ACTIVATE LEARNING

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LEAD PERSON: Group Director of Marketing and Customer Experience		
VERSION	REVIEWER/APPROVAL	REVIEW/NOTES
3. 10 May 2016	Corporation Safeguarding Committee, Group Director of Marketing and Customer Experience, Student Support Teams, Group HR	Full review
4. 22 May 2017	Safeguarding Committee	Amended to include International students
5. 6 December 2017	Safeguarding Committee Corporation	Full review to ensure Child Protection is clear
6. 22 June 2018	Group Director of Marketing and Customer Experience / Corporation	Full review in light of Keeping Children Safe in Education, GDPR and merger
7. 18 March 2019	Group Director of Marketing and Customer Experience, Group Student Support Manager, Interim Head of Student Support (GCG), Group Learning Support Manager, Group Director of People and Change, Head of Human Resources	Full review in line with statutory guidelines and legislation and merger.

SAFEGUARDING AND CHILD PROTECTION POLICY

Purpose

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

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

Background

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

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

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

Scope

This policy applies to the Activate Learning colleges and Activate Apprenticeships. Children refers to learners under the age of 18. A vulnerable adult is a person over 18 who is or may be in need of

community care services by reason of disability, age or illness; and is or may be unable to take care of unable to protect him or herself against significant harm or exploitation.

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

Activate Learning recognises that threats may originate from a range of different extremist groups. Any form of extremist ideology, radicalisation or terrorist activity is also covered by this policy.

Policy Statement

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

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

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

STAFF
In relation to staff recruitment we will:
- Implement safe recruitment procedures when employing staff and maintain accurate records of these checks on a Single Central Record;
- Ensure every staff member has an enhanced DBS check;
- Implement the following verification for all recruits:
    - Identity;
    - Right to work in the UK;
    - Professional qualifications.
- Obtain references from previous employment;
- Ensure a risk assessment is completed for staff awaiting a DBS check with appropriate supervision outlined within the assessment (as outlined in the Safer Recruitment Policy);
- Comply with our legal duty to refer by following the ISA Referral Guidance 2010;
- Ensure that at least one interviewing manager on an interview panel has undertaken Safer Recruitment training and that all managers complete Safer Recruitment training within one year of commencement.

In relation to staff training we will:
- Train all staff and contractors so they are aware of their responsibilities, know how to protect themselves from false allegations, recognise potential Safeguarding or Child Protection issues and know how to respond appropriately. The specific training requirements are detailed in Appendix A.
- Provide appropriate training to ensure members of staff are aware of the issues of Safeguarding and the procedures to follow. This includes pre-commencing employment all staff complete the Home Office online Prevent training course, introduction to safeguarding, and e-safety awareness. Deliver level 2 generalist training as a minimum expectation then

every three years which includes providing part 1 of Keeping Children Safe in Education, with particular focus on current issues and recent changes to legislation. All staff with line management responsibility complete the NSPCC safer recruitment training.

- Provide appropriate training to ensure members of staff are aware of the issues of Health and Safety and the procedures to follow.
- Ensure staff receive regular Safeguarding and child protection updates (for example, via email, e-bulletins and staff meetings, to provide them with the relevant skills and knowledge to safeguarding children effectively.

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

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

In relation to concerns about other staff and Safeguarding procedures:
- If staff members have concerns about another staff member this should be referred to the Designated Safeguarding Lead or the Director of Human Resources in the first instance. Where there are concerns about the Designated Safeguarding Lead these should be referred to the Chief Executive Officer. Where the concern is about the Chief Executive Officer, this should be referred to the Chair of Governors.
- All allegations against a staff member will be reported to Local Authority Designated Lead Officer within 24 hours of the allegation being made.

- Staff and volunteers should feel able to raise concerns about poor or unsafe practice and potential failures in the college's Safeguarding regime. There are appropriate whistleblowing procedures, which are suitably reflected in staff training and staff behaviour policies, concerns can be raised with the group management team.
- Where a staff member feels unable to raise the issue with the group or feels that their genuine concerns are not being addressed, other whistleblowing channels are open with the Local Authority Designated Lead Officer.

STUDENTS
In relation to teaching Safeguarding we will:
- Ensure that all students are taught about safeguarding, including online safety. All students receive a face to face Safeguarding induction in their first six weeks at college.
- All students will cover relevant issues through the tutorial wellness curriculum and events and enrichment opportunities.

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

In relation to students missing from education we will:
- Follow the Group's procedures for dealing with children that go missing from education, particularly on repeat occasions, to help identify the risk of abuse and neglect, including sexual exploitation, and to help prevent the risks of their going missing in future;
  - Ensure staff are alert to signs to look out for and the individual triggers to be aware of when considering the risks of potential Safeguarding concerns such as travelling to conflict zones, FGM and forced marriage;
  - Have an admission register and an attendance register;
  - Inform the Local Authority of any student who is going to be deleted from the admission register or if a student fails to attend college regularly, or has been absent without the college's permission for a continuous period of 10 school days or more, at such intervals agreed between the college and the Local Authority.
  - Where reasonably possible, we hold more than one emergency contact number for our students.

In relation to International students we will:
- Ensure we have taken all reasonable steps to ensure that all adults in positions of

responsibility with substantial access to our learning community are of good character and complete the Group Leader suitability check;
- Ensure the Host-link child protection and Safeguarding policy is adhered to and all relevant checks and support are delivered in relation to residential.
- Provide a 24 hour emergency contact number to all International students.

In relation to Looked After Children and previously looked after children we will:
- Ensure that staff have the skills, knowledge and understanding to keep Looked After Children and previously looked after children safe
- A designated person is appointed to promote the educational achievement of enrolled students who are looked after.
- Ensure that appropriate staff have the information they need in relation to the child's legal looked after legal status, the child's contact arrangements or those with parental responsibility, child care arrangements and level of authority delegated to the carer by the authority.
- The Designated Lead will have details of the child's social worker and the name of the virtual school head in the authority that looks after the child.

In relation to children with Special Educational needs and disabilities:
- We will recognise that children with special educational needs (SEN) and disabilities can face additional Safeguarding challenges.
- We ensure that there is an advanced trained safeguarding officer within each of our Lifeskills Faculty sites.
- We will provide additional pastoral support to learners with SEN and disabilities.

GOVERNORS
In relation to Governor responsibilities we will:
- Ensure that governors comply with their duties under legislation. They have regard to this guidance to ensure that the policies, procedures and training in the colleges are effective and comply with the law at all times.

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

In relation to visitors we will:
- Ensure all visitors sign in and out at main receptions;
- Ensure they wear a visitor lanyard at all times;
- Notify all visitors of Safeguarding procedures and supply them with an information card.

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

PREVENT
In relation to our responsibilities in line with the PREVENT agenda we will:
- Closely follow any locally agreed procedure as set out by the Home Office and Local Authority and/or Local Authority Safeguarding Children Board's agreed processes and criteria for safeguarding individuals vulnerable to extremism and radicalisation;

- Strive to eradicate the myths and assumptions that can lead to some young people becoming alienated and disempowered, especially where the narrow approaches young people may experience elsewhere may make it harder for them to challenge or question these radical influences. In our group this will be achieved by good teaching, primarily via tutorial and other personal development, behaviour and welfare topics throughout the curriculum; but also by adopting the methods outlined in the Government's guidance 'Teaching approaches that help build resilience to extremism among young people' DfE 2011 and promoting fundamental British values as part of every student's pathway programme;
- Ensure that all of our teaching approaches help our pupils build resilience to extremism and give pupils a positive sense of identity through the development of critical thinking skills;
- Ensure that all of our staff are equipped to recognise extremism and are skilled and confident enough to challenge it;
- Keep up-to-date with developments and good practice and keep our Preventing Extremism and Radicalisation Policy under review.

Definitions

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

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

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

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

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

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

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

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

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

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

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

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

Forced marriage
Forcing a person into a marriage is a crime in England and Wales. A forced marriage is one entered into without the full and free consent of one or both parties and where violence, threats or any other form of coercion is used to cause a person to enter into a marriage. Threats can be physical or emotional and psychological. A lack of full and free consent can be where a person does not consent or where they cannot consent (if they have learning disabilities, for example). Nevertheless, some communities use religion and culture as a way to coerce a person into marriage.

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

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

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

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

Extremism
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

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 regard103 to the need to prevent people from being drawn into terrorism". This duty is known as the Prevent duty

Channel
Channel is a programme which focuses on providing support at an early stage to people who are identified as being vulnerable to being drawn into terrorism. It provides a mechanism for schools to make referrals if they are concerned that an individual might be vulnerable to radicalisation

Domestic abuse

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

Peer on Peer abuse

Children can abuse other children. This is generally referred to as peer on peer abuse and can take many forms. This can include (but is not limited to) bullying (including cyberbullying); sexual violence and sexual harassment; physical abuse such as hitting, kicking, shaking, biting, hair pulling, or otherwise causing physical harm; sexting and initiating/hazing type violence and rituals.

Early help

Early help means providing support as soon as a problem emerges at any point in a child's life. Where a child would benefit from co-ordinated early help, an early help inter-agency assessment should be arranged.

Child criminal exploitation: County lines

Criminal exploitation of children is a geographically widespread form of harm that is a typical feature of county lines criminal activity: drug networks or gangs groom and exploit children and young people to carry drugs and money from urban areas to suburban and rural areas, market and seaside towns

Safeguarding and Prevent Roles and Responsibilities

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

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

Safeguarding Officers (Level 3 Advanced trained):
- Respond to Safeguarding concerns and keep accurate case notes. Report to the Safeguarding and Welfare Advisers/Wellbeing Advisers to escalate any concerns that may require specialist support or referral to external support networks.

Safeguarding and Welfare Advisers/Wellbeing Advisers:
- Respond to Safeguarding concerns within the agreed timescales;
- Carry out assessments to determine the level of risk, raise concerns with the Designated Safeguard Lead and inform the Local Authority and other partner organisations of any concerns;
- Advise on updates on legislation and Local Authority compliance.
- Report to the Deputy Designated Safeguarding Leads (Student Support Delivery Managers) on any cases which are of concern.

Deputy Designated Safeguarding Leads (Student Support Delivery Managers):
- Have a responsibility at an operational level within the organisation, ensuring specialist safeguarding staff are supported and directed in their duties;
- Report any concerns to the Designated Safeguarding Lead (Head of Student Support)
- Will always be available during College open hours, or arrange suitable cover when this is not possible.
- Oversees the provision of resources and training for all staff.

Group Designated Safeguarding Lead (Head of Student Support):
- Acts as the main contact for outside agencies and the most senior 'go to' person in the organisation, delegating these responsibilities to the DSL as appropriate;
- Has a responsibility at an operational level within the organisation, ensuring specialist safeguarding staff are supported and directed in their duties;
- Will always be available during College open hours, or arrange suitable cover when this is not possible.
- Reports to the Group Executive Team;
- Oversees the provision of resources and training for all staff.

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

Group Chief Executive Officer:

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

Corporation Lead Governor for Safeguarding:
- Advises and guides the organisation on Safeguarding and Prevent issues.
- Provides challenge to the Executive team to improve quality of provision.
- Ensures appropriate policies and procedures are in place in order for action to be taken in a timely manner to safeguard and promote children's welfare

Procedures and guidelines associated with the Safeguarding policy

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

Appendix A - DBS and Safeguarding Protocol

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

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

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

All members of the Safeguarding Team receive advanced safeguarding training through Local Safeguarding Children Boards. This is refreshed every two years.
Safeguarding Leads completed the Designated Lead training through Local Safeguarding Children Boards. This is refreshed every two years.
The team also complete regular professional development. This is delivered by attending training provided though external organisations, using internal specialists and through visits from external speakers.

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

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

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

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

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

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

Dealing with convictions
If a DBS is returned with details of convictions HR advice must be sought. Consideration will be given to the Rehabilitation of Offenders Act and also:
• The nature, seriousness and relevance of the offence
• How long ago the offence occurred
• One-off or history of offences
• Circumstances surrounding the offence
• Changes in circumstances
• Country in which the offence occurred
• De-criminalisation and remorse.

Employing ex-offenders

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

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

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

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

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

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

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

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

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

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

Staff who have lived outside the UK

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

Employment of ex-offenders – existing employees

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

A failure to disclose such information to the college (including spent convictions for posts where the

rehabilitation of Offenders Exemption Orders apply) may lead to disciplinary action

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

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

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

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

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

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

Retaining information provided by the DBS
The DBS advise that 'Disclosure documents' must be destroyed six months after they are no longer needed. The information recorded must be:
- Record of receipt
- Information on decisions made
- Reference number
- Date of issue of Enhanced check.

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

Access to students' requirements matrix – pre-engagement check stage

Job Family	ID Check	DBS check[12]				Prohib' from teaching check	Right to work in UK	Proof of quals	2years of employment or volunteering evidence		Employment offer or Volunteer agreement accepted
		Basic check	Standard check	Enhanced adult barred list	Enhanced child barred list				Reference 1	Reference 2 or more	
Director (Group Executive Team)	M		M				M	M	M	If reqd	M
Faculty Director	M		M				M	M	M	If reqd	M
Managerial	M		M				M	O	M	If reqd	M
Classroom/Student Support	M			M	M	M	M	O	M	If reqd	M
Business Support	M		M				M	O	M	If reqd	M
Student Crew	M	O	O				M				
Apprentice	M		M				M				M
Teacher	M			M	M	M	M	M	M	M	M
V-Hours	M			M	M	M	M	M	M	M	M
Casual Business Support	M	O	O				M	O			
Volunteer	M			O	O						
Agency/Consultant – Director	M		M				M	O	O	If reqd	
Agency/Consultant – Managerial	M		M				M	O	O	If reqd	
Agency/Consultant – Class/Student Support	M				M	M	M			If reqd	
Agency/Consultant – Business Support	M		M		N		M	O	M	If reqd	
Agency/Consultant – Teacher	M			M	M	M	M	M	M	If reqd	
Contractor[3]	M										
Governor	M		M								
Tenant		O									
Overseas Student Group Leader	M	Police Check									M

Key to entries
M   Mandatory and will not have access until successfully checked or agreed;
(Blank)   No action required
O   Optional – management or HR decision – must be recorded and logged in iTrent;

Mandatory training requirements

Job Family	Online safe-guarding	Prevent Training	e-safety	Face to face safe-guarding[4]	NSPCC Safer recruitment	Fire safety
Director (Group Executive Team)	M	M	M	M	M	M
Faculty Director	M	M	M	M	M	M
Managerial	M	M	M	M	M	M
Classroom/Student Support	M	M	M	M	N	M
Business Support	M	M	M	M	N	M
Student Crew	M	M	O	N	N	M
Apprentice	M	M	M	M	N	M
Teacher	M	M	M	M	N	M
V-Hours	M	M	M	M	N	M
Casual Business Support	O	O	O	N	N	M
Volunteer	M	O	O	O	N	O
Agency/Consultant – Director	M	M	M	O	N	M
Agency/Consultant – Managerial	M	M	M	O	N	M
Agency/Consultant – Class/Student Support	M	M	M	O	N	M
Agency/Consultant – Business Support	M	O	O	O	N	M
Agency/Consultant – Teacher	M	M	M	M	N	M
Contractor	N	N	N	O	N	O
Governor	O	O	O	O	N	O
Tenant	N	N	N	N	N	N
Overseas Group Leader	N	N	N	N	N	M

Key: M – Mandatory; N: Not required; O: Optional, managers decision

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

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

Information must always be used in the best interest of students and never to intimidate, humiliate, or embarrass the student. Confidential information about a student should never be used casually in conversation or shared with any person other than on a need-to-know basis. In circumstances where the student's identity does not need to be disclosed the information should be used anonymously. In circumstances where members of staff do not need to know all the detail, this should remain the case.
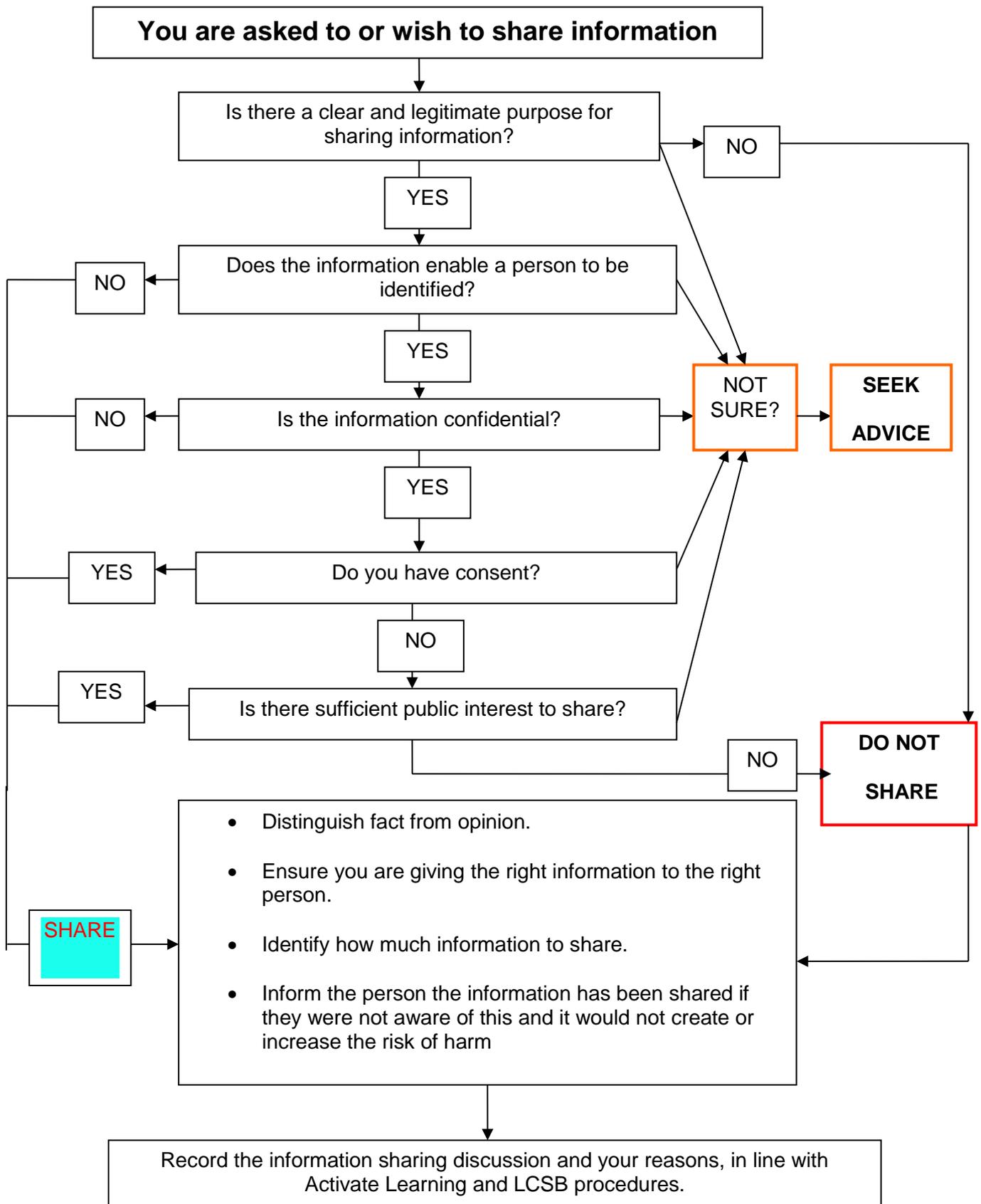
There are some circumstances in which a member of staff may be expected to share information about a student, for example when abuse is alleged or suspected. In such cases, members of staff have a duty to pass information on without delay, but only to those with designated child/adult protection responsibilities. In college, this is the Head of Student Support, Delivery Managers, Safeguarding and Welfare Advisers and Wellbeing Advisers.

If a member of staff is in any doubt about whether to share information or keep it confidential he or she should seek advice from the Safeguarding and Welfare Advisers or Wellbeing Advisers. Deputy Designated Safeguarding Lead or the Designated Safeguarding Lead/Head of Student Support

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

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

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

You are asked to or wish to share information

Is there a clear and legitimate purpose for sharing information? → NO → NOT SURE? → SEEK ADVICE

YES

Does the information enable a person to be identified? → NO

YES

Is the information confidential? → NO

YES

Do you have consent? → YES

NO

Is there sufficient public interest to share? → YES

NO → DO NOT SHARE

NOT SURE? → SEEK ADVICE

SHARE →

- Distinguish fact from opinion.

- Ensure you are giving the right information to the right person.

- Identify how much information to share.

- Inform the person the information has been shared if they were not aware of this and it would not create or increase the risk of harm

Record the information sharing discussion and your reasons, in line with Activate Learning and LCSB procedures.

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

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

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

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

Appendix C
Reporting concerns or disclosures relating to Safeguarding issues

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

1. Any member of staff who either suspects, witnesses or is told of any incident of physical, emotional, sexual, financial, discriminatory or institutional abuse or neglect occurring in the college, or to a student, child or vulnerable adult outside the college environment has a duty to report this immediately to the Safeguarding Team. If no one from the team is available immediately, staff should contact Student support who will locate a member of the team or the Safeguarding Officer/Deputy Designated Safeguarding Lead. In the rare case that none of these are available, the member of staff should report directly to member of the Group Executive Team or to Social Services/Police. Staff are aware that anyone can report a safeguarding concern to the Multi Agency Safeguarding hub

2. Staff should not leave the student, suspect or relevant witnesses alone until arrangements have been made either through the Safeguarding Team or directly with external agencies to ensure that the parties are safe and that witness evidence is not contaminated.

3. Staff should hand over any notes taken during the disclosure and submit a written record to the relevant member of the Safeguarding Team or receiving designated person as soon as is practicably possible afterwards of what they have suspected, witnessed or been told.
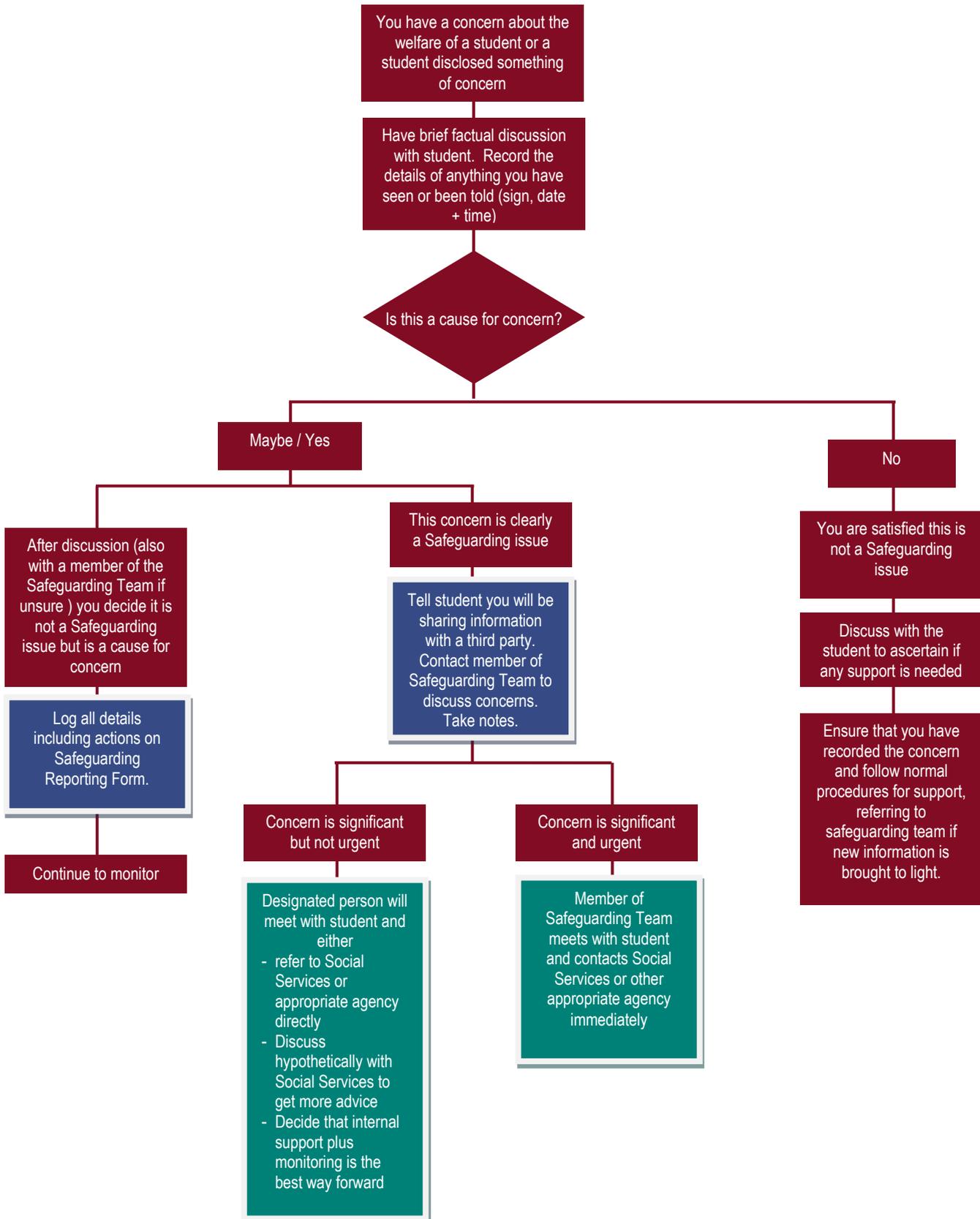
Staff should be aware that:

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

Staff should:

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

Decision Making Flowchart

You have a concern about the welfare of a student or a student disclosed something of concern

Have brief factual discussion with student. Record the details of anything you have seen or been told (sign, date + time)

Is this a cause for concern?

Maybe / Yes

After discussion (also with a member of the Safeguarding Team if unsure) you decide it is not a Safeguarding issue but is a cause for concern

Log all details including actions on Safeguarding Reporting Form.

Continue to monitor

This concern is clearly a Safeguarding issue

Tell student you will be sharing information with a third party. Contact member of Safeguarding Team to discuss concerns. Take notes.

Concern is significant but not urgent

Designated person will meet with student and either
- refer to Social Services or appropriate agency directly
- Discuss hypothetically with Social Services to get more advice
- Decide that internal support plus monitoring is the best way forward

Concern is significant and urgent

Member of Safeguarding Team meets with student and contacts Social Services or other appropriate agency immediately

No

You are satisfied this is not a Safeguarding issue

Discuss with the student to ascertain if any support is needed

Ensure that you have recorded the concern and follow normal procedures for support, referring to safeguarding team if new information is brought to light.

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

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

- Report the matter immediately to Human Resources or the Group Head of Student Support (Designated Safeguarding Lead) who will contact the Group Director of Marketing and Customer Experience.
-
- Any suspicion, allegation or actual abuse by a member of staff must be reported to the Safeguarding Executive Director as soon as possible, but within 24 hours.

On being notified of any allegation of abuse involving a member of staff, the Safeguarding Executive Director will:

- Take such steps as are necessary to ensure the safety of the person in question and anyone else who might be at risk.
- Consult with Human Resources and the local authority designated officer to decide whether a referral should be made under the Local Authority Designated Officer procedures.

During investigation of an alleged safeguarding incident against a member of staff by a student(s), the student(s) will be interviewed by a member of the Group Leadership team at a location specified by the college and may be accompanied by a parent/carer where:

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

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

When the college makes a referral to the Local Authority Designated Officer or Multi Agency Safeguarding Hub there may ensue:

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

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

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

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

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

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

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

Retention
Once a recruitment (or other relevant) decision has been made, the colleges shall not keep disclosure information for any period longer than is absolutely necessary. This is generally for a period of up to six months, to allow for the consideration and resolution of any disputes or complaints. If, in very exceptional circumstances, it is considered necessary to keep disclosure information for longer than six-months, the colleges will consult the DBS about this and shall give full consideration to Data Protection legislation and the individual's Human Rights before doing so. Throughout this time, the usual conditions regarding safe storage and strictly controlled access will prevail.
If concerns have been raised about an adult's behaviour around children, you should keep the records in their personnel file either until they reach normal retirement age or for 10 years - whichever is longer (IRMS, 2016). You should keep records for the same amount of time regardless of whether the allegations were unfounded. However if you find that allegations are malicious you should destroy the record immediately. Information should be kept for this length of time even if the person stops working or volunteering for the organisation

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

Loss of a disclosure or disclosure information
If a member of staff discovers that a disclosure or disclosure information has been lost they must inform the Human Resources who will take appropriate action and inform the DBS.

Requests to reveal disclosure information to third parties

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

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

Subject Access Requests

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

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

Appendix F

Procedure for dealing with e-safety incidents

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

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

Procedure

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

1. Depending on the nature of the e-safety incident, it should be reported initially as follows:
   - If it involved a student, it should be reported to the Safeguarding and Wellbeing Adviser, Wellbeing Adviser, Deputy Designated Safeguarding Lead and Group Safeguarding Lead or a Safeguarding Officer
   - If it involved a member of staff, it should be reported to the Group Designated Safeguarding Lead (Head of Student Support) or Director of Human Resources

2. A referral of the incident may be made to an external agency such as the Police if appropriate.

3. Depending on the nature of the incident, the following steps may be undertaken for students:
   - Temporary suspension of access, caution issued
   - Removal of access pending investigation with possible referral to the Bullying and Harassment of Students Policy
   - Removal of access pending investigation with possible referral to the Student Behavioural and Disciplinary Policy
   - Exclusion

4. An investigation will always be undertaken. Depending on the nature of the incident, the following steps may be taken for staff:
   - No further action taken
   - Disciplinary meeting with sanctions as appropriate
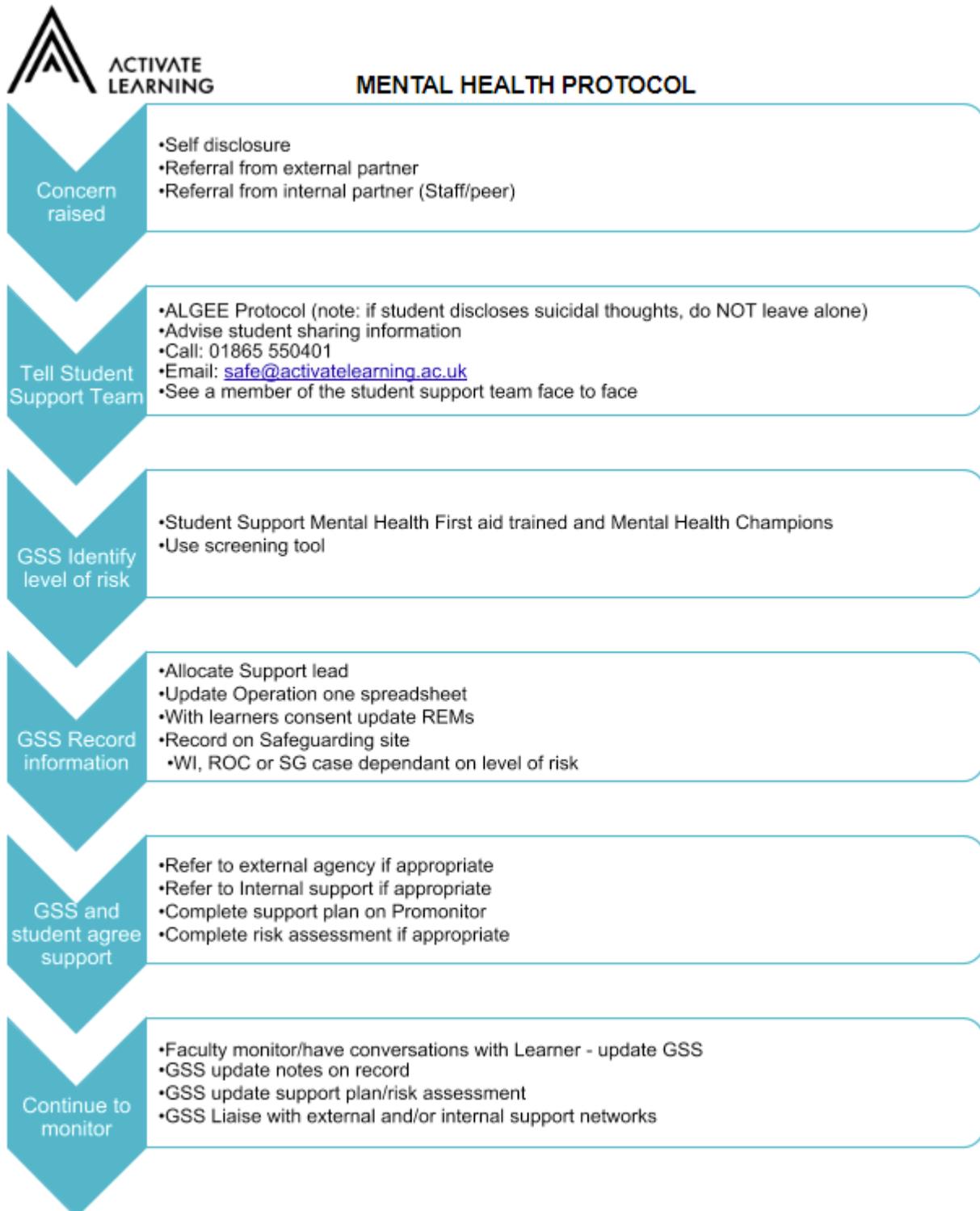   - Suspension
   - Dismissal

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

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

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

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

ACTIVATE LEARNING — MENTAL HEALTH PROTOCOL

Concern raised
- Self disclosure
- Referral from external partner
- Referral from internal partner (Staff/peer)

Tell Student Support Team
- ALGEE Protocol (note: if student discloses suicidal thoughts, do NOT leave alone)
- Advise student sharing information
- Call: 01865 550401
- Email: safe@activatelearning.ac.uk
- See a member of the student support team face to face

GSS Identify level of risk
- Student Support Mental Health First aid trained and Mental Health Champions
- Use screening tool

GSS Record information
- Allocate Support lead
- Update Operation one spreadsheet
- With learners consent update REMs
- Record on Safeguarding site
  - WI, ROC or SG case dependant on level of risk

GSS and student agree support
- Refer to external agency if appropriate
- Refer to Internal support if appropriate
- Complete support plan on Promonitor
- Complete risk assessment if appropriate

Continue to monitor
- Faculty monitor/have conversations with Learner - update GSS
- GSS update notes on record
- GSS update support plan/risk assessment
- GSS Liaise with external and/or internal support networks

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

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

On receiving an allegation or disclosure of abuse, the Safeguarding and Welfare Adviser, Wellbeing Adviser, Deputy Designated Safeguarding Lead or Safeguarding officer will:

- Take steps needed to protect any student involved from risk of immediate harm. (This may involve allocating an appropriate member of staff, as far as possible a person chosen by the student him/herself, to stay with him or her until suitable arrangements for his/her protection are made.).
- Not interview or investigate the allegation further, but refer the matter immediately to the relevant Social Services department.
    - o   When making the referral you should include any information they have on the child's developmental needs, the capacity of the child's parents or carers to meet those needs and any external factors that may be undermining their capacity to parent. This information may be included in any assessment, including an early help assessment, which may have been carried out prior to a referral into local authority children's social care. Where an early help assessment has already been undertaken, it should be used to support a referral to local authority children's social care; however, this is not a prerequisite for making a referral.
- Take handwritten verbatim notes.
- Consult the Duty Social Worker/Police and follow advice about contacting parents, other staff, police, doctor or alleged perpetrator or witnesses directly. Agree with the Duty Social Worker/Police any necessary next steps in relation to:
    - i.   Informing a student's parents/guardian/next of kin (there are circumstances where it would be inappropriate to inform parents/guardians/next of kin immediately an allegation has been made).
    - ii.   A medical examination or treatment for the student (again, there are circumstances where medical evidence will be needed).
    - iii.   Immediate protection that may be needed for a student who has been the victim of abuse.
    - iv.   The person who has given information about abuse, and a student against whom an allegation has been made (each of these may now be at risk).
    - v.   Informing other people at the college (including any other member of staff) of the allegation and its investigation. Information should be shared on a strictly 'need to know' basis.
- The person who makes a referral should always follow up their concerns if they are not satisfied with the response.
- Inform the student or person who made the initial allegation of what the next steps are to be, having agreed these with the Duty Social Worker.
- Inform the Head of Student Support (Designated Safeguarding Lead) (if not the designated person to whom the concern has been reported) of the allegations and the action taken as above, and agree necessary further action in line with these standards.
- Take any steps for the longer term protection and support of each student who has made allegations of abuse or neglect, or is alleged to have suffered from abuse or neglect, taking his or her wishes into account. Ensure they are aware of the support available internally and externally and put supportive measures in place.
- Record the incident (names, date, time and content of disclosure) and create a folder on the Safeguarding site of SharePoint. The report must include the name and position of the person to whom the matter is reported. Gather notes from other staff involved to hold on file.
- Feedback should be given by local authority children's social care to the referrer on the decisions taken. Where appropriate, this feedback should include the reasons why a case may not meet the statutory threshold and offer suggestions for other sources of more

suitable support. Practitioners should always follow up their concerns if they are not satisfied with the local authority children's social care response and should escalate their concerns if they remain dissatisfied

- Arrange for any counselling support that may be necessary (if appropriate) for staff involved in the reporting of abuse, through the Human Resources Team.

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

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

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

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

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

Appendix J
Advice and procedures for staff regarding touch and restraint

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

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

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

Advice for staff
The Education and Inspections Act 2006 Section165, which inserts section 85C into the Further and Higher Education Act 1992 (c. 13), gives power to members of staff of further education institutions to use force.

Activate Learning recognises that there may be occasions where members of staff are required to use reasonable force either to defend themselves or protect others from injury. The term 'reasonable' in these circumstances means 'using no more force than is needed'
However the use of force to restrain or physically direct another person should be regarded as a last resort. A general culture of limited touch should apply with physical intervention avoided if possible.

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

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

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

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

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

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

Where force can be used
Staff may only exercise the statutory power to use force where:

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

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

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

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

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

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

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

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

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

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

Procedure regarding touch and restraint

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

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

Post-incident support

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

- providing first aid treatment on site or seeking medical assistance for injuries beyond basic first aid.

- transferring to hospital any person where further treatment is required or recommended. School pupils and those under the age of 18 should be accompanied by a member of staff who should stay with them until they are 'handed back' to the school or their parent or guardian/ carer.

- ensuring that learners and staff who are affected by an incident have continuing support for as long as necessary by using the college's existing support networks in respect of:
  - physical consequences
  - support to deal with emotional stress or loss of confidence
  - analysing / reflecting on the incident

Complaints

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

Responsibility for the monitoring of this procedure

It will be the responsibility of the Head of Student Support to monitor the effectiveness of this procedure by:
- assessing the nature and frequency of relevant incidents;
- monitoring any complaints or risks associated with the policy.

Reasonable force

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

There is no legal definition of what degree of force is reasonable, it will always depend upon the precise circumstances of the individual case; however the degree of force used should always be:
- in proportion to the consequences it is intended to prevent; and
- the minimum needed to achieve the desired result.

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

The Crown Prosecution Service view of reasonable force is:
A person may use such force as is reasonable in the circumstances for the purposes of:

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

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

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

Appendix K
Procedure for recording shared individual risk assessments

1. A record of all students who declare a disability, illness, additional needs or vulnerability is compiled by the Learning Support Delivery Manager on the support database**.** Reports and records relating to assessment and support of students are to be collated into one central file held by the Learning Support Delivery Manager. This ensures the holistic overview and assessment of student needs and enables a coordinated approach to ongoing support, further assessment and intervention should it be required.

2. A copy of the **SIR** is made available to the Safeguarding team, Learning Support and other colleagues as appropriate.

3. Tutors of all students who have declared a disability, illness, additional needs or vulnerability for which a risk assessment may be appropriate – for instance, someone who is epileptic or has a mental illness, are contacted and asked to work with the student on a risk assessment / Health Support Plan. (Form available on Staff Portal). This is only completed once the student needs have been assessed, meaningful and explicit consent has been obtained to share the information and a support plan has been written.

4. The Tutor will take on the role of **Key Worker** for these students, unless another college professional is deemed more appropriate – e.g. Student Welfare Adviser for Looked After and Young People Leaving Care etc. **Guidance and support in completing these specialist risk assessments should be sought from the** Learning Support Delivery Manager

5. One copy of the completed risk assessment form will be signed by both staff member and student and be retained securely in the curriculum area

6. An electronic copy of the risk assessment is sent to the Safeguarding site, by the member of staff completing the assessment, and to the the Learning Support Delivery Manager. All copies received will be checked against the original list to ensure compliance.

7. Any information suggesting that immediate action may be required as part of the outcome of the risk assessment should be lodged on the Duty Manager site and also with the the Learning Support Delivery Manager. It is the responsibility of the Key Worker to ensure that these actions are implemented.

Appendix L
Guidance relating to trips and residential

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

Always do a full risk assessment.

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

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

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

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

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

*Sexual Offences Act 2003

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

Appendix M
Prevention of violent extremism – The 'Prevent' agenda

1. In February 2008 the Government published guidance to local partners including colleges on preventing violent extremism[1]. While the guidance was prompted following examples of Al Qaida behaviour, it is also aimed at reducing the risk of radicalisation of vulnerable people by other groups, including some Animal Rights Groups and Far Right Groups.

2. Prevent is about preventing people from being drawn into terrorism or into supporting terrorism. Prevent takes and multi-agency approach and is about managing risks. Prevent:
    o   responds to the ideological challenge we face from terrorism and aspects of extremism, and the threat we face from those who promote these views;
    o   provides practical help to prevent people from being drawn into terrorism and ensure they are given appropriate advice and support;
    o   works with a wide range of sectors (including education, criminal justice, faith, charities, online and health) where there are risks of radicalisation that we need to deal with.

3. Radicalisation refers to the process by which a person comes to support terrorism and forms of extremism leading to terrorism. To reduce the risk from terrorism we need not only to stop terrorist attacks but also to prevent people becoming terrorists. This is one objective of Prevent, part of CONTEST, the Government's strategy for countering international terrorism.

4. Radicalisation is usually a process over time, not a single event and during that process, behaviours as well as opinions are likely to change. These changes may be apparent to the friends, families and work colleagues of the person concerned, along with teachers. As part of wider safeguarding responsibilities college staff will be alert to:

    Disclosures by students of their exposure to the extremist actions, views or materials of others outside of college, such as in their homes or community groups, especially where students have not actively sought these out;
    o   Graffiti symbols, writing or art work promoting extremist messages or images;
    o   Students accessing extremist material online, including through social networking sites;
    o   Parental/agent reports of changes in behaviour, friendship or actions and requests for assistance;
    o   Local authority services, police reports of issues affecting students in other colleges, universities, schools or other settings;
    o   Students voicing opinions drawn from extremist ideologies and narratives;
    o   Use of extremist or 'hate' terms to exclude others or incite violence;
    o   Intolerance of difference, whether secular or religious or, in line with our equalities policy, views based on, but not exclusive to, gender, disability, homophobia, race, colour or culture;
    o   Attempts to impose extremist views or practices on others;
    o   Anti-western or Anti-British views

5. Colleges have a specific role to:
    o   protect and prevent members of the college community, particularly young students, from being radicalised and drawn into terrorism
    o   spotting risks and reporting when they are concerned
    o   working with other agencies to deal with any risks

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

6. Young people and vulnerable groups are particularly targeted by groups who may promote violent extremist activity. The aim of *Prevent* is to stop people becoming or supporting terrorists, by challenging the spread of terrorist ideology, supporting vulnerable individuals, and working in key sectors and institutions.

7. Channel is a key element of the *Prevent* strategy. It is a multi-agency approach to protect people at risk from radicalisation. Channel uses existing collaboration between local authorities, statutory partners (such as the education and health sectors, social services, children's and youth services and offender management services), the police and the local community to identify individuals at risk of being drawn into terrorism; assess the nature and extent of that risk; and develop the most appropriate support plan for the individuals concerned. Channel is about safeguarding children and adults from being drawn into committing terrorist-related activity.

8. Activate Learning staff should be aware of signs of radicalisation and have the confidence to report their concerns.
   o All Staff complete the home office online training pre-commencing employment and Prevent is included within the level 2 safeguarding training for all staff. There are also specific training sessions on this agenda throughout the year.
   o Designated staff complete WRAP (Workshop to Raise Awareness of Prevent) training.

9. Any concerns should be recorded in writing and reported to the Designated Safeguarding Lead (Head of Student Support), Deputy Designated Safeguarding Lead (Student Support Delivery Manager or the Safeguarding and wellbeing Adviser. They will liaise with the contact at the appropriate police authority following the procedures in the joint protocol.

10. Activate Learning will also promote the ethos of the 'Prevent' agenda by encouraging free and open debate but challenging extreme views. It will encourage through its classroom practice, theme weeks and induction activities, a belief in Equality of Opportunity and the celebration of Diversity.

11. Activate Learning will not host or allow its premises to be used by extreme groups and will seek to prevent the distribution of extreme literature.

12. Activate Learning have a legal responsibility to forbid the promotion of partisan political views in the teaching of any subject in the Activate Group and must take such steps as are reasonably practicable to secure that where political issues are brought to the attention of students they are offered a balanced presentation of opposing views. Promotion of any organisations linked to violent extremism is contrary to the values of the Activate Learning Group and could constitute gross misconduct.

13. Activate Learning will provide appropriate support through its own staff or by referral to external agencies, for any student in danger of radicalisation.

14. The Group has robust procedures for identifying and assessing the risks posed by visiting speakers and external parties hiring rooms on campus. Faculty colleagues notify Group Student Support of any planned outside speakers at least 14 days in advance of the visit. Any concerns are referred to the Group Designated Safeguarding Person for assessment of risk and potential refusal of entry if the risk threshold is exceeded. Institutional Effectiveness refer concerns about room bookings to the Group Designated Safeguarding Person for similar risk assessment. All visiting speakers will be supervised by a member of group staff, who are expected to interject or stop the event if they feel the speaker is promoting extremist views or inequality in any form.

15. The group keeps learners safe from the influence of radicalisation when learning onsite through the use of filtering systems as a means of restricting access to harmful content. The

robust firewall prevents the use of inappropriate search terms and any intentional or accidental access to unsuitable material online. Web filters are used to block access to keywords and a reporting 6 mechanism is in place to capture details of user accounts performing unsuitable searches. Activate Learning enforces an Acceptable Use Policy for IT users which explicitly outlines user guidelines and responsibilities in line with Company expectations. As some young people and staff may legitimately conduct online research into terrorism and counter-terrorism as part of their studies, the group has clear policies in place to identify and address instances where online materials are accessed for curriculum purposes.

16. Whistleblowing Where there are concerns of extremism or radicalisation, students, staff and governors will be encouraged to make use of our internal systems to 'Whistleblow' or raise any issue in confidence. They must inform the Group Designated Safeguarding Lead or Head of Campus straight away.

17. The Activate Learning mission is to transform lives through learning. Learning is powerful in equipping people with the knowledge, skills and critical thinking, to keep themselves safe and prepare them for life in modern multi-cultural Britain and globally. Activate Learning aims to develop and nurture learners these by:
    o using the curriculum and enrichment activities to embed and contextualise British Values
    o developing the content and influence of the tutorial programme with learners, enabling a growing understanding of the political, moral, social and religious issues that can lead to extremist ideologies and avoiding its development (covering democracy, freedom of speech, the rule of law, human rights and responsibilities);
    o systematically challenging the myths and assumptions that lead to people becoming alienated and disempowered, through good tutoring, opportunities for discussion and debate;
    o using teaching approaches which help our learners to build resilience to extremism and give them a positive sense of identity through the development of critical thinking skills;
    o creating learning environments that provide a safe place where learners can express free thought, explore controversial issues safely and where our teachers encourage and facilitate this;
    o encouraging learners to respect one another and to respect and tolerate difference, especially those of a different faith or no faith others, with particular regard to the protected characteristics set out in the Equality Act 2010;
    o using effective and well-managed Student Voice which enables learners to actively participate in the democratic process;
    o having a clearly communicated and consistently applied the disciplinary policy so that learners understand what is expected of them and the consequences of both meeting and failing to meet these expectations;
    o implementing a code of conduct which is regularly referred to and communicated with students, reiterating that we are a college community built on mutual respect and understanding;
    o adopting restorative approaches, where possible, to resolve any difficulties between members of our college community; 5
    o having a rigorous commitment to student safety on- and off-campus;
    o offering learners a module in 'Digital Citizenship', designed to help them understand the risks they may face online and to empower them as digital citizens. The module includes information on digital literacy and ethics, inappropriate content, online sexual solicitation, online privacy and cyberbullying amongst other topics.

Appendix N
Missing persons procedure

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

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

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

Safeguarding team establish level of risk;
- Circumstances of absence
- Any Student support plan in place
- Age of student
- Maturity of student
- Any physical or cognitive disability of the student

Any continuing or urgent need for the student to have medication or medical treatment
- Legal status of the child
- Risk of offending
- Influence of peer groups, family or friends
- Predatory influences on the student
- Any known risk of abduction
- Environmental factors including weather, time of year etc.

Share information with partner agencies involved with the student.

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

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

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

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

All staff should be aware that children going missing, particularly repeatedly, can act as vital warning sign of a range of safeguarding possibilities.

Equality Impact Assessment

We believe that people from a range of backgrounds and experiences can enhance the life and development of the institution and that all individuals should be treated on the basis of individual merit and without prejudice. Activate Learning will therefore aim to provide an education service which actively promotes equality of opportunity and freedom from discrimination on grounds of protected characteristics, namely age, disability, sex, gender reassignment, marriage and civil partnerships, pregnancy and maternity, race, religion and beliefs, sexual orientation and socio economic status in both education and employment. Activate Learning expects all employees, students, and associated partner organisations to adopt this policy. Activate learning is committed to carrying out Equality Impact Assessments (EIA) on its policies and procedures in order that some measurement is made of the contribution that the policy/procedure makes towards equality and diversity objectives.	
Name and role of person(s) carrying out EIA	Leanne Hicks
Name of policy, procedure, practice, plan or process	Safeguarding and Child protection Policy
What is the main aim or purpose of the policy, procedure, practice, plan or process?	The Safeguarding and Child Protection policy is for all staff. It outlines the Activate Learning position on Safeguarding and clarifies the action to be taken to ensure that they meet their duties relating to protecting the safety and promoting the wellbeing of children and vulnerable adults; it signposts to related policies and additional guidance. The policy covers the arrangements for responding to Child Protection issues. Safeguarding and Child Protection are about promoting the welfare of children is defined for the purposes of this guidance as: protecting children and vulnerable adults from maltreatment; preventing impairment of children's health or development; ensuring that children grow up in circumstances consistent with the provision of safe and effective care; and taking action to enable all children to have the best outcomes.
Is this a new (N) or existing (E) policy, practice,	☐ N xE

plan or process? (Please tick relevant box)	
Person responsible for policy, practice, plan or process	Miriam O'Leary
Date of equality impact assessment	March 2019

Evidence

What information has been gathered to inform the EIA? Consider, for example, people's views from focus groups and surveys, and statistical information or other relevant evidence. Consider both quantitative and qualitative information	• Student Feedback • Faculty staff feedback • Student Support and national data
What has this information revealed?	85% of students with safeguarding or child protection concerns are retained at college. 96% of students say they feel safe at College Nationally rates of depression and anxiety amongst teenagers has risen by 70% over the past 25 years. To date, in 2019 out of 780 safeguarding concerns across the group we have only had 1 which relates Prevent Males are less likely to disclose support needs. This is evident both on a national level and within the college.
Is further information required? If so, how will this information be gathered and used?	Focus groups have continued to be held with minority groups reinforces that the preferred method to access support is through their own external networks. We continue to raise the profile of the extensive support opportunities available through the colleges.,

Impact

Has the equality impact assessment identified potential or actual areas of concern, negative impact, or areas of inequality? If so, please tick	☐ Race	☐ Age
	☐ Disability	☐ Religion and belief
	X Gender (including Gender reassignment)	☐ Marriage / civil partnership

the relevant boxes.	☐ Pregnancy / maternity	☐ Socio-economic
	☐ Sexual orientation	☐ Other area of equality (please state)
Has the equality impact assessment identified areas that would further advance equality if changes were made, for example fostering good relations between different groups, meeting needs or encouraging participation? If so, please tick the relevant boxes.	☐ Race ☐ Disability ☐ Gender (including Gender reassignment) ☐ Pregnancy / maternity ☐ Sexual orientation	☐ Age ☐ Religion and belief ☐ Marriage / civil partnership ☐ Socio-economic X Other area of equality (please state)
Please provide a brief summary of the outcomes of the EIA including ● Issues identified in the EIA ● Areas of potential inequality ● Opportunities to further advance equality ● Opportunities to foster good relations	● The college may not be identifying students at risk of radicalisations ● Male students are less likely to disclosed students ● Mental health is an increasing concern in young people	

Action - Equality Action Plan

Issue	Planned Actions for Improvement	Expected Outcomes and Targets with Milestones & Target Dates	Person Responsible for Completion
Further training for staff around Prevent	Training for all staff be rolled out during CPD week in August 2019 WRAP training for designated Staff in May 2019	Early identification of students at risk of radicalisation.	Leanne Hicks Regional FE Prevent Coordinator
Disclosures of support needs from male students	Hold focus group around male students	Constructive feedback around barriers and actions we can take moving forward	Ben Sims/Charlotte Morgan

Increase in students with poor mental health	Raise profile of support available through enrichment campaigns. Resources on display in classrooms. Training for Faculty staff	Referrals to counselling. Engagement with student support. Faculty confident to provide support and spot the signs.	Student Support