements	19
15. Links with other policies	20
Appendix 1: types of abuse.....	21
Appendix 2: safer recruitment and DBS checks – policy and procedures	23
Appendix 3: allegations of abuse made against staff.....	27
Appendix 4: specific safeguarding issues	32

ELMHOUSE SAFEGUARDING CONTACTS

- *ELMHOUSE DESIGNATED SAFEGUARDING LEAD; MARCIA ABRAMS*
0203-5385530/07792576776
- *Name and contact details of the link governor for safeguarding*
NAVLET WILLIAMSON
- *Name and contact details of the chair of governors*
- *Name and contact details of the local authority designated officer (LADO) reporting a staff member or organisation*

Andrew Zachariades on **020 7926 4679** or **07720 828 700** or email LADO@lambeth.gov.uk (secure).

Integrated Referral Hub on 020 7926

3100 or email helpandprotection@lambeth.gov.uk or help.protection@lambeth.cjsm.net (secure email)

Contact Us

Report a concern

If you think a child is at risk of being abused or neglected or if someone is neglecting or abusing you, please contact Lambeth Children's Social Care on [020 7926 5555](tel:02079265555) (24 hours).

If you are a professional, please follow up with a [Multi-Agency Referral Form \(MARF\)](#).

Email: helpandprotection@lambeth.gov.uk or help.protection@lambeth.cjsm.net (secure email)

In an emergency call the Police on 999.

Report elsewhere

If you would prefer to contact someone other than Lambeth Council, there are charities that can offer advice and support:

For adults concerned about a child, contact the NSPCC on [0808 800 5000](tel:08088005000).

For children and young people, contact Childline on [0800 1111](tel:08001111). Childline is a free and confidential service.

Contact the LSCB for general enquiries

Email: Lambethscb@lambeth.gov.uk

- *Contact details of other relevant organisations, such as the government's Channel helpline which centre staff and governors can call to raise concerns about extremism with respect to a learner (020 7340 7264)*

1. Aims

The centre aims to ensure that:

- Appropriate action is taken in a timely manner to safeguard and promote learner's welfare
- All staff are aware of their statutory responsibilities with respect to safeguarding
- Staff are properly trained in recognising and reporting safeguarding issues

2. Legislation and statutory guidance

This policy is based on the Department for Education's statutory guidance [Keeping Children Safe in Education \(2018\)](#) and [Working Together to Safeguard Children \(2018\)](#), and the [Governance Handbook](#). We comply with this guidance and the arrangements agreed and published by our 3 local safeguarding partners.

This policy is also based on the following legislation:

:

- [The Children's Act 1989](#) (and [2004 amendment](#)), which provides a framework for the care and protection of children
- Section 5B(11) of the Female Genital Mutilation Act 2003, as inserted by section 74 of the [Serious Crime Act 2015](#), which places a statutory duty on teachers to report to the police where they discover that female genital mutilation (FGM) appears to have been carried out on a girl under 18
- [Statutory guidance on FGM](#), which sets out responsibilities with regards to safeguarding and supporting girls affected by FGM
- [The Rehabilitation of Offenders Act 1974](#), which outlines when people with criminal convictions can work with learner's
- Schedule 4 of the [Safeguarding Vulnerable Groups Act 2006](#), which defines what 'regulated activity' is in relation to learner's
- [Statutory guidance on the Prevent duty](#), which explains centre s' duties under the Counter-Terrorism and Security Act 2015 with respect to protecting people from the risk of radicalisation and extremism

.

3. Definitions

Safeguarding and promoting the welfare of learner means:

- Protecting learner from maltreatment
- Preventing impairment of learner's health or development
- Ensuring that learner grow up in circumstances consistent with the provision of safe and effective care
- Taking action to enable all learner to have the best outcomes

Learner protection is part of this definition and refers to activities undertaken to prevent learner suffering, or being likely to suffer, significant harm.

Abuse is a form of maltreatment of a learner, and may involve inflicting harm or failing to act to prevent harm. Appendix 1 explains the different types of abuse.

Neglect is a form of abuse and is the persistent failure to meet a learner's basic physical and/or psychological needs, likely to result in the serious impairment of the learner's health or development. Appendix 1 defines neglect in more detail.

Sexting (also known as youth produced sexual imagery) is the sharing of sexual imagery (photos or videos) by learner

Learner includes everyone under and over the age of 18.

The following are identified in Keeping Children Safe in Education (and defined in the Childcare Act 2004, as amended by chapter 2 of the Children and Social Work Act 2017). They will make arrangements to work together to safeguard and promote the welfare of local learner, including identifying and responding to their needs:

- The local authority (LA)
- A clinical commissioning group for an area within the LA
- The chief officer of police for a police area in the LA area

4. Equality statement

Some learner have an increased risk of abuse, and additional barriers can exist for some learner with respect to recognising or disclosing it. We are committed to anti-discriminatory practice and recognise learner's diverse circumstances. We ensure that all learner have the same protection, regardless of any barriers they may face.

We give special consideration to learner who:

- Have special educational needs (SEN) or disabilities (see section 9)
- Are young carers
- May experience discrimination due to their race, ethnicity, religion, gender identification or sexuality
- Have English as an additional language
- Are known to be living in difficult situations – for example, temporary accommodation or where there are issues such as substance abuse or domestic violence
- Are at risk of FGM, sexual exploitation, forced marriage, or radicalisation
- Are asylum seekers
- Are at risk due to either their own or a family member's mental health needs
- Are looked after or previously looked after

5. Roles and responsibilities

Safeguarding and learner protection is **everyone's** responsibility. This policy applies to all staff, volunteers and governors in the centre and is consistent with the procedures of the 3 safeguarding partners. Our policy and procedures also apply to extended centre and off-site activities.

5.1 All staff

All staff will read and understand part 1 and Annex A of the Department for Education's statutory safeguarding guidance, [Keeping Learner Safe in Education](#), and review this guidance at least annually.

All staff will be aware of:

- Our systems which support safeguarding, including this learner protection and safeguarding policy, the staff [behaviour policy/code of conduct], the role and identity of the designated safeguarding lead (DSL) and, the behaviour policy. The early help process (sometimes known as the common assessment framework) and their role in it, including identifying emerging problems, liaising with the DSL, and sharing information with other professionals to support early identification and assessment
- The process for making referrals to local authority learner's social care and for statutory assessments that may follow a referral, including the role they might be expected to play
- What to do if they identify a safeguarding issue or a learner tells them they are being abused or neglected, including specific issues such as FGM, and how to maintain an appropriate level of confidentiality while liaising with relevant professionals
- The signs of different types of abuse and neglect, as well as specific safeguarding issues, such as learner sexual exploitation (CSE), FGM and radicalisation

Section 13 and appendix 4 of this policy outline in more detail how staff are supported to do this.

5.2 The designated safeguarding lead (DSL)

The DSL is a member of the senior leadership team. Our DSL is [Marcia Abrams/ Centre Manager]. The DSL takes lead responsibility for learner protection and wider safeguarding.

During term time, the DSL will be available during centre hours for staff to discuss any safeguarding concerns.

Contact Details

Email: marciaabrams@elmhousetraining.org.uk

Tel: 02035385539/07792576776

When the DSL is absent, the [deputy/] – **[Navlet Williamson Governor responsible for safeguarding] – will act as cover.**

If the DSL and [deputy/deputies] are not available, **[Zebina Campbell/Lecturer]** will act as cover (for example, during out-of-hours/out-of-term activities).

The DSL will be given the time, funding, training, resources and support to:

- Provide advice and support to other staff on learner welfare and learner protection matters
- Take part in strategy discussions and inter-agency meetings and/or support other staff to do so
- Contribute to the assessment of learner
- Refer suspected cases, as appropriate, to the relevant body (local authority learner's social care, Channel programme, Disclosure and Barring Service, and/or police), and support staff who make such referrals directly

The DSL will also keep the Governors informed of any issues, and liaise with local authority case managers and designated officers for learner protection concerns as appropriate.

The full responsibilities of the DSL and [deputy/deputies] are set out in their job description.

5.3 The governing board

The governing board will approve this policy at each review, ensure it complies with the law and hold the centre manager to account for its implementation.

The governing board will appoint a senior board level (or equivalent) lead [*Navlet Williamson*] to monitor the effectiveness of this policy in conjunction with the full governing board. This is always a different person from the DSL.

The chair of governors will act as the 'case manager' in the event that an allegation of abuse is made against the centre manager, where appropriate (see appendix 3).

All governors will read Keeping Learner Safe in Education.

Section 13 has information on how governors are supported to fulfil their role.

5.4 The centre manager

The centre manager is responsible for the implementation of this policy, including:

- Ensuring that staff (including temporary staff) and volunteers are informed of our systems which support safeguarding, including this policy, as part of their induction
- Communicating this policy to learners when they join the centre and via the centre website
- Ensuring that the DSL has appropriate time, funding, training and resources, and that there is always adequate cover if the DSL is absent
- Ensuring that all staff undertake appropriate safeguarding and learner protection training and update this regularly
- Acting as the 'case manager' in the event of an allegation of abuse made against another member of staff or volunteer, where appropriate (see appendix 3)

6. Confidentiality

The Centre complies with the requirements of the Data Protection Act 1998, which allows for disclosure of personal data where this is necessary to protect the vital interests of a learner. There is an exemption from the disclosure requirements of both computer and paper records, except where the case results in a court action.

You should note that:

- *Timely information sharing is essential to effective safeguarding*
- *Fears about sharing information must not be allowed to stand in the way of the need to promote the welfare, and protect the safety, of learner*
- *The Data Protection Act (DPA) 2018 and GDPR do not prevent, or limit, the sharing of information for the purposes of keeping learner safe*
- *If staff need to share ‘special category personal data’, the DPA 2018 contains ‘safeguarding of learner and individuals at risk’ as a processing condition that allows practitioners to share information without consent if it is not possible to gain consent, it cannot be reasonably expected that a practitioner gains consent, or if to gain consent would place a learner at risk*
- *Staff should never promise a learner that they will not tell anyone about a report of abuse, as this may not be in the learner’s best interests*
- *The government’s information sharing advice for safeguarding practitioners includes 7 ‘golden rules’ for sharing information, and will support staff who have to make decisions about sharing information*
- *If staff are in any doubt about sharing information, they should speak to the designated safeguarding lead (or deputy)*
- *Confidentiality is also addressed in this policy with respect to record-keeping in section 12, and allegations of abuse against staff in appendix 3*

7. Recognising abuse and taking action

Staff, volunteers and governors must follow the procedures set out below in the event of a safeguarding issue.

Please note – in this and subsequent sections, you should take any references to the DSL to mean “the DSL (or deputy DSL)”.

7.1 If a learner is suffering or likely to suffer from harm, or in immediate danger

Make a referral to Lambeth social care and/or the police **immediately** if you believe a learner is suffering or likely to suffer from harm, or in immediate danger. **Anyone can make a referral.**

Tell the DSL (see section 5.2) as soon as possible if you make a referral directly.

If you are worried about a learner/child, contact the Integrated Referral Hub:

- **Professionals' Line: 020 7926 3100**
- **Email:** helpandprotection@lambeth.gov.uk or help.protection@lambeth.cjsm.net (secure email) If you are a professional, please always follow up your referral in writing by filling in the [Multi-Agency Referral Form \(MARE\)](#) and forward it to the email address above.

If a learner/child is at immediate risk of significant harm, please dial 999

<https://www.gov.uk/report-learner-abuse-to-local-council>

7.2 If a learner makes a disclosure to you

If a learner discloses a safeguarding issue to you, you should:

- Listen to and believe them. Allow them time to talk freely and do not ask leading questions
- Stay calm and do not show that you are shocked or upset
- Tell the learner they have done the right thing in telling you. Do not tell them they should have told you sooner
- Explain what will happen next and that you will have to pass this information on. Do not promise to keep it a secret
- Write up your conversation as soon as possible in the learner's own words. Stick to the facts, and do not put your own judgement on it
- Sign and date the write-up and pass it on to the DSL. Alternatively, if appropriate, make a referral to Lambeth social care and/or the police directly (see 7.1), and tell the DSL as soon as possible that you have done so

7.3 If you discover that FGM has taken place or a learner is at risk of FGM

The Department for Education's Keeping Children Safe in Education explains that FGM comprises "all procedures involving partial or total removal of the external female genitalia, or other injury to the female genital organs".

FGM is illegal in the UK and a form of learner abuse with long-lasting, harmful consequences. It is also known as 'female genital cutting', 'circumcision' or 'initiation'.

Possible indicators that a learner has already been subjected to FGM, and factors that suggest a learner may be at risk, are set out in appendix 4.

Any staff who discovers (either through disclosure by the victim or visual evidence) that an act of FGM appears to have been carried out on a **learner under 18** must immediately report this to the police, personally. This is a statutory duty, and teachers will face disciplinary sanctions for failing to meet it.

Unless they have good reason not to, they should also discuss the case with the DSL and involve Lambeth social care as appropriate.

Any other member of staff who discovers that an act of FGM appears to have been carried out on a **learner under 18** must speak to the DSL and follow our local safeguarding procedures.

The duty for teachers mentioned above does not apply in cases where a learner is *at risk* of FGM or FGM is suspected but is not known to have been carried out. Staff should not examine learners.

Any member of staff who suspects a learner is *at risk* of FGM or suspects that FGM has been carried out [on a **learner age 18 or over and they** appears to have been a victim of FGM] must speak to the DSL and follow our local safeguarding procedures.

If you come into contact with a child that due to indicators and your assessment of that child and/or family, you suspect is at risk, or has experienced Female Genital Mutilation, you should make a referral by contacting

Lambeth Social Services Referral and Assessment Screening Team from Monday to Friday from 9am - 5pm on any of the numbers below: Tel: 020 7926 1772; 0207 9267 856; 0207 926 6586; 0207 926 6583; 0207 926 6010; 0207 926 7868

Or Out of Hours Emergency Tel: 020 7926 1000

If you would like advice on a specific case or making a referral, you can contact Nana Amoo-gottfried :
e: NAmooGottfried@lambeth.gov.uk] or Suzanne McLeod [e: SMcleod@lambeth.gov.uk].

If professionals identify an adult woman who needs support you can contact the below services:

1. The Gaia Centre provides a one-to-one confidential and bespoke support service for females aged 13+ and males aged 16+ who live in Lambeth and who have experienced or who may be at risk of gender-based violence, including female genital mutilation. The service is free and staffed by female members of staff only. Children are welcome and child care provision is available. Practitioners can contact the Gaia centre on behalf of victims or victims can self-refer by calling 0207 733 8724 or emailing lambethvawg@refuge.org.uk to make a referral. The centre is open 8am to 6pm Monday to Friday with an additional out-of-hours 24 hour on-call service.
2. The African Well Woman's Clinic, based in Guy's and St Thomas' Hospital, provides counselling, support, advice and a reversal operation. Practitioners can contact the clinic on behalf of females, or females can self-refer, by calling 020 8188 6872 or emailing Comfort.Momoh@gstt.nhs.uk. Women from anywhere across the UK can access the service. African Advocacy Foundation works in Lambeth, Southwark and Lewisham on campaigns and community events, raising awareness around FGM. They also provide drop-in confidential counselling and advice as well as discussions through group meetings for women, and can provide advice to professionals working with children and families to safeguard girls at risk of FGM. To access the service call 020 8698 4473 or email mulkaht@a-af.org. If there are immediate concerns in relation to the safety of any individual then the Police should be called on 999 as a priority. The Metropolitan Police have a specialist team who provide advice on FGM, Project Azure, you can contact them for advice on 020 7161 2888. [Please note they do not accept referrals.]

7.4 If you have concerns about a learner (as opposed to believing a learner is suffering or likely to suffer from harm, or in immediate danger)

Figure 1 on page 10 illustrates the procedure to follow if you have any concerns about a learner's welfare.

Where possible, speak to the DSL first to agree a course of action.

If in exceptional circumstances the DSL is not available, this should not delay appropriate action being taken. Speak to a member of the senior leadership team and/or take advice from local authority learner's social care. You can also seek advice at any time from the NSPCC helpline on 0808 800 5000.

Make a referral to local authority learner's social care directly, if appropriate (see 'Referral' below). Share any action taken with the DSL as soon as possible.

Early help

If early help is appropriate, the DSL will generally lead on liaising with other agencies and setting up an inter-agency assessment as appropriate. Staff may be required to support other agencies and professionals in an early help assessment, in some cases acting as the lead practitioner.

The DSL will keep the case under constant review and the centre will consider a referral to local authority learner's social care if the situation does not seem to be improving. Timelines of interventions will be monitored and reviewed.

Referral

If it is appropriate to refer the case to local authority learner's social care or the police, the DSL will make the referral or support you to do so.

If you make a referral directly (see section 7.1), you must tell the DSL as soon as possible.

The local authority will make a decision within 1 working day of a referral about what course of action to take and will let the person who made the referral know the outcome. The DSL or person who made the referral must follow up with the local authority if this information is not made available, and ensure outcomes are properly recorded.

If the learner's situation does not seem to be improving after the referral, the DSL or person who made the referral must follow local escalation procedures to ensure their concerns have been addressed and that the learner's situation improves.

7.5 If you have concerns about extremism

If a learner is not suffering or likely to suffer from harm, or in immediate danger, where possible speak to the DSL first to agree a course of action.

If in exceptional circumstances the DSL is not available, this should not delay appropriate action being taken. Speak to a member of the senior leadership team and/or seek advice from local authority learner's social care. Make a referral to local authority learner's social care directly, if appropriate (see 'Referral' above).

Where there is a concern, the DSL will consider the level of risk and decide which agency to make a referral to. This could include [Channel](#), the government's programme for identifying and supporting individuals at risk of being drawn into terrorism, or the local

authority learner's social care team.

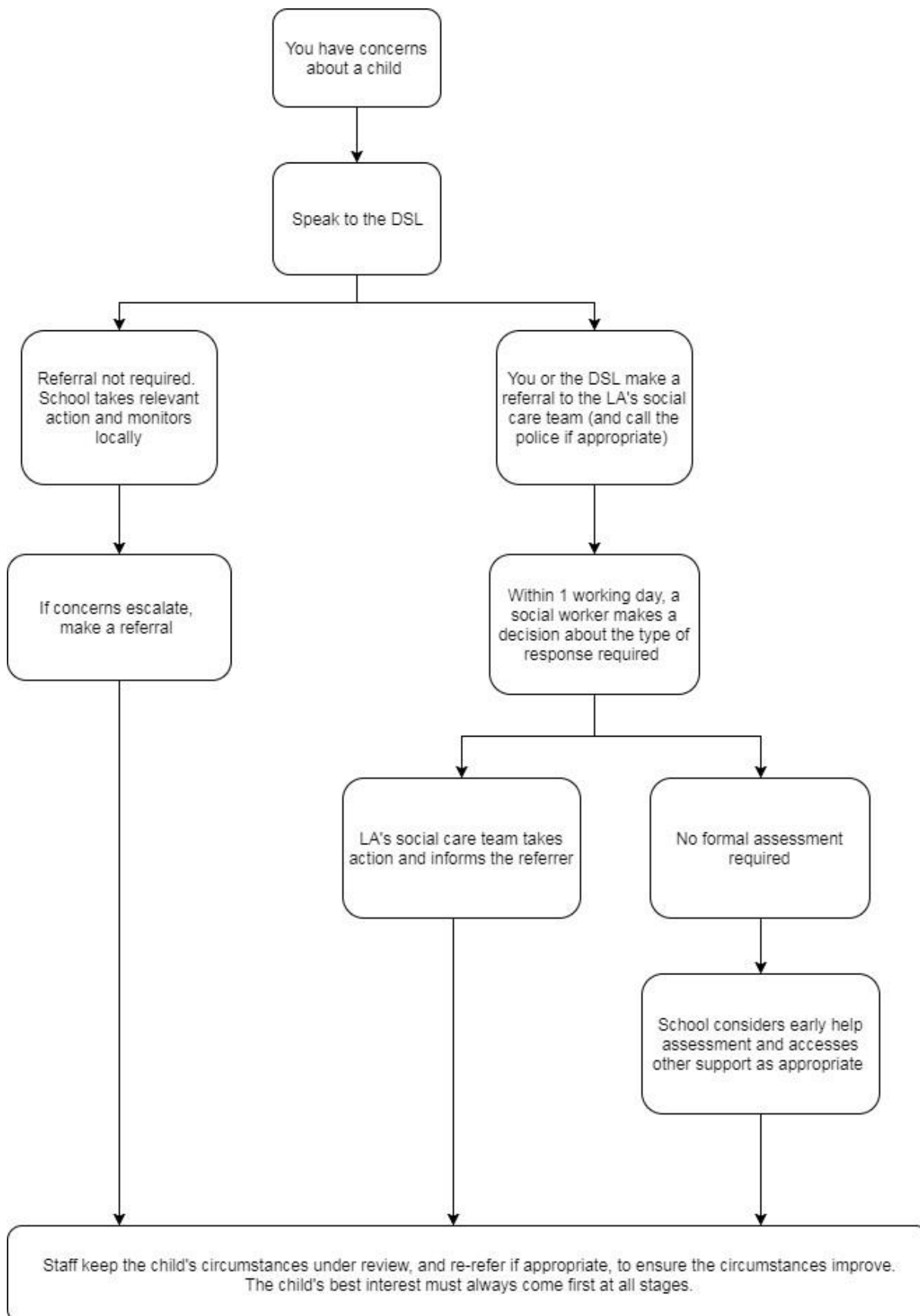
The Department for Education also has a dedicated telephone helpline, 020 7340 7264, which centre staff and governors can call to raise concerns about extremism with respect to a learner. You can also email counter.extremism@education.gov.uk. Note that this is not for use in emergency situations.

In an emergency, call 999 or the confidential anti-terrorist hotline on 0800 789 321 if you:

- Think someone is in immediate danger
- Think someone may be planning to travel to join an extremist group
- See or hear something that may be terrorist-related

Figure 1: procedure if you have concerns about a learner's welfare (as opposed to believing a learner is suffering or likely to suffer from harm, or in immediate danger)

(Note – if the DSL is unavailable, this should not delay action. See section 7.4 for what to do.)



7.6 Concerns about a staff member or volunteer

If you have concerns about a member of staff or volunteer, or an allegation is made about a member of staff or volunteer posing a risk of harm to learner, speak to the centre manager. If the concerns/allegations are about the centre manager, speak to the chair of governors.

The centre manager/chair of governors will then follow the procedures set out in appendix 3, if appropriate.

:

If you have concerns about a member of staff or volunteer, or an allegation is made about a member of staff or volunteer posing a risk of harm to learner, speak to the centre manager. If the concerns/allegations are about the centre manager, speak to the proprietor.

The centre manager/proprietor will then follow the procedures set out in appendix 3, if appropriate.

:

If you have concerns about a member of staff or volunteer, or an allegation is made about a member of staff or volunteer posing a risk of harm to learner, speak to the centre manager. The centre manager will then follow the procedures set out in appendix 3, if appropriate. If the concerns/allegations are about the centre manager, speak to the designated officer at the local authority. Where appropriate, the centre will inform Ofsted of the allegation and actions taken, within the necessary timescale (see appendix 3 for more detail).

7.7 Allegations of abuse made against other learners

We recognise that learner are capable of abusing their peers. Abuse will never be tolerated or passed off as “banter”, “just having a laugh” or “part of growing up”.

We also recognise the gendered nature of peer-on-peer abuse (i.e. that it is more likely that girls will be victims and boys perpetrators). However, all peer-on-peer abuse is unacceptable and will be taken seriously.

Most cases of learners hurting other learners will be dealt with under our centre’s behaviour policy, but this learner protection and safeguarding policy will apply to any allegations that raise safeguarding concerns. This might include where the alleged behaviour:

- Is serious, and potentially a criminal offence
- Could put learners in the centre at risk
- Is violent
- Involves learners being forced to use drugs or alcohol
- Involves sexual exploitation, sexual abuse or sexual harassment, such as indecent exposure, sexual assault, or sexually inappropriate pictures or videos (including sexting)

If a learner makes an allegation of abuse against another learner:

- You must record the allegation and tell the DSL, but do not investigate it
- The DSL will contact the local authority learner's social care team and follow its advice, as well as the police if the allegation involves a potential criminal offence
- The DSL will put a risk assessment and support plan into place for all learner involved (including the victim(s), the learner(ren) against whom the allegation has been made and any others affected) with a named person they can talk to if needed
- The DSL will contact the learner and adolescent mental health services (CAMHS), if appropriate

We will minimise the risk of peer-on-peer abuse by:

- Challenging any form of derogatory or sexualised language or behaviour, including requesting or sending sexual images
- Being vigilant to issues that particularly affect different genders – for example, sexualised or aggressive touching or grabbing towards female learners, and initiation or hazing type violence with respect to boys
- Ensuring our curriculum helps to educate learners about appropriate behaviour and consent
- Ensuring learners know they can talk to staff confidentially by **[putting this procedure in learner's booklet]**
- Ensuring staff are trained to understand that a learner harming a peer could be a sign that the learner is being abused themselves, and that this would fall under the scope of this policy

7.8 Sexting

This is a suggested approach based on guidance from the UK Council for Learner Internet Safety for all staff and for DSLs and senior leaders. Elmhouse Training Staff will be following this procedure.

Your responsibilities when responding to an incident

If you are made aware of an incident involving sexting (also known as 'youth produced sexual imagery'), you must report it to the DSL immediately.

You must **not**:

- View, download or share the imagery yourself, or ask a learner to share or download it. If you have already viewed the imagery by accident, you must report this to the DSL
- Delete the imagery or ask the learner to delete it
- Ask the learner(s) who are involved in the incident to disclose information regarding the imagery (this is the DSL's responsibility)
- Share information about the incident with other members of staff, the learner(s) it involves or their, or other, learners and/or carers
- Say or do anything to blame or shame any young people involved

You should explain that you need to report the incident, and reassure the learner(s) that they will receive support and help from the DSL.

Initial review meeting

Following a report of an incident, the DSL will hold an initial review meeting with appropriate centre staff. This meeting will consider the initial evidence and aim to determine:

- Whether there is an immediate risk to learner(s)
- If a referral needs to be made to the police and/or learner's social care
- If it is necessary to view the imagery in order to safeguard the young person (in most cases, imagery should not be viewed)
- What further information is required to decide on the best response
- Whether the imagery has been shared widely and via what services and/or platforms (this may be unknown)
- Whether immediate action should be taken to delete or remove images from devices or online services
- Any relevant facts about the learners involved which would influence risk assessment
- If there is a need to contact another centre, college, setting or individual
- Whether to contact learners or carers of the learners involved (in most cases learners should be involved)

The DSL will make an immediate referral to police and/or learner's social care if:

- The incident involves an adult
- There is reason to believe that a young person has been coerced, blackmailed or groomed, or if there are concerns about their capacity to consent (for example owing to special educational needs)
- What the DSL knows about the imagery suggests the content depicts sexual acts which are unusual for the young person's developmental stage, or are violent
- The imagery involves sexual acts and any learner in the imagery is under 13
- The DSL has reason to believe a learner is at immediate risk of harm owing to the sharing of the imagery (for example, the young person is presenting as suicidal or self-harming)

If none of the above apply then the DSL, in consultation with the centre manager and other members of staff as appropriate, may decide to respond to the incident without involving the police or learner's social care.

Further review by the DSL

If at the initial review stage a decision has been made not to refer to police and/or learner's social care, the DSL will conduct a further review.

They will hold interviews with the learners involved (if appropriate) to establish the facts and assess the risks.

If at any point in the process there is a concern that a learner has been harmed or is at risk of harm, a referral will be made to learner's social care and/or the police immediately.

Informing learners

The DSL will inform learners at an early stage and keep them involved in the process, unless there is a good reason to believe that involving them would put the learner at risk of harm.

Referring to the police

If it is necessary to refer an incident to the police, this will be done through

Recording incidents

All sexting incidents and the decisions made in responding to them will be recorded. The record-keeping arrangements set out in section 12 of this policy also apply to recording incidents of sexting.

Curriculum coverage

As many of our learners are parents staff should demonstrate through the curriculum issues around sexting to raise awareness..

Teaching covers the following in relation to sexting:

- What it is
- How it is most likely to be encountered
- The consequences of requesting, forwarding or providing such images, including when it is and is not abusive
- Issues of legality
- The risk of damage to people's feelings and reputation

Learners also learn the strategies and skills needed to manage:

- Specific requests or pressure to provide (or forward) such images
- The receipt of such images

This policy on sexting is also shared with learners so they are aware of the processes the centre will follow in the event of an incident.

8. Notifying learners

Where appropriate, we will discuss any concerns about a learner with the learner's learners. The DSL will normally do this in the event of a suspicion or disclosure.

Other staff will only talk to learners about any such concerns following consultation with the DSL.

If we believe that notifying the learners would increase the risk to the learner, we will discuss this with the local authority learner's social care team before doing so.

In the case of allegations of abuse made against other learner, we will normally notify the learners of all the learner involved.

9. Learners with special educational needs and disabilities

We recognise that learners with special educational needs (SEN) and disabilities can face additional safeguarding challenges. Additional barriers can exist when recognising abuse and neglect in this group, including:

- Assumptions that indicators of possible abuse such as behaviour, mood and injury relate to the learner's disability without further exploration
- Learners being more prone to peer group isolation than other learners

- The potential for learners with SEN and disabilities being disproportionately impacted by behaviours such as bullying, without outwardly showing any signs
- Communication barriers and difficulties in overcoming these barriers

We offer extra pastoral support for learners with SEN and disabilities. This includes:

10. Mobile phones and cameras

Staff are allowed to bring their personal phones to centre for their own use, but will limit such use to non-contact time when learners are not present. Staff members' personal phones will remain in their bags or cupboards during contact time with learners.

Staff will not take pictures or recordings of learners on their personal phones or cameras.

We will follow the General Data Protection Regulation and Data Protection Act 2018 when taking and storing photos and recordings for use in the centre .

11. Complaints and concerns about centre safeguarding policies

11.1 Complaints against staff

Complaints against staff that are likely to require a learner protection investigation will be handled in accordance with our procedures for dealing with allegations of abuse made against staff (see appendix 3).

11.2 Other complaints

Explain how your centre handles safeguarding-related complaints of other types here – for example, those related to learners or premises.

11.3 Whistle-blowing

See Whistle Blowing Policy

12. Record-keeping

We will hold records in line with our records retention schedule.

All safeguarding concerns, discussions, decisions made and the reasons for those decisions, must be recorded in writing. If you are in any doubt about whether to record something, discuss it with the DSL.

Non-confidential records will be easily accessible and available. Confidential information and records will be held securely and only available to those who have a right or professional need to see them.

Safeguarding records relating to individual learner will be retained for a reasonable period of time after they have left the centre .

If a learner for whom the centre has, or has had, safeguarding concerns moves to another centre , the DSL will ensure that their learner protection file is forwarded promptly and securely, and separately from the main learner file. In addition, if the concerns are significant or complex, and/or social services are involved, the DSL will speak to the DSL of the receiving centre and provide information to enable them to have time to make any necessary preparations to ensure the safety of the learner.

- Appendix 2 sets out our policy on record-keeping specifically with respect to recruitment and pre-employment checks
- Appendix 3 sets out our policy on record-keeping with respect to allegations of abuse made against staff

13. Training

13.1 All staff

All staff members will undertake safeguarding and learner protection training at the beginning of each term and induction, including on whistle-blowing procedures, to ensure they understand the centre's safeguarding systems and their responsibilities, and can identify signs of possible abuse or neglect. This training will be regularly updated and will be in line with advice from the Local Authority.

All staff will have training on the government's anti-radicalisation strategy, Prevent, to enable them to identify learner at risk of being drawn into terrorism and to challenge extremist ideas.

Staff will also receive regular safeguarding and learner protection updates (for example, through emails, e-bulletins and staff meetings) as required, but at least annually.

Volunteers will receive appropriate training,.

13.2 The DSL and [deputy/deputies]

The DSL and [deputy/deputies] will undertake learner protection and safeguarding training at least every 2 years.

In addition, they will update their knowledge and skills at regular intervals and at least annually (for example, through e-bulletins, meeting other DSLs, or taking time to read and digest safeguarding developments).

They will also undertake Prevent awareness training.

13.3 Governors

All governors receive training about safeguarding, to make sure they have the knowledge and information needed to perform their functions and understand their responsibilities.

As the chair of governors may be required to act as the 'case manager' in the event that an allegation of abuse is made against the centre manager, they receive training in managing allegations for this purpose.

13.4 Recruitment – interview panels

At least one person conducting any interview for a post at the centre will have undertaken safer recruitment training. This will cover, as a minimum, the contents of the Department for Education's statutory guidance, Keeping Learner Safe in Education, and will be in line with local safeguarding procedures.

13.5 Staff who have contact with learners and families

All staff who have contact with learner and families will have supervisions which will provide them with support, coaching and training, promote the interests of learner and allow for confidential discussions of sensitive issues.

14. Monitoring arrangements

This policy will be reviewed **annually** by [Marcia Abrams/Centre Manager]. At every review, it will be approved by the full governing board.

15. Links with other policies

This policy links to the following policies and procedures:

- Behaviour
- Staff [**behaviour/code of conduct**]
- Complaints
- Health and safety
- Attendance
- Online safety
- Equality
- Sex and relationship education
- First aid
- Curriculum
- Privacy notices

These appendices are based on the Department for Education's statutory guidance, Keeping Learner Safe in Education.

Appendix 1: types of abuse

Abuse, including neglect, and safeguarding issues are rarely standalone events that can be covered by one definition or label. In most cases, multiple issues will overlap.

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

Emotional abuse is the persistent emotional maltreatment of a learner such as to cause severe and adverse effects on the learner's emotional development. Some level of emotional abuse is involved in all types of maltreatment of a learner, although it may occur alone.

Emotional abuse may involve:

- Conveying to a learner that they are worthless or unloved, inadequate, or valued only insofar as they meet the needs of another person
- Not giving the learner opportunities to express their views, deliberately silencing them or 'making fun' of what they say or how they communicate
- Age or developmentally inappropriate expectations being imposed on learner. These may include interactions that are beyond a learner's developmental capability, as well as overprotection and limitation of exploration and learning, or preventing the learner participating in normal social interaction
- Seeing or hearing the ill-treatment of another
- Serious bullying (including cyberbullying), causing learner frequently to feel frightened or in danger, or the exploitation or corruption of learner

Sexual abuse involves forcing or enticing a learner or young person to take part in sexual activities, not necessarily involving a high level of violence, whether or not the learner is aware of what is happening. 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
- Non-contact activities, such as involving learner in looking at, or in the production of, sexual images, watching sexual activities, encouraging learner to behave in sexually inappropriate ways, or grooming a learner 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 learner.

Neglect is the persistent failure to meet a learner's basic physical and/or psychological needs, likely to result in the serious impairment of the learner's health or development. Neglect may occur during pregnancy as a result of maternal substance abuse.

Once a learner is born, neglect may involve a parent or carer failing to:

- Provide adequate food, clothing and shelter (including exclusion from home or abandonment)
- Protect a learner from physical and emotional harm or danger
- Ensure adequate supervision (including the use of inadequate care-givers)

- Ensure access to appropriate medical care or treatment

It may also include neglect of, or unresponsiveness to, a learner's basic emotional needs.

Appendix 2: safer recruitment and DBS checks – policy and procedures

We will record all information on the checks carried out in the centre 's single central record (SCR). Copies of these checks, where appropriate, will be held in individuals' personnel files. We follow requirements and best practice in retaining copies of these checks, as set out below.

New staff

When appointing new staff, we will:

- Verify their identity
- Obtain (via the applicant) an enhanced Disclosure and Barring Service (DBS) certificate, including barred list information for those who will be engaging in regulated activity (see definition below). We will not keep a copy of this for longer than 6 months
- Obtain a separate barred list check if they will start work in regulated activity before the DBS certificate is available
- Verify their mental and physical fitness to carry out their work responsibilities
- Verify their right to work in the UK. We will keep a copy of this verification for the duration of the member of staff's employment and for 2 years afterwards
- Verify their professional qualifications, as appropriate
- Ensure they are not subject to a prohibition order if they are employed to be a teacher
- Carry out further additional checks, as appropriate, on candidates who have lived or worked outside of the UK, including (where relevant) any teacher sanctions or restrictions imposed by a European Economic Area professional regulating authority, and criminal records checks or their equivalent
- Check that candidates taking up a management position are not subject to a prohibition from management (section 128) direction made by the secretary of state

We will ensure that appropriate checks are carried out to ensure that individuals are not disqualified under the 2018 Childcare Disqualification Regulations and Childcare Act 2006. Where we take a decision that an individual falls outside of the scope of these regulations and we do not carry out such checks, we will retain a record of our assessment on the individual's personnel file. This will include our evaluation of any risks and control measures put in place, and any advice sought.

We will ask for written information about previous employment history and check that information is not contradictory or incomplete.

We will seek references on all short-listed candidates, including internal candidates, before interview. We will scrutinise these and resolve any concerns before confirming appointments. The references requested will ask specific questions about the suitability of the applicant to work with learner.

Regulated activity means a person who will be:

- Responsible, on a regular basis in a centre or college, for teaching, training, instructing, caring for or supervising learner; or
- Carrying out paid, or unsupervised unpaid, work regularly in a centre or college where that work provides an opportunity for contact with learner; or
- Engaging in intimate or personal care or overnight activity, even if this happens only once and regardless of whether they are supervised or not

Existing staff

If we have concerns about an existing member of staff's suitability to work with learner, we will carry out all the relevant checks as if the individual was a new member of staff. We will also do this if an individual moves from a post that is not regulated activity to one that is.

We will refer to the DBS anyone who has harmed, or poses a risk of harm, to a learner or vulnerable adult where:

- We believe the individual has engaged in [relevant conduct](#); or
- The individual has received a caution or conviction for a relevant offence, or there is reason to believe the individual has committed a listed relevant offence, under the [Safeguarding Vulnerable Groups Act 2006 \(Prescribed Criteria and Miscellaneous Provisions\) Regulations 2009](#); or
- The 'harm test' is satisfied in respect of the individual (i.e. they may harm a learner or vulnerable adult or put them at risk of harm); and
- The individual has been removed from working in regulated activity (paid or unpaid) or would have been removed if they had not left

Agency and third-party staff

We will obtain written notification from any agency or third-party organisation that it has carried out the necessary safer recruitment checks that we would otherwise perform. We will also check that the person presenting themselves for work is the same person on whom the checks have been made.

Contractors

We will ensure that any contractor, or any employee of the contractor, who is to work at the centre has had the appropriate level of DBS check (this includes contractors who are provided through a PFI or similar contract). This will be:

- An enhanced DBS check with barred list information for contractors engaging in regulated activity
- An enhanced DBS check, not including barred list information, for all other contractors who are not in regulated activity but whose work provides them with an opportunity for regular contact with learner

We will obtain the DBS check for self-employed contractors.

We will not keep copies of such checks for longer than 6 months.

Contractors who have not had any checks will not be allowed to work unsupervised or engage in regulated activity under any circumstances.

We will check the identity of all contractors and their staff on arrival at the centre .

For self-employed contractors such as counsellors and coaches, we will ensure that appropriate checks are carried out to ensure that individuals are not disqualified under the 2018 Childcare Disqualification Regulations and Childcare Act 2006.

Where we decide that an individual falls outside of the scope of these regulations and we do not carry out such checks, we will retain a record of our assessment. This will include our evaluation of any risks and control measures put in place, and any advice sought.

Trainee/student teachers

Where applicants for initial teacher training are salaried by us, we will ensure that all necessary checks are carried out.

Where trainee teachers are fee-funded, we will obtain written confirmation from the training provider that necessary checks have been carried out and that the trainee has been judged by the provider to be suitable to work with learner.

In both cases, this includes checks to ensure that individuals are not disqualified under the 2018 Childcare Disqualification Regulations and Childcare Act 2006.

Volunteers

We will:

- Never leave an unchecked volunteer unsupervised or allow them to work in regulated activity
- Obtain an enhanced DBS check with barred list information for all volunteers who are new to working in regulated activity
- Carry out a risk assessment when deciding whether to seek an enhanced DBS check without barred list information for any volunteers not engaging in regulated activity. We will retain a record of this risk assessment
- Ensure that appropriate checks are carried out to ensure that individuals are not disqualified under the 2018 Childcare Disqualification Regulations and Childcare Act 2006. Where we decide that an individual falls outside of the scope of these regulations and we do not carry out such checks, we will retain a record of our assessment. This will include our evaluation of any risks and control measures put in place, and any advice sought

Governors

All governors will have an enhanced DBS check without barred list information.

They will have an enhanced DBS check with barred list information if working in regulated activity.

All governors will also have a section 128 check (as a section 128 direction disqualifies an individual from being a maintained centre governor).

The chair of the board will have their DBS check countersigned by the secretary of state.

All proprietors, trustees, local governors and members will also have the following checks:

- A section 128 check (to check prohibition on participation in management under [section 128 of the Education and Skills Act 2008](#)).
- Identity
- Right to work in the UK
- Other checks deemed necessary if they have lived or worked outside the UK

The chair of the board will have their DBS check countersigned by the secretary of state. All governors will also have the following checks:

- Identity
- Right to work in the UK
- Other checks deemed necessary if they have lived or worked outside the UK

Staff working in alternative provision settings

Where we place a learner with an alternative provision provider, we obtain written confirmation from the provider that they have carried out the appropriate safeguarding checks on individuals working there that we would otherwise perform.

Adults who supervise learners on work experience

When organising work experience, we will ensure that policies and procedures are in place to protect learner from harm.

We will also consider whether it is necessary for barred list checks to be carried out on the individuals who supervise a learner under 16 on work experience. This will depend on the specific circumstances of the work experience, including the nature of the supervision, the frequency of the activity being supervised, and whether the work is regulated activity.

Learners staying with host families

Where the centre makes arrangements for learners to be provided with care and accommodation by a host family to which they are not related (for example, during a foreign exchange visit), we will request enhanced DBS checks with barred list information on those people.

Where the centre is organising such hosting arrangements overseas and host families cannot be checked in the same way, we will work with our partner centres abroad to ensure that similar assurances are undertaken prior to the visit.

Appendix 3: allegations of abuse made against staff

This section of this policy applies to all cases in which it is alleged that a current member of staff or volunteer has:

- Behaved in a way that has harmed a learner, or may have harmed a learner, or
- Possibly committed a criminal offence against or related to a learner, or
- Behaved towards a learner or learner in a way that indicates he or she would pose a risk of harm to learner

It applies regardless of whether the alleged abuse took place in the centre . Allegations against a teacher who is no longer teaching and historical allegations of abuse will be referred to the police.

We will deal with any allegation of abuse against a member of staff or volunteer very quickly, in a fair and consistent way that provides effective learner protection while also supporting the individual who is the subject of the allegation.

Our procedures for dealing with allegations will be applied with common sense and judgement.

Suspension

Suspension will not be the default position, and will only be considered in cases where there is reason to suspect that a learner or other learner is/are at risk of harm, or the case is so serious that it might be grounds for dismissal. In such cases, we will only suspend an individual if we have considered all other options available and there is no reasonable alternative.

Based on an assessment of risk, we will consider alternatives such as:

- Redeployment within the centre so that the individual does not have direct contact with the learner or learner concerned
- Providing an assistant to be present when the individual has contact with learner
- Redeploying the individual to alternative work in the centre so that they do not have unsupervised access to learner
- Moving the learner or learner to classes where they will not come into contact with the individual, making it clear that this is not a punishment and learners have been consulted
- Temporarily redeploying the individual to another role in a different location, for example to an alternative centre or other work for the

Definitions for outcomes of allegation investigations

- **Substantiated:** there is sufficient evidence to prove the allegation
- **Malicious:** there is sufficient evidence to disprove the allegation and there has been a deliberate act to deceive
- **False:** there is sufficient evidence to disprove the allegation
- **Unsubstantiated:** there is insufficient evidence to either prove or disprove the allegation (this does not imply guilt or innocence)
- **Unfounded:** to reflect cases where there is no evidence or proper basis which supports the allegation being made

Procedure for dealing with allegations

In the event of an allegation that meets the criteria above, the centre manager (or chair of governors where the centre manager is the subject of the allegation) – the ‘case manager’ – will take the following steps:

- Immediately discuss the allegation with the designated officer at the local authority. This is to consider the nature, content and context of the allegation and agree a course of action, including whether further enquiries are necessary to enable a decision on how to proceed, and whether it is necessary to involve the police and/or learner’s social care services. (The case manager may, on occasion, consider it necessary to involve the police *before* consulting the designated officer – for example, if the accused individual is deemed to be an immediate risk to learner or there is evidence of a possible criminal offence. In such cases, the case manager will notify the designated officer as soon as practicably possible after contacting the police)
- Inform the accused individual of the concerns or allegations and likely course of action as soon as possible after speaking to the designated officer (and the police or learner’s social care services, where necessary). Where the police and/or learner’s social care services are involved, the case manager will only share such information with the individual as has been agreed with those agencies
- Where appropriate (in the circumstances described above), carefully consider whether suspension of the individual from contact with learner at the centre is justified or whether alternative arrangements such as those outlined above can be put in place. Advice will be sought from the designated officer, police and/or learner’s social care services, as appropriate
- **If immediate suspension is considered necessary**, agree and record the rationale for this with the designated officer. The record will include information about the alternatives to suspension that have been considered, and why they were rejected. Written confirmation of the suspension will be provided to the individual facing the allegation or concern within 1 working day, and the individual will be given a named contact at the centre and their contact details
- **If it is decided that no further action is to be taken** in regard to the subject of the allegation or concern, record this decision and the justification for it and agree with the designated officer what information should be put in writing to the individual and by whom, as well as what action should follow both in respect of the individual and those who made the initial allegation
- **If it is decided that further action is needed**, take steps as agreed with the designated officer to initiate the appropriate action in centre and/or liaise with the police and/or learner’s social care services as appropriate
- Provide effective support for the individual facing the allegation or concern, including appointing a named representative to keep them informed of the progress of the case and considering what other support is appropriate.
- Inform the learners or carers of the learner/learner involved about the allegation as soon as possible if they do not already know (following agreement with learner’s social care services and/or the police, if applicable). The case manager will also inform the learners or carers of the requirement to maintain confidentiality about any allegations made against teachers (where this applies) while investigations are ongoing. Any parent or carer who wishes to have the confidentiality restrictions removed in respect of a teacher will be advised to seek legal advice

- Keep the learners or carers of the learner/learner involved informed of the progress of the case and the outcome, where there is not a criminal prosecution, including the outcome of any disciplinary process (in confidence)
- Make a referral to the DBS where it is thought that the individual facing the allegation or concern has engaged in conduct that harmed or is likely to harm a learner, or if the individual otherwise poses a risk of harm to a learner

We will inform Ofsted of any allegations of serious harm or abuse by any person living, working, or looking after learner at the premises (whether the allegations relate to harm or abuse committed on the premises or elsewhere), and any action taken in respect of the allegations. This notification will be made as soon as reasonably possible and always within 14 days of the allegations being made.

If the centre is made aware that the secretary of state has made an interim prohibition order in respect of an individual, we will immediately suspend that individual from teaching, pending the findings of the investigation by the Teaching Regulation Agency.

Where the police are involved, wherever possible the **[governing board]** will ask the police at the start of the investigation to obtain consent from the individuals involved to share their

statements and evidence for use in the centre 's disciplinary process, should this be required at a later point.

Timescales

- Any cases where it is clear immediately that the allegation is unsubstantiated or malicious will be resolved within 1 week
- If the nature of an allegation does not require formal disciplinary action, we will institute appropriate action within 3 working days
- If a disciplinary hearing is required and can be held without further investigation, we will hold this within 15 working days

Specific actions

Action following a criminal investigation or prosecution

The case manager will discuss with the local authority's designated officer whether any further action, including disciplinary action, is appropriate and, if so, how to proceed, taking into account information provided by the police and/or learner's social care services.

Conclusion of a case where the allegation is substantiated

If the allegation is substantiated and the individual is dismissed or the centre ceases to use their services, or the individual resigns or otherwise ceases to provide their services, the case manager and the centre 's personnel adviser will discuss with the designated officer whether to make a referral to the DBS for consideration of whether inclusion on the barred lists is required.

If the individual concerned is a member of teaching staff, the case manager and personnel adviser will discuss with the designated officer whether to refer the matter to the Teaching Regulation Agency to consider prohibiting the individual from teaching.

Individuals returning to work after suspension

If it is decided on the conclusion of a case that an individual who has been suspended can return to work, the case manager will consider how best to facilitate this.

The case manager will also consider how best to manage the individual's contact with the learner or learner who made the allegation, if they are still attending the centre .

Unsubstantiated or malicious allegations

If an allegation is shown to be deliberately invented, or malicious, the centre manager, or other appropriate person in the case of an allegation against the centre manager, will consider whether any disciplinary action is appropriate against the learner(s) who made it, or whether the police should be asked to consider whether action against those who made the allegation might be appropriate, even if they are not a learner.

Confidentiality

The centre will make every effort to maintain confidentiality and guard against unwanted publicity while an allegation is being investigated or considered.

The case manager will take advice from the local authority's designated officer, police and learner's social care services, as appropriate, to agree:

- Who needs to know about the allegation and what information can be shared
- How to manage speculation, leaks and gossip, including how to make learners or carers of a learner/learner involved aware of their obligations with respect to confidentiality

- What, if any, information can be reasonably given to the wider community to reduce speculation
- How to manage press interest if, and when, it arises

Record-keeping

The case manager will maintain clear records about any case where the allegation or concern meets the criteria above and store them on the individual's confidential personnel file for the duration of the case. Such records will include:

- A clear and comprehensive summary of the allegation
- Details of how the allegation was followed up and resolved
- Notes of any action taken and decisions reached (and justification for these, as stated above)

If an allegation or concern is not found to have been malicious, the centre will retain the records of the case on the individual's confidential personnel file, and provide a copy to the individual.

Where records contain information about allegations of sexual abuse, we will preserve these for the Independent Inquiry into Learner Sexual Abuse (IICSA), for the term of the inquiry. We will retain all other records at least until the individual has reached normal pension age, or for 10 years from the date of the allegation if that is longer.

The records of any allegation that is found to be malicious will be deleted from the individual's personnel file.

References

When providing employer references, we will not refer to any allegation that has been proven to be false, unsubstantiated or malicious, or any history of allegations where all such allegations have been proven to be false, unsubstantiated or malicious.

Learning lessons

After any cases where the allegations are *substantiated*, we will review the circumstances of the case with the local authority's designated officer to determine whether there are any improvements that we can make to the centre's procedures or practice to help prevent similar events in the future.

This will include consideration of (as applicable):

- Issues arising from the decision to suspend the member of staff
- The duration of the suspension
- Whether or not the suspension was justified
- The use of suspension when the individual is subsequently reinstated. We will consider how future investigations of a similar nature could be carried out without suspending the individual

Appendix 4: specific safeguarding issues

Learner missing from education

A learner going missing from education, particularly repeatedly, can be a warning sign of a range of safeguarding issues. This might include abuse or neglect, such as sexual abuse or exploitation or learner criminal exploitation, or issues such as mental health problems, substance abuse, radicalisation, FGM or forced marriage.

There are many circumstances where a learner may become missing from education, but some learner are particularly at risk. These include learner who:

- Are at risk of harm or neglect
- Are at risk of forced marriage or FGM
- Come from Gypsy, Roma, or Traveller families
- Come from the families of service personnel
- Go missing or run away from home or care
- Are supervised by the youth justice system
- Cease to attend a centre
- Come from new migrant families

We will follow our procedures for unauthorised absence and for dealing with learner who go missing from education, particularly on repeat occasions, to help identify the risk of abuse and neglect, including sexual exploitation, and to help prevent the risks of going missing in future. This includes informing the local authority if a learner leaves the centre without a new centre being named, and adhering to requirements with respect to sharing information with the local authority, when applicable, when removing a learner's name from the admission register at non-standard transition points.

Staff will be trained in signs to look out for and the individual triggers to be aware of when considering the risks of potential safeguarding concerns which may be related to being missing, such as travelling to conflict zones, FGM and forced marriage.

If a staff member suspects that a learner is suffering from harm or neglect, we will follow local learner protection procedures, including with respect to making reasonable enquiries. We will make an immediate referral to the local authority learner's social care team, and the police, if the learner is suffering or likely to suffer from harm, or in immediate danger.

Learner sexual exploitation

Learner sexual exploitation (CSE) is a form of learner sexual abuse that occurs where an individual or group takes advantage of an imbalance of power to coerce, manipulate or deceive a learner into sexual activity in exchange for something the victim needs or wants, and/or for the financial advantage or increased status of the perpetrator or facilitator.

This can involve violent, humiliating and degrading sexual assaults, but does not always involve physical contact and can happen online. For example, young people may be persuaded or forced to share sexually explicit images of themselves, have sexual conversations by text, or take part in sexual activities using a webcam.

Learner or young people who are being sexually exploited may not understand that they are being abused. They often trust their abuser and may be tricked into believing they are in a loving, consensual relationship.

If a member of staff suspects CSE, they will discuss this with the DSL. The DSL will trigger the local safeguarding procedures, including a referral to the local authority's learner's

social care team and the police, if appropriate.

Indicators of sexual exploitation can include a learner:

- Appearing with unexplained gifts or new possessions
- Associating with other young people involved in exploitation
- Having older boyfriends or girlfriends
- Suffering from sexually transmitted infections or becoming pregnant
- Displaying inappropriate sexualised behaviour
- Suffering from changes in emotional wellbeing
- Misusing drugs and/or alcohol
- Going missing for periods of time, or regularly coming home late
- Regularly missing centre or education, or not taking part in education

Homelessness

Being homeless or being at risk of becoming homeless presents a real risk to a learner's welfare.

The DSL and **[deputy/deputies]** will be aware of contact details and referral routes in to the local housing authority so they can raise/progress concerns at the earliest opportunity (where appropriate and in accordance with local procedures).

Where a learner has been harmed or is at risk of harm, the DSL will also make a referral to learner's social care.

So-called 'honour-based' violence (including FGM and forced marriage)

So-called 'honour-based' violence (HBV) encompasses incidents or crimes committed to protect or defend the honour of the family and/or community, including FGM, forced marriage, and practices such as breast ironing.

Abuse committed in this context often involves a wider network of family or community pressure and can include multiple perpetrators.

All forms of HBV are abuse and will be handled and escalated as such. All staff will be alert to the possibility of a learner being at risk of HBV or already having suffered it. If staff have a concern, they will speak to the DSL, who will activate local safeguarding procedures.

FGM

The DSL will make sure that staff have access to appropriate training to equip them to be alert to learner affected by FGM or at risk of FGM.

Section 7.3 of this policy sets out the procedures to be followed if a staff member discovers that an act of FGM appears to have been carried out or suspects that a learner is at risk of FGM.

Indicators that FGM has already occurred include:

- A learner confiding in a professional that FGM has taken place
- A mother/family member disclosing that FGM has been carried out
- A family/learner already being known to social services in relation to other safeguarding issues

- A girl:
 - Having difficulty walking, sitting or standing, or looking uncomfortable
 - Finding it hard to sit still for long periods of time (where this was not a problem previously)
 - Spending longer than normal in the bathroom or toilet due to difficulties urinating
 - Having frequent urinary, menstrual or stomach problems
 - Avoiding physical exercise or missing PE
 - Being repeatedly absent from centre , or absent for a prolonged period
 - Demonstrating increased emotional and psychological needs – for example, withdrawal or depression, or significant change in behaviour
 - Being reluctant to undergo any medical examinations
 - Asking for help, but not being explicit about the problem
 - Talking about pain or discomfort between her legs

Potential signs that a learner may be at risk of FGM include:

- The girl's family having a history of practising FGM (this is the biggest risk factor to consider)
- FGM being known to be practised in the girl's community or country of origin
- A parent or family member expressing concern that FGM may be carried out
- A family not engaging with professionals (health, education or other) or already being known to social care in relation to other safeguarding issues
- A girl:
 - Having a mother, older sibling or cousin who has undergone FGM
 - Having limited level of integration within UK society
 - Confiding to a professional that she is to have a "special procedure" or to attend a special occasion to "become a woman"
 - Talking about a long holiday to her country of origin or another country where the practice is prevalent, or learners stating that they or a relative will take the girl out of the country for a prolonged period
 - Requesting help from a teacher or another adult because she is aware or suspects that she is at immediate risk of FGM
 - Talking about FGM in conversation – for example, a girl may tell other learner about it (although it is important to take into account the context of the discussion)
 - Being unexpectedly absent from centre
 - Having sections missing from her 'red book' (learner health record) and/or attending a travel clinic or equivalent for vaccinations/anti-malarial medication

The above indicators and risk factors are not intended to be exhaustive.

Forced marriage

Forcing a person into marriage is a crime. A forced marriage is one entered into without the full and free consent of one or both parties and where violence, threats, or any other form of coercion is used to cause a person to enter into a marriage. Threats can be physical or emotional and psychological.

Staff will receive training around forced marriage and the presenting symptoms. We are aware of the 'one chance' rule, i.e. we may only have one chance to speak to the potential victim and only one chance to save them.

If a member of staff suspects that a learner is being forced into marriage, they will speak to the learner about their concerns in a secure and private place. They will then report this to the DSL.

The DSL will:

- Speak to the learner about the concerns in a secure and private place
- Activate the local safeguarding procedures and refer the case to the local authority's designated officer
- Seek advice from the Forced Marriage Unit on 020 7008 0151 or fm@fco.gov.uk
- Refer the learner to an education welfare officer, pastoral tutor, learning mentor, or centre counsellor, as appropriate

Preventing radicalisation

Radicalisation refers to the process by which a person comes to support terrorism and forms of extremism. Extremism is vocal or active opposition to fundamental British values, such as democracy, the rule of law, individual liberty, and mutual respect and tolerance of different faiths and beliefs.

Centres have a duty to prevent learner from being drawn into terrorism. The DSL will undertake Prevent awareness training and make sure that staff have access to appropriate training to equip them to identify learner at risk.

We will assess the risk of learner in our centre being drawn into terrorism. This assessment will be based on an understanding of the potential risk in our local area, in collaboration with our local safeguarding partners and local police force.

We will ensure that suitable internet filtering is in place, and equip our learners to stay safe online at centre and at home.

There is no single way of identifying an individual who is likely to be susceptible to an extremist ideology. Radicalisation can occur quickly or over a long period.

Staff will be alert to changes in learners' behaviour.

The government website [Educate Against Hate](#) and charity [NSPCC](#) say that signs that a learner is being radicalised can include:

- Refusal to engage with, or becoming abusive to, peers who are different from themselves
- Becoming susceptible to conspiracy theories and feelings of persecution
- Changes in friendship groups and appearance
- Rejecting activities they used to enjoy
- Converting to a new religion
- Isolating themselves from family and friends

- Talking as if from a scripted speech
- An unwillingness or inability to discuss their views
- A sudden disrespectful attitude towards others
- Increased levels of anger
- Increased secretiveness, especially around internet use
- Expressions of sympathy for extremist ideologies and groups, or justification of their actions
- Accessing extremist material online, including on Facebook or Twitter
- Possessing extremist literature
- Being in contact with extremist recruiters and joining, or seeking to join, extremist organisations

Learners who are at risk of radicalisation may have low self-esteem, or be victims of bullying or discrimination. It is important to note that these signs can also be part of normal teenage behaviour – staff should have confidence in their instincts and seek advice if something feels wrong.

If staff are concerned about a learner, they will follow our procedures set out in section 7.5 of this policy, including discussing their concerns with the DSL.

Staff should **always** take action if they are worried.

Further information on the centre's measures to prevent radicalisation are set out in other centre policies and procedures, including

Checking the identity and suitability of visitors

All visitors can only enter the building if they register at the reception area. If staff see visitors in the building independently they have a duty to ask if they have been registered at reception.

Visitors will be required to verify their identity to the satisfaction of staff and to leave their belongings, including their mobile phone(s), in a safe place during their visit.

If the visitor is unknown to the setting, we will check their credentials and reason for visiting before allowing them to enter the setting. Visitors should be ready to produce identification.

Visitors are expected to sign the visitors' book and wear a visitor's badge.

Visitors to the centre who are visiting for a professional purpose, such as educational psychologists and centre improvement officers, will be asked to show photo ID and:

- Will be asked to show their DBS certificate, which will be checked alongside their photo ID; or
- The organisation sending the professional, such as the LA or educational psychology service, will provide prior written confirmation that an enhanced DBS check with barred list information has been carried out

All other visitors, including visiting speakers, will be accompanied by a member of staff at all times. We will not invite into the centre any speaker who is known to disseminate extremist views, and will carry out appropriate checks to ensure that any individual or organisation using centre facilities is not seeking to disseminate extremist views or radicalise learners or staff.