

TITLE: Safeguarding and Child Protection Policy	REF: LS003	VERSION: 6
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LEAD PERSON: Group Director of Marketing and Customer Experience		
VERSION	REVIEWER/APPROVAL	REVIEW/NOTES
3. 10 May 2016	Corporation Safeguarding Committee Group Director of Marketing and Customer Experience Student Support Teams Group HR	Full review
4. 22 May 2017	Safeguarding Committee	Amended to include International students
5. 6 December 2017	Safeguarding Committee Corporation 19.02.2018	Full review to ensure Child Protection is clear
6. 22 June 2018	Group Director of Marketing and Customer Experience / Corporation	Full review in light of Keeping Children Safe in Education, GDPR and merger

SAFEGUARDING AND CHILD PROTECTION POLICY

Purpose

The Safeguarding and Child Protection policy is for all staff. It outlines the Activate Learning position on Safeguarding and clarifies the action to be taken to ensure that they meet their duties relating to protecting the safety and promoting the wellbeing of young people and vulnerable adults; it signposts to related policies and additional guidance. The policy covers the arrangements for responding to Child Protection issues.

Safeguarding and Child Protection are about promoting the welfare of children is defined for the purposes of this guidance as: protecting children and vulnerable adults from maltreatment; preventing impairment of children's health or development; ensuring that children grow up in circumstances consistent with the provision of safe and effective care; and taking action to enable all children to have the best outcomes.

Background

In order to deliver the Activate Learning mission **to provide talent for business, transforming lives through learning** and stay true to our learning philosophy, colleges create a safe and secure environment in which learners are enabled to develop and flourish.

Activate Learning has a legal duty to address Safeguarding and Child Protection. A number of pieces of legislation and guidance documents provide the legal and guidance framework within which we work.

Ofsted, the inspection and regulatory body that covers the school and further education sectors, has a keen and growing focus on ensuring that providers discharge their duties relating to Safeguarding.

Scope

This policy applies to the Activate Learning colleges and Activate Apprenticeships. Children refers to learners under the age of 18. A vulnerable adult is a person over 18 who is or may be in need of community care services by reason of disability, age or illness; and is or may be unable to take care of unable to protect him or herself against significant harm or exploitation.

The policy applies to situations where a child or vulnerable adult is suffering significant harm, or is likely to do so, as action should be taken to protect that child. Action should also be taken to promote the welfare of a child in need of additional support, even if they are not suffering harm or are at immediate risk.

Policy Statement

Activate Learning recognises its legal and moral duty to promote the wellbeing and development of all students and protect them from harm. For that reason, Safeguarding and Child Protection measures are integral to many aspects of the safe and supportive learning experience we strive to create.

While the whole learning community benefits from this holistic approach to Safeguarding, we take a rigorous stance on the protection of students who are identified in Safeguarding and Child Protection related legislation and statutory guidance, namely those who are under 18 or who are vulnerable adults.

In relation to the environment we will:

- Provide a physical and emotional environment that is healthy, safe and secure, in which students can thrive;
- Ensure that all members of the communities are identifiable by the wearing of lanyards and identity badges appropriate to their role;
- Raise awareness of issues relating to Health and Safety within the organisation.

In relation to staff recruitment we will:

- Implement safer recruitment procedures when employing staff and maintain accurate records of these checks on a Single Central Record;
- Ensure every staff member has an enhanced DBS check;
- Implement the following verification for all recruits:
 - Identity;
 - Mental and physical fitness to carry out their work responsibilities. A job applicant is asked relevant questions about disability and health in order to establish, whether they have the physical and mental capacity for the specific role;
 - Right to work in the UK;
 - Professional qualifications.
- Obtain references from previous employment;
- Ensure a risk assessment is completed for staff awaiting a DBS check with appropriate supervision outlined within the assessment (as outlined in the Safer Recruitment Policy);
- Comply with our legal duty to refer by following the ISA Referral Guidance 2010;
- Ensure that at least one interviewing manager on an interview panel has undertaken Safer Recruitment training and that all managers complete Safer Recruitment training within one year of commencement.

In relation to training we will:

- Train all staff and contractors so they are aware of their responsibilities, know how to protect themselves from false allegations, recognise potential Safeguarding or Child Protection issues and know how to respond appropriately. The specific training requirements are detailed in Appendix A;
- Provide appropriate training to ensure members of staff are aware of the issues of Safeguarding and the procedures to follow. This includes a full Safeguarding session within new staff induction and three yearly refresher sessions as a minimum expectation, with particular focus on current issues and recent changes to legislation;
- Provide appropriate training to ensure members of staff are aware of the issues of Health and Safety and the procedures to follow.

In relation to recognising and responding to concerns all staff will:

- Adopt and apply safe working practices;
- Promote all aspects of Safeguarding to students so they know how to access support and advice;
- Be aware of and alert to signs and symptoms of abuse and know to whom they should report any concerns or suspicions;
- Be able to recognise when a student is not achieving their developmental potential, or when their physical or mental health is impaired;
- Be able to recognise when a student is displaying risky or harmful behaviour, or is being neglected or abused;
- Be able to recognise when a student or staff reported incident may be a Safeguarding or Child Protection concern;
- Refer concerns, even if in doubt, to a designated member of staff who will refer to the appropriate authorities, so that they can investigate and take action;
- Be advised to maintain an attitude of 'it could happen here' where Safeguarding or Child Protection is concerned;
- When concerned about the welfare of a child, always act in the interests of the child;
- Be aware of the expert sources of advice on the signs of abuse and neglect. Each area's Local Safeguarding Children Board (LSCB) should be able to advise on useful material, including training options;
- Be aware of and follow the procedure for reporting a Safeguarding incident and other Safeguarding related procedures and guidance;
- Work with social care, the police, health services and other services to promote the welfare of children and protect them from harm.

Appendix A - DBS and Safeguarding protocol

Appendix B - Guidelines for maintaining confidentiality, information sharing and recording confidential information

Appendix C - Reporting concerns or disclosures relating to Safeguarding incidents

Appendix D - Procedure for staff that are made aware of allegations against another member of staff

Appendix E - Secure Storage, Handling, Use, retention and Disposal of Disclosures and Disclosure Information Guidelines

Appendix F - Procedure for dealing with E safety issues

Appendix G - Advice for staff and procedures for handling high risk situations

Appendix S - Procedure for reporting female genital mutilation

In relation to staff with a specific Safeguarding responsibility we will:

- Nominate a Designated Safeguarding lead who will provide support to staff members to carry out their Safeguarding duties and who will liaise closely with other services such as Children's Social Care;
- Agree and publish clear roles and responsibilities;
- Ensure all designated staff attend Level 3 Advanced training provided by Oxfordshire Safeguarding Children Board;
- Adopt a case management approach to the identification, assessment and support of students at risk of harm;
- Notify the appropriate agencies so that they can investigate and take any necessary action. It is not the responsibility of college staff to investigate suspected abuse; this is a matter for Social Services, the Police and/Multi Agency Safeguarding Hub;
- Apply agreed procedures when sharing information about a student.

Appendix H - Role of designated person and procedure for handling an allegation or disclosure

Appendix I - Guidance for Safeguarding team regarding Self-Harm and Suicide

In relation to students we will:

- Work with students to equip them with the knowledge needed to safeguard themselves and each other, including risks posed by peer on peer abuse. This includes activities within the tutorial programme that promote Safeguarding concerns and issues;
- Make students aware of Safeguarding support within the college or group on a continual and proactive basis through tutorials, events and promotional material;
- Consult with students regarding issues relating to Health and Safety;
- Involve students in decision making by including them in strategic Safeguarding group meetings;
- Implement procedures for identifying and assessing the risk posed by any incoming students who may pose a threat to others;
- Use various methods of student engagement to regularly monitor students' perception of their safety;
- Consult students to identify the issues that they face;
- Liaise with feeder schools to ensure a smooth transition, with support, for applicants/new students;
- Protect students from radicalisation and forms of extremism leading to terrorism by:
 - Being vigilant for the signs of radicalisation and have the confidence to report their concerns to their line manager;
 - Encouraging free and open debate, but challenging extreme views and promoting the belief equality of opportunity and the celebration of diversity;
 - Forbidding the use of premises by extreme groups and preventing the distribution of extreme literature.

In relation to students missing from education we will:

- Follow the Group's procedures for dealing with children that 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 their going missing in future;
- Ensure staff are alert to signs to look out for and the individual triggers to be aware of when considering the risks of potential Safeguarding concerns such as travelling to conflict zones, FGM and forced marriage;
- Have an admission register and an attendance register;
- Inform the Local Authority of any student who is going to be deleted from the admission register or if a student fails to attend college regularly, or has been absent without the college's permission for a continuous period of 10 school days or more, at such intervals agreed between the college and the Local Authority.

In relation to Governor responsibilities we will:

- Ensure that governors comply with their duties under legislation. They have regard to this guidance to ensure that the policies, procedures and training in the colleges are effective and comply with the law at all times;
- Ensure a member of the governing body is nominated to liaise with the designated officer(s) from the relevant local authority and partner agencies in the event of allegations of abuse made against the Head of Campus.

In relation to the use of contractors we will:

- Ensure that any contractor, or any employee of the contractor, who is to work at the college has been subject to the appropriate level of DBS check;
- Not allow a contractor in respect of whom no checks have been obtained be allowed to work unsupervised, or engage in regulated activity;
- Check the identity of contractors and their staff on arrival.

In relation to visitors we will:

- Ensure all visitors sign in and out at main receptions;
- Ensure they wear a visitor lanyard at all times;
- Notify all visitors of Safeguarding procedures and supply information card.

Appendix J - Procedure for arranging support for students

Appendix K - Procedure for staff in organisations where students are on work placement or similar

Appendix G - Advice for staff and procedures for handling actual or threatened self-harm or suicidal thoughts

Appendix L - Advice and procedures for staff regarding touch and restraint

Appendix M - Procedure for shared individual risk assessment

Appendix O - Prevention of violent extremism – the Prevent agenda

Appendix P - Missing person procedure

In relation to concerns about other staff and Safeguarding procedures:

- If staff members have concerns about another staff member then this should be referred to the Head of Campus. Where there are concerns about the Head of Campus this should be referred to the Chair of Governors or Chair of the Group Executive Team;
- Staff and volunteers should feel able to raise concerns about poor or unsafe practice and potential failures in the school or college's safeguarding regime. There are appropriate whistleblowing procedures, which are suitably reflected in staff training and staff behaviour policies, concerns can be raised with the group management team;
- Where a staff member feels unable to raise the issue with the group or feels that their genuine concerns are not being addressed, other whistleblowing channels are open with the Local Safeguarding Children Board.

In relation to liaison and partnership with external parties we will:

- Work together with the Local Safeguarding Teams and other relevant agencies;
- Refer to appropriate agencies e.g. the Police, Social Services or Local Safeguarding Children Board, Local Authority Designated Officer as necessary;
- Inform the Education and Skills Funding Agency, via the CEO or Chair, if the organisation becomes subject of a Safeguarding enquiry.

In relation to our responsibilities in line with the PREVENT agenda we will:

- Closely follow any locally agreed procedure as set out by the Home Office and Local Authority and/or Local Authority Safeguarding Children Board's agreed processes and criteria for safeguarding individuals vulnerable to extremism and radicalisation;
- Strive to eradicate the myths and assumptions that can lead to some young people becoming alienated and disempowered, especially where the narrow approaches young people may experience elsewhere may make it harder for them to challenge or question these radical influences. In our group this will be achieved by good teaching, primarily via tutorial and other personal development, behaviour and welfare topics throughout the curriculum; but also by adopting the methods outlined in the Government's guidance 'Teaching approaches that

help build resilience to extremism among young people' DfE 2011 and promoting fundamental British values as part of every student's pathway programme;

- Ensure that all of our teaching approaches help our pupils build resilience to extremism and give pupils a positive sense of identity through the development of critical thinking skills;
- Ensure that all of our staff are equipped to recognise extremism and are skilled and confident enough to challenge it;
- Keep up-to-date with developments and good practice and keep our Preventing Extremism and Radicalisation Policy under review.

In relation to International students we will:

- Ensure we have taken all reasonable steps to ensure that all adults in positions of responsibility with substantial access to our learning community are of good character and complete the Group Leader suitability check;
- Ensure the Homestay Safeguarding Policy is adhered to and all relevant checks and support are delivered;
- Provide a 24 hour emergency contact number to all International students.

Appendix Q - Group Leader suitability check

Appendix R - Homestay safeguarding policy

Definitions

Child

A child is any person under 18 years of age. (Children's Act, 1989)

Vulnerable adult

A vulnerable adult is defined as a person 'who is or may be in need of community care services by reason of mental or other disability, age or illness; and who is or may be unable to take care of him or herself, or unable to protect him or herself against significant harm or exploitation.' (Department of Health, 2000)

Child Protection

Child protection is the protection of children from violence, exploitation, abuse and neglect. Article 19 of the UN Convention on the Rights of the Child provides for the protection of children in and out of the home.

Safeguarding

Is wider than Child Protection and is defined as: protecting from maltreatment preventing impairment of health or development ensuring that a person is growing up in circumstances consistent with the provision of safe and effective care undertaking that role so as to enable optimum life chances and to enter adulthood successfully.

Safeguarding therefore covers more than the contribution made to child and adult protection in relation to individual children or adults. It also encompasses issues such as student health and safety, bullying, and a range of other issues, e.g. arrangements for meeting the medical needs of students with medical conditions, providing first aid, college security, and drug and alcohol misuse. This list is not exhaustive and there may be other safeguarding issues that arise in the colleges.

Safeguarding is also about being proactive and putting measures in place in advance of any contact with students to ensure that students are going to be kept safe.

Duty of Care

This is the duty which rests upon an individual to ensure that all reasonable steps are taken to ensure the safety of a student involved in any activity, or interaction for which that individual is responsible. Any person in charge of, or working with students in any capacity, is considered both legally and morally to owe them a duty of care.

Abuse

A form of maltreatment of a child. Somebody may abuse or neglect a child by inflicting harm, or by failing to act to prevent harm. They may be abused by an adult or adults or another child or children.

Designated Person

A designated person is a member of staff who has responsibility for receiving and handling safeguarding and child protection concerns and has been trained to perform the role to an appropriate level. At Activate Learning the Group Designated Safeguarding Lead is the Group Student Support Manager.

Emotional Abuse

Emotional abuse can be defined as persistent emotional ill treatment which is likely to cause serious harm to emotional development.

Neglect

Neglect is the persistent failure to meet a person's basic physical and psychological needs, which is likely to result in serious impairment to health and development.

Physical Abuse

This can best be described as actions such as hitting, shaking, throwing, poisoning, burning, scalding, drowning or suffocating that cause harm to an individual. Physical harm may also be caused when a parent or carer fabricates the symptoms of, or deliberately induces, illness in a child.

Sexual Abuse

This is defined as forcing or enticing a child/young person or vulnerable adult to take part in sexual activities, whether or not they are aware of what is happening. It may involve penetrative or non-penetrative acts and includes involving children/young people or vulnerable adults in watching pornographic material or watching sexual acts.

Forced marriage

Forcing a person into a marriage is a crime in England and Wales. A forced marriage is one entered into without the full and free consent of 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. A lack of full and free consent can be where a person does not consent or where they cannot consent (if they have learning disabilities, for example). Nevertheless, some communities use religion and culture as a way to coerce a person into marriage.

Human trafficking/modern slavery

Modern Slavery is the term used within the UK and is defined within the Modern Slavery Act 2015. The Act categorises offences of Slavery, Servitude and Forced or Compulsory Labour and Human Trafficking (which comes from the Palermo Protocol).

Child sexual exploitation

This is a form of child sexual abuse. It occurs where an individual or group takes advantage of an imbalance of power to coerce, manipulate or deceive a child or young person under the age of 18 into sexual activity (a) in exchange for something the victim needs or wants, and/or (b) for the financial advantage or increased status of the perpetrator or facilitator. The victim may have been sexually exploited even if the sexual activity appears consensual. Child sexual exploitation does not always involve physical contact; it can also occur through the use of technology.

Female Genital Mutilation

This form of abuse comprises all procedures involving partial or total removal of the external female genitalia or other injury to the female genital organs. It is illegal in the UK and a form of child abuse with long-lasting harmful consequences.

Radicalisation:

This refers to the process by which a person comes to support terrorism and extremist ideologies associated with terrorist groups. (Revised Prevent Duty Guidance for England and Wales, issued on 12th March 2015 and revised on 16th July 2015).

Domestic abuse

Any incident or pattern of incidents of controlling, coercive, threatening behaviour, violence or abuse between those aged 16 or over who are, or have been, intimate partners or family members regardless of gender or sexuality. The abuse can encompass, but is not limited to; psychological, physical, sexual, financial and emotional.

Peer on Peer abuse:

Children can abuse other children. This is generally referred to as peer on peer abuse 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 and initiating/hazing type violence and rituals.

Safeguarding and Prevent Roles and Responsibilities

All staff, contractors and volunteers:

- Contribute to creating a safe learning for all;
- Are aware of and follow the organisation's safeguarding policies and procedures; they recognise, respond and report any concerns that may be raised about the safety and welfare of a young person or vulnerable adult.

Faculty managers / Heads of department and teaching staff:

- Ensure that the learning environment is safe and that Safeguarding is embedded within teaching practice to educate learners on staying safe, building resilience and developing critical thinking skills.

Safeguarding Officers (*Level 3 Advanced trained*):

- Respond to Safeguarding concerns and keep accurate case notes. Report to the Deputy Designated Safeguarding Lead to escalate any concerns that may require specialist support or referral to external support networks.

Group Safeguarding Advisers:

- Respond to Safeguarding concerns within the agreed timescales;
- Carry out assessments to determine the level of risk, raise concerns with the Designated Safeguard Lead and inform the Local Authority and other partner organisations of any concerns;
- Advise on updates on legislation and Local Authority compliance.

Deputy Designated Safeguarding Leads:

- Have a responsibility at an operational level within the organisation, ensuring specialist safeguarding staff are supported and directed in their duties;
- Report any concerns to the Designated Safeguarding Lead;
- Oversees the provision of resources and training for all staff.

Group Designated Safeguarding Lead (*Group Student Support Manager*):

- Acts as the main contact for outside agencies and the most senior 'go to' person in the organisation, delegating these responsibilities to the DSL as appropriate;
- Has a responsibility at an operational level within the organisation, ensuring specialist safeguarding staff are supported and directed in their duties;
- Reports to the Group Executive Team;
- Oversees the provision of resources and training for all staff.

Safeguarding Committee:

- Represents Faculty, HR, IT, Student Support, Property and Environment, Activate Enterprise and ensures that sound arrangements for Safeguarding are in place across all these service areas;
- Steers developments; monitors and reports on compliance and impact.

Group Executive Officer:

- Has organisational responsibility for ensuring Activate Learning meets its duties under Safeguarding and Prevent.

Corporation Lead Governor for Safeguarding:

- Advises and guides the organisation on Safeguarding and Prevent issues;
- Provides challenge to the Executive team to improve quality of provision.

Procedures and guidelines associated with the Safeguarding policy

New

Appendix A	DBS and Safeguarding Protocol
Appendix B	Guidelines for maintaining confidentiality, information sharing and recording confidential information
Appendix C	Reporting concerns or disclosures relating to safeguarding incidents
Appendix D	Procedure for staff that are made aware of allegations against another member of staff
Appendix E	Secure Storage, Handling, Use, retention and Disposal of Disclosures and Disclosure Information Guidelines
Appendix F	Procedure for dealing with e-safety issues
Appendix G	Advice for staff and procedures for handling actual or threatened self-harm or suicidal thoughts
Appendix H	Role of designated person and procedure for handling an allegation or disclosure
Appendix I	Guidance for Safeguarding team regarding self-harm and suicide
Appendix J	Procedure for arranging support for students
Appendix K	Procedure for staff in organisations where students are on work placement or similar
Appendix L	Advice and procedures for staff regarding touch and restraint
Appendix M	Procedure for shared individual risk assessments
Appendix N	Guidance relating to trips and residentials
Appendix O	Prevention of violent extremism – the 'Prevent' agenda
Appendix P	Missing persons procedure
Appendix Q	Group leader suitability check
Appendix R	Homestay provider safeguarding policy
Appendix S	Procedure for recognising and reporting female genital mutilation

Appendix A - DBS and Safeguarding Protocol

Safeguarding Training

Anyone working with the colleges in any of the following capacities is required to undergo safeguarding training:

- New employees
- Student Crew
- Governors
- Agency workers
- Contractors
- Volunteers / Those engaging in work experience at the college or long-term visitors

Members of staff are required to undertake training prior to working with Activate Learning but will also receive additional Safeguarding training during their staff induction day. This training is designed to ensure that staff are aware of the college procedures for reporting Safeguarding or child protection concerns, wider Safeguarding issues such as drug and alcohol problems, homelessness, risky behaviour and guidance on professional conduct.

All members of the Safeguarding Team receive specialist safeguarding training through Oxfordshire Safeguarding Children Board. This is refreshed every two years. The team also receive regular professional development through Safeguarding meetings. This is delivered using internal specialists and through visits from external speakers.

Disclosure and Barring Service (DBS) checks

The table below sets out details of which workers require enhanced DBS disclosures, the timescales in which these must be completed and renewed.

When completing the DBS form original documents must be provided and photocopies retained for the personal file.

DBS checks must only be submitted for the candidate selected for appointment.

DBS checks must be validated at least every five years. Employees must be made aware of their obligation to inform their manager of any cautions or convictions that arise between these checks taking place.

Barred list

For roles with regular, unsupervised contact with young people or vulnerable adults/vulnerable groups, the Teachers' Pension website must be checked before employing academic staff to ensure that they are not prevented from teaching.

The barred list must be checked before any worker commences working at Activate Learning

Dealing with convictions

If a DBS is returned with details of convictions HR advice must be sought. Consideration will be given to the Rehabilitation of Offenders Act and also:

- The nature, seriousness and relevance of the offence
- How long ago the offence occurred
- One-off or history of offences
- Circumstances surrounding the offence
- Changes in circumstances
- Country in which the offence occurred
- Decriminalisation and remorse.

Employing Ex-offenders

Activate Learning recognise their responsibilities under the Rehabilitation of Offenders Act and will ensure that convictions that are not relevant to an employee or potential employee's service do not affect their employment with the college. Activate Learning undertake not to discriminate unfairly against any subject of a disclosure on the basis of conviction or other information revealed.

Having a criminal record will not necessarily bar an individual from a position with the Activate College Group. This will depend on the nature of the position and the circumstances and background of the offence. Unless an appointment is prohibited by law, a criminal conviction will not automatically prevent an applicant from appointment.

Activate Learning undertake to discuss any matter revealed in a disclosure with the person seeking the position before a conditional offer of employment is withdrawn.

When convictions are disclosed (by the applicant or through a disclosure check), Activate Learning will carry out a risk assessment (see Recruitment and Selection Policy) and may, at their discretion, decline to select the individual for employment.

In circumstances where the appointment of a person with a serious record might give rise to criticism of the college, the CEO should be consulted before the appointment is confirmed.

If an individual has a criminal record which shows that under Schedule 4 of the Criminal Justice and Courts Services Act 2000 she/he is banned from working or seeking to work with young people under the age of 18, the college will automatically refuse employment. If an individual is recorded on the Barred list the colleges will automatically refuse employment and will also inform the ISA as per the Group statutory duty.

Where applicable, applicants will be informed that their application will no longer be processed due to information received on previous convictions.

If, following a disclosure check, it is confirmed that there are no previous convictions or the convictions already disclosed are not considered relevant, an offer of employment subject to the usual conditions will be made.

In cases where the employee has already started, the information will be provided to the CEO and the offer of employment will be confirmed providing other required checks are satisfactory.

Where information provided by the DBS differs from that provided by the applicant, the HR representative must discuss the discrepancy with the applicant before a decision to appoint is reached. Where there is a disagreement the applicant should have the opportunity to see the information provided by the DBS, where their Code of Practice allows. An applicant who believes the information is incorrect and who wishes to make representations to the DBS should do so in the first instance through the HR representative. If it is ascertained that undisclosed convictions or cautions do exist the HR representative will meet to consider this new information.

Staff who have lived outside the UK

Newly appointed staff who have lived outside the United Kingdom are required to undergo the same checks as for all other staff in schools and FE colleges. This includes a DBS Disclosure and Barred List check. In addition, the colleges will seek to obtain a Certificate of Good Conduct from the relevant embassy.

Employment of ex-offenders – existing employees

All employees are **required** to declare to The Activate Learning Group any criminal convictions or cautions whilst they are employed by the college.

A failure to disclose such information to the college (including spent convictions for posts where the rehabilitation of Offenders Exemption Orders apply) may lead to disciplinary action

Employees are also **encouraged** to declare if they are subject of a police investigation in the UK or abroad, which may lead to one of these sanctions. The reason for this disclosure is for the colleges to protect their reputation and safeguard the interests of its students, and to provide appropriate support to the individual employee.

Supervision

If a member of staff has not received full disclosure, the relevant line manager will have discretion to make an informed decision as to whether the person will be permitted to commence employment pending the receipt of a DBS disclosure. A risk assessment must be completed in order to assist the decision making process. In all such cases that person will be required to be supervised until the full disclosure is received.

This is to ensure that staff are not left alone with students to minimise any risk of potentially harmful situations (or accusations). Essentially this means that a third party should be present, whether it is a member of staff or a student.

The DBS does not define “supervision”, which has made it difficult to draw up a definition that satisfies everyone. One thing that should be clear is that supervision is not to question the competence of staff but purely to protect both students and staff alike.

Portability

Portability refers to the re-use of a DBS check (Disclosure), obtained for a position in one organisation and later used for another position in another organisation. The Activate Group do not facilitate portability.

Payment for Disclosure Information

Where the Activate Group request DBS disclosures as an integral part of the recruitment process these will be paid via the HR budget.

Retaining information provided by the DBS

The DBS advise that ‘Disclosure documents’ must be destroyed six months after they are no longer needed. The information recorded must be:

- Record of receipt
- Information on decisions made
- Reference number
- Date of issue of Enhanced check.

Details of discussions with staff about criminal or other declarations must be retained on personal files.

Worker (Type)	DBS (Disclosure and Barring Service)	Renewal	Safeguarding Training	Renewal	Safeguarding Training Options	Accountable
New employees	Prior to commencement of employment with risk assessment if not in place by start date. Teaching staff/nursing/nursery/counselling staff (Enhanced Level) all other staff (Standard Level)	5 years	Prior to commencement of employment or on first day of employment	3 years	Online OSCB or LSIS (managers)	Line Manager
Student Crew/Talent Team/Other	Prior to commencement of employment with risk assessment if not in place by start date	5 years (if	Prior to commencement of employment or on first day of employment	3 years	Online OSCB or LSIS (managers) Via video (currently being completed),	Line Manager
Governors	Prior to appointment	5 years	Prior to appointment.	3 years	Online OSCB or LSIS (managers)	Clerk of Governors
Agency Workers	Prior to commencement of appointment with risk assessment if not in place by start date.	5 years	Prior to commencement of service or on first day of service	3 years	Online OSCB or LSIS (managers)	Line Manager / HR in conjunction with Agency
Contractors	Prior to commencement of services with risk assessment if not in place by start date	5 years	Prior to commencement of services or on first day of service	3 years	<i>Contractual agreement that all contractors on site will have completed a DBS check and Safeguarding Training (Recommend Online OSCB or LSIS for managers - copy of certificate must be held)</i>	Requester of Service or Facilities Manager (for maintenance)
Contractors – Short Term (Less than 3 days)	Risk assessment	None	Face to Face/Video/card	Each Visit	<i>Advisory - Contractual agreement that all contractors on site will have completed a DBS check and Safeguarding Training (Recommend Online OSCB or LSIS for managers - copy of certificate must be held)</i>	Requester of Service or Facilities Manager (for maintenance)
Volunteers/ Work Experience/ Long Term Visitors /Others	Prior to commencement with risk assessment if not in place by first day on site	5 years	Prior to commencement or on first day on site	3 years	Online training, or Face to face training, or Copy of training from alternative provider e.g. university.	Line Manager/College contact

Appendix B - Guidelines for maintaining confidentiality, information sharing and recording confidential information

Members of staff may have access to confidential information about students in order to undertake their everyday responsibilities. In some circumstances staff may be given highly sensitive or private information. They should never use confidential or personal information about a student or her/his family for their own, or others' advantage (including that of partners, friends, relatives or other schools/services).

Information must always be used in the best interest of students and never to intimidate, humiliate, or embarrass the student. Confidential information about a student should never be used casually in conversation or shared with any person other than on a need-to-know basis. In circumstances where the student's identity does not need to be disclosed the information should be used anonymously. In circumstances where members of staff do not need to know all the detail, this should remain the case.

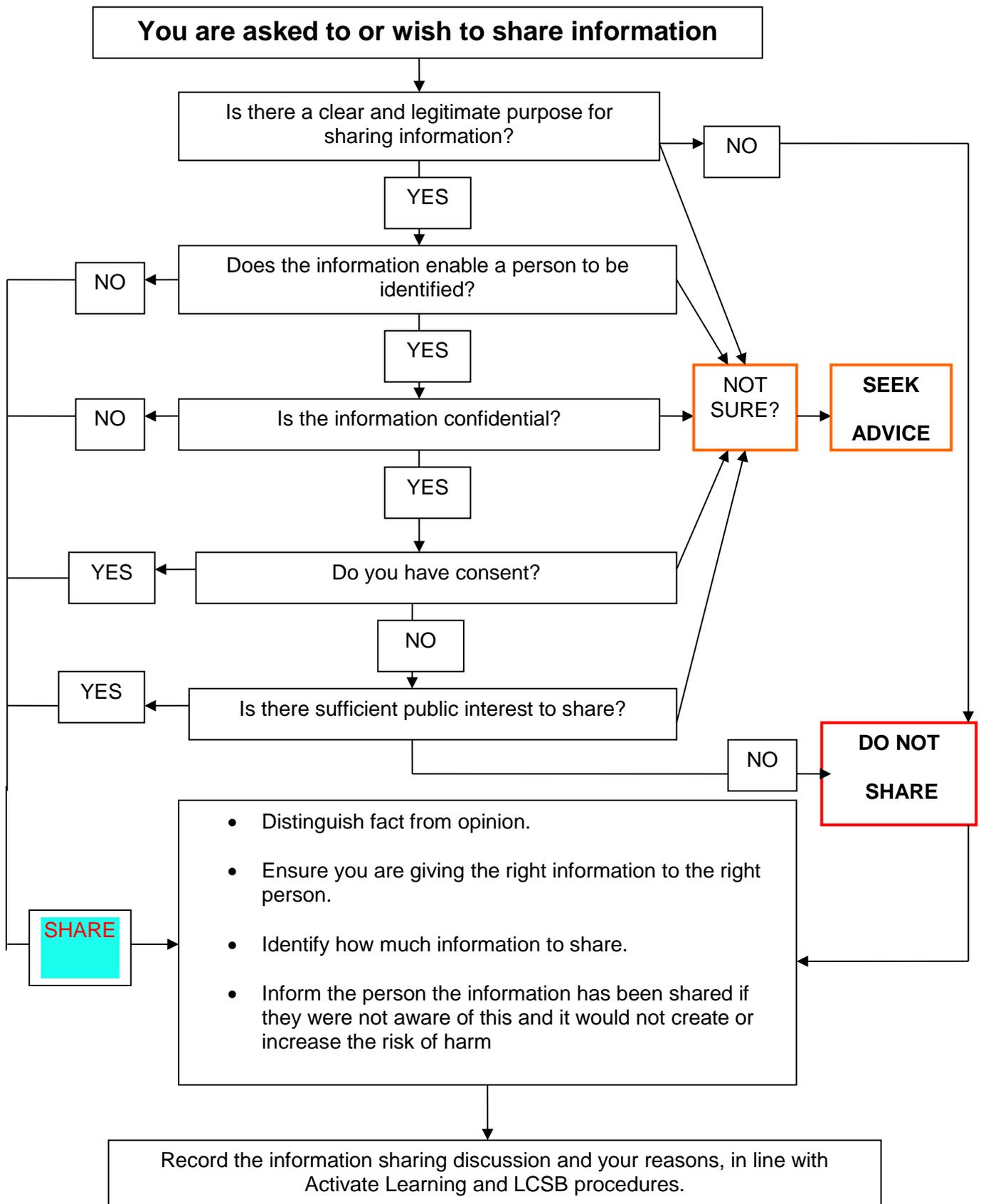
There are some circumstances in which a member of staff may be expected to share information about a student, for example when abuse is alleged or suspected. In such cases, members of staff have a duty to pass information on without delay, but only to those with designated child/adult protection responsibilities. In college, this is the Group Support Manager, Group Safeguarding Adviser, Deputy Designated Safeguarding Lead the Safeguarding Officer.

If a member of staff is in any doubt about whether to share information or keep it confidential he or she should seek advice from the Group Safeguarding Adviser, Deputy Designated Safeguarding Lead or the Designated Safeguarding Lead/Group Support Manager.

The storing and processing of personal information about students is governed by the General Data Protection Regulation 2018.

Information shared outside of the European Economic Area (EEA) or shared without reason or consent constitutes a Data Breach. Should any employee discover or be responsible for a data breach; this must be reported immediately to the Data Protection Officer.

The following flowchart may also be useful in deciding whether information should be shared.



If you are not sharing information, please record the reasons for not sharing the information and keep in your confidential records. In the unlikely event of a data breach and/or 'subject access request', immediate referral must be made to the Activate Learning Data Protection Officer*.

The safety, well-being and protection of students are the paramount consideration in all decisions staff make about confidentiality. The appropriate sharing of information between college staff is an essential element in ensuring a student's well-being and safety.

The general rule is that staff should make clear that there are limits to confidentiality at the beginning of the conversation with the student. These limits relate to ensuring student's safety and well-being. The student should be informed when confidence has to be broken for this reason and will be encouraged to do this for themselves whenever this is possible.

Any student who wishes to disclose must be informed that the member of staff has a professional responsibility to share the relevant information about the protection of the learner with other professionals. If a student confides in a member of staff and asks for the information to be kept secret, they must be informed that the member of staff has a responsibility to share the information with someone who can help if deemed necessary. This needs to be done with care and sensitivity and the student needs to be reassured that the matter will only be discussed with people who need to know.

Procedure for recording when information of a confidential nature has been shared

- When you are clear on justification for sharing information complete a referral form which is located in the Safeguarding SharePoint site of Staff Portal
- The form will go to a member of the safeguarding team who will then follow the procedure as shown in the flowchart.

Appendix C - Reporting concerns or disclosures relating to Safeguarding issues

If the Safeguarding incident is a child or adult protection issue:

1. Any member of staff who either suspects, witnesses or is told of any incident of physical, emotional, sexual, financial, discriminatory or institutional abuse or neglect occurring in the college, or to a student, child or vulnerable adult outside the college environment has a duty to report this immediately to the Safeguarding Team. If no one from the team is available immediately, staff should contact Student support/Student Services who will locate a member of the team or the Safeguarding Officer / Deputy Designated Safeguarding Lead. In the rare case that none of these are available, the member of staff should report direct a member of the Group Executive Team or to Social Services / Police. Staff are aware that anyone can report a safeguarding concern to the Multi Agency Safeguarding hub
2. Staff should not leave the student, suspect or relevant witnesses alone until arrangements have been made either through the Safeguarding Team or directly with external agencies to ensure that the parties are safe and that witness evidence is not contaminated.
3. Staff should hand over any notes taken during the disclosure and submit a written record to the relevant member of the Safeguarding Team or receiving designated person as soon as is practicably possible afterwards of what they have suspected, witnessed or been told.

Staff should be aware that:

- It is not the responsibility of staff to investigate suspected cases of abuse. They are reported to Social Services, Police or Multi Agency Safeguarding Hub if necessary.
- Any questioning should be limited to the minimum necessary to seek clarification only, strictly avoiding 'leading' the person who has approached them by making suggestions or asking questions that introduce their own ideas about what may have happened. (Do NOT ask questions like 'did he / she do x to you? Instead use TED – Tell, Explain and Describe).
- Any questioning should stop as soon as the student has disclosed that he or she believes that something abusive has happened to him or her, or to someone else.
- They should tell the informing student that they will now make sure that the appropriate people are brought in to follow up the disclosure.
- They should not take any action beyond that agreed in the procedures established by college and the Local Safeguarding Children's Board and Local Safeguarding Adults Board.
- They should never promise a student complete confidentiality – instead they should explain that they may need to pass information to relevant staff in the college and other professionals to help keep the student and others safe.

Staff should:

- Make handwritten verbatim notes
- Tell the person, very early on in the discussion that you may have to share what they are telling you with someone else.
- Allow the person to speak without interruptions, accepting what is said, but **do not investigate**.
- Alleviate feelings of guilt and isolation, whilst passing no judgement i.e. **Reassure**.
- Advise that you will try to offer support, but that you **must pass on the information**.
- Offer additional support – for instance a college Counsellor.
- Inform a designated member of staff immediately.
- **Record and date any facts**, which support the disclosure or your suspicions.
- **Offer your notes** to the designated person.
- **Do not discuss** the issue with anyone but the designated person.

Reporting Student on Student Abuse

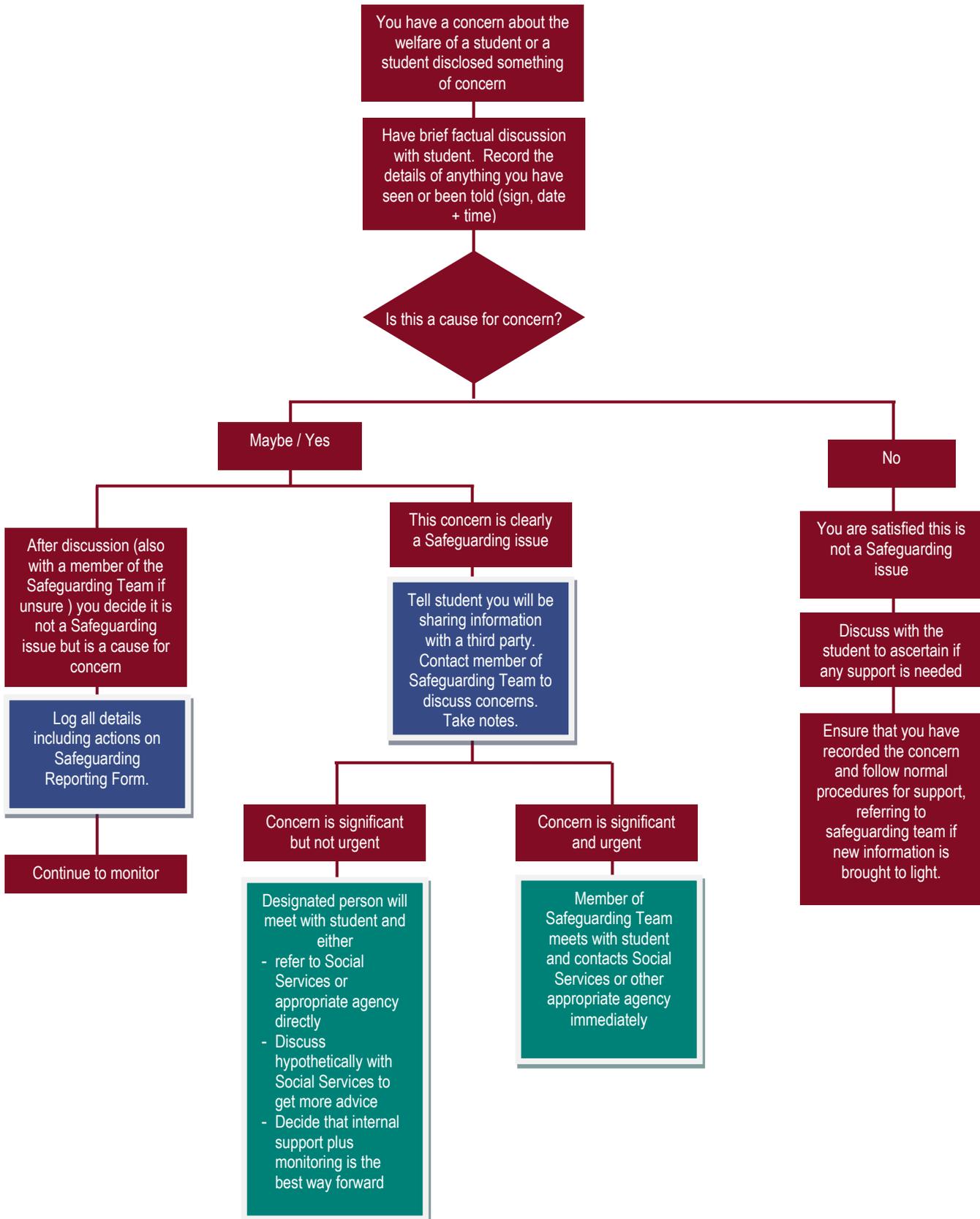
This procedure applies to all students of the college and covers all college-related activity when a student is in the legitimate care of a member of college staff (for example trips, visits, placements).

The purpose of this procedure is to provide guidelines for staff for reporting abuse involving student on student.

If abuse is suspected, alleged, witnessed or disclosed, the following process applies:

1. The reporting member of staff will contact the Duty Manager and ensure the immediate safety of the parties and the non-contamination of relevant evidence and witnesses from the scene of the incident.
2. The Group Safeguarding Adviser, Designated Safeguarding Lead/Group Support Manager or Deputy Designated Safeguarding Lead or a member of the Safeguarding Team must be immediately informed.
3. If appropriate, the receiving member of the Safeguarding Team will refer immediately to an external agency such as police, Social Services or the Multi Agency Safeguarding Hub.
4. Alternatively, the Group Student Support Manager or the Group Safeguarding Adviser will investigate with the relevant members of staff and respectively with the complainant and the accused. A parent, guardian or advocate can be present for the complainant and the accused.
5. Witness statements will be gathered.
6. Measures will be put in place to safeguard both the complainant and the accused which could include a full risk assessment.
7. Post investigation actions may be implemented including;
 - No further action
 - Following the Behavioural and Disciplinary Policy and supportive action plan
 - Linking with Safeguarding Board and following guidance suggested
 - External agency involvement, including the Police
8. All records of actions and outcomes will be recorded on the central safeguarding database on the SharePoint Team Site.

Decision Making Flowchart



Appendix D - Procedure for staff that are made aware of allegations against another member of staff or worker, not including student disclosure and procedure for follow up

Members of staff who hear an allegation of abuse against another member of staff should:

- Report the matter immediately to Human Resources or the Group Student Support Manager who will contact the Group Director of Marketing and Customer Experience and the CEO of the college.
- Any suspicion, allegation or actual abuse by a member of staff must be reported to the Principal as soon as possible, but within 24 hours.

On being notified of any allegation of abuse involving a member of staff, the CEO will:

- Take such steps as are necessary to ensure the safety of the person in question and anyone else who might be at risk.
- Consult with Human Resources and the local Social Services Department to decide whether a referral should be made under the local Area Child Protection Committee procedures.

During investigation of an alleged safeguarding incident against a member of staff by a student(s), the student(s) will be interviewed by a member of the Senior Management Team at a location specified by the college and may be accompanied by a parent or legal guardian where:

- The student/s is under the age of 18 or is a vulnerable adult
- Consent has been given by the student(s)
- In doing so, the student(s) would not be placed at risk of significant harm

If appropriate, the meeting may also include a member of the safeguarding team or an external safeguarding/child protection professional e.g. the Local Authority Designated Officer.

A referral (to the Local Authority Designated Officer) must be made if a potential criminal act has been alleged, or if the student indicates that he or she has suffered, or is likely to suffer, significant harm. A decision not to make a referral can be taken where:

- the allegation involves the use of reasonable force to restrain a student
- It is absolutely clear that it is impossible for the allegation to be true.

A decision not to make a referral in these circumstances does not automatically mean that the Activate Group should take not take any further action. Only when the allegation is wholly unfounded or of a trivial nature should there be no further investigation under the Activate Groups own disciplinary procedures.

When the college makes a referral to Social Services or Multi Agency Safeguarding Hub there may ensue:

- A requirement to suspend the staff member pending investigation (without prejudice or presumption of guilt).
- An area Child Protection Committee child protection investigation.
- A police investigation.

Activate Learning disciplinary procedures must be clearly distinct from any investigation conducted under Area Child Protection Committee procedures or by the Police. Investigations will take precedence over the institution's disciplinary proceedings and should be conducted first. Conducting concurrent internal and external investigations is not appropriate. Activate Learning's responsibility is to ensure that the parties are safe and that evidence is not contaminated and made available promptly to the investigating officer.

Appendix E - Secure storage, handling, use, retention and disposal of disclosures and disclosure information guidelines

As an organisation using the Criminal Records Bureau (DBS) disclosure service to help assess the suitability of applicants for positions of trust, the college complies fully with the DBS Code of Practice regarding the correct handling, use, storage, retention and disposal of disclosures and disclosure information. It also complies fully with its obligations under the Data Protection Act and other relevant legislation pertaining to the safe handling, use, storage, retention and disposal of disclosure information

Storage and access

Disclosure information is never kept on an applicant's personnel file and is always kept separately and securely, in lockable, non-portable, storage containers with access strictly controlled and limited to those who are entitled to see it as part of their duties.

Handling

In accordance with section 124 of the Police Act 1997, disclosure information is only passed to those who are authorised to receive it in the course of their duties. We maintain a record of all those to whom disclosures or disclosure information has been revealed and we recognise that it is a criminal offence to pass this information to anyone who is not entitled to receive it.

Usage

Disclosure information is only used for the specific purpose for which it was requested and for which the applicant's full consent has been given.

Retention

Once a recruitment (or other relevant) decision has been made, the colleges shall not keep disclosure information for any period longer than is absolutely necessary. This is generally for a period of up to six months, to allow for the consideration and resolution of any disputes or complaints. If, in very exceptional circumstances, it is considered necessary to keep disclosure information for longer than six-months, the colleges will consult the DBS about this and shall give full consideration to Data Protection legislation and the individual's Human Rights before doing so. Throughout this time, the usual conditions regarding safe storage and strictly controlled access will prevail.

If concerns have been raised about an adult's behaviour around children, you should keep the records in their personnel file either until they reach normal retirement age or for 10 years - whichever is longer (IRMS, 2016). You should keep records for the same amount of time regardless of whether the allegations were unfounded. However if you find that allegations are malicious you should destroy the record immediately. Information should be kept for this length of time even if the person stops working or volunteering for the organisation

Disposal

Once the retention period has elapsed, the colleges shall ensure that any disclosure information is immediately suitably destroyed by secure means, i.e. by shredding, pulping or burning. While awaiting destruction, disclosure information will not be kept in any insecure receptacle (e.g. waste bin or confidential waste sack). The colleges will not keep any photocopy or other image of the disclosure or any copy or representation of the contents of a disclosure. However, notwithstanding the above, the colleges may keep a record of the date of issue of a disclosure, the name of the subject, the type of disclosure requested, the position for which the disclosure was requested, the unique reference number of the disclosure and the details of the recruitment decision taken.

Loss of a disclosure or disclosure information

If a member of staff discovers that a disclosure or disclosure information has been lost they must

inform the Human Resources who will take appropriate action and inform the DBS.

Requests to reveal disclosure information to third parties

There may be circumstances when you are requested to reveal details of a disclosure to a third party, for example, in connection with legal proceedings. Such requests must be submitted to Human Resources who will seek legal advice, as appropriate, and inform the DBS of any such request immediately and prior to releasing any information.

All requests to reveal disclosure information to third parties, even to OFSTED must be channeled through the Human Resources Department.

Subject Access Requests

Data Protection legislation allows an individual to request all information pertaining to them from an organization; this is known as a Subject Access Request. An individual is only entitled to their own personal data, and not to information relating to other people (unless they are acting on behalf of someone). All Subject Access Requests will be checked by the Data Protection Officer prior to issue, to ensure no information is released that relates to other subjects or may cause harm to the requester or other individuals.

All Subject Access Requests must be channeled through the Activate Learning Data Protection Officer.

Appendix F - Procedure for dealing with e-safety incidents

This procedure applies to all students of the colleges and covers all college-related activity when a student is in the legitimate care of a member of college staff (for example trips, visits, placements).

The purpose of this procedure is to provide guidelines for staff for reporting e-safety incidents for example bullying through Social Networking sites such as Facebook.

Procedure

Following an e-safety incident, the following process applies:

1. Depending on the nature of the e-safety incident, it should be reported initially as follows:
 - If it involved a student, it should be reported to the Group Safeguarding Adviser, Deputy Designated Safeguarding Lead and Group Support Manager or a Safeguarding Officer
 - If it involved a member of staff, it should be reported to the Principal or the Director of Human Resources
2. A meeting of the e-safety group will be convened, to agree the next course of action.
3. A referral of the incident may be made to an external agency such as the Police if appropriate.
4. Depending on the nature of the incident, the following steps may be undertaken for students:
 - Caution issued
 - Temporary suspension of access, caution issued
 - Removal of access pending investigation with possible referral to the Bullying and Harassment of Students Policy
 - Removal of access pending investigation with possible referral to the Student Behavioural and Disciplinary Policy
 - Exclusion
5. An investigation will always be undertaken. Depending on the nature of the incident, the following steps may be taken for staff:
 - No further action taken
 - Disciplinary meeting with sanctions as appropriate
 - Suspension
 - Dismissal

Serious concerns or allegations against staff will always be reported to the ISA (Independent Safeguarding Authority), LADO (Local Authority Designated Officer) and/or the Police.

Up to date details on the staff within the safeguarding team can be found on this section on SharePoint Safeguarding site http://staffportal/business_support/CP/default.aspx

For guidance on dealing with bullying and similar issues please see the Bullying and Harassment of Students Policy

Appendix G - Advice for staff and procedures for handling actual or threatened self-harm or suicidal thoughts

This procedure applies to all students of the colleges and covers all college-related activity when a student is in the legitimate care of a member of college staff (for example trips, visits, placements).

The purpose of this advice and procedure is to inform staff how to respond to observed or reported self-harm, suicidal thoughts, threats of or serious injury.

Information about self-harm

Self-harm is a wide definition that includes eating disorders, self-injury, risk-taking behaviour and drug / alcohol misuse. This policy focuses on the self-injury aspect of self-harm; however, support is available for any behaviour which is deemed to be harmful to our students.

Self-harm is a coping mechanism. An individual harms their physical self to deal with emotional pain, or to break feelings of numbness by arousing sensation. Self-harm is any deliberate, non-suicidal behaviour that inflicts physical harm on the body and is aimed at relieving emotional distress. Physical pain is often easier to deal with than emotional pain, because it causes 'real' feelings. Injuries can prove to an individual that their emotional pain is real and valid. Self-harming behaviour may calm or awaken a person yet self-harm only provides temporary relief; it does not deal with the underlying issues. Self-harm can become a natural response to the stresses of day-to-day life and can escalate in frequency and severity. Self-harm can include but is not limited to, cutting, burning, banging, bruising, scratching or taking part in high risk activities. Self-harm is often habitual, chronic and repetitive; it tends to affect people for months and years. People who self-harm usually make a great effort to hide their injuries and scars, and are often uncomfortable about discussing their emotional inner or physical outer pain. It can be difficult for people to seek help from the NHS or from those in positions of authority, perhaps due to the stigma associated with seeking help for mental health issues. Self-harm is usually private and personal, and it is often hidden from family and friends. Some people do show their scars and one should not assume that they are attention seeking, although attention may well be needed.

Like any behaviour, self-harm may be used to attract attention, but this is not usually the focus of chronic, repetitive self-harm. If self-harm is being used in order to gain attention, staff must consider the reasons as to why someone is in such dire need of attention. It could be there is a problem at home, or issues of bullying, and they feel that no one is listening or hearing them.

Self-harm is not about seeking attention, a way of fitting in or a response to music, films or the 'emo' or 'gothic' culture. Prejudices and perceptions may lead people to believe they 'know' that self-harm is linked to a certain demographic or background, but each person is unique and will have found self-harm by their own route, and rely on it at times of stress due to the release and relief it offers them.

Self-harm is a coping mechanism, it is important to recognise and respond to the underlying reasons behind a person's self-harm. Risk factors include, but are not limited to:

- Low self-esteem
- Perfectionism
- Mental health issues such as depression and anxiety
- The onset of a more complicated mental illness such as schizophrenia, bi-polar disorder or a personality disorder
- Problems at home or school
- Physical, emotional or sexual abuse

Warning signs may not be visible but some of the things below may indicate a student is suffering internally which may lead to self-harm:

- Drug and / or alcohol misuse or risk taking behaviour
- Negativity and lack of self esteem
- Out of character behaviour
- Bullying other pupils
- A sudden change in friends or withdrawal from a group.

Physical signs indicating self-injury may be occurring;

- Obvious cuts, scratches or burns that do not appear of an accidental nature
- Frequent 'accidents' that cause physical injury
- Regularly bandaged arms and / or wrists
- Reluctance to take part in physical exercise or other activities that require a change of clothes
- Wearing long sleeves and trousers even during hot weather

Although self-harm is non suicidal behaviour and relied on as an attempt to cope and manage, it must be recognised that the emotional distress that leads to self-harm can also lead to suicidal thoughts and actions.

It is therefore all incidents of self-harm must be taken seriously. The underlying issues and emotional distress must be thoroughly investigated and necessary emotional support given, in order to minimise any greater risk.

N.B It is important to recognise that none of these risk factors may appear to be present. Sometimes it is the outwardly happy, high-achieving person with a stable background who is suffering internally and hurting themselves in order to cope.

Information about Suicidal Feelings

If a student discloses that they are thinking about suicide always take this seriously. It is important to take the time to listen and take action outlined in the procedure. It is important to remember that young people may express strong feelings about a wide range of emotions. When investigated they have little or no intention of suicide and are instead trying to communicate the depth of unhappiness that they feel. Although this may mean there is no immediate risk of suicide, support should be arranged for the student before their thoughts of suicide become more serious.

Whether a student discloses to express their feelings, or because they have real intent, trust your instincts and follow the guidelines to ensure the student accesses the appropriate support.

The following factors can indicate that someone is statistically more at risk of suicide:

- Male gender – men are three times more likely to commit suicide than women
- Previous suicide attempt
- Alcohol and drug abuse
- Low socio-economic status
- Previous psychiatric treatment
- Concurrent mental health disorder
- Low social support / living alone / isolation
- Significant life events

There may be no warning signs, but some of the changes or behaviours below may indicate personal crisis:

- Sudden changes in their usual pattern of relating to others

- Marked personal changes such as disinterest in studies or future, apathy about appearance and self-neglect, lack of concentration, changes in sleep pattern, delusions or hallucinations, sudden happiness after lengthy period of depression
- Self-harm and suicide attempts
- Marked weight increase or decrease
- Increased use of alcohol or drugs
- Verbal expressions direct or indirect such as “I wish I were dead”, “You won’t have to bother with me anymore” or “I’d like to go to sleep and never wake up”.

N.B It is important to recognise that none of these risk factors may appear to be present. Sometimes it is the outwardly happy, high-achieving person with a stable background who is suffering internally.

Any student who discloses thoughts of suicide is reaching out for help. It is important that we react positively reinforcing the student has done the right thing by telling someone and help is available. This will encourage them to continue seeking support when they need it.

Staff receiving/observing initial disclosure should:

- Take all disclosures seriously, avoid dismissing as invalid
- Remain calm and non-judgemental
- Encourage students to be open with you and reassure them they can get the support they need if they are willing to talk
- Not promise to keep confidentiality
- Alert a member of the Safeguarding Team immediately if the student is at risk

Appendix H - Role of designated person and procedure for handling an allegation or disclosure

Where the matter reported relates to a student from a partner organisation (such as a school) the designated member of staff should make contact with the designated person of that organisation and open communications.

On receiving an allegation or disclosure of abuse, the Group Safeguarding Adviser, Deputy Designated Safeguarding Lead or Safeguarding officer:

- Take steps needed to protect any student involved from risk of immediate harm. (This may involve allocating an appropriate member of staff, as far as possible a person chosen by the student him/herself, to stay with him or her until suitable arrangements for his/her protection are made.).
- Not interview or investigate the allegation further, but refer the matter immediately to the relevant Social Services department.
- Take handwritten verbatim notes.

- Consult the Duty Social Worker/Police and follow advice about contacting parents, other staff, police, doctor or alleged perpetrator or witnesses directly. Agree with the Duty Social Worker/Police any necessary next steps in relation to:
 - i. Informing a student's parents/guardian/next of kin (there are circumstances where it would be inappropriate to inform parents/guardians/next of kin immediately an allegation has been made).
 - ii. A medical examination or treatment for the student (again, there are circumstances where medical evidence will be needed).
 - iii. Immediate protection that may be needed for a student who has been the victim of abuse.
 - iv. The person who has given information about abuse, and a student against whom an allegation has been made (each of these may now be at risk).
 - v. Informing other people at the college (including any other member of staff) of the allegation and its investigation. Information should be shared on a strictly 'need to know' basis.

- Inform the student or person who made the initial allegation of what the next steps are to be, having agreed these with the Duty Social Worker.
- Inform the Group Student Support Manager (if not the designated person to whom the concern has been reported) of the allegations and the action taken as above, and agree necessary further action in line with these standards.
- Take any steps for the longer term protection and support of each student who has made allegations of abuse, or is alleged to have suffered from abuse, taking his or her wishes into account.
- Record the incident (names, date, time and content of disclosure) and create a folder on the Safeguarding site of SharePoint. The report must include the name and position of the person to whom the matter is reported. Gather notes from other staff involved to hold on file.
- The telephone report must be confirmed in writing to the Local Authority Social Services Department or Multi Agency Safeguarding Hub within 24 hours using the appropriate documentation.
- Arrange for any counselling support that may be necessary (if appropriate) for staff involved in the reporting of abuse, through the Human Resources Team.

Appendix I - Guidance for Safeguarding Team regarding self-harm and suicide

Self harm

- Avoid asking the student to reveal their scars or describe their self-harm.
- Avoid asking a student to stop self-harming - you may be removing the only coping mechanism they have.
- Ask if they are injured now? Seek help from a first aider as necessary.
- Refer the student for Counselling for an emergency appointment and inform them of your intentions. Gain consent wherever possible.
- Refer to a college nurse or student's GP for advice on wound care and keep tools clean

Suicide

For disclosed intent or feeling of suicide, ask questions to assess immediacy for example:

- Do you have a plan? Have they thought about how, when, where?
- What are you going to do after you leave me?
- Does anyone else know you feel this way?
- If this assessment indicates the student may attempt suicide before any support can be arranged, get immediate support.
- If the disclosure appears to be an indication of how the student is feeling rather than intent to commit an act, arrange support for the soonest possible opportunity. This can include support from the CHAT Team who can support the student to make a GP appointment or assessment.
- Trust your instincts - if you are not happy sending a student away then don't - get immediate support by ringing for an ambulance. If you believe that the person is at immediate risk and they are not cooperating, the Police have a duty to attend and support the transfer of the person to hospital for an emergency assessment.

If a member of staff observes or has reported to them any incidents of self harm, suicidal thoughts, threats of or serious injury, the following process applies:

Seriously Injured or Threatening Serious Injury / Suicide

1. If a student presents as seriously injured or is threatening serious injury to self or others, the Police or an ambulance must be called by dialling the emergency services on '999' and requesting the appropriate service. Please ensure that your location is given.
2. Please ensure that Student Support / Reception know that the Police or an ambulance has been called, and inform them of your location.
3. The member of staff attending the incident should call on and expect the support of other staff.
4. A member of staff must stay with the student at all times until somebody (i.e. Police or ambulance crew) takes over.
5. Staff in support should:
 - Contact security and/or first aid as appropriate
 - Inform reception if the Police or an ambulance is required
 - Meet the Police or ambulance crew
6. If the student refuses assistance, an ambulance should still be called and the ambulance crew will support.

7. If the student leaves before the ambulance arrives, the incident should be reported to the police and, depending upon police advice, the student's next of kin notified.
8. The member of the Safeguarding Team should ensure that the incident is reported to the Group Safeguarding Adviser or Deputy Designated Safeguarding Lead in order to log it on the central safeguarding database.
9. If an ambulance is not required, the student should be referred for counselling and/or their GP for further support.
10. The student should continue to be supported and monitored.

Appendix J - Procedure for arranging support for students

The student disclosing abuse should be made aware of the continued support in college at what will be a difficult and distressing time for them. The member of staff they speak to should:

- Explain to the student the support that is available within the college
- Explain the wider support networks and any external agencies that may be able to help (details of these can be found in the Student Course handbook Talk to the student about seeing a college Counsellor and, if they want, help them to arrange a first appointment.
- Consult the Group Student Support Manager / Group Student Support Team Leader or the Safeguarding Officer for more information and support if necessary.

Appendix K - Procedure for staff in organisations where students are on work placement or similar

- Work-based learning staff and those working on behalf of Activate Learning should all access either the full Safeguarding training or the on-line version. They should therefore be aware of their duties with regard to Safeguarding.
- If they have any concerns regarding Safeguarding they should contact a member of the Group Safeguarding team, following the disclosure procedure.
- The Initial Risk Assessment undertaken prior to the placement should identify any potential safeguarding risks and steps should be taken to minimise or remove the risk completely. This should be completed by the relevant Faculty Area.
- Consideration should be given to the circumstances of the placement. Special consideration should be given to the number of supervisory staff and the gender mix between students and supervising staff. Advice and Guidance is available from the Safeguarding team.
- Further information can be found in the Students in The Workplace Policy.

Students

All students on programmes which require Work Placements as part of the course and where this involves contact with children/vulnerable adults will be subject to DBS checks. The group is committed to ensuring that a student's choice of study is not adversely affected as a result of clearance requirements.

Students will be required to apply to the DBS via their college as part of their enrolment process. The Heads of Faculty have overall responsibility for ensuring that the policy is adhered to and placements are planned at the beginning of the term.

Those in the Activate Group who are involved in the admissions process will receive appropriate guidance in identifying and assessing the relevance and circumstances of offences and to comply with the college's policies and procedures.

Appendix L - Advice and procedures for staff regarding touch and restraint

This procedure applies to all students in Activate Learning colleges and covers all college-related activity when a student is in the legitimate care of a member of college staff (for example trips, visits, placements).

The purpose of this procedure is to inform staff of the process to follow in response to an incident that may require reasonable use of force or restraint.

Force cannot be used as a punishment – this is unlawful.

Advice for staff

The Education and Inspections Act 2006 Section 165, which inserts section 85C into the Further and Higher Education Act 1992 (c. 13), gives power to members of staff of further education institutions to use force.

Activate Learning recognises that there may be occasions where members of staff are required to use reasonable force either to defend themselves or protect others from injury. However the use of force to restrain or physically direct another person should be regarded as a last resort. A general culture of limited touch should apply with physical intervention avoided if possible.

Whilst there are situations in which there is no safer alternative, individual members of staff should try to minimise the chance of these arising by:

- creating a calm, orderly and supportive college climate that minimises the risk of violence of any kind.
- an active approach to teaching learners how to manage strong emotions.
- having regard to avoiding actions that may be seen as inciting violence.
- effective management of individual incidents.
- avoiding any physical contact with any other person unless essential to teaching and learning process or normal working arrangements.

Preventative measures will not always work. Therefore, in the circumstances where members of staff judge that the risks associated with not using force are greater than those associated with using force, they should follow the Activate Learning guidance and procedures. Staff using any force who have been properly trained for their role in college and follow the guidance and procedures will be fully supported by the Activate Group in the event of any legal action taken by a student as a result of the application of force.

Authorisation to restrain

All members of staff are authorised by the CEOI to use necessary and reasonable force to prevent or stop a potentially harmful/violent or dangerous act taking place where the well-being of learners or another member of staff is at risk. The decision to restrain another individual is to be made solely by the member of staff and they do so under their own instruction/volition. There is no expectation for staff to intervene in a harmful/violent or dangerous situation where they feel their own well-being/health would be at risk.

Restraint is where a necessary amount of force to prevent a person from causing damage/harm to themselves or others is used by a member of staff to stop their actions. All students at the college, including under 16s, can be restrained by members of staff. Where a member of staff has applied necessary restraint appropriately, the Activate Group will support their actions. If a student or member of staff chooses to complain or take legal action against a member of staff in relation to the reasonable use of restraint where it had prevented harm to others, the Activate Group will support the member of staff who applied the necessary restraint.

Members of staff should also be aware if force was used against students or members of staff that was not considered necessary and/or reasonable this may be viewed as a disciplinary offence and may result in dismissal.

Where force can be used

Staff may only exercise the statutory power to use force where:

- they and the student are on college premises
- they are off college premises, but are in lawful control or charge of the student (for example on a college visit or at offsite facilities).

Other than in these circumstances, staff have only common law rights to use force to defend themselves, persons or property (for example a member of the public on site who is not covered by a learning agreement).

Incidents where restraint may be used

A member of staff may only use force to prevent a student from doing (or continuing to do) certain prescribed actions, namely:

- a. committing a criminal offence.
- b. causing personal injury to, or damage to the property of any person (including the student).
- c. prejudicing the maintenance of good order and discipline at the college.

Examples of situations that fall into the above categories a and b are:

- a student attacks a member of staff, or another learner
- students are fighting
- a student is committing, or on the verge of committing, deliberate or serious damage to property or to themselves
- a student is causing, or at risk of causing, injury or damage by accident, by dangerous play, or by misuse of dangerous materials or objects
- a student is running or behaving inappropriately in a corridor or on a stairway in a way in which he or she is likely to have or cause an accident which may injure him, herself or others
- a student aged under the minimum school leaving age absconds from a class or tries to leave the campus other than at an authorised time. The judgement on whether to use force in this situation would depend on an assessment of the degree of risk to the student if he or she is not kept in the classroom or college (age and understanding would be critical factors)

Examples of situations that fall into category c. are where the student:

- is behaving in a dangerous way that is seriously disrupting a lesson
- blocks a door to prevent others from leaving
- is using a mobile phone to disrupt a lesson (a member of staff could forcibly confiscate the phone by removing it from a hand or desk but could not lawfully search the learner for the phone)
- resists attempts to search him or her for a weapon (see the Student Search Policy)

Decisions on whether to use force must depend on judgements about:

- the seriousness of the incident as judged by the effect of the injury, damage, or disorder, which is likely to result if force is not used
- the chances of achieving the desired result by other means
- the relative risks associated with physical intervention compared with using other strategies

Procedure regarding touch and restraint

A general culture of limited touch should apply with physical intervention avoided if possible. However, if physical intervention is required to prevent personal injury, damage or the committing of a criminal offence, the following process applies;

1. Staff should use the minimum necessary force to restrain or prevent injury, damage or a criminal act.
2. Staff may require assistance when dealing with an incident that may lead to or require reasonable use of force or restraint. Staff should call for support from colleagues in the immediate area and in extreme circumstances the Police may be called.
3. Incidents should be reported as soon as is practicably possible to the Group Safeguarding Adviser or members of the Safeguarding Team.
4. The Safeguarding Officer will inform the relevant Head of Faculty and Group Executive Team.
5. Incidents involving 14-16 year olds should also be reported to the 14-16 Team and the appropriate school informed.
6. The Safeguarding Officer or member of the Safeguarding Team will log the incident of the central safeguarding database and include the following details:
 - a short narrative of what happened including dates, times, people present, location.
 - any force or restraint method used, for example restrictive holds
 - if the incident caused injury or distress
 - justification for the use of force? This is particularly relevant where the judgement was very finely balanced
7. Any injuries will require the completion of the standard college Accident Form.
8. The student(s) will be referred to the procedures within the Behavioural Management and Student Disciplinary Policy.

Post-incident support

Serious incidents can be upsetting and can result in injuries. Managers should ensure support by:

- providing first aid treatment on site or seeking medical assistance for injuries beyond basic first aid.
- transferring to hospital any person where further treatment is required or recommended. School pupils and those under the age of 18 should be accompanied by a member of staff who should stay with them until they are 'handed back' to the school or their parent or guardian/ carer.
- ensuring that learners and staff who are affected by an incident have continuing support for as long as necessary by using the college's existing support networks in respect of:
 - physical consequences
 - support to deal with emotional stress or loss of confidence
 - analysing / reflecting on the incident

Complaints

All complaints will be dealt with following the college's standard complaints procedure.

Responsibility for the monitoring of this procedure

It will be the responsibility of the Group Support Manager to monitor the effectiveness of this procedure by:

- assessing the nature and frequency of relevant incidents;
- monitoring any complaints or risks associated with the policy.

Reasonable force

Reasonable force covers the broad range of actions used that involve a degree of physical contact with students to control or restrain.

There is no legal definition of what degree of force is reasonable, it will always depend upon the precise circumstances of the individual case; however the degree of force used should always be:

- in proportion to the consequences it is intended to prevent; and
- the minimum needed to achieve the desired result.

When reaching a decision about using force, staff will need to take into account relevant factors related to any special educational needs or disabilities a particular learner may have.

The Crown Prosecution Service view of reasonable force is:

A person may use such force as is reasonable in the circumstances for the purposes of:

- self-defence
- defence of another
- defence of property
- prevention of crime
- lawful arrest.

In assessing the reasonableness of the force used, prosecutors should ask two questions:

- was the use of force justified in the circumstances, i.e. was there a need for any force at all?
- was the force used excessive in the circumstances?

Appendix M - Procedure for recording shared individual risk assessments

1. A record of all students who declare a disability, illness, additional needs or vulnerability is compiled by the Learning Support Delivery Manager on the support database. Reports and records relating to assessment and support of students are to be collated into one central file held by the Learning Support Delivery Manager. This ensures the holistic overview and assessment of student needs and enables a coordinated approach to ongoing support, further assessment and intervention should it be required.
2. A copy of the **SIR** is made available to the Safeguarding team, Learning Support and other colleagues as appropriate.
3. Tutors of all students who have declared a disability, illness, additional needs or vulnerability for which a risk assessment may be appropriate – for instance, someone who is epileptic or has a mental illness, are contacted and asked to work with the student on a risk assessment / Health Support Plan. (Form available on Staff Portal). This is only completed once the student needs have been assessed, meaningful and explicit consent has been obtained to share the information and a support plan has been written.
4. The Tutor will take on the role of **Key Worker** for these students, unless another college professional is deemed more appropriate – e.g. Student Welfare Adviser for Looked After and Young People Leaving Care etc. **Guidance and support in completing these specialist risk assessments should be sought from the Learning Support Delivery Manager**
5. One copy of the completed risk assessment form will be signed by both staff member and student and be retained securely in the curriculum area
6. An electronic copy of the risk assessment is sent to the Safeguarding site, by the member of staff completing the assessment, and to the the Learning Support Delivery Manager. All copies received will be checked against the original list to ensure compliance.
7. Any information suggesting that immediate action may be required as part of the outcome of the risk assessment should be lodged on the Duty Manager site and also with the the Learning Support Delivery Manager. It is the responsibility of the Key Worker to ensure that these actions are implemented.

Appendix N - Guidance relating to trips and residentials

Staff should take particular care when supervising students in the less formal atmosphere of a residential setting or after-college activity. Always have another member of staff present when supervising out of college activities unless previously agreed with a senior member of staff.

Always do a full risk assessment.

Individual risk assessments must be in place for any student who is a potential risk and / or where a relevant vulnerability has been identified.

Always gain parental consent for students under the age of 18.

During college activities that take place off the college site or out of college hours, a more relaxed discipline or informal dress and language code may be acceptable. However members of staff remain in a position of trust and responsibility and need to ensure that their behaviour cannot be interpreted as seeking to establish an inappropriate relationship or friendship. Please note that any sexual relationship between an under 18 year old student and a person in a position of trust is illegal*

Where out of college activities include overnight stays, careful consideration needs to be given to the sleeping arrangements. Students, staff and parents should be informed of these prior to the start of the trip.

Health and Safety arrangements require members of staff to keep colleagues/employers aware of their whereabouts, especially when involved in an out of college activity.

*Sexual Offences Act 2003

NB The ratio of students to staff members and gender mix cannot be prescriptive; it should be based on the individual risk of the activity and the individual needs of the students, The Health and Safety team are able to support you in making an appropriate judgment.

Appendix O - Prevention of violent extremism – The ‘Prevent’ agenda

1. In February 2008 the Government published guidance to local partners including colleges on preventing violent extremism^[1]. While the guidance was prompted following examples of Al Qaida behaviour, it is also aimed at reducing the risk of radicalisation of vulnerable people by other groups, including some Animal Rights Groups and Far Right Groups.
2. Radicalisation refers to the process by which a person comes to support terrorism and forms of extremism leading to terrorism. To reduce the risk from terrorism we need not only to stop terrorist attacks but also to prevent people becoming terrorists. This is one objective of Prevent, part of CONTEST, the Government’s strategy for countering international terrorism.
3. Young people and vulnerable groups are particularly targeted by groups who may promote violent extremist activity. The aim of *Prevent* is to stop people becoming or supporting terrorists, by challenging the spread of terrorist ideology, supporting vulnerable individuals, and working in key sectors and institutions.
4. Channel is a key element of the *Prevent* strategy. It is a multi-agency approach to protect people at risk from radicalisation. Channel uses existing collaboration between local authorities, statutory partners (such as the education and health sectors, social services, children’s and youth services and offender management services), the police and the local community to identify individuals at risk of being drawn into terrorism; assess the nature and extent of that risk; and develop the most appropriate support plan for the individuals concerned. Channel is about safeguarding children and adults from being drawn into committing terrorist-related activity.
5. Activate Learning staff should be aware of signs of radicalisation and have the confidence to report their concerns to their line manager. This is included within the Safeguarding Induction for staff and refresher training. There are also specific training sessions on this agenda throughout the year.
6. Any concerns should be recorded in writing and reported to the Group Support Manager or the Group Safeguarding Adviser. They will liaise with the contact at the appropriate police authority following the procedures in the joint protocol.
7. Activate Learning will also promote the ethos of the ‘Prevent’ agenda by encouraging free and open debate but challenging extreme views. It will encourage through its classroom practice, theme weeks and induction activities, a belief in Equality of Opportunity and the celebration of Diversity.
8. Activate Learning will not host or allow its premises to be used by extreme groups and will seek to prevent the distribution of extreme literature.
9. Activate Learning have a legal responsibility to forbid the promotion of partisan political views in the teaching of any subject in the Activate Group and must take such steps as are reasonably practicable to secure that where political issues are brought to the attention of students they are offered a balanced presentation of opposing views. Promotion of any organisations linked to violent extremism is contrary to the values of the Activate Learning Group and could constitute gross misconduct.
10. Activate Learning will provide appropriate support through its own staff or by referral to external agencies, for any student in danger of radicalisation.

^[1] Learning Together to be Safe: A toolkit to help colleges contribute to the prevention of violent extremism. February 2009 Department for Innovation, Universities and Skills www.dius.gov.uk

Appendix P - Missing persons procedure

A student should be considered missing if their whereabouts cannot be established and where the circumstances are out of character or the context suggests the person may be subject of crime or at risk of harm to themselves or another



If a student is believed to be missing, refer immediately to the safeguarding team.



Try to make direct contact with the student.
If appropriate contact family/friends



Safeguarding team establish level of risk;

- Circumstances of absence
- Any Student support plan in place
- Age of student
- Maturity of student
- Any physical or cognitive disability of the student

Any continuing or urgent need for the student to have medication or medical treatment

- Legal status of the child
- Risk of offending
- Influence of peer groups, family or friends
- Predatory influences on the student
- Any known risk of abduction
- Environmental factors including weather, time of year etc.



Share information with partner agencies involved with the student.



If there is a level of risk the Police should be informed immediately.
Continue to inform parents/carer of action taken if appropriate.



Throughout the process keep a full record of all action taken and messages received and given

Follow up actions on students return;
Complete safe and well check. Identify any concerns and/or if repeated episodes a support plan/risk assessment should be completed



If student returns to college – notify police, external partners and parent/carer

Appendix Q – Group leader suitability check

At Activate Learning we take our Child Protection and Safeguarding responsibilities very seriously. As part of our Safeguarding Policy, we are committed to taking all reasonable steps to ensure that all adults in positions of responsibility with substantial access to our learning community are of good character. To do this we will undertake a criminal background check for all visiting group leaders.

Please complete, sign and return this form with a copy of your passport and signed group leader agreement to international@activatelearning.ac.uk.

If you have any questions or concerns about this process, please do not hesitate to contact a member of the international team by e-mail or by phone: 0044 (0) 1865 5 51838

We appreciate your co-operation and support.

Forename:	
Surname:	
Date of Birth <dd/mm/yyyy>:	
Nationality:	
Home Address:	
Telephone number:	
Name of group:	
I have provided:	<input type="checkbox"/> Copy of passport <input type="checkbox"/> Signed copy of group leader agreement
I hereby give my permission for Activate Learning to carry out a criminal background check. I understand that this may involve contacting my local police department or other local authority.	
Signed:	
Date <dd/mm/yyyy>:	

Appendix R - Host-Link child protection and safeguarding policy

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Introduction

Host-Link recognises their responsibility to safeguard children and young people while staying in Host-Link home stay accommodation. This policy exists to give guidelines to all staff and homestay hosts and volunteers. We will ensure we provide a safe and supportive environment for all international young learners staying in homestays and implement procedures for identifying and reporting cases, or suspected cases, of harm or abuse.

Host-Link firmly believe in 'Duty of Care'; there is a legal responsibility that adults who work with children as professionals or volunteers have a duty to look after them properly; children depend on adults for their safety and well-being.

Purpose

To provide protection for children and young people who stay with Host-Link's homestay hosts.

To provide guidance to staff and homestay hosts on what to do in the event that they suspect a child or young person may be at risk of abuse or harm.

We will seek to safeguard children and young people by:

Ensuring appropriate vetting takes place of all homestay hosts. Homestay hosts will apply via an application form that documents who lives in the home.

When viewing, approving a Homestay, the Host-Link Accommodation Officer looks at the following:

- Cleanliness and facilities
- Security
- Evidence of occupants at the address
- Facilities such as furniture, study space, bathroom etc
- Appropriate space and privacy (for example own room and study space)
- Supportive environment
- Distance from College
- Why families want to become hosts

Host-Link UK follows best practice according to British Council guidelines.

The main carer must therefore have a satisfactory DBS check undertaken before under 18s are placed with them and every 3 years thereafter.

From January 2018 all adults in the household are also required to be incorporated into checks. Therefore, the main carer (the applicant) must tick the 'Working at home address' box (equivalent to box 66 on the DBS's own application form) to ensure that the police can also inform Host-Link UK if any adults resident at or closely associated with the address are deemed unsuitable to work with under 18s.

<https://www.gov.uk/government/publications/dbs-home-based-positions-guide/home-based-position-definition-and-guidance>

Existing DBS certificates if dated in the last 12 months can also be checked and reviewed for suitability. Host-Link will also check list 99 if needed to satisfy safeguarding requirements.

Up to two external (non-family) referees will be taken to gain references on the host's suitability to work with under 18 learners. A Fire Risk Assessment will be sent to host families once a year and should be carried out before they host any students.

All appointed homestays hosts (and other adults in the home) should be aware of the Host-Link UK organisation's safeguarding policy and relevant code of conduct. The main carer is required to complete and sign a Child Protection Declaration (Children Act 1989 and Protection of Children Act 1999) for hosting young people under the age of 18 as well as Homestay General Service agreement.

Host-Link will provide pastoral care and 24 hour emergency phone number alongside the school emergency number.

Learners below the age of 16 will not be permitted to live alone without written parental / guardian / agent consent. They will be placed in pairs with youngest learners placed near to the school as possible.

Homestay hosts are asked to bring all young learners particularly under the age of 16 into school on the first day.

Daily pick-up and drop-off by homestay hosts can be organised at one meeting point for young learners.

Curfews will be in place. Under 16's will not be allowed out in the evening and should arrive back by dinner time no later than 8pm. Parental permission maybe given for 16-17 year olds: back by 10pm Mon-Fri; back by 11pm weekends.

The Homestay hosts will monitor students to identify any symptoms of possible abuse, and will respond to suspicions of abuse.

Providing an abusive behaviour policy and information on expected codes of behaviour to students and ensuring that they understand these.

Homestay hosts are visited and checked every two years by the Accommodation Officer to ensure the environment is appropriate.

Homestay hosts are also asked to talk and interact and feedback to Host-Link if they suspect that students in homestay are being influenced at school by individuals or groups trying to radicalise or convert them to extremist ways or thinking. "PREVENT" (Counter-Terrorism and Security Act 2015) is a government initiative to try and reduce the likelihood of people supporting terrorism or becoming terrorists. It also aims to reduce the risk of radicalization happening within institutions. Prevent refers to all ages, not just students under 18.

Any complaints or concerns about Homestay hosts can be made to Host-Link and will be immediately investigated by the Accommodation Officer and appropriate action taken. If deemed necessary the homestay host will cease to be used by Host-Link. Any interaction / feedback with students i.e. telephone calls or visits will be logged by Host-Link and appropriately followed up if required.

It is expected that the school will also check verbally or through feedback that learners are happy with their homestays.

Host-Link will also gain feedback via a form from their learners as to their experience in homestay.

The Host-Link Safeguarding Policy and Code of Conduct is circulated to all staff and is covered at the induction when employment commences.

Host-Link Staff are given training opportunities to ensure they recognise the symptoms of abuse (physical, sexual, emotional and neglect) and how they should respond to such abuse.

Sharing information and acting promptly and professionally to any concerns. At least one designated Safeguarding Officer is available for staff to refer to.

Policy reviewed on an annual basis, or more frequently if deemed necessary.

Safe working practice for staff and home stay providers

All members of staff and homestay hosts should ensure that they avoid making themselves vulnerable to suspicion of any form of abuse by maintaining relationships with their students at an appropriate level. Staff should follow the code of conduct and abusive behavior guidelines and procedures set out in the company handbook. Guidance is provided to home stay providers by the Accommodation Officer.

If a member of staff or home stay provider is accused of abuse, management will investigate and resolve where appropriate. The member of staff will be suspended from employment while a full investigation takes place, and if necessary, disciplinary hearing takes place in accordance with company policy.

- All staff and homestay hosts should treat young people with the respect and dignity, valuing each person as an individual and recognising the contribution they can make.
- Staff and homestay hosts should provide an example which they would wish others to follow.
- Staff should not spend excessive amounts of time alone with under 18's away from others. Any individual meetings must be kept as open as possible and be in a public place.
- As an organisation which deals with students, Host-Link ensure that staff are aware of their responsibilities under Child Protection legislation and our procedures relating to staff receives training at induction.

How to identify abuse

Abuse is a term used to describe a range of ways in which one person harms in some way another. It can be difficult to identify abuse, but below are some ways it can be identified:

- An individual telling someone they are being abused.
- Another student telling you of their concern about a friend or fellow student.
- Unexplained injuries with no satisfactory explanation for their cause.
- Difficulty in making friends or socializing.
- Personality changes and behavioral changes, eating disorders, being aggressive, being disruptive, self-harm, being inattentive, homesickness.

Procedure for reporting allegations or suspicions of abuse

Concerns about the wellbeing of a child staying with a homestay host should be discussed with the Accommodation Officer who has a responsibility to ensure that the child's needs are met whilst living with the family.

Host-Link will act promptly to deal with any suspicions or allegations made. The School organization, LADO and the police will be informed of any allegations of serious harm or abuse by any person living or working with, or looking after children.

How to react if you suspect abuse

- Remain calm and listen to the individual without interrupting.
- Make it clear that you are taking them seriously.
- Reassure them that they should not feel guilty and let them know you are going to do everything you can to help them.
- Accept what is said. It is not for you to decide whether or not a suspicion or allegation is true.
- Advise them that you have to pass the information on and whom you have to tell.
- Make a note of what was said, who was present, and pass this information on. Use the child's own words or explanations.

The Safeguarding Officer will take appropriate action. This may involve external agencies and contacting parents.

Record keeping and confidentiality

All records, information and confidential notes are kept in separate files in a locked cabinet accessible only by the Safeguarding Officers.

Private Fostering

Local council children's services will be notified if a child under the age of 16 (18 if disabled) lives with a local family for more than 28 days, and for the homestay host to be assessed by a visit to the placement and talk with the child within 7 days of placement. It is an offence not to notify the local council of a private fostering arrangement. This is in order to safeguard and protect the child's welfare and provide appropriate support and help to the child, carer and parent. The homestay host and any member of their household over the age of 16 may be DBS checked.

Host-Link operates a policy of not providing accommodation to students under the age of 16 for more than 28 days.

Last updated October 2017

Next review October 2018

Appendix S - Procedure for recognising and reporting female genital mutilation

Reporting

Any staff member who becomes aware that a girl under 18 has been subject to female genital mutilation, or is at risk of becoming so, must report this immediately to the Designated Safeguarding Officer. This is a legal duty – see the legal position below.

The statutory reporting duty recommends that a report is made orally by calling 101, the single non-emergency number.

The Safeguarding team will treat this as any other Child Protection case and report this without delay using the 101 telephone line.

About FGM

Female genital mutilation (FGM) is a collective term for procedures, which include the removal of part or all of the external female genitalia for non-medical purposes. The practice is medically unnecessary, extremely painful and has serious health consequences, both at the time when the mutilation is carried out and in later life. The procedure is typically performed on girls aged between 4 and 13, but in some cases it is performed on new-born infants or on young women before marriage or pregnancy.

FGM is practised in at least 28 African countries (in particular, Egypt, Ethiopia, Somalia and Sudan, as well as Nigeria and Kenya, Togo and Senegal) as well as countries in the Middle East (including Yemen, Oman, Iraqi Kurdistan). However, as a result of immigration and refugee movements, FGM is now being practiced by ethnic minority populations in other parts of the world, such as USA, Canada, Europe, Australia and New Zealand.

Globally it is estimated that between 100 and 140 million women have undergone FGM; this equates to 3 million per year. Within England and Wales it is estimated that 66,000 women have undergone FGM and 24,000 girls under the age of 15 are at risk.

The legal position

FGM has been a criminal offence in the U.K. since the Prohibition of Female Circumcision Act 1985 was passed. The Female Genital Mutilation Act 2003 replaced the 1985 Act and makes it an offence for the first time for UK nationals or permanent UK residents to carry out FGM abroad, or to aid, abet, counsel or procure the carrying out of FGM abroad, even in countries where the practice is legal.

The Female Genital Mutilation (FGM) mandatory reporting duty is a legal duty provided for in the FGM Act 2003 (as amended by the Serious Crime Act 2015). This reporting duty came into effect in England on the 31st of October 2015.

The legislation requires regulated health and social care professionals and teachers in England and Wales to make a report to the police where, in the course of their professional duties, they either:

1. Are informed by a girl under 18 that an act of FGM has been carried out on her; or
2. Observe physical signs which appear to show that an act of FGM has been carried out on a girl under 18 and they have no reason to believe that the act was necessary for the girl's physical or mental health or for purposes connected with labour or birth. Failure to do so may lead to prosecution of the professional. For the purposes of the duty, the relevant age is the girl's age at the time of the disclosure/identification of FGM (i.e. it does not apply where a woman aged 18 or over discloses she had FGM when she was under 18).

Complying with the duty does not breach any confidentiality requirement or other restriction on disclosure which might otherwise apply. The duty is a personal duty which requires the individual professional who becomes aware of the case to make a report; the responsibility cannot be

transferred. The only exception to this is if you know that another individual from your profession has already made a report; there is no requirement to make a second.

Indicators

These indicators are not exhaustive and whilst the factors detailed below may be an indication that a child is facing FGM, it should not be assumed that is the case simply on the basis of someone presenting with one or more of these warning signs. These warning signs may indicate other types of abuse such as forced marriage or sexual abuse that will also require a multi-agency response. The following are some signs that the child may be at risk of FGM:

- The family belongs to a community in which FGM is practiced;
- Maternal or other family member disclosure;
- Any female child whose older sibling has undergone FGM;
- The family makes preparations for the child to take a holiday, e.g. arranging vaccinations, planning an absence from school;
- The child talks about a 'special procedure/ceremony' that is going to take place.
- Consider whether any other indicators exist that FGM may have or has already taken place, for example:
 1. the child has changed in behaviour after being absent from school; or
 2. the child has health problems, particularly bladder or menstrual problems.

