Safeguarding and Child Protection Policy

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2.1	Role updates	DSL	Oct. 2019
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3.1	Appendix 4 – Covid update	DSL	Jan 2021

Approval

Approved By	Meeting Date	Next Review
Senior Leadership Team	25 July 2023	25 July 2024
TLA Committee	October 2023	-
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Related Policies

Ref.	Policy
EDI-01	Equality and Diversity Policy
HS-01	Health and Safety Policy
	Risk Assessment Procedure
FM-04	Security Policy
DP-01	Data Protection Policy
HR-01	Staff Recruitment Policy
SS-01	Admissions Policy
TLA-01	Teaching, Learning and Assessment Policy
QD-06	Complaints, Compliments and Suggestions Policy
HR-03	Whistleblowing Policy
HR-24	Staff Code of Conduct
SS-02	Visitor Policy
SS-03	Learner Behaviour, Support and Disciplinary Policy
SGP-04	Child on ChildAbuse Policy
SGP-02	Prevent Policy
IS-02	Firewall Policy
SLT-04	Dynamic Lockdown Policy
SST-09	Missing Student Policy
SST-07	Residential Accommodation Allocation Policy
TLA-05	Remote Learning Policy
CUR-08	Work Placement Policy

Equality Impact Assessment

Equality Impact Assessment
The policy is robust and there is no evidence of unlawful discrimination and all reasonable adjustment opportunities have been considered and will be subject to continuous monitoring and review.

High Level Strategic Objectives this Policy feeds in to;

- To provide an outstanding and personalised student experience
- Provide a wide range of high-quality student support including information, advice, and guidance.

Legislative Framework that this Policy relates to;

- Children Act 1989 and 2004 amendment-section 11
- Section 175 of the Education Act 2002
- Counter-Terrorism and Security Act 2015
- Protecting children from radicalisation: the prevent duty – August 2015
- Working together to safeguard children – December 2023
- Keeping children safe in education – September 2024Section 5B(11) of the Female Genital Mutilation Act 2003, as inserted by section 74 of the Serious Crime Act 2015
- The Rehabilitation of Offenders Act 1974
- Schedule 4 of the Safeguarding Vulnerable Groups Act 2006, which defines what 'regulated activity' is in relation to children.
- School Staffing (England) Regulations 2009
- Sexual Offences Act (2003)

This policy forms part of a suite of documents and policies which relate to the safeguarding responsibilities of the College.

Northamptonshire Safeguarding Children Partnership

The following **3 safeguarding partners** are identified in Keeping Children Safe in Education (and defined in the Children Act 2004, as amended by chapter 2 of the Children and Social Work Act 2017). They will make arrangements to work together to safeguard and promote the welfare of local children, including identifying and responding to their needs:

- The local authority (LA)

- Integrated Care Systems' (ICSs) for an area within the LA

- The chief officer of police for a police area in the LA area

Moulton College complies with this guidance and the procedures set out by Northamptonshire Safeguarding Children Partnership.

http://www.northamptonshirescb.org.uk/about-northamptonshire-safeguarding-children-partnership/the-partnership/

Safeguarding and Child Protection Policy

Policy Statement

1. At Moulton College we are committed to safeguarding children and young people, and we expect everyone who works in our college to share this commitment and ensure we create a culture of vigilance.

    Adults in our college take all welfare concerns seriously and encourage children and young people to talk to us about anything that worries them. We will always act in the best interest of the child.

    The need for guidelines and procedures is important to ensure that this is done with understanding and clarity.

    The college assesses the risks and issues in the wider community when considering the well-being and safety of its students.

    The college provides guidance to organisations providing work experience with details of expected conduct when working with under 18s and safeguarding procedures

2. Moulton College will aim to protect and safeguard children and young people through the application of the procedures linked to this policy. The College recognises that protecting and safeguarding children and young people is a shared responsibility and depends upon effective joint working between partners that have different roles and expertise.

3. This policy aims to inform staff, parents/carers, volunteers, and governors about the college's statutory responsibilities for safeguarding children and young people. It aims to enable everyone to have a clear understanding of how these responsibilities should be carried out and that appropriate action is taken in a timely manner to safeguard and promote children's welfare.

4. At Moulton students are taught about safeguarding, including but not exhaustive of Child-on-Child abuse and online safety, through various teaching and learning opportunities, as part of providing a broad and balanced curriculum. Students are taught to recognise when they are at risk and how to get help when they need it by;

    - Personal development tutors' tutorials
    - Leaflets/posters around college
    - Pop up screens on computer
    - Wellbeing days
    - 1:1 pastoral appointments
    - External speakers

Policy Standards

5. Moulton College will work with the Northamptonshire Safeguarding Children Partnership (NSCP), the Local Authority Designated Officer (DO), the police and social services whilst always placing the welfare of the child at the centre of actions taken.

6. Moulton College will work within the Working Together to Safeguard Children (2023) and Keeping Children Safe in Education (2024)statutory guidance to safeguard and promote the welfare of children.

7. Moulton College recognises that all members of staff and students have an important role to play in safeguarding the welfare of children and preventing their abuse. To this end all staff employed by or working with the college are required to adhere to the procedures

linked to the Safeguarding and Child Protection policy and these procedures are clearly outlined to staff during induction undertaken by all new staff.

8.   It is not the responsibility of the College or its staff to investigate abuse.

9.   Any member of staff receiving a complaint or allegation or who has suspicions that child abuse is taking place will follow the procedures for reporting the incident via the Safeguarding team who are DSL level trained in Safeguarding. Moulton College is a member of the Northamptonshire Safeguarding Children Partnership.

10.   The safeguarding and child protection policy and procedures will be reviewed annually by the Vice Principal of Curriculum, who is the Designated Senior Person responsible for safeguarding, and the Director of SEND and Student Experience who is the Designated Safeguarding Lead and Single Point of Contact for Prevent, in line with the current statutory guidance and in consultation with the Northamptonshire Safeguarding Children Partnership as appropriate. Substantive changes will be approved by the Board of Governors.

11.   Where a student who is not defined as a child under the Children Act (1989) is identified as being at risk, the same procedures will be followed up to informing the Designated Senior Person. This applies to all students, but special consideration may be necessary in the case of students with learning difficulties and disabilities and/or who may be regarded as a vulnerable adult under the age of 25.

Definitions

12.   Safeguarding and promoting the welfare of children is defined as:

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

13.   The term 'Child' refers to anyone under the age of 18.

14.   This policy also applies to vulnerable young people and adults who may be over the age of 18.

15.   Child Protection is part of safeguarding and promoting welfare. Child protection is the activity undertaken to protect specific children who are suffering, or who are likely to suffer, significant harm.

16.   Abuse is a form of maltreatment of a child and may involve inflicting harm or failing to act to prevent harm.

17.   Neglect is a form of abuse and is the persistent failure to meet a child's basic physical and/or psychological needs, likely to result in the serious impairment of the child's health or development.

Roles and Responsibilities

18.   Safeguarding and child protection is **everyone's** responsibility. This policy applies to all staff, volunteers and governors in the school and is consistent with the procedures of Northamptonshire Safeguarding Children Partnership

19.   Our policy and procedures also apply to extended college and off-site activities.

20.   We will include opportunities across the curriculum, including tutorials for young people to be taught about safeguarding and to develop the skills they need to recognise danger and know where to seek help.

21.   We will maintain an attitude of "it could happen here" where safeguarding is concerned.

Responsibilities of all staff

22.   All staff will read and understand Part I and Annex A of the Department for Education's statutory safeguarding guidance, Keeping Children Safe in Education 2024 and review this guidance at least annually.

23.   All staff stand in a position of trust in relation to young people. As a result, they have a responsibility to conduct themselves in line with the professional standards expected of those standing in such a role.

24.   All staff will be aware of:

- Our systems which support safeguarding, including the staff code of conduct, the role of the designated safeguarding lead (DSL), the behaviour policy, Child-on-Child abuse policy and the safeguarding response to children who are absent from education (CAE The early help process and their role in it, including identifying emerging problems, liaising with the safeguarding team and sharing information with other professionals to support early identification and assessment
- The process for making referrals to local authority children's social care and for statutory assessments that may follow a referral, including the role they might be expected to play.
- What to do if they identify a safeguarding issue or a child tells them they are being abused or neglected, including specific issues such as FGM, and how to maintain an appropriate level of confidentiality while liaising with relevant professionals
- The signs of different types of abuse and neglect, as well as specific safeguarding issues, such as child criminal exploitation, child sexual exploitation (CSE), FGM, child-on-child abuse and radicalisation.
- Serious Violence - All staff should be aware of indicators, which may signal that children are at risk from or are involved with serious violent crime. These may include increased absence from college, a change in friendships or relationships with older individuals or groups, a significant decline in performance, signs of self-harm, or a significant change in wellbeing, or signs of assault or unexplained injuries. Unexplained gifts or new possessions could also indicate that children have been approached by or are involved with individuals associated with criminal networks or gangs.
- **All staff to be aware of the college monitoring and filtering systems and that it is in place to prevent children and young people accessing inappropriate and harmful content online.**

Board of Governors Responsibilities

25.   The Board of Directors/Governors at Moulton College stand by their responsibilities as stated in Keeping Children Safe in Education, 2024. Governors also have a specific responsibility for ensuring that the College monitors the impact of its work and learns lessons from Child Safeguarding Practice Reviews.

26. The Board of Governors recognise that the Local Authority and the Local Safeguarding Partnership has a statutory responsibility to monitor schools' and colleges' compliance with statutory guidance.

27. The link governor for Safeguarding and Prevent is Suzanne Ljewsky. As part of their duties, they will take lead responsibility for overseeing any allegations made against the Principal and other Directors/ Governors in relation to safeguarding matters.

28. Where an allegation is made against the link Governor the Chair of Governors will then take the lead. She is responsible for overseeing the liaison between the Designated Officer, Social Services and/or the police, in connection with such allegations. This will not involve undertaking any form of investigation but will ensure good communication between the parties and provision of information to assist enquiries.

29. The Board of Governors instructs the College to:

   ▪ Provide a safe environment for children, young people and adults to learn in.
   ▪ Identify those who are suffering, or are likely to suffer significant harm or who are at risk of radicalisation.
   ▪ Take appropriate action to see that learners are kept safe at College, and that disclosures of potential abuse occurring at home or elsewhere are reported appropriately.
   ▪ Refer concerns that a young person or adult is at risk of significant harm or might be at risk of significant harm to the appropriate referral agents.
   ▪ Work effectively with others as required by 'Working Together to Safeguard Children, July 2023'.
   ▪ Listen to the voice of the child/young person/adult and always act in the interest of the child/ young person/adult.
   ▪ Ensure appropriate safeguarding response for learners who go missing from College.
   ▪ Ensure there is an effective Safeguarding Policy in place together with a Staff Code of Conduct which includes staff/learner relationships and communications including social media.

30. The Board of Governors will approve and review annually the Safeguarding Policy and Procedure, and receive regular information on safeguarding with the aim of:

   ▪ Maintaining awareness of progress across the College and/or issues relating to the welfare of children, young people, and adults at risk of harm.
   ▪ Being reassured by the Principal and Vice Principal that systems are in place and effective in relation to the identification of young people and adults at risk of harm, and procedures for reporting concerns are widely known.
   ▪ Ensuring effective procedures for reporting and dealing with allegations of abuse by members of staff or others who come into contact with learners through College activity are in place including referral to the Designated Officer.
   ▪ Ensuring safe recruitment of staff and volunteers
   ▪ Ensuring staff are appropriately trained to discharge their duties in relation to safeguarding.
   ▪ Ensuring procedures are in place to make referral to the Disclosure and Barring Services (DBS) if a person in regulated activity has been dismissed or removed due to safeguarding concerns or would have been if they had not resigned.
   ▪ regularly reviewing the effectiveness of College filters and monitoring systems at the annual Safeguarding meeting with IT staff and service providers.

31. In developing policies and procedures, the Board of Governors will take account of guidance issued by the Northamptonshire Children's Trust and the Counterterrorism and Security Act, 2015.

32. The Principal, Governors and all staff working with children, young people and adults at

risk of harm will receive adequate training to familiarise them with their safeguarding roles and responsibilities. They will be familiar with College procedures and policies and receive annual updates. A member of the College Management Team will be the Designated Safeguarding Lead who will be assisted by the Safeguarding Team who share responsibility for safeguarding learners. Governors should regularly review the effectiveness of college filters and monitoring systems. They should ensure that the leadership team and relevant staff are aware of and understand the systems in place, Manage them effectively, know how to escalate concerns when identified

33. The Board of Governors will receive from the Designated Safeguarding Lead, regular update reports which includes how the duties have been discharged.

The Senior Person with responsibility for Safeguarding and Prevent Responsibilities

34. The Senior Person with responsibility for safeguarding, Faye Williams, Vice Principal can be contacted on 01604 491121 extension 2029 and is responsible for ensuring that:

- Staff are aware of issues relating to the welfare of children, young people and adults at risk of harm (including online). On instruction from the Principal, the Vice Principal will inform the Safeguarding team who will contactthe Designated Officer for children and young people under 18 or the Adult Safeguarding Unit for adults at risk of harm to discuss referral and action when in relation to an allegation against a staff member. The Vice principal will report to the Disclosure and Barring Service (DBS) if a person in regulated activity has been dismissed or removed due to safeguarding concerns or would have been if they had not resigned.
- Ensuring that staff (including temporary staff) and volunteers are informed of this policy as part of their induction
- Communicating this policy to parents when their child joins the college and via the college website
- Ensuring that the DSL has appropriate time, funding, training and resources, and that there is always adequate cover if the DSL is absent
- Ensuring that all staff undertake appropriate safeguarding and child protection training and update this regularly
- Acting as the 'case manager' in the event of an allegation of abuse made against another member of staff or volunteer, where appropriate

The Designated Safeguarding Lead and Single Point of Contact for Prevent Responsibilities

35. The Designated Safeguarding Lead (DSL), Nikki Southgate Director of SEND and Student Experience can be contacted on 01604 491121 extension 2010 and is responsible for ensuring that:

- Cases of suspected abuse or allegations are appropriately referred to relevant agencies (local authority children's social care, Channel programme, Disclosure and Barring Service, and/or police).
- Advice and support is provided to staff on issues relating to safeguarding.
- A record of any safeguarding referral, complaint or concern is kept, even where that concern does not lead to a referral.
- Parents/carers/employers of children, young people or adults within the College have access to the College's Safeguarding Policy.
- Moulton College works with appropriate partners to safeguard children, young people, and adults at risk of harm.
- A member of the Safeguarding Team or tutor attends case conferences and review meetings, contributes to assessments and provides reports when requested.
- Has lead responsibility for the expectations and responsibilities around the colleges filtering and monitoring IT systems

- Where staff discover that an act of FGM has been carried out it is reported to the police as our mandatory duty.
- Prepare a safeguarding report for the Board of Governors
- The Vice Principal and Principal are informed of any issues and liaise with Local Authority case managers and Designated Officers for child protection concerns as appropriate.
- Refresher training is attended at least every two years. The DSL should also undertake Prevent awareness training and their knowledge and skills should be refreshed, (for example via e-bulletins, meeting other DSLs, or taking time to read and digest safeguarding developments), at least annually.
- They are aware of the statutory guidance PACE Code C 2019, the role of an Appropriate Adult following the Child Q case review.

36. The DSL will be given the time, funding, training, resources, and support to meet the above responsibilities.

37. When the DSL is absent, the Deputy Designated Safeguarding Lead, Vicki Hickman (Safeguarding and Wellbeing Manager) will act as cover.

38. If the DSL and deputy are not available, the Safeguarding Assistant, Dan Noone (Residential Coordinator) and Safeguarding and Wellbeing Officers will act as cover.

39. The Deputy DSL, Safeguarding and Wellbeing officers and the Safeguarding Assistant are trained to the same level as the DSL.

40. Whilst the activities of the designated safeguarding lead can be delegated to appropriately trained deputies, the ultimate **lead responsibility** for child protection, as set out above, remains with the designated safeguarding lead; this **lead responsibility** should not be delegated. (*Annex C; Paragraph 2 Keeping Children Safe in Education 2024*

41. The full responsibilities of the DSL are set out in their job description.

42. The Designated Safeguarding Lead should undergo formal training every two years. The DSL should also undertake Prevent awareness training. In addition to this training, their knowledge and skills should be refreshed, (for example via e-bulletins, meeting other DSLs, or taking time to read and digest safeguarding developments), at least annually.

43. The Safeguarding and Wellbeing Team will:

- Liaise with the Designated Safeguarding Lead regarding referrals.
- Appropriately refer cases of suspected abuse or allegations to relevant agencies.
- Provide advice and support to other staff on issues relating to safeguarding.
- Attend case conferences and review meetings as appropriate, contributing to assessments and providing reports when requested.
- Attend refresher training at least every two years and keep up-to-date.

44. The Executive Director of Human Resources will be responsible for ensuring compliance with safeguarding requirements in relation to the recruitment and induction of staff and for the implementation of safer recruitment practices.

45. Safer recruitment training is available to all relevant staff and governors who are involved in the recruitment process.

Raising a Concern

46. Where any member of staff has a concern the following procedure will apply:

- Safeguarding concern is reported onto the electronic system My Concern.
  Emergencies are phoned through to the duty safeguarding officer before logged on the

My Concern system.

- ▪ This triggers an alert to the safeguarding team who monitor MyConcern, and will triage the urgency of the safeguarding situation within the hour.
- ▪ Safeguarding team will follow up - usually by making face-to-face contact with the student, who the concern is about.
- ▪ Parents/carers called and notified if young person is under 18 or if we have concerns about their safety or vulnerability if over 18 unless to do so would place the child/young person/vulnerable adult at further risk or undermine the collection of evidence e.g., obtaining forensic evidence.
- ▪ GP, Police, emergency services, Prevent, MASH referral or Mental Health Crisis team alerted if required.
- ▪ All actions and referrals are logged on the system and followed up as relevant.

Thresholds for Intervention

47. The DSL/Deputy DSL will decide on the most appropriate course of action and whether the concerns should be referred to Children's Social Care, referring to the Northamptonshire Thresholds Guidance or guidance from the relevant local authority. If it is decided to make a referral to Children's Social care the parent/carer will be informed, unless to do so would place the child at further risk or undermine the collection of evidence e.g. obtaining forensic evidence. All concerns, discussions and decisions will be recorded on My Concern. NB: Informing parents/carer does not require seeking their consent to share the information with professionals who need to know.

48. The DSL/Deputy DSLwill provide guidance on the appropriate action. Options will include:

- ▪ Managing any support for the child internally via the college's own pastoral support processes
- ▪ An Early Help Assessment or
- ▪ A referral for statutory services e.g., the child is or might be in need or suffering or likely to suffer significant harm

49. **Early Help** - If early help is appropriate, the DSL/Deputy DSL's will generally lead on liaising with other agencies and setting up an inter-agency assessment as appropriate. Staff may be required to support other agencies and professionals in an early help assessment, in some cases acting as the lead practitioner. Any such cases should be kept under constant review and consideration given to a referral to Children's Social Care for assessment for statutory services if the young person's situation does not appear to be improving or is getting worse.

50. **Children in Need** – A child in need is defined under the *Children Act 1989* as a child who is unlikely to achieve or maintain a reasonable level of health or development, or whose health and development is likely to be significantly or further impaired, without the provision of services; or a child who is disabled. The Local Authority is required to provide services for children in need for the purposes of safeguarding and promoting their welfare. Children in need may be assessed under section 17 of the *Children Act 1989*.

51. **Children suffering or likely to suffer significant harm** - Local authorities, with the help of other organisations as appropriate, have a duty to make enquiries under section 47 of the *Children Act 1989* if they have reasonable cause to suspect that a child is suffering, or is likely to suffer, significant harm. Such enquiries enable them to decide whether they should take any action to safeguard and promote the child's welfare and must be initiated where there are concerns about maltreatment, including all forms of abuse and neglect, female genital mutilation or other so-called honour-based abuse, and extra-familial threats like radicalisation and criminal/sexual exploitation.

52. The DSL/Deputy DSL should refer all cases of suspected abuse or neglect to the Multi Agency Safeguarding Hub (MASH), Police (cases where a crime may have been committed) and to the Channel programme where there is a radicalisation concern.

53. Safeguarding Referrals must be made in one of the following ways:

   ▪ By telephone contact to the Multi-Agency Safeguarding Hub (MASH): 0300 126 7000 (Option 1)
   ▪ By e-mail to: MASH@northamptonshire.gcsx.gov.uk
   ▪ By using the online referral form found at:

   https://northamptonshire-self.achieveservice.com/en/service/Make_a_children_s_referral_to_Northamptonshire_s_MASH

   ▪ In an emergency outside office hours, contact children's social care out of hours team on 01604 626938 or the Police
   ▪ If a child is in immediate danger at any time, left alone or missing, the police should be contacted directly and/or an ambulance using 999

Safeguarding and Prevent Board

54. Moulton College's Cross-College Safeguarding and Prevent Committee will meet a minimum of three times a year to:

   ▪ Oversee the review and development of Moulton College's Safeguarding and Prevent Policies and Procedures, including any linked policies.
   ▪ Raise awareness of developments and good practice in relation to safeguarding and prevent
   ▪ Monitor the single central record.
   ▪ Review College security arrangements including IT.
   ▪ Receive and review the College's Safeguarding Reports prior to its presentation to SLT and the Board of Governors

Prevent

55. The Prevent Strategy is part of the Government's overall counter terrorism strategy known as CONTEST. The aim of Prevent is to stop people being drawn into terrorism: terrorist groups who pose a threat to the UK, seek to radicalise and recruit people to their cause. Early intervention is at the core of Prevent, aiming to divert people away from being drawn into terrorist activity.

56. The College has a statutory duty under Section 26 of the Counter Terrorism and Security Act 2015 to have "due regard to the need to prevent people from being drawn into terrorism".

The Government has defined extremism in the Prevent Strategy as:

" the promotion or advancement of an ideology based on violence, hatred or intolerance, that aims to:

   1. negate or destroy the fundamental rights and freedom of others; or
   2. undermine, overturn or replace the UK's system of liberal parliamentary democracy and democratic right; or
   3. intentionally create a permissive environment for others to achieve the results in (1) or (2).

57. British values are defined as: "democracy, the rule of the law, individual liberty and mutual respect and tolerance for those with different faiths and beliefs".

58. The College recognises that extremism and exposure to extremist materials and influences can lead to poor outcomes for learners and so should be addressed as a safeguarding concern. We also recognise that if we fail to challenge extremist views we are failing to protect our learners. Therefore, the Prevent agenda will be addressed as a safeguarding concern.

59. As part of the Colleges' wider safeguarding responsibilities staff will be alert to:

   ▪ Disclosures by learners of their exposure to extremist actions, views or materials by others, both inside or outside of the College, including in their homes, community groups, especially where learners have not actively sought these out
   ▪ Learners expressing opinions that indicate a support for terrorism or violence/ or for the leaders of terrorist organisations
   ▪ Attempts to impose extremist views or practices on others
   ▪ Possession of violent or extremist material in digital or hard format including possession of material relating to weapons and explosives
   ▪ Graffiti symbols, writing or artwork promoting extremist messages or images
   ▪ Learners accessing extremist material online, including through social networking sites
   ▪ Parental reports of changes in behaviour, friendships or actions and request for assistance
   ▪ Intolerance of difference, whether secular or religious or views based on, but not exclusive to, gender, disability, homophobia, race or culture

60. The above is not exhaustive and it should be noted that those behaviours listed above are not themselves indicators or criminality or criminal intent. Prevent is about looking for signs that an individual may be at risk and benefit from some supportive intervention.

61. Prejudice, discrimination, or extremist views, including derogatory language will be challenged and where necessary dealt with in line with our Learner Behaviour, Support and Disciplinary Policy for Learners and Code of Conduct for staff.

62. Where there is a concern, the DSL/Deputy DSL's will consider the level of risk and decide which agency to make a referral to. This could include **Channel**, the government's programme for identifying and supporting individuals at risk of being drawn into terrorism, or the local authority children's social care team.

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

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

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

British Values

65. Moulton consider British Values to underpin what it is to be a citizen in our modern and diverse society and as such are of significant importance to everyone involved in any College activity. These values are promoted through the College's themed event programme and embedded into curriculum.

66. The five-part definition of British Values is:

- Democracy
- The Rule of Law
- Individual Liberty
- Mutual Respect
- Tolerance of Different Faiths and Beliefs

Use of External Agencies and Speakers

67. The College is committed to enriching our learners' experience at Moulton and to the health and wellbeing of our learners via themed events. We proactively vet those organisations that we invite into our College to ensure their suitability, effectiveness, and benefit to our learners. Staff complete a Visiting Speaker check list prior to them coming on site as per the Visiting Speaker Policy.

68. This process is to ensure that we do not unwittingly use agencies that contradict each other with their messages or that are inconsistent with, or are in opposition to the College's values and ethos.

Female Genital Mutilation (FGM)

69. The Department for Education's Keeping Children Safe in Education (2024) explains that FGM comprises "all procedures involving partial or total removal of the external female genitalia, or other injury to the female genital organs". FGM is illegal in the UK and a form of child abuse with long-lasting, harmful consequences. It is also known as 'female genital cutting', 'circumcision' or 'initiation'.

70. Possible indicators that a learner has already been subjected to FGM, and factors that suggest a learner may be at risk, are set out in appendix 1

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

72. Unless they have good reason not to, they should also discuss the case with the DSL/Deputy DSL's and involve children's social care as appropriate.

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

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

75. Any member of staff who suspects a learner is *at risk* of FGM or suspects that FGM has been carried out, or discovers that a pupil aged 18 or over appears to have been a victim of FGM must speak to the DSL/Deputy DSL's and follow our local safeguarding procedures.

Child on Child Abuse

76. We recognise that children are capable of abusing their peers.

77. Even if there are no reported cases of Child-on-Child abuse, such abuse may still be taking place and is simply not being reported.

78. It should be recognised that it is more likely that girls will be victims and boys' perpetrators, however all Child-on-Child abuse is unacceptable and will be taken seriously. Staff should be aware that students may not wish to be known as victim or perpetrator.

79. Moulton College has a zero-tolerance approach to abuse, it should never be tolerated or passed off as "banter" or "part of growing up" as this can lead to a culture of unacceptable behaviours and an unsafe environment for children.

80. Child on Child abuse can take many forms. This can include but is not limited to:

   ▪ Child on Child
   ▪ Bullying (including cyberbullying, prejudice-based and discriminatory bullying
   ▪ Sexual violence and sexual harassment
   ▪ Abuse in intimate personal relationships between peers
   ▪ Physical abuse such as hitting, kicking, shaking, biting, hair pulling or otherwise

81. Most cases of pupils hurting other pupils will be dealt with under the school's behaviour policy and Child on Child policy but this child protection and safeguarding policy will apply to any allegation that raises safeguarding concerns. This might include where the alleged behaviour:

   ▪ Is serious and potentially a criminal offence
   ▪ Could put pupils in the school at risk
   ▪ Is violent
   ▪ Involves pupils being forced to use drugs or alcohol
   ▪ Involves sexual exploitation or sexual abuse, such as indecent exposure, sexual assault, or sexually inappropriate pictures or videos/sharing of nudes or semi nudes. *UK Council for Internet Safety (UKCIS) Guidance: Sharing nudes and semi-nudes(December 2020)*

82. If one child or young person causes harm to another, this should not necessarily be dealt with as abuse. When considering whether behaviour is abusive, it is important to consider:

   ▪ Whether there is a large difference in power (for example age, size, ability, development) between the young people concerned; or
   ▪ Whether the perpetrator has repeatedly tried to harm one or more other children; or
   ▪ Whether there are concerns about the intention of the alleged perpetrator.

83. Child on Child abuse can manifest itself in many ways and different gender issues can be prevalent. Severe harm may be caused to children by abusive and bullying behaviour of other children, which may be physical, sexual or emotional and can include gender-based violence/sexual assaults, sharing of nudes/semi-nudes, domestic abuse, peer-on-peer exploitation, serious youth violence, stalking, sexual bullying or harmful sexual behaviour.

84. Guidance on responding to and managing sexting incidents can be found at: Sexual violence and sexual harassment between children in schools and colleges.pdf Sexting In Schools FINAL Jan17.pdf

85. In order to minimise the risk of Child on Child abuse the school:

   ▪ Provides a developmentally appropriate PSHE curriculum which develops students understanding of acceptable behaviour and keeping themselves safe.
   ▪ Have systems in place for any student to raise concerns with staff, knowing that they will be listened to, believed, and valued.
   ▪ Develop robust risk assessments where appropriate.
   ▪ Have relevant policies in place (e.g., Child on Child abuse policy and behaviour policy).

86.   Children with special educational needs or disabilities (SEND) or certain health conditions can face additional safeguarding challenges. Additional barriers can exist when recognising abuse and neglect in this group of children.

87.   These can include:

- Assumptions that indicators of possible abuse such as behaviour, mood and injury related to the child's condition without further exploration;
- These children being more prone to peer group isolation or bullying (including prejudice-based bullying) than other children;
- The potential for children with SEND or certain medical conditions being disproportionally impacted by behaviours such as bullying, without outwardly showing any signs; and
- Communication barriers and difficulties in managing or reporting these challenges.
- At Moulton College we provide pastoral support and attention for these students, along with ensuring any appropriate support for communication is in place, for example learning support assistance and access to a specialist learning support assistant for ASD/ADHD/Emotional and behaviour. 1:1 pastoral appointments.

Sexual violence and sexual harassment between children in colleges

88.   Sexual violence and sexual harassment can occur between two children of any age and sex. It can also occur through a group of children sexually assaulting or sexually harassing a single child or group of children.

89.   Children who are victims of sexual violence and sexual harassment will likely find the experience stressful and distressing. This will, in all likelihood, adversely affect their educational attainment.

90.   Sexual violence and sexual harassment exist on a continuum and may overlap, they can occur Online and offline (both physical and verbal) and are never acceptable. It is important that all victims are taken seriously and offered appropriate support. Staff should be aware that some groups are potentially more at risk. Evidence shows girls, children with SEND and LGBT children are at greater risk.

91.   Staff should be aware of the importance of:

- making clear that sexual violence and sexual harassment is not acceptable, will never be tolerated and is not an inevitable part of growing up;
- not tolerating or dismissing sexual violence or sexual harassment as "banter", "part of growing up", "just having a laugh" or "boys being boys"; and
- challenging behaviours (potentially criminal in nature), such as grabbing bottoms, breasts and genitalia, flicking bras and lifting up skirts. Dismissing or tolerating such behaviours risks normalising them.

What is Sexual Violence and Sexual Harassment?
Sexual violence

92.   It is important that school and college staff are aware of sexual violence and the fact children can, and sometimes do, abuse their peers in this way. When referring to sexual violence we are referring to sexual offences under the Sexual Offences Act 2003 as described below:

93.   Rape: A person (A) commits an offence of rape if: they intentionally penetrate the vagina, anus or mouth of another person (B) with their penis, B does not consent to the penetration and A does not reasonably believe that B consents.

Statutory rape is a type of sexual offense that occurs when one person has sexual intercourse with another person who is under the age of consent. The age of

consent for sexual activity in the UK is 16 years old. (Sexual offences act 2003 Part 1 section 9).

94.   Assault by Penetration: A person (A) commits an offence if: they intentionally penetrate the vagina or anus of another person (B) with a part of their body or anything else, the penetration is sexual, B does not consent to the penetration and A does not reasonably believe that B consents

95.   Sexual Assault: A person (A) commits an offence of sexual assault if: they intentionally touch another person (B), the touching is sexual, B does not consent to the touching and A does not reasonably believe that B consents.

What is consent?

96.   Consent is about having the freedom and capacity to choose. Consent to sexual activity may be given to one sort of sexual activity but not another, e.g.to vaginal but not anal sex or penetration with conditions, such as wearing a condom. Consent can be withdrawn at any time during sexual activity and each time activity occurs. Someone consents to vaginal, anal or oral penetration only if they agree by choice to that penetration and has the freedom and capacity to make that choice.

Sexual Harassment

97.   When referring to sexual harassment we mean 'unwanted conduct of a sexual nature' that can occur online and offline. When we reference sexual harassment, we do so in the context of child-on-child sexual harassment. Sexual harassment is likely to: violate a child's dignity, and/or make them feel intimidated, degraded, or humiliated and/or create a hostile, offensive or sexualised environment.

98.   Whilst not intended to be an exhaustive list, sexual harassment can include:

- sexual comments, such as: telling sexual stories, making lewd comments, making sexual remarks about clothes and appearance and calling someone sexualised names;
- sexual "jokes" or taunting;
- physical behaviour, such as: deliberately brushing against someone, interfering with someone's clothes (schools and colleges should be considering when any of this crosses a line into sexual violence - it is important to talk to and consider the experience of the victim) and displaying pictures, photos or drawings of a sexual nature; and online sexual harassment. This may be standalone, or part of a wider pattern of sexual harassment and/or sexual violence.

It may include:

- non-consensual sharing of sexual images and videos.
- sexualised online bullying.
- unwanted sexual comments and messages, including, on social media; and
- sexual exploitation; coercion and threats
- Upskirting - generally involves taking a picture under a person's clothing without them knowing, with the intention of viewing their genitals or buttocks to obtain sexual gratification, or cause the victim humiliation, distress or alarm. It is now a criminal offence.

The response to a report of sexual violence or sexual harassment

99.   The initial response to a report from a studentis important. It is essential that all victims are reassured that they are being taken seriously and that they will be supported and kept safe. A victim should never be given the impression that they are creating a problem by

reporting sexual violence or sexual harassment. Nor should a victim ever be made to feel ashamed for making a report.

100. Domestic abuse – This can be psychological, sexual, physical, financial or emotional, which can include control coercion and threats. This can impact on child/young person through seeing, hearing or experiencing the effects of domestic abuse and/or experiencing it through their own intimate relationships.

Dealing with a Disclosure

101. If a young person discloses that he or she has been abused in some way, the member of staff/volunteer should:

- Listen to what is being said without displaying shock or disbelief
- Accept what is being said
- Allow the child to talk freely
- Reassure the child, but not make promises which it might not be possible to keep
- Never promise a child that they will not tell anyone - as this may ultimately not be in the best interests of the child.
- Reassure him or her that what has happened is not his or her fault
- Stress that it was the right thing to tell
- Listen, only asking questions when necessary to clarify
- Not criticise the alleged perpetrator
- Explain what has to be done next and who has to be told
- Make a written record (see Record Keeping)
- Pass the information to the Safeguarding Team without delay.

102. Alternatively, if appropriate, make a referral to children's social care and/or the police directly (see 7.1), and tell the DSL/Deputy DSL's as soon as possible that you have done so.

If an adult student discloses any nonconsensual sexual act or harassment the member of staff/volunteer should:

- Listen to what is being said without displaying shock or disbelief
- Accept what is being said
- Allow the student to talk freely
- Reassure the student, but not make promises which it might not be possible to keep
- Reassure him or her that what has happened is not his or her fault
- Stress that it was the right thing to tell
- Listen, only asking questions when necessary to clarify
- Not criticise the alleged perpetrator
- Encourage student to speak with safeguarding who would signpost to external support
- Make a written record (see Record Keeping) and inform student of need to do so
- Pass the information to the Safeguarding Team without delay.

If vulnerable adult and appropriate, make a referral to adult social care and/or the police directly and inform the safeguarding team of action taken.

Allegations or Low-level concerns about an adult working in the college whether as a tutor, agency staff, support staff, other staff, volunteers or contractor

103. At Moulton College we recognise the possibility that adults working in the college may harm children and young people, including governors, volunteers, temp staff and contractors.

104. Allegations or concerns may come from various sources, for example, a suspicion; complaint; or disclosure made by a young person, parent, or other adult within or outside of the organisation; or as a result of vetting checks undertaken.

105. The Senior Person with Responsibility for Safeguarding has to decide whether the concern is an allegation or low-level concern. The term 'low-level' concern does not mean that it is insignificant, it means that the behaviour towards a child/young person does not meet the criteria for an allegation; and the person has acted in a way that is inconsistent with the staff code of conduct, including inappropriate conduct outside of work.

106. Example low-level concern behaviours include, but are not limited to:

- Taking photographs of young people on their mobile phone;
- Using inappropriate, intimidating or offensive language
- Meeting young person outside of the college setting for non-college reasons
- Being friends with students on social media

107. If any staff has concerns about a member of staff or a volunteer, they should speak to the Senior Person with Responsibility for Safeguarding. If the concern has been raised via a third party, the safeguarding team should collect as much evidence as possible by speaking:

- Directly to the person who raised the concern, unless it has been raised anonymously;
- To the individual involved and any witnesses.

108. If you have concerns about the Senior Person with Responsibility for Safeguarding, they should speak to the chair of governors.

109. Staff can also discuss any concerns about any staff member or volunteer with the DSL/Deputy DSL.

110. Reports about supply staff and contractors should be notified to their employers, so any potential patterns of inappropriate behaviour can be identified.

111. The DSL/Deputy DSL (or chair of governors, in the case of a concern about the Senior Designated Person with Responsibility for Safeguarding) will also inform the Designated Officer (formerly LADO) for the local authority.

112. Low-level concerns should be recorded in writing. Records must be kept confidential and comply with Data Protection Act 2018. Records will be reviewed regularly and any patterns of concerning, problematic or inappropriate behaviour identified. If any patterns are identified and then meet the criteria for an allegation, then it will be referred to the Designated Officer. The policies and processes will be revised and if necessary extra training delivered to minimise the risk of it happening again.

113. Before contacting the Designated Officer, college will conduct basic enquiries in line with local procedures to establish the facts to help them determine whether there is any foundation to the allegation; being careful not to jeopardise any future police investigation.

114. For referrals regarding adults in education and other information on the role of the Designated Officer follow the link below:

http://www.northamptonshirescb.org.uk/health-professionals/taking-action/designated-officer/

115. Where an allegation is made against a supply teacher or volunteer, the DSL will immediately contact Designated Officer and the Exec of HR will contact the relevant Agency.. The College will continue to support any investigation that is required.

116. In no circumstances will the College decide to cease to use a supply teacher/volunteer due to safeguarding concerns, without finding out the facts and liaising with the local authority designated officer to determine a suitable outcome.

117. An allegation is any information which indicates that a member of staff/volunteer may have:

- Behaved in a way that has, or may have harmed a student
- Possibly committed a criminal offence against/related to a student Behaved towards a child/young person or people in a way which indicates she/he would pose a risk of harm to them and/or
- Behaved or may have behaved in a way that indicates they may not be suitable to work with children (also includes behaviour outside the college)

What college staff should do if they have concerns about safeguarding practices within the college:

118. All staff and volunteers should feel able to raise concerns about poor or unsafe practice and potential failures in the college's safeguarding arrangements.

119. Appropriate whistle blowing procedures, which are suitably reflected in staff training and staff behaviour policies, should be in place for such concerns to be raised with the college's senior leadership team. A whistleblowing disclosure must be about something that affects the general public such as:

- A criminal offence has been committed, is being committed or is likely to be committed
- A legal obligation has been breached
- There has been a miscarriage of justice
- The health or safety of any individual has been endangered
- The environment has been damaged
- Information about any of the above has been concealed.

The NSPCC run a whistleblowing helpline on behalf of the government, the number is 0800 028 0285

120. If staff members have concerns about another staff member, then this should be referred to the Senior Person with Responsibility for Safeguarding or Principal. Where there are concerns about the Senior Person with Responsibility for Safeguarding or Principal, this should be referred to the Chair of Governors.

121. The Chair of Governors in the college is:

NAME: David McVean   CONTACT: 01604 491131   Ext 2403

122. In the absence of the Chair of Governors, the Vice Chair should be contacted. The Vice Chair in the college is:

NAME: Charles Matts   CONTACT: 01604 491131   Ext 2403

123. In the event of a staff member feeling unable to raise an issue with their employer or feels that their genuine concerns are not being addressed, allegations should be reported directly to the Designated Officer (formerly LADO). Staff may consider discussing any concerns with the DSL and if appropriate make any referral via them.

124. The person to whom an allegation is first reported should take the matter seriously and keep an open mind. She/he should not investigate or ask leading questions if seeking clarification; it is important not to make assumptions. Confidentiality should not be

promised, and the person should be advised that the concern will be shared on a 'need to know' basis only.

125. Actions to be taken include making an immediate written record of the allegation using the informant's words – including time, date and place where the alleged incident took place, brief details of what happened, what was said and who was present. This record should be signed, dated, and immediately passed on to the Senior Person with Responsibility for Safeguarding. The recipient of an allegation must **not** unilaterally determine its validity, and failure to report it in accordance with procedures is a potential disciplinary matter.

126. The Senior Person with Responsibility for Safeguarding/Chair of Governors will not investigate the allegation itself, or take written or detailed statements, but will consult with Designated Officer (formerly LADO) to see if a referral is required:

Multi-Agency Safeguarding Hub: 0300 126 7000

127. If the allegation meets any of the criteria set out at the start of this section, contact should always be made with the Designated Officer (formerly LADO) without delay.

128. If it is decided that the allegation does not meet the threshold for safeguarding, it will be handed back to the employer for consideration via the college's internal procedures.

129. The Senior Person with Responsibility for Safeguarding should, as soon as possible, **following briefing** from the Designated Officer inform the subject of the allegation.

130. Where a staff member feels unable to raise an issue with their employer/through the whistle blowing procedure or feels that their genuine concerns are not being addressed, other whistleblowing channels may be open to them:

Multi-Agency Safeguarding Hub: **0300 126 7000**

NSPCC whistleblowing helpline is available for staff who do not feel able to raise concerns regarding child protection failures internally. Staff can call: **0800 028 0285** – line is available from 8:00 AM to 8:00 PM, Monday to Friday and Email: **help@nspcc.org.uk**

Safer Working Practice

131. To reduce the risk of allegations, all staff should be aware of safer working practice and should be familiar with the guidance contained in the staff code of conduct and Safer Recruitment Consortium document *Guidance for safer working practice for those working with children and young people in education settings (2022).*

132. The document seeks to ensure that the responsibilities of college leaders towards young people and staff are discharged by raising awareness of illegal, unsafe, unprofessional and unwise behaviour. This includes guidelines for staff on positive behaviour management in line with the ban on corporal punishment **(**School Standards and Framework Act 1998**).** Please see the Staff Code of Conduct policy for more information.

Record Keeping

133. All concerns, discussions and decisions made and the reasons for those decisions should be recorded on My Concern. If in doubt about recording requirements, staff should discuss with the DSL/Deputy DSL.

134. When a young person has made a disclosure, the member of staff/volunteer should:

▪ Record the information on My Concern as soon as possible after the conversation.

- Do not destroy the original notes in case they are needed by a court. Handwritten notes should be uploaded to My Concern.
- Record the date, time, place and any noticeable non-verbal behaviour and the words used by the child
- Record statements and observations rather than interpretations or assumptions

135. All records need to be uploaded to My Concern promptly. No copies should be retained by the member of staff or volunteer.

136. Confidential information and records will be held securely and only available to those who have a right or professional need to see them.

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

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

139. The Safeguarding team will contact the previous education establishment of new starters in September each year, requesting child protection files which may have not been received.

Confidentiality and Information Sharing

140. Information sharing is vital in identifying and tackling all forms of abuse and neglect. GDPR does not prevent, or limit, the sharing of information for the purposes of keeping children safe. Lawful and secure information sharing between schools/colleges, Children's Social Care, and other local agencies, is essential for keeping children safe and ensuring they get the support they need.

141. **The Data Protection Act 2018 introduced 'safeguarding' as a reason to be able to process sensitive, personal information, even without consent** (DPA, Part 2,18; Schedule 8, 4)

142. When the safeguarding team is considering whether, or not, to share safeguarding information (especially with other agencies) Moulton College will record who they are sharing that information with and for what reason. If we have taken a decision not to seek consent from the data subject and/or parent/carer that should also be recorded within My Concern

143. All relevant information can be shared without consent if to gain consent would place a child at risk.

144. Fears about sharing information **must not be allowed** to stand in the way of promoting the welfare and protecting the safety of children/young people. As with all data sharing, appropriate organisational and technical safeguards should still be in place.

145. The Working Together to Safeguarding Children (2023) statutory guidance states the following:

   1. Effective sharing of information is essential for early identification of need, assessment, and service provision to keep children safe.
   2. All professionals responsible for children should be proactive in sharing information as early as possible to help identify, assess and respond to risks or concerns about the safety and welfare of children, whether this is when problems are first emerging, or where a child is already known to local authority children's social care (e.g. they are being supported as a child in need or have a child protection plan). You should be

alert to sharing important information about any adults with whom that child has contact, which may affect the child's safety or welfare.

3. Information sharing is also essential for the identification of patterns of behaviour when a child has gone missing, when multiple children appear associated to the same context or locations of risk, or in relation to children in the secure estate where there may be multiple local authorities involved in a child's care.

4. Fears about sharing information must not be allowed to stand in the way of the need to promote the welfare, and protect the safety, of children, which must always be the paramount concern.

146. To ensure effective safeguarding arrangements:

- you should have arrangements in place that set out clearly the processes and the principles for sharing information. The arrangement should cover how information will be shared within your own organisation/agency; and with others who may be involved in a child's life

- all professionals responsible for children should not assume that someone else will pass on information that they think may be critical to keeping a child safe. If a member of staff has concerns about a child's welfare and considers that they may be a child in need or that the child has suffered or is likely to suffer significant harm, then they should share the information with local authority children's social care and/or the police. Staff should be particularly alert to the importance of sharing information when a child moves from one school to another, due to the risk that knowledge pertinent to keeping a child safe could be lost.

- you should aim to gain consent to share information, but should be mindful of situations where to do so would place a child at increased risk of harm. Information may be shared without consent if you have good reasons to do so, and believe that the sharing the information will enhance the safeguarding of a child in a timely manner. When decisions are made to share or withhold information, you should record who has been given the information and why.

147. Safeguarding young people raises issues of **confidentiality** that must be clearly understood by all staff/volunteers in colleges.

148. Staff should never promise that they will not tell anyone about an allegation, as this may not be in the young person's best interests

149. Staff/volunteers who receive information about young people and their families in the course of their work should share that information only within appropriate professional contexts.

150. Timely information sharing is essential to effective safeguarding.

151. Information must only be shared on a 'need-to-know' basis, but you do not need consent to share information if a child/young person is suffering, or at risk of, serious harm.

Communication with Parents/Carers

152. Moulton College will ensure the Safeguarding Policy is available publicly via the college website.

153. Where appropriate, we will discuss any concerns about a child/young person with their parents./carers. The DSL/Deputy DSL will normally do this in the event of a suspicion or disclosure.

154. Other staff will only talk to parents/carers about any such concerns following consultation with the DSL/Deputy DSL

155. If we believe that notifying the parents/carers would increase the risk to the child, we will discuss this with the local authority children's social care before doing so.

156. In the case of allegations of abuse made against other young people, we will normally notify the parents/carers of all the young people involved.

Online Safety

157. We ensure that we have effective mechanisms to identify, intervene in, and escalate any incident where appropriate. Online safety is included in our curriculum at all levels and information is also provided to parents/carers.

158. When children/young people use the college's network to access the internet, they are protected from inappropriate content by our filtering and monitoring system Smoothwall. However, many pupils are able to access the internet using their own data plan. To minimise inappropriate use students receive tutorials on online safety and phones are encouraged to be away during lessons.

159. All staff are made aware of the college policy on Online Safety which sets our expectations relating to:

   ▪ Creating a safer online environment – including training requirements, filters and monitoring;
   ▪ Giving everyone the skills, knowledge and understanding to help children and young people stay safe on-line;
   ▪ Inspiring safe and responsible use and behaviour;
   ▪ Safe use of mobile phones both within college and on school trips/outings;
   ▪ Safe use of camera equipment, including camera phones; and
   ▪ What steps to take if you have concerns and where to go for further help.

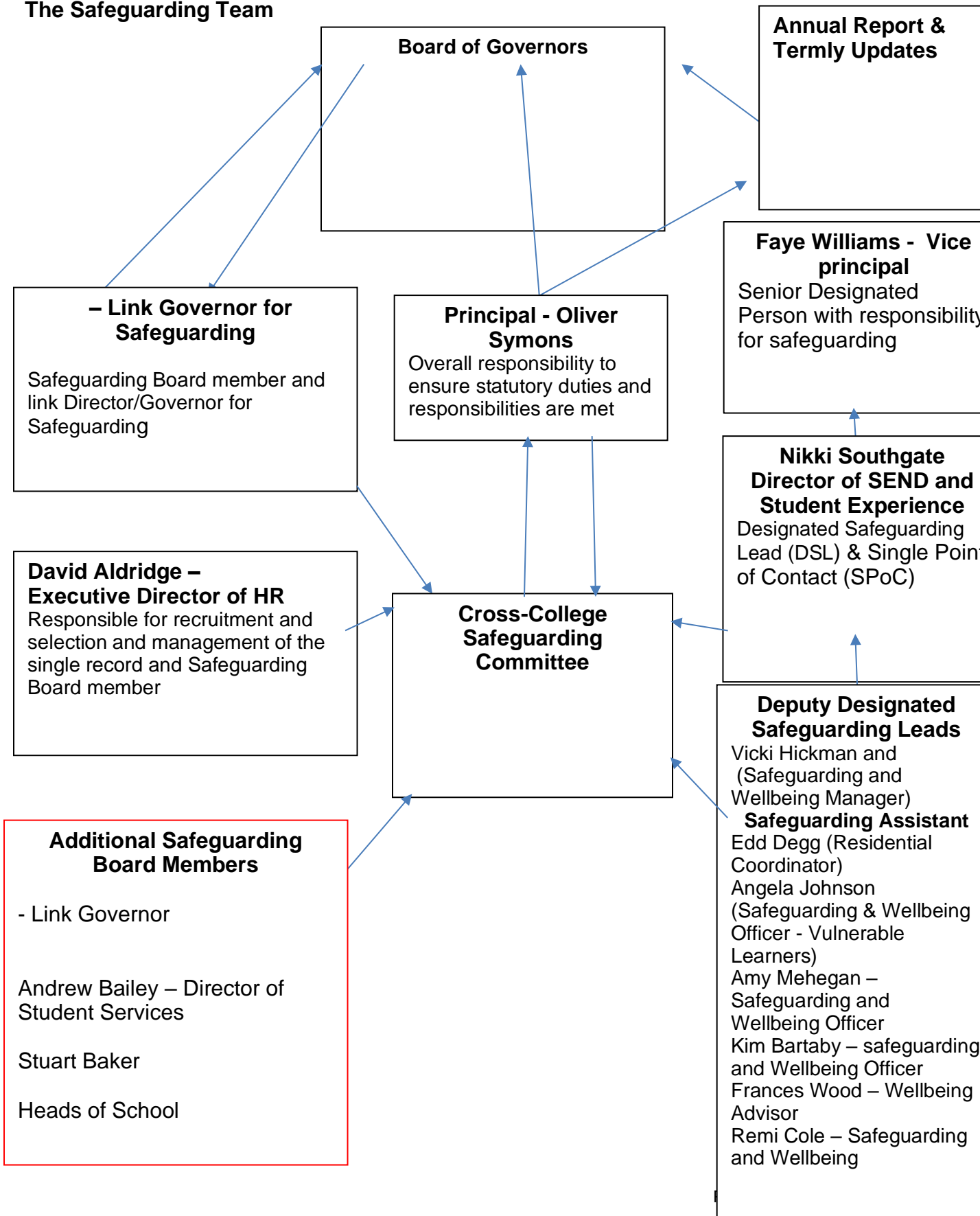160. Staff must read the Staff Code of Conduct in relation to personal online behaviour.
154. The DSL/DDSL will request test of the college filtering system on a termly basis from IT.
155. Filtering and monitoring systems to be reviewed at annual safeguarding meeting with actions made. All actions to be reviewed at termly Safeguarding and prevent meetings.

Implementation, Monitoring and Review of the Safeguarding Policy

161. The policy will be reviewed annually by the governing body. It will be implemented through the college's induction and training programme, and as part of day-to-day practice. Compliance with the policy will be monitored by the Designated Safeguarding Lead and through staff performance measures.

The Safeguarding Team

Board of Governors

Annual Report & Termly Updates

– Link Governor for Safeguarding

Safeguarding Board member and link Director/Governor for Safeguarding

Principal - Oliver Symons
Overall responsibility to ensure statutory duties and responsibilities are met

Faye Williams - Vice principal
Senior Designated Person with responsibility for safeguarding

David Aldridge – Executive Director of HR
Responsible for recruitment and selection and management of the single record and Safeguarding Board member

Nikki Southgate Director of SEND and Student Experience
Designated Safeguarding Lead (DSL) & Single Point of Contact (SPoC)

Cross-College Safeguarding Committee

Additional Safeguarding Board Members

- Link Governor

Andrew Bailey – Director of Student Services

Stuart Baker

Heads of School

Deputy Designated Safeguarding Leads
Vicki Hickman and
 (Safeguarding and Wellbeing Manager)
 Safeguarding Assistant
Edd Degg (Residential Coordinator)
Angela Johnson (Safeguarding & Wellbeing Officer - Vulnerable Learners)
Amy Mehegan – Safeguarding and Wellbeing Officer
Kim Bartaby – safeguarding and Wellbeing Officer
Frances Wood – Wellbeing Advisor
Remi Cole – Safeguarding and Wellbeing

Indicators of Abuse and Neglect

Types of abuse

Keeping Children Safe in Education, 2024 states:

21. All staff should be aware of indicators of abuse and neglect (see below), understanding that children can be at risk of harm inside and outside of the school/college, inside and outside of home and online. Exercising professional curiosity and knowing what to look for is vital for the early identification of abuse and neglect so that staff are able to identify cases of children who may be in need of help or protection.

22. All school and college staff should be aware that abuse, neglect and safeguarding issues are rarely standalone events and cannot be covered by one definition or one label alone. In most cases, multiple issues will overlap with one another.

23. All staff, but especially the designated safeguarding lead (and deputies) should consider whether children are at risk of abuse or exploitation in situations outside their families. Extra-familial harms take a variety of different forms and children can be vulnerable to multiple harms including (but not limited to) sexual abuse (including harassment and exploitation), domestic abuse in their own intimate relationships (teenage relationship abuse), criminal exploitation, serious youth violence, county lines, and radicalisation.

24. All staff should be aware that technology is a significant component in many safeguarding and wellbeing issues. Children are at risk of abuse and other risks online as well as face to face. In many cases abuse and other risks will take place concurrently both online and offline. Children can also abuse other children online, this can take the form of abusive, harassing, and misogynistic/misandrist messages, the non-consensual sharing of indecent images, especially around chat groups, and the sharing of abusive images and pornography, to those who do not want to receive such content.

25. In all cases, if staff are unsure, they should always speak to the designated safeguarding lead or deputy. Indicators of abuse and neglect

26. **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. Harm can include ill treatment that is not physical as well as the impact of witnessing ill treatment of others. This can be particularly relevant, for example, in relation to the impact on children of all forms of domestic abuse. Children may be abused in a family or in an institutional or community setting by those known to them or, more rarely, by others. Abuse can take place wholly online, or technology may be used to facilitate offline abuse. Children may be abused by an adult or adults or by another child or children.

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

28. **Emotional abuse**: the persistent emotional maltreatment of a child such as to cause severe and adverse effects on the child's emotional development. It may involve conveying to a child that they are worthless or unloved, inadequate, or valued only

insofar as they meet the needs of another person. It may include not giving the child opportunities to express their views, deliberately silencing them or 'making fun' of what they say or how they communicate. It may feature age or developmentally inappropriate 11 expectations being imposed on children. These may include interactions that are beyond a child's developmental capability as well as overprotection and limitation of exploration and learning or preventing the child from participating in normal social interaction. It may involve seeing or hearing the ill-treatment of another. It may involve serious bullying (including cyberbullying), causing children frequently to feel frightened or in danger, or the exploitation or corruption of children. Some level of emotional abuse is involved in all types of maltreatment of a child, although it may occur alone.

29. **Sexual abuse**: involves forcing or enticing a child or young person to take part in sexual activities, not necessarily involving violence, whether or not the child is aware of what is happening. The activities may involve physical contact, including assault by penetration (for example rape or oral sex) or non-penetrative acts such as masturbation, kissing, rubbing, and touching outside of clothing. They may also include non-contact activities, such as involving children in looking at, or in the production of, sexual images, watching sexual activities, encouraging children to behave in sexually inappropriate ways, or grooming a child in preparation for abuse. Sexual abuse can take place online, and technology can be used to facilitate offline abuse. Sexual abuse is not solely perpetrated by adult males. Women can also commit acts of sexual abuse, as can other children. The sexual abuse of children by other children is a specific safeguarding issue in education and all staff should be aware of it and of their school or college's policy and procedures for dealing with it.

30. **Neglect**: the persistent failure to meet a child's basic physical and/or psychological needs, likely to result in the serious impairment of the child's health or development. Neglect may occur during pregnancy, for example, as a result of maternal substance abuse. Once a child is born, neglect may involve a parent or carer failing to: provide adequate food, clothing and shelter (including exclusion from home or abandonment); protect a child from physical and emotional harm or danger; ensure adequate supervision (including the use of inadequate care-givers); or ensure access to appropriate medical care or treatment. It may also include neglect of, or unresponsiveness to, a child's basic emotional needs.

The framework for understanding children's needs:
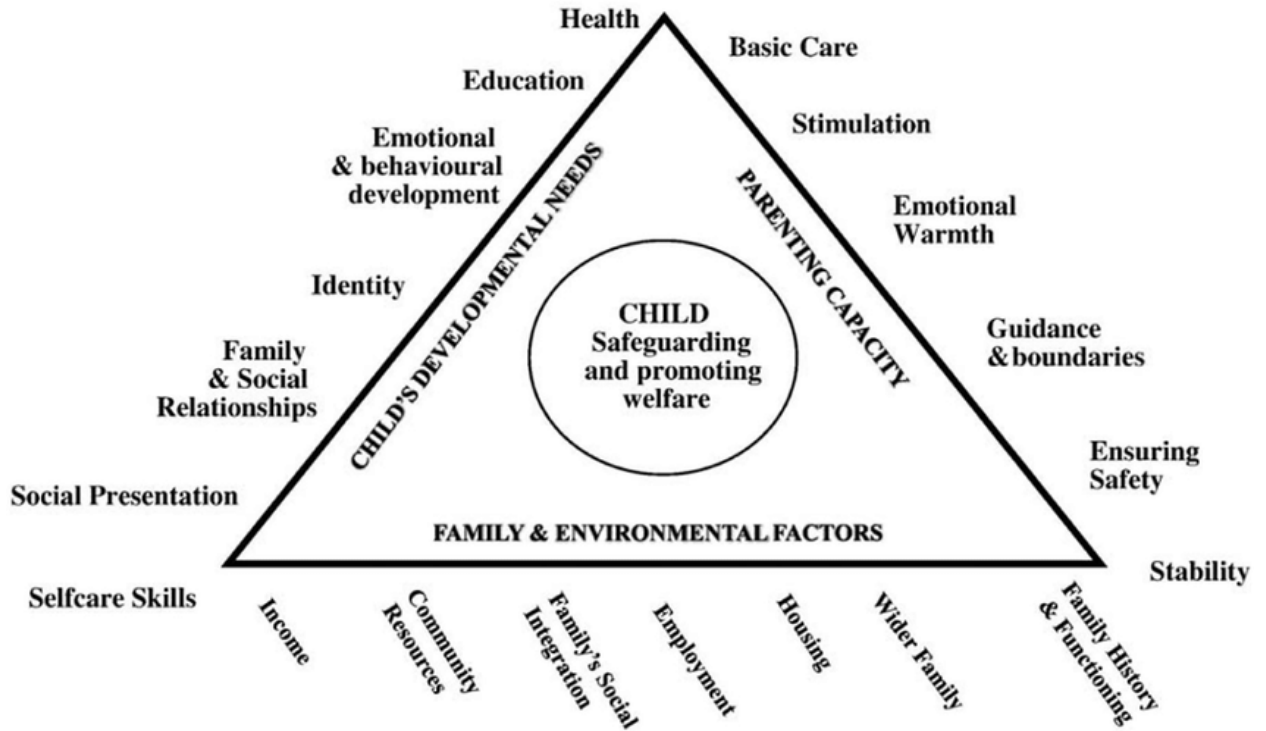
In addition to the above, from Working Together to Safeguard Children (DfE 2023), refer to the latest Thresholds and Pathways document Northamptonshire Thresholds Guidance

Appendix 2

Annex A - Specific Safeguarding Issues - Further Information

Keeping Children Safe in Education, 2024 states:

Child abduction and community safety incidents

Child abduction is the unauthorised removal or retention of a minor from a parent or anyone with legal responsibility for the child. Child abduction can be committed by parents or other family members; by people known but not related to the victim (such as neighbours, friends and acquaintances); and by strangers.

Other community safety incidents in the vicinity of a school can raise concerns amongst children and parents, for example, people loitering nearby or unknown adults engaging children in conversation.

As children get older and are granted more independence (for example, as they start walking to school on their own) it is important they are given practical advice on how to keep themselves safe. Many schools provide outdoor-safety lessons run by teachers or by local police staff. It is important that lessons focus on building children's confidence and abilities rather than simply warning them about all strangers.

Further information is available at: www.actionagainstabduction.org and www.clevernevergoes.org.

Child Criminal Exploitation (CCE) and Child Sexual Exploitation (CSE)

We know that different forms of harm often overlap, and that perpetrators may subject children and young people to multiple forms of abuse, such as criminal exploitation (including county lines) and sexual exploitation.

In some cases the exploitation or abuse will be in exchange for something the victim needs or wants (for example, money, gifts or affection), and/or will be to the financial benefit or other advantage, such as increased status, of the perpetrator or facilitator. Children can be exploited by adult males or females, as individuals or in groups. They may also be exploited by other children, who themselves may be experiencing exploitation – where this is the case, it is important that the child perpetrator is also recognised as a victim.

Whilst the age of the child may be a contributing factor for an imbalance of power, there are a range of other factors that could make a child more vulnerable to exploitation, including, sexual identity, cognitive ability, learning difficulties, communication ability, physical strength, status, and access to economic or other resources.

Some of the following can be indicators of both child criminal and sexual exploitation where children:

• appear with unexplained gifts, money or new possessions
• associate with other children involved in exploitation
• suffer from changes in emotional well-being
• misuse alcohol and other drugs
• go missing for periods of time or regularly come home late, and
• regularly miss school or education or do not take part in education.

Children who have been exploited will need additional support to help keep them in education.

Child Sexual Exploitation (CSE) can be a one-off occurrence or a series of incidents over time and range from opportunistic to complex organised abuse. It can involve force and/or enticement-based methods of compliance and may, or may not, be accompanied by violence or threats of violence.

Some additional specific indicators that may be present in CSE are children who:
• have older boyfriends or girlfriends; and
• suffer from sexually transmitted infections, display sexual behaviours beyond expected sexual development or become pregnant.

Further information on signs of a child's involvement in sexual exploitation is available in Home Office guidance: Child sexual exploitation: guide for practitioners

County lines

County lines is a term used to describe gangs and organised criminal networks involved in exporting illegal drugs using dedicated mobile phone lines or other form of "deal line". This activity can happen locally as well as across the UK - no specified distance of travel is required. Children and vulnerable adults are exploited to move, store and sell drugs and money. Offenders will often use coercion, intimidation, violence (including sexual violence) and weapons to ensure compliance of victims.

Children can be targeted and recruited into county lines in a number of locations including any type of schools (including special schools), further and higher educational institutions, pupil referral units, children's homes and care homes.

Children are also increasingly being targeted and recruited online using social media. Children can easily become trapped by this type of exploitation as county lines gangs can manufacture drug debts which need to be worked off or threaten serious violence and kidnap towards victims (and their families) if they attempt to leave the county lines network.

A number of the indicators for CSE and CCE as detailed above may be applicable to where children are involved in county lines. Some additional specific indicators

that may be present where a child is criminally exploited through involvement in county lines are children who:

• go missing and are subsequently found in areas away from their home
• have been the victim or perpetrator of serious violence (e.g. knife crime)
• are involved in receiving requests for drugs via a phone line, moving drugs, handing over and collecting money for drugs
• are exposed to techniques such as 'plugging', where drugs are concealed internally to avoid detection • are found in accommodation that they have no connection with, often called a 'trap house or cuckooing' or hotel room where there is drug activity
• owe a 'debt bond' to their exploiters
• have their bank accounts used to facilitate drug dealing.

Further information on the signs of a child's involvement in county lines is available in guidance published by the Home Office and The Children's Society County Lines Toolkit For Professionals

Children and the court system

Children are sometimes required to give evidence in criminal courts, either for crimes committed against them or for crimes they have witnessed. There are two age appropriate guides to support children 5-11-year olds and 12-17 year olds.

The guides explain each step of the process, support and special measures that are available. There are diagrams illustrating the courtroom structure and the use of video links is explained.

Making child arrangements via the family courts following separation can be stressful and entrench conflict in families. This can be stressful for children. The Ministry of Justice has launched an online child arrangements information tool with clear and concise information on the dispute resolution service. This may be useful for some parents and carers.

Children missing from education

All staff should be aware that children going missing, particularly repeatedly, can act as a vital warning sign of a range of safeguarding possibilities. This may include abuse and neglect, which may include sexual abuse or exploitation and can also be a sign of child criminal exploitation including involvement in county lines. It may indicate mental health problems, risk of substance abuse, risk of travelling to conflict zones, risk of female genital mutilation, 'honour'-based abuse or risk of forced marriage. Early intervention is essential to identify the existence of any underlying safeguarding risk and to help prevent the risks of a child going missing in future. It is important that staff are aware of their school's or college's unauthorised absence and children missing from education procedures.

Children with family members in prison

Approximately 200,000 children in England and Wales have a parent sent to prison each year. These children are at risk of poor outcomes including poverty, stigma, isolation and poor mental health. The National Information Centre on Children of Offenders, NICCO provides information designed to support professionals working with offenders and their children, to help mitigate negative consequences for those children.

Cybercrime

Cybercrime is criminal activity committed using computers and/or the internet. It is broadly categorised as either 'cyber-enabled' (crimes that can happen off-line but are enabled at scale and at speed on-line) or 'cyber dependent' (crimes that can be committed only by using a computer). Cyber-dependent crimes include:

• unauthorised access to computers (illegal 'hacking'), for example accessing a school's computer network to look for test paper answers or change grades awarded
• 'Denial of Service' (Dos or DDoS) attacks or 'booting'. These are attempts to make a computer, network or website unavailable by overwhelming it with internet traffic from multiple sources, and,
• making, supplying or obtaining malware (malicious software) such as viruses, spyware, ransomware, botnets and Remote Access Trojans with the intent to commit further offence, including those above.

Children with particular skills and interest in computing and technology may inadvertently or deliberately stray into cyber-dependent crime. If there are concerns about a child in this area, the designated safeguarding lead (or a deputy), should consider referring into the **Cyber Choices** programme. This is a nationwide police programme supported by the Home Office and led by the National Crime Agency, working with regional and local policing. It aims to intervene where young people are at risk of committing, or being drawn into, low-level cyber-dependent offences and divert them to a more positive use of their skills and interests.

Note that **Cyber Choices** does not currently cover 'cyber-enabled' crime such as fraud, purchasing of illegal drugs on-line and child sexual abuse and exploitation, nor other areas of concern such as on-line bullying or general on-line safety.

Additional advice can be found at: Cyber Choices, 'NPCC- When to call the Police' and National Cyber Security Centre - NCSC.GOV.UK.

Domestic abuse

The Domestic Abuse Act 2021 received Royal Assent on 29 April 2021. The Act introduces the first ever statutory definition of domestic abuse and recognises the impact of domestic abuse on children, as victims in their own right, if they see, hear or experience the effects of abuse. The statutory definition of domestic abuse, based on the previous cross-government definition, ensures that different types of

relationships are captured, including ex-partners and family members. The definition captures a range of different abusive behaviours, including physical, emotional and economic abuse and coercive and controlling behaviour. Under the statutory definition, both the person who is carrying out the behaviour and the person to whom the behaviour is directed towards must be aged 16 or over and they must be "personally connected" (as defined in section 2 of the 2021 Act).

Types of domestic abuse include intimate partner violence, abuse by family members, teenage relationship abuse and child to parent abuse. Anyone can be a victim of domestic abuse, regardless of sexual identity, age, ethnicity, socio-economic status, sexuality or background and domestic abuse can take place inside or outside of the home. The government will issue statutory guidance to provide further information for those working with domestic abuse victims and perpetrators, including the impact on children.

All children can witness and be adversely affected by domestic abuse in the context of their home life where domestic abuse occurs between family members. Experiencing domestic abuse can have a serious, long lasting emotional and psychological impact on children. In some cases, a child may blame themselves for the abuse or may have had to leave the family home as a result.

Young people can also experience domestic abuse within their own intimate relationships. This form of child-on-child abuse is sometimes referred to as 'teenage relationship abuse'. Depending on the age of the young people, this may not be recognised in law under the statutory definition of 'domestic abuse' (if one or both parties are under 16). However, as with any child under 18, where there are concerns about safety or welfare, child safeguarding procedures should be followed and both young victims and young perpetrators should be offered support.

Operation Encompass

Operation Encompass operates in all police forces across England. It helps police and schools work together to provide emotional and practical help to children. The system ensures that when the police are called to an incident of domestic abuse, where there are children in the household who have experienced the domestic incident, the police will inform the key adult (usually the designated safeguarding lead (or deputy)) in school before the child or children arrive at school the following day. This ensures that the school has up to date relevant information about the child's circumstances and can enable immediate support to be put in place, according to the child's needs. Operation Encompass does not replace statutory safeguarding procedures. Where appropriate, the police and/or schools should make a referral to local authority children's social care if they are concerned about a child's welfare. More information about the scheme and how schools can become involved is available on the Operation Encompass website.

Operation Encompass provides an advice and helpline service for all staff members from educational settings who may be concerned about children who have experienced domestic abuse. The helpline is available 8AM to 1PM, Monday

to Friday on 0204 513 9990 (charged at local rate). National Domestic Abuse Helpline Refuge runs the National Domestic Abuse Helpline, which can be called free of charge and in confidence, 24 hours a day on 0808 2000 247. Its website provides guidance and support for potential victims, as well as those who are worried about friends and loved ones. It also has a form through which a safe time from the team for a call can be booked.

Additional advice on identifying children who are affected by domestic abuse and how they can be helped is available at:

• NSPCC- UK domestic-abuse Signs Symptoms Effects
• Refuge what is domestic violence/effects of domestic violence on children
• Safe Young Lives: Young people and domestic abuse | Safelives
• Domestic abuse: specialist sources of support (includes information for adult victims, young people facing abuse in their own relationships and parents experiencing child to parent violence/abuse)
• Home : Operation Encompass (includes information for schools on the impact of domestic abuse on children)

Homelessness

Being homeless or being at risk of becoming homeless presents a real risk to a child's welfare. The designated safeguarding lead (and any deputies) should be aware of contact details and referral routes into the Local Housing Authority so they can raise/progress concerns at the earliest opportunity. Indicators that a family may be at risk of homelessness include household debt, rent arrears, domestic abuse and anti-social behaviour, as well as the family being asked to leave a property. Whilst referrals and/or discussion with the Local Housing Authority should be progressed as appropriate, and in accordance with local procedures, this does not, and should not, replace a referral into local authority children's social care where a child has been harmed or is at risk of harm.

The Homelessness Reduction Act 2017 places a new legal duty on English councils so that everyone who is homeless or at risk of homelessness will have access to meaningful help including an assessment of their needs and circumstances, the development of a personalised housing plan, and work to help them retain their accommodation or find a new place to live. The following factsheets usefully summarise the new duties: Homeless Reduction Act Factsheets. The new duties shift the focus to early intervention and encourages those at risk to seek support as soon as possible, before they are facing a homelessness crisis.

In most cases school and college staff will be considering homelessness in the context of children who live with their families, and intervention will be on that basis. However, it should also be recognised in some cases 16 and 17 year olds could be living independently from their parents or guardians, for example through their exclusion from the family home, and will require a different level of intervention and support. Local authority children's social care will be the lead agency for these

children and the designated safeguarding lead (or a deputy) should ensure appropriate referrals are made based on the child's circumstances. The Department for Levelling Up, Housing and Communities have published joint statutory guidance on the provision of accommodation for 16 and 17 year olds who may be homeless and/or require accommodation: here.

Mental health

Where children have suffered abuse and neglect, or other potentially traumatic adverse childhood experiences, this can have a lasting impact throughout childhood, adolescence and into adulthood. It is key that staff are aware of how these children's experiences, can impact on their mental health, behaviour, and education.

More information can be found in the Mental health and behaviour in schools guidance, colleges may also wish to follow this guidance as best practice. Public Health England has produced a range of resources to support secondary school teachers to promote positive health, wellbeing and resilience among children. See Every Mind Matters for links to all materials and lesson plans.

Modern Slavery and the National Referral Mechanism

Modern slavery encompasses human trafficking and slavery, servitude and forced or compulsory labour. Exploitation can take many forms, including: sexual exploitation, forced labour, slavery, servitude, forced criminality and the removal of organs.

Further information on the signs that someone may be a victim of modern slavery, the support available to victims and how to refer them to the NRM is available in Statutory Guidance. Modern slavery: how to identify and support victims - GOV.UK

Preventing radicalisation

Children are vulnerable to extremist ideology and radicalisation. Similar to protecting children from other forms of harms and abuse, protecting children from this risk should be a part of a schools or colleges safeguarding approach.

Extremism is the vocal or active opposition to our fundamental values, including democracy, the rule of law, individual liberty and the mutual respect and tolerance of different faiths and beliefs. This also includes calling for the death of members of the armed forces.

Radicalisation refers to the process by which a person comes to support terrorism and extremist ideologies associated with terrorist groups.

Terrorism is an action that endangers or causes serious violence to a person/people; causes serious damage to property; or seriously interferes or disrupts an electronic system. The use or threat must be designed to influence the

government or to intimidate the public and is made for the purpose of advancing a political, religious or ideological cause.

Although there is no single way of identifying whether a child is likely to be susceptible to an extremist ideology, there are possible indicators that should be taken into consideration alongside other factors and contexts. Background factors combined with specific influences such as family and friends may contribute to a child's vulnerability.

Similarly, radicalisation can occur through many different methods (such as social media or the internet) and settings (such as within the home).

However, it is possible to protect vulnerable people from extremist ideology and intervene to prevent those at risk of radicalisation being radicalised. As with other safeguarding risks, staff should be alert to changes in children's behaviour, which could indicate that they may be in need of help or protection. Staff should use their judgement in identifying children who might be at risk of radicalisation and act proportionately which may include the designated safeguarding lead (or deputy) making a Prevent referral.

Although not a cause for concern on their own, possible indicators when taken into consideration alongside other factors or context may be a sign of being radicalised. Further information and a list of such indicators can be found at Radicalisation and Extremism - Examples and Behavioural Traits (educateagainsthate.com)

The Prevent duty

All schools and colleges are subject to a duty under section 26 of the Counter-Terrorism and Security Act 2015 (the CTSA 2015), in the exercise of their functions, to have "due regard148 to the need to prevent people from being drawn into terrorism".149 This duty is known as the Prevent duty.

The Prevent duty should be seen as part of schools' and colleges' wider safeguarding obligations. Designated safeguarding leads (and deputies) and other senior leaders in schools should familiarise themselves with the revised Prevent duty guidance: for England and Wales, especially paragraphs 57-76, which are specifically concerned with schools (and also covers childcare). Designated safeguarding leads (and deputies) and other senior leaders in colleges should familiar themselves with the Prevent duty guidance: for further education institutions in England and Wales. The guidance is set out in terms of four general themes: risk assessment, working in partnership, staff training, and IT policies.

The school's or college's designated safeguarding lead (and any deputies) should be aware of local procedures for making a Prevent referral.

Channel

Channel is a voluntary, confidential support programme which focuses on providing support at an early stage to people who are identified as being vulnerable to being drawn into terrorism. Prevent referrals may be passed to a multi-agency Channel panel, which will discuss the individual referred to determine whether they are vulnerable to being drawn into terrorism and consider the appropriate support required. A representative from the school or college may be asked to attend the Channel panel to help with this assessment. An individual's engagement with the programme is entirely voluntary at all stages.

The designated safeguarding lead (or deputy) should consider if it would be appropriate to share any information with the new school or college in advance of a child leaving. For example, information that would allow the new school or college to continue supporting victims of abuse or those who are currently receiving support through the 'Channel' programme, and have that support in place for when the child arrives.
Statutory guidance on Channel is available at: Channel guidance.

Additional support

The Department has published further advice for schools on the Prevent duty. The advice is intended to complement the Prevent guidance and signposts to other sources of advice and support.

The Home Office has developed three e-learning modules:
• Prevent awareness e-learning offers an introduction to the Prevent duty.
• Prevent referrals e-learning supports staff to make Prevent referrals that are robust, informed and with good intention.
• Channel awareness e-learning is aimed at staff who may be asked to contribute to or sit on a multi-agency Channel panel.

Educate Against Hate, is a government website designed to support school teachers and leaders to help them safeguard their students from radicalisation and extremism. The platform provides free information and resources to help school staff identify and address the risks, as well as build resilience to radicalisation.

For advice specific to further education, the Education and Training Foundation (ETF) hosts the Prevent for FE and Training. This hosts a range of free, sector specific resources to support further education settings comply with the Prevent duty. This includes the Prevent Awareness e-learning, which offers an introduction to the duty, and the Prevent Referral e-learning, which is designed to support staff to make robust, informed and proportionate referrals.

The ETF Online Learning environment provides online training modules for practitioners, leaders and managers, support staff and governors/Board members outlining their roles and responsibilities under the duty.

London Grid for Learning have also produced useful resources on Prevent (Online Safety Resource Centre - London Grid for Learning (lgfl.net).

Sexual violence and sexual harassment between children in schools and colleges

Sexual violence and sexual harassment can occur between two children of any age and sex from primary to secondary stage and into colleges. It can also occur online. It can also occur through a group of children sexually assaulting or sexually harassing a single child or group of children.

Children who are victims of sexual violence and sexual harassment will likely find the experience stressful and distressing. This will, in all likelihood, adversely affect their educational attainment and will be exacerbated if the alleged perpetrator(s) attends the same school or college. Sexual violence and sexual harassment exist on a continuum and may overlap, they can occur online and face to face (both physically and verbally) and are never acceptable.

It is essential that **all** victims are reassured that they are being taken seriously and that they will be supported and kept safe. A victim should never be given the impression that they are creating a problem by reporting sexual violence or sexual harassment. Nor should a victim ever be made to feel ashamed for making a report. Detailed advice is available in Part five of this guidance.

Serious Violence
There are a number of indicators, which may signal children are at risk from, or are involved with, serious violent crime. These may include:

increased absence from school

• a change in friendships or relationships with older individuals or groups
• a significant decline in performance
• signs of self-harm or a significant change in wellbeing, or signs of assault or unexplained injuries
• Unexplained gifts or new possessions could also indicate that children have been approached by, or are involved with, individuals associated with criminal networks or gangs and may be at risk of criminal exploitation.

The likelihood of involvement in serious violence may be increased by factors such as:
• being male
• having been frequently absent or permanently excluded from school
• having experienced child maltreatment and having been involved in offending, such as theft or robbery.

A fuller list of risk factors can be found in the Home Office's Serious Violence Strategy.

Professionals should also be aware that violence can often peak in the hours just before or just after school, when pupils are travelling to and from school. These times can be particularly risky for young people involved in serious violence.

Advice for schools and colleges is provided in the Home Office's Criminal exploitation of children and vulnerable adults: county lines guidance. The Youth Endowment Fund (YEF) Toolkit sets out the evidence for what works in preventing young people from becoming involved in violence.

Home Office funded Violence Reduction Units (VRU) operate in the 20 police force areas across England and Wales that have the highest volumes of serious violence, as measured by hospital admissions for injury with a sharp object. A list of these locations can be found here. As the strategic co-ordinators for local violence prevention, each VRU is mandated to include at least one local education representative within their Core Membership group, which is responsible for setting the direction for VRU activity. Schools and educational partners within these areas are encouraged to reach out to their local VRU, either directly or via their education Core Member, to better ingrain partnership working to tackle serious violence across local areas and ensure a joined up approach to young people across the risk spectrum.

The Police, Crime, Sentencing and Courts Act will introduce early in 2023 a new duty on a range of specified authorities, such as the police, local government, youth offending teams, health and probation services, to work collaboratively, share data and information, and put in place plans to prevent and reduce serious violence within their local communities. Educational authorities and prisons/youth custody authorities will be under a separate duty to co-operate with core duty holders when asked, and there will be a requirement for the partnership to consult with all such institutions in their area.

The Duty is not intended to replace or duplicate existing safeguarding duties. Local partners may choose to meet the requirements of the Duty through existing multi-agency structures, such as multi-agency safeguarding arrangements, providing the correct set of partners are involved.

So-called 'honour'-based abuse (including Female Genital Mutilation and Forced Marriage)

So-called 'honour'-based abuse (HBA) encompasses incidents or crimes which have been committed to protect or defend the honour of the family and/or the community, including female genital mutilation (FGM), forced marriage, and practices such as breast 152 ironing. Abuse committed in the context of preserving 'honour' often involves a wider network of family or community pressure and can include multiple perpetrators. It is important to be aware of this dynamic and additional risk factors when deciding what form of safeguarding action to take. All forms of HBA are abuse (regardless of the motivation) and should be handled and escalated as such. Professionals in all agencies, and individuals and groups in

relevant communities, need to be alert to the possibility of a child being at risk of HBA, or already having suffered HBA.

Actions

If staff have a concern regarding a child who might be at risk of HBA or who has suffered from HBA, they should speak to the designated safeguarding lead (or deputy). As appropriate, the designated safeguarding lead (or deputy) will activate local safeguarding procedures, using existing national and local protocols for multi-agency liaison with the police and local authority children's social care. Where FGM has taken place, since 31 October 2015 there has been a mandatory reporting duty placed on teachers that requires a different approach (see below).

FGM

FGM 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.

FGM mandatory reporting duty for teachers

Section 5B of the Female Genital Mutilation Act 2003 (as inserted by section 74 of the Serious Crime Act 2015) places a statutory duty upon teachers, along with regulated health and social care professionals in England and Wales, to report to the police where they discover (either through disclosure by the victim or visual evidence) that FGM appears to have been carried out on a girl under 18. Those failing to report such cases may face disciplinary sanctions. It will be rare for teachers to see visual evidence, and they should not be examining pupils or students, but the same definition of what is meant by "to discover that an act of FGM appears to have been carried out" is used for all professionals to whom this mandatory reporting duty applies. Information on when and how to make a report can be found at: [Mandatory reporting of female genital mutilation procedural information](#).

Teachers must personally report to the police cases where they discover that an act of FGM appears to have been carried out.151 Unless the teacher has good reason not to, they should still consider and discuss any such case with the school's or college's designated safeguarding lead (or deputy) and involve local authority children's social care as appropriate. The duty does not apply in relation to at risk or suspected cases (i.e. where the teacher does not discover that an act of FGM appears to have been carried out, either through disclosure by the victim or visual evidence) or in cases where the woman is 18 or over. In these cases, teachers should follow local safeguarding procedures. The following is a useful summary of the FGM mandatory reporting duty: [FGM Fact Sheet](#).

Further information can be found in the [Multi-agency statutory guidance on female genital mutilation](#) and the [FGM resource pack](#) particularly section 13.

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 perpetrators use perceived cultural practices to coerce a person into marriage. Schools and colleges can play an important role in safeguarding children from forced marriage.

The Forced Marriage Unit (FMU) has created: Multi-agency practice guidelines: handling cases of forced marriage (pages 75-80 of which focus on the role of schools and colleges) and, Multi-agency statutory guidance for dealing with forced marriage, which can both be found at [The right to choose: government guidance on forced marriage - GOV.UK (www.gov.uk)](https://www.gov.uk) School and college staff can contact the Forced Marriage Unit if they need advice or information: Contact: 020 7008 0151 or email fmu@fcdo.gov.uk.

Additional advice and support

There is a wealth of information available to support schools and colleges. The following list is not exhaustive but should provide a useful starting point:

Abuse

Supporting practice in tackling child sexual abuse - CSA Centre Centre of Expertise on Child Sexual Abuse has free evidence-based practice resources to help professionals working with children and young people to identify and respond appropriately to concerns of child sexual abuse.

What to do if you're worried a child is being abused – DfE advice
Domestic abuse: Various Information/Guidance - Home Office (HO)
Faith based abuse: National Action Plan - DfE advice
Disrespect NoBody campaign - GOV.UK - Home Office website
Tackling Child Sexual Abuse Strategy – Home Office policy paper
Together we can stop child sexual abuse – HM Government campaign

Bullying

Preventing bullying including cyberbullying - DfE advice

Children absent from from education, home or care

Children missing education - DfE statutory guidance
Child missing from home or care - DfE statutory guidance

Children and adults missing strategy - Home Office strategy

Children with family members in prison

National Information Centre on Children of Offenders - Barnardo's in partnership with HM
Prison and Probation Service

Child Exploitation

Trafficking: safeguarding children - DfE and Home Office guidance
Care of unaccompanied and trafficked children – DfE statutory guidance
Modern slavery: how to identify and support victims – HO statutory guidance
Child exploitation disruption toolkit - HO statutory guidance
County Lines Toolkit For Professionals - The Children's Society in partnership with Victim
Support and National Police Chiefs' Council

Confidentiality

Gillick competency Fraser guidelines - Guidelines to help with balancing children's rights
along with safeguarding responsibilities.

Drugs

Drug strategy 2021 - Home Office strategy
Information and advice on drugs - Talk to Frank website
Drug and Alcohol education — teacher guidance & evidence review – PSHE Association

(so called) "Honour Based Abuse" including FGM and child marriage

Female genital mutilation: information and resources- Home Office guidance
Female genital mutilation: multi agency statutory guidance - DfE, Department for Health,
and Home Office
Child marriage - Child Marriage Unit (CMU) resources
Child marriage - Government multi-agency practice guidelines and multi-agency statutory guidance
FGM resource pack – HM Government guidance

Health and Well-being

Rise Above: Free PSHE resources on health, wellbeing and resilience - Public Health
England
Supporting pupils at schools with medical conditions - DfE statutory guidance

Mental health and behaviour in schools - DfE advice
Overview - Fabricated or induced illness - NHS advice

Homelessness

Homelessness code of guidance for local authorities – Department for Levelling Up,
Housing and Communities guidance

Information Sharing

Government information sharing advice - Guidance on information sharing for people
who provide safeguarding services to children, young people, parents and carers.
Information Commissioner's Office: Data sharing information hub - Information to help
schools and colleges comply with UK data protection legislation including UK GDPR.

Online safety-advice

Childnet provide guidance for schools on cyberbullying
Educateagainsthate provides practical advice and support on protecting children from
extremism and radicalisation

London Grid for Learning provides advice on all aspects of a school or college's online
safety arrangements
NSPCC E-safety for schools provides advice, templates, and tools on all aspects of a
school or college's online safety arrangements
Safer recruitment consortium "guidance for safe working practice", which may help
ensure staff behaviour policies are robust and effective
Searching screening and confiscation is departmental advice for schools on searching
children and confiscating items such as mobile phones
South West Grid for Learning provides advice on all aspects of a school or college's
online safety arrangements
Use of social media for online radicalisation - A briefing note for schools on how social
media is used to encourage travel to Syria and Iraq
Online Safety Audit Tool from UK Council for Internet Safety to help mentors of trainee

teachers and newly qualified teachers induct mentees and provide ongoing support,
development and monitoring
Online safety guidance if you own or manage an online platform DCMS advice
A business guide for protecting children on your online platform DCMS advice
UK Safer Internet Centre provide tips, advice, guides and other resources to help keep
children safe online

Online safety- Remote education, virtual lessons and live streaming

Case studies for schools to learn from each other
Guidance Get help with remote education resources and support for teachers and school
leaders on educating pupils and students
Departmental guidance on safeguarding and remote education including planning remote
education strategies and teaching remotely
London Grid for Learning guidance, including platform specific advice
National cyber security centre guidance on choosing, configuring and deploying video
conferencing
UK Safer Internet Centre guidance on safe remote learning
Online Safety- Support for children
Childline for free and confidential advice
UK Safer Internet Centre to report and remove harmful online content
CEOP for advice on making a report about online abuse

Online safety- Parental support

Childnet offers a toolkit to support parents and carers of children of any age to start
discussions about their online life, and to find out where to get more help and support
Commonsensemedia provide independent reviews, age ratings, & other information
about all types of media for children and their parents
Government advice about protecting children from specific online harms such as child
sexual abuse, sexting, and cyberbullying
Internet Matters provide age-specific online safety checklists, guides on how to set
parental controls, and practical tips to help children get the most out of their digital world
How Can I Help My Child? Marie Collins Foundation – Sexual Abuse Online
Let's Talk About It provides advice for parents and carers to keep children safe from
online radicalisation

London Grid for Learning provides support for parents and carers to keep their children
safe online, including tips to keep primary aged children safe online
Stopitnow resource from The Lucy Faithfull Foundation can be used by parents and
carers who are concerned about someone's behaviour, including children who may be
displaying concerning sexual behaviour (not just about online)
National Crime Agency/CEOP Thinkuknow provides support for parents and carers to
keep their children safe online
Net-aware provides support for parents and carers from the NSPCC and O2, including a
guide to social networks, apps and games
Parentzone provides help for parents and carers on how to keep their children safe
online
Talking to your child about online sexual harassment: A guide for parents – This is the
Children's Commissioner's parent guide on talking to your children about online sexual
harassment
#Ask the awkward – Child Exploitation and Online Protection Centre guidance to parents
to talk to their children about online relationships

Private fostering

Private fostering: local authorities - DfE statutory guidance

Radicalisation

Prevent duty guidance- Home Office guidance
Prevent duty: additional advice for schools and childcare providers - DfE advice

Educate Against Hate website - DfE and Home Office advice
Prevent for FE and Training - Education and Training Foundation (ETF)
Extremism and Radicalisation Safeguarding Resources – Resources by London Grid for
Learning

Serious Violence

Serious violence strategy - Home Office Strategy
Factors linked to serious violence and how these factors can be used to identify
individuals for intervention – Home Office
Youth Endowment Fund – Home Office
Gangs and youth violence: for schools and colleges - Home Office advice

Tackling violence against women and girls strategy- Home Office strategy
Violence against women and girls: national statement of expectations for victims
- Home
Office guidance

Sexual violence and sexual harassment

Specialist Organisations
Barnardo's - UK charity caring for and supporting some of the most vulnerable children
and young people through their range of services.
Lucy Faithful Foundation - UK-wide child protection charity dedicated to preventing child
sexual abuse. They work with families affected by sexual abuse and also run the
confidential Stop it Now! Helpline.
Marie Collins Foundation – Charity that, amongst other things, works directly with
children, young people, and families to enable their recovery following sexual
abuse.
NSPCC - Children's charity specialising in child protection with statutory powers enabling
them to take action and safeguard children at risk of abuse.
Rape Crisis - National charity and the umbrella body for their network of independent
member Rape Crisis Centres.
UK Safer Internet Centre - Provides advice and support to children, young people,
parents, carers and schools about staying safe online.

Harmful sexual behaviour

Rape Crisis (England & Wales) or The Survivors Trust for information, advice, and details
of local specialist sexual violence organisations.
NICE guidance contains information on, amongst other things: developing interventions;
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working with families and carers; and multi-agency working.
HSB toolkit The Lucy Faithfull Foundation - designed for parents, carers, family members
and professionals, to help everyone play their part in keeping children safe. It has links to
useful information, resources, and support as well as practical tips to prevent harmful
sexual behaviour and provide safe environments for families.
NSPCC Learning: Protecting children from harmful sexual behaviour and NSPCC -
Harmful sexual behaviour framework- free and independent advice about HSB.

Contextual Safeguarding Network – Beyond Referrals (Schools) provides a school selfassessment toolkit and guidance for addressing HSB in schools.
Preventing harmful sexual behaviour in children - Stop It Now provides a guide for
parents, carers and professionals to help everyone do their part in keeping children safe,
they also run a free confidential helpline.

Support for Victims

Anti-Bullying Alliance - Detailed information for anyone being bullied, along with advice
for parents and schools. Signposts to various helplines and websites for further support.
Rape Crisis - Provide and signpost to a range of services to support people who have
experienced rape, child abuse or any kind of sexual violence.
The Survivors Trust- UK-wide national umbrella agency with resources and support
dedicated to survivors of rape, sexual violence and child sex abuse.
Victim Support - Supporting children and young people who have been affected by crime.
Also provides support to parents and professionals who work with children and young
people – regardless of whether a crime has been reported or how long ago it was.
Childline provides free and confidential advice for children and young people.

Toolkits

ask AVA - The Ask AVA prevention platform has been created to support education
practitioners across the UK to develop and deliver a comprehensive programme to stop
Violence Against Women and Girls.
NSPCC - Online Self-assessment tool to ensure organisations are doing everything they
can to safeguard children.
NSPCC - Resources which help adults respond to children disclosing abuse.
NSPCC also provides free and independent advice about HSB: NSPCC - Harmful sexual
behaviour framework
Safeguarding Unit, Farrer and Co. and Carlene Firmin, MBE, University of Bedfordshire -
Peer-on-Peer Abuse toolkit provides practical guidance for schools on how to prevent,
identify early and respond appropriately to peer-on-peer abuse.

Contextual Safeguarding Network – self-assessment toolkit for schools to assess their
own response to HSB.
Childnet - STAR SEND Toolkit equips, enables and empowers educators with the
knowledge to support young people with special educational needs and disabilities.
Childnet - Just a joke? provides lesson plans, activities, a quiz and teaching guide
designed to explore problematic online sexual behaviour with 9-12 year olds.
Childnet - Step Up, Speak Up a practical campaign toolkit that addresses the issue of
online sexual harassment amongst young people aged 13-17 years old.
NSPCC - Harmful sexual behaviour framework An evidence-informed framework for
children and young people displaying HSB.
Contextual Safeguarding Network – Beyond Referrals - Schools levers for addressing
HSB in schools.

Sharing nudes and semi-nudes

London Grid for Learning-collection of advice - Various information and resources dealing
with the sharing of nudes and semi-nudes.
UKCIS Sharing nudes and semi-nudes: advice for education settings working with
children and young people - Advice for schools and colleges on responding to incidents
of non-consensual sharing of nudes and semi-nudes.

Support for parents/carers

NCA CEOP Thinkuknow: Advice/resources on how to deal with concerns about what
children may be doing online including advice on how to help challenge harmful sexual
attitudes and start a conversation to support positive sexual behaviour

Appendix 3

Identification ID Card/Lanyard

1 Purpose

The purpose of the Identification ID card/Lanyard Policy is:

- To provide standards and requirements for the display of identification

- To provide a consistent method of identification.

- To provide additional means of establishing a safe community for staff, visitors and students.

2 Aim

The Policy aims to ensure effective identification and safeguarding measures are in place.

This Policy should be read in conjunction with the following Policies:

- Learner Behaviour Support and Disciplinary Policy

- Staff Disciplinary Policy

- Admissions Policy

3 Procedures/Responsibilities

3.1 Managers

All Managers are required to sign a policy which confirms they have read and understood the content of the policy and will ensure that all staff/volunteers will enforce and adhere to the policy.

3.2 Staff

- All staff will be issued a photographic ID card and College lanyard upon employment.

- While in the workshops ID cards may be worn using a clip on accessory for those staff who would encounter health and safety issues while using a lanyard

- ID cards must be worn using a College breakaway lanyard (purple) to identify individuals as staff members.

- If a staff member refuses to wear their lanyard, or has to be repeatedly told to wear it, disciplinary action should be taken, in the absence of exceptional circumstances.

- The ID card and College lanyard must be visible at all times and not obstructed by clothing.

- All staff are responsible for challenging persons not displaying an ID card with a College lanyard.

- If a staff member finds a student displaying an out of date ID card, the staff member is responsible for retaining the ID card.

- Staff must return their identification ID cards and College lanyards to HR upon termination of employment.

- If staff are found not wearing their ID card and College lanyard, this will be referred to their line manager.

- Further incidents of non-compliance will be addressed via the staff disciplinary procedures. Staff who have lost their ID card and College lanyard must go to the HR Team to be issued with a replacement ID card and lanyard.

- Staff who have not lost their ID card and College lanyard but have forgotten to bring it to work must be issued with a temporary ID card and College lanyard.

3.3 Applicants

All potential students and their parent/guardian will be monitored whilst on campus. During their visit they will be issued with a visitor's badge and lanyard (pink).

3.4 Students

- All students will be issued with a photographic ID card and a breakaway college lanyard (green) upon enrolment.

- All students should wear their lanyard at all times while on college property (this includes social areas and while moving between buildings).

- Lanyards are to be worn around the neck and not tied to bags/arms or hanging out of pockets.

- All staff have a responsibility to challenge any student or staff member not wearing a lanyard.

- If a student refuses to wear their lanyard, they should be asked to leave college property until such time that they are wearing a lanyard. If they continue to refuse or have to be repeatedly told to wear it, disciplinary action should be taken, in the absence of exceptional circumstances.

- In exceptional cases related to Special Education Needs or Disability (SEND) there may be a reason why a staff/student member cannot wear a lanyard around their neck. In this instance a formal request must be made to the Director of Student Services outlining reasons why and providing any supporting evidence.

- In workshops/high risk environments, students will be asked to remove their lanyard for certain tasks by their tutor. As an alternative clips will be provided so that identification is still displayed in these sessions.

- Students who have lost their ID card and/or College lanyard must go to the Learning Resource Centre to be issued with a replacement.

- Students who have not lost their ID card and college lanyard but have forgotten to bring it must report to the Student Services Team to be issued with a temporary lanyard which must be returned at the end of the day. Students who repeatedly forget their lanyard should be subject to a disciplinary sanction.

- When a student leaves or withdraws from a course, they should be requested to hand in their ID card, holder and lanyard on the last day of attendance to a member of staff.

- If a student is asked to leave by the College, they should be requested to hand in their ID card and college lanyard of the last day of attendance to a member of staff. Returned ID cards and college lanyards should be returned to the Student Services Team.

3.5 Governors

Governors will be issued with a Governor identification ID card and Governor lanyard (navy)

3.6 Contractors

All Contractors must report to reception to check-in, those who have registered a DBS with us will be issued an orange lanyard and do not need to be escorted by their host. Those without a DBS will be escorted by a staff member during their visit and will be issued a pink ID Card/lanyard/sticker. All contractors must wear their ID cards on the provided College lanyard (pink & orange), around the neck at all times while on campus. ID cards may be worn using a clip, unless issued on a sticker, provided by the College for those personnel who would encounter health and safety issues with the use of a lanyard. ID cards and College lanyards must be returned to the Facilities department upon completion of work each day. Contractors who have lost their ID card and College lanyard must report to the Facilities Department to be issued with a replacement ID card and College lanyard.

3.7 Visitors

Visitors must report to the Main Reception to be issued with an ID card/sticker and lanyard (pink). When visitors are issued with their ID card they must state what department or person they are on campus to visit. Visitors will be collected by their host from reception and will be escorted at all times. Visitors must return their ID card and College lanyard to the Main Reception at the end of their visit. Visitors who have lost their ID card and College lanyard must report to the Main Reception to be issued with a replacement ID card and College lanyard. This above applies to all businesses operating from a College property.

3.8 Special Events

Visitors who are on campus as part of an authorised special event must sign in at designated check in points around the campus where they will receive a College ID and visitor lanyard (pink).

3.9 Exceptions

During pandemic periods, visitors and contractors will be issued with disposable stickers, in the same coloring as above. No lanyards will be issued. Students, staff and governors will continue to be issued with lanyards as they are for their own personal use

Equality Impact Assessment (EIA)

Please complete both sides of this Equality Impact Assessment and ensure that the latest copy of this is recorded as part of the appendices of the specific policy.

Policy Reference and Name	SGP – 01 Safeguarding and Child Protection Policy
Assessment date	8 September 2021
Completed by	Director of Student and Learning Support
What are the aims of the policy?	This policy aims to inform staff, parents/carers, volunteers and governors about the college's statutory responsibilities for safeguarding children and young people. It aims to enable everyone to have a clear understanding of how these responsibilities should be carried out and that appropriate action is taken in a timely manner to safeguard and promote children's welfare.
Who does the policy affect?	All members of staff, governors, students, prospective students, visitors, volunteers
Who is involved in implementing the policy?	Governors, CEO, SLT, VP Curriculum, ,DoS&LS, DSLs
What information is currently available about the impact of this policy and its associated procedures?	In responding to and managing situations around safeguarding, the college remains mindful of its duty of care and of its statutory obligations and will work within the guidance of Working Together to Safeguard Children (2023) and Keeping Children Safe in Education (2024) which ensures statutory guidance to safeguard and promote the welfare of children. There is also various other legislative framework in which this policy relates and is compliant with. In dealing with cases the college remains mindful of its duties under the Data Protection Act 2018 and the college's Data Protection Policy.

Do you need more information to help you make an assessment about the impact of this policy and its associated procedures?	No
Do you have any examples that show how this policy will have a positive impact on any of the equality characteristics listed in the table below?	When responding to individual issues, protected characteristics and other Equality factors will be clearly observed.
Which other policies does this policy link with?	Equality and Diversity Policy Health and Safety Policy Risk Assessment Procedure Security Policy Data Protection Policy Staff Recruitment Policy Admissions Policy Teaching, Learning and Assessment Policy Complaints, Compliments and Suggestions Policy Whistleblowing Policy Staff Code of Conduct Visitor Policy Learner Behaviour, Support and Disciplinary PolicyChild-on-Child Abuse Policy Prevent Policy Firewall Policy Dynamic Lockdown Policy Missing Student Policy Residential Accommodation Allocation Policy Remote Learning Policy
What consultation has taken place in the development of this policy?	Student Support team, Residential Team, Quality Team, External safeguarding network

Use the table below to assess the impact of this policy on each of the listed characteristics. Your decision
must be evidence based. Sources of evidence might include success rates, achievement gaps, application

and enrolment data, student voice, consultation outcomes, recruitment and employment data, customer
feedback or complaints, meeting minutes.

Characteristic (These characteristics are protected under the Equality Act 2010)	Negative impact? Y / N	Evidence to support your impact assessment decision	Requires further action? Y/N
Age	N		N
Disability	N		N
Race	N		N
Gender, inc. re-assignment	N		N
Sexual orientation	N		N
Religion / belief	N		N
Pregnancy / maternity	N		N
Marriage / civil partnership	N		N
Socio-economic	N		N

Overall EIA judgement

Select	
✓	*No change required* - The assessment is that the policy is/will be robust. There is no evidence of potentially unlawful discrimination and all reasonable opportunities to advance equality and foster good relations have been taken, subject to continuing monitoring and review
	Adjust the policy or practice - This involves taking steps to remove any barriers, to better advance equality and/or to foster good relations. This may involve removing or changing the aspect of the policy that creates any negative or unwanted impact. It may also involve introducing additional measures to reduce or mitigate any potential negative impact
	Continue the policy - This means adopting/continuing with the policy despite the potential for adverse impact. Set out the rationale for this decision, including how the decision is compatible with our legal obligation. Where there is discrimination, but it is considered not to be unlawful – the objective justification must be recorded
	Stop the policy - If there would otherwise be unlawful discrimination or adverse effects that are not justified and cannot be prevented/mitigated