SAFEGUARDING – REPORTING A CONCERN PROCEDURE

Procedure Statement

At Activate Learning we want all students and apprentices to feel safe, supported and cared for in line with the core values of our Learning Philosophy and commitments outlined in the Safeguarding and Child Protection Policy. The procedures outlined in this document will help ensure that the Safeguarding and Child Protection Policy is implemented consistently across the Activate Learning College Group.

This document outlines the staff's responsibilities in relation to safeguarding and the steps they should follow when responding to concerns about a child or adult at risk, including how to respond to a disclosure and make referrals to the Safeguarding Team.

Responsibilities

This safeguarding procedure applies to all members of Activate Learning, including staff, governors, volunteers, visitors, contractors, and users of our premises.

It encompasses all students, including those on work placements, online learners, apprentices, franchisees, and 14-16 students in partnership with schools.

Everyone is responsible for raising awareness, identifying risks, and promptly referring concerns to the Safeguarding Team by following the steps outlined in this procedure.

If ever unsure, Appendix 2 provides guidance on safeguarding thresholds, and who is responsible for the follow up. If in doubt, staff should seek advice from the Safeguarding Team. Their role includes supporting and referring learners at risk of harm, abuse, and neglect, and working collaboratively with multi-agency external partners.

Safeguarding Disclosures

Activate Learning recognises that some students may face barriers to verbally disclosing abuse or harm, due to factors like vulnerability, age, disability, communication difficulties, gender, ethnicity, or past trauma. Consequently, anyone with concerns about a student's safety or well-being should take immediate action rather than waiting for verbal disclosure.

Indicators of potential harm include, but are not limited to:
- Altered behaviour or emotional presentation e.g., withdrawn, tearful, fearful, watchful, aggressive, emotional outbursts.
- Physical changes e.g., bruises, cuts, burns, concealing injuries with clothing or makeup, neglecting self-care.
- Low self-esteem, talk of hopelessness or being a burden, incidents of self-harm.
- Poor social skills, sexualised behaviour or language, engagement in risk taking behaviour.
- Frequent signs of tiredness, hunger, or poor personal hygiene.
- Misusing substances such as drugs or alcohol.
- Unexplained or recurrent absence from college or placement, or incidents of going missing.
- Increased online activity, shifts in personal attitudes towards others, or withdrawal from previously enjoyed activities.
- Possessing multiple mobile phones or unexplained possessions like money, clothes, or technology.

Activate Learning recognises that children or adults at risk are more likely to disclose to someone they trust, and this could be any member of Activate Learning staff. Therefore, all staff should be familiar with appropriate responses and actions in such situations.

Staff should be reassured that it is not their responsibility to investigate abuse; their role is to respond effectively, document the disclosure, and promptly report it to the Safeguarding Team.

How To Respond to a Safeguarding Disclosure

Do	Don't
Listen carefully, giving your full attention	Interrupt or rush them, or become distracted thinking about what to say or do next
Use open and neutral body language	Act shocked, disgusted, or panicked
Reassure the student they have done the right thing in telling somebody and what you are going to do next	Promise to keep information confidential or 'a secret' or make promises you cannot keep
Make accurate notes using the student's exact words	Make assumptions or use your own words to describe events
Accept what they are saying, take it seriously and convey belief	Try to investigate yourself or assume information is already known or has been reported to relevant professionals
Use a body map if mapping injuries	Take photographs or receive / view indecent images of children

Sometimes it will be appropriate to ask clarifying questions to better understand the context of a disclosure. It is important to use open-ended questions or phrases rather than leading or closed questions.

Appropriate Questions	Inappropriate Questions
Where, when and/or how did this happen?	Did you feel sad when that happened?
Could you describe what happened?	Did they hurt you?
Who was there?	Things haven't been very good at home recently, have they?
Can you tell me more about that?	They aren't very nice, are they?
Is there anything else you'd like to talk about?	Why didn't you tell anybody before?
Is there anything else I can help with?	Are you sure this is true?

You should inform the learner that you cannot keep this information a secret or confidential and have a duty of care to pass on any information that indicates they or somebody else is at risk of harm.

You should reassure them that they will be kept informed about and supported through the next steps.

Procedure For Referring to The Safeguarding Team
If you are worried about the safety or welfare of any student (regardless of their age), you must pass this on immediately to the Safeguarding Team.

You can report a concern in one of the following ways:
- **Call: 01865 550401**
- **Email: safe@activatelearning.ac.uk**
- **Complete a record of concern form on SharePoint (Link to record of concern form)**
- **Speak to the Designated Safeguarding Adviser directly (Appendix 1 lists the Safeguarding Team members on each campus).**

IMPORTANT - Once referred, staff must follow up immediately with a written record and ensure this is sent to the relevant Designated Safeguarding Adviser. This can be via email or on a safeguarding Record of Concern form. Safeguarding referrals should not be via ProMonitor due to confidentiality.

Next Steps
The Safeguarding Team will likely liaise with the referrer to gather more information. They will arrange to meet with the student(s) to explore the concerns further.

Depending on the nature of the concerns, the Safeguarding Team may take one or more of the following actions:

- Refer to Police and/or Adult or Children's Social Care
- Refer or signpost to specialist external support such as mental health services or rape and sexual assault services, specialist counselling etc.
- Speak with the student's parent/carer(s), so long as this does not place the student at greater risk or harm.
- Refer to internal support such as college counsellors, learning support, intervention progress coaches etc.
- Create or update the student's support plan on Promonitor and/or conduct a Safeguarding Personal Risk Assessment (PRA).
- Offer the student ongoing emotional and pastoral support.

Procedure For Responding to a Concern Outside of Normal College Hours
The Safeguarding Team are available to support during usual college business hours (Monday – Thursday, 08:30am – 17:00pm and Friday, 08:30am – 16:30pm).

However, in rare circumstances staff may become aware that a student is at immediate risk of harm outside of college business hours e.g., in the evenings, a weekend or bank holiday. In these circumstances, staff must follow this up appropriately. Appendix 3 provides guidance for residential wardens.

Below are the relevant agencies that can support 'out of hours':

Crime -
If staff become concerned a student is in immediate danger, at imminent risk of harm or has been the victim of a crime they should contact the relevant emergency service.

Role	Contact Number
Emergency services e.g., Police, Ambulance, Fire Service	999
Police	101

Safeguarding -
If staff become concerned a child or adult at risk is being abused or neglected, they should contact the Children or Adult's Social Care department in the Local Authority that the student normally resides. Each local authority operates an 'out of hours' emergency service for Children's and Adult's Social Care.

Local Authority	Contact Number
Surrey	01483 517898
Reading, Windsor and Maidenhead, Wokingham	01344 786543
Bracknell	01344 352000
Oxfordshire (including Banbury and Blackbird Leys)	0800 833408
Hampshire	0300 555 1373

Unsure of which Local Authority to contact? Staff can use this tool: https://www.gov.uk/find-local-council

Mental health –
If a student is experiencing a mental health crisis e.g., report they have or are going to harm themselves or somebody else, or have plans to end their life, staff should alert emergency services immediately on 999.

If a student report's struggling with their mental health e.g., thoughts of self-harm or suicidal ideation, staff should contact the student's emergency contacts to alert them. They should also encourage the student to access support from a health professional or mental health service.

Service	Contact Number
Crisis Mental Health Helpline	0800 915 46444
Samaritans	116 123

Once you have made an 'out of hours' referral, you must contact the Safeguarding Team to inform them via the above channels. They will offer ongoing support to the student(s).

Activate Learning recognises that having dealt with an emergency or crisis, staff may also require support. If this is the case, you can speak to your line manager or HRBP for advice on where to seek assistance.

Escalating a Concern Which Has Not Been Followed Up

The aim of our safeguarding policy and procedure is to reduce risks to children and adults who are at risk, by ensuring that the right actions are taken by the right people at the right time. If staff feel no action has been taken or believe concerns have not been addressed appropriately, this must be escalated.

If it is believed that a concern has not been appropriately managed by any member of staff including the designated safeguarding advisers, staff should escalate their concern to a DDSL, the DSL or Director of Student Experience and Safeguarding.

If after escalating your concern, staff still feel that appropriate action has not been taken, they can refer to the Whistleblowing Policy and/or contact the Local Authority Designated Officer (LADO) within the Local Authority your setting operates in.

Raising a Concern Against a Staff Member or Adult in a Position of Authority

If staff, volunteers, students, visitors, or contractors have concerns that an adult has or may have:

- Behaved in a way that has harmed a child or may have hurt a child.
- Committed a criminal offence against or related to a child.
- Behaved towards a child in a way that indicates they may pose a risk of harm to children.

This must be reported immediately to HR, a DDSL and/or the DSL so that it can be investigated appropriately. In all such cases the allegation will be reported by the DDSL or DSL to the Local Authority Designated Officer (LADO) within statutory timescales.

References

This document should be read in conjunction with the following policies:

- Activate Learning Safeguarding and Child Protection Policy
- Activate Learning Child on Child Abuse Policy and Procedure
- Student Behaviour and Disciplinary Policy
- Whistleblowing Policy

Appendices

Appendix 1 - Safeguarding Team Structure
Appendix 2 - Safeguarding Thresholds
Appendix 3 - Residential Out of Hours Safeguarding Procedure

Appendix 1

Safeguarding Team Structure Chart..vsdx

What constitutes a safeguarding concern?
A safeguarding concern is one which relates to abuse, harm or neglect of a child or adult at risk. It relates to instances where a child or adult who needs care and support is or is at risk of experiencing harm.

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

Each report or incident is dealt with in a person-centered manner and on a case-by-case basis. However, below are some scenarios which are generally considered a safeguarding concern and should be reported to the Safeguarding Team. This list is not exhaustive and cannot account for all instances, therefore, if staff are unsure, they should speak to a member of the Safeguarding Team for advice and guidance.

Safeguarding Concern	Examples
Addiction	Not having control over doing, taking, or using something to the point it may be harmful e.g., gambling, drugs, alcohol, pornography.
Allegations Against Staff	An allegation that implies a staff member may have: • Behaved in a way which has or may have harmed a young person, • Possibly committed a criminal offence related to a child or adult at risk, • Indicates they may be unsuitable to work with children or may pose a risk of harm to children or adults at risk.
Bullying	Individuals or groups seek to harm, intimidate, or coerce someone who is perceived to be vulnerable e.g., • Physical assaults e.g., fights. • Verbal abuse e.g., name calling. • Threats of harm or intimidation. • Racial, sexual, or homophobic bullying. • Making silent, hoax or abusive calls.
Child-On-Child Abuse	Abusive behaviours involving children under the age of 18. May include: • Bullying (e.g., cyberbullying, prejudice-based and discriminatory bullying). • Abuse in intimate personal relationships between children. • Physical abuse such as hitting, kicking. • Sexual violence such as rape, assault by penetration and sexual assault. • Sexual harassment such as sexual comments, remarks, jokes. • Causing someone to engage in sexual activity without consent. • Consensual and non-consensual sharing of nude and semi-nude images and/or videos (e.g., sexting or youth produced sexual imagery). • Upskirting (e.g., taking a picture under a person's clothing without their permission). • Initiation/hazing type violence and rituals.
Concern For Parents / Carers	Concerns for student's family members which is having a detrimental impact on the child: • Family member in prison or affected by parental offending. • Parent/carer misusing substances. • Adult mental health issues. • Exposure to domestic abuse.
Criminal Exploitation	Young people are manipulated and coerced into committing crimes or anti-social behaviour e.g., stealing, carrying weapons, dealing drugs, gang violence.
Cyberbullying	Includes: • Sending threatening or abusive text messages • Creating and sharing embarrassing images or videos • 'Trolling' - sending menacing or upsetting messages on social networks • Setting up hate sites or groups about a child • Encouraging young people to self-harm

	• Creating fake accounts, hijacking or stealing online identities to embarrass a young person or cause trouble using their name.
Domestic Abuse	Any type of controlling, coercive, threatening behaviour, violence, or abuse between people who are, or who have been in a relationship, regardless of gender or sexuality. It can include physical, sexual, psychological, emotional, or financial abuse.
Emotional Abuse	Continual emotional mistreatment of somebody e.g., name calling, humiliating them, threats of harm / violence, mocking them, exposing a child to distressing events or information, ignoring them.
Fabricated Illness	Someone makes up or causes the symptoms of illness in someone else e.g., giving them medicine they do not need, or making them unwell.
Family Breakdown	Breakdown of relationships between a student and family/relatives which is causing tension at home or for the student and having a detrimental impact on the student's health, wellbeing or safety.
Female Genital Mutilation	The partial or total removal of external female genitalia for non-medical reasons. It's also known as female circumcision or cutting.
Financial Abuse	Someone misusing, withholding, or taking someone else's money.
Financial Poverty	A student over the age of 18 is lacking the finances or resources to provide a decent standard of living e.g., food, housing, basic needs.
Forced Marriage	Someone being tricked, coerced, or forced into marrying someone without their consent. Any marriage of those under the age of 18 is now a crime.
Going Missing	Reports of a student going missing from home/placement. Frequently absconding from college.
Harassment	When someone repeatedly behaves in a way that makes another person feel scared, distressed, or threatened. E.g., bullying, cyberstalking, abusive or unwanted communication, sending unwanted gifts etc.
Harmful Sexual Behaviour	Developmentally inappropriate sexual behaviour, which may be harmful or abusive e.g., inappropriate touching, using sexual violence or threats of violence, sexual activity with other children or adults.
Homelessness	Being homeless or being at risk of becoming homeless e.g., living in unsafe home circumstances, being 'kicked out' of home, or sofa-surfing with friends.
Honour-Based Abuse	Encompasses incidents or crimes which have been committed to protect or defend the 'honour' of the family and/or the community, e.g., female genital mutilation (FGM), forced marriage, and practices such as breast ironing.
Mental Ill-Health	All people have 'mental health' but this can become a safeguarding concern when mental ill-health puts them or others at risk of harm. Examples include: • Self-harm. • Suicidal thoughts, plans or attempts. • Historic self-harm or suicidality. • Instances of being hospitalised or sectioned under the Mental Health Act. • Eating disorders such as anorexia or bulimia. • Conditions which have a negative impact on a student's health or wellbeing e.g., depression, bi-polar, psychosis or schizophrenia. • Bereavement or bereaved by suicide.
Neglect	Not meeting a child's basic physical and/or psychological needs, resulting in serious damage to their health and development e.g., inadequate food, clothing, shelter, healthcare.
Physical Abuse	Somebody hurting someone else on purpose e.g., hit, punched, kicked, slapped, burnt.
Privately Fostered	When a child under 16 (or 18 is disabled) is cared for and provided with accommodation, by an adult who is not a relative, for 28 days or more.
Radicalisation	A person comes to support terrorism and extremist ideologies associated with terrorist groups.
Self-Neglect	When a person (over the age of 18) is unable or unwilling to care for their own essential needs e.g., personal hygiene, health, home conditions, hoarding.
Serious Youth Violence	Involvement in gangs, carrying or using weapons such as knives, acid etc.

Sexual Abuse	Forcing or enticing a child to take part in sexual activities e.g., rape, sexual touching, indecent images of children etc. Can be online or in person. This could include abuse that took place when the student is now an adult but was a child at the time of the abuse e.g., 'non-recent' abuse or historical incidents of sexual abuse.
Sexual Assault	A student over 18 has been the victim or perpetrator of a sexual assault such as rape, assault by penetration, sexual touching, forced to kiss someone – without consent.
Sexual Exploitation	Young people under 18, are coerced or groomed into exploitative situations and relationships. May be given things such as gifts, money, drugs, alcohol, status, or affection in exchange for taking part in sexual activities.
Sexual Harassment	Sexual harassment is unwanted sexual behaviour that makes someone feel upset, scared, offended, or humiliated. E.g., sexual comments or gestures, someone exposing themselves, staring or leering at someone.
Stalking	Like harassment but the stalker will have a fixation or obsession with the person they're targeting. Examples include following someone, going to their home uninvited, monitoring their whereabouts or forms of communication.
Substance Misuse	Drug or alcohol misuse which has a detrimental impact on the student's health or wellbeing. Can include misusing someone else's prescribed medication e.g., mental health medication.
Trafficking	Recruiting and moving children who are then exploited e.g., child sexual exploitation, benefit fraud, forced marriage, forced labour, criminal exploitation.

For concerns that do not meet the threshold for 'harm' (as described above), there is a wealth of holistic and pastoral support available for learners at Activate Learning.

Below are some examples of who else may be able to support learners with low level, pastoral, wellbeing or behaviour concerns.
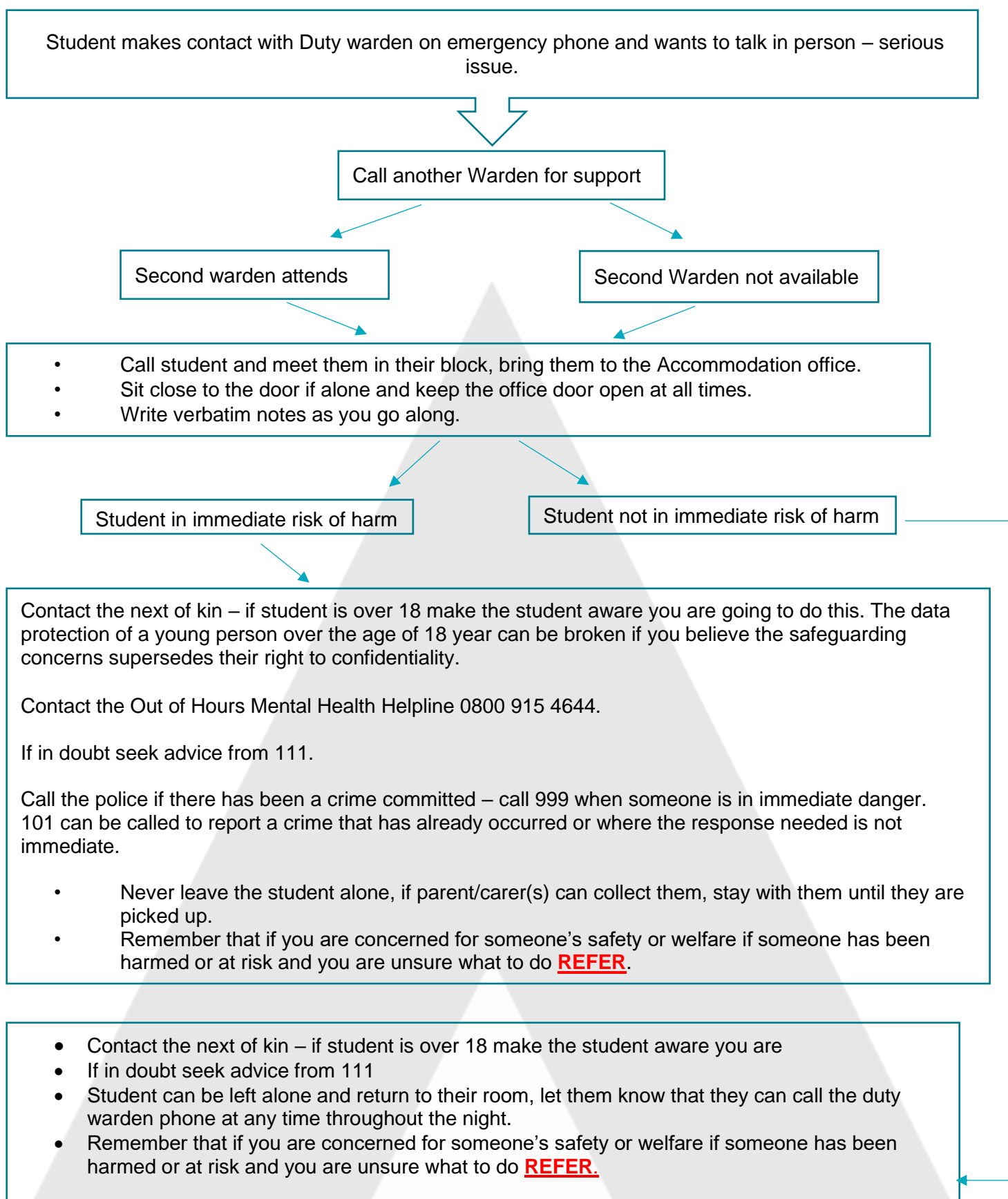
Nature of concern	Who to contact	Next steps
Behavioral incidents on site such as a fight, verbal threats, malicious fire alarm, damage to property.	Behaviour and Welfare Officer Duty Manager	Behaviour and Welfare Officer to investigate, take statements and act upon immediately. Duty Manager to make decision whether students need to be suspended, immediately. If under 18, or under 25 with an EHCP, parent/carer(s) to be contacted. Faculty to initiate disciplinary procedure. Safeguarding Team to be contacted if there was physical/emotional harm to student(s)/staff e.g., someone has been assaulted. Behaviour and Welfare Officer/Safeguarding Team to report to Police/Social Care, if necessary.
Emotional wellbeing e.g., feeling anxious, low motivation, issues with sleep, friendship issues, struggling with college work etc.	Tutor Intervention Progress Coach Counsellor	Tutor to offer emotional or practical support through signposting or referral to Progress/Intervention Coaches and/or Counsellors, with consent. If under 18, or under 25 with an EHCP, parent/carer(s) to be contacted by tutor.
General student absence (illness, no contact).	Tutor Faculty Co-Ordinator Group Admin	Tutor/Faculty Co-Ordinator/Group Admin to call student/emergency contact on the same day to ascertain reasons for absence.

		If absent for a prolonged period, Tutor/Faculty to arrange a 'Cause for Concern' meeting with student to address the concerns. If under 18, or under 25 with an EHCP, parent/carer(s) to be contacted by tutor. Refer to Retention Panel.
Student is absent and emergency contact does not know where they are. Information provided indicates student is vulnerable or unsafe.	Safeguarding Team, immediately.	Faculty to make enquiries with emergency contacts/friends etc. If student's whereabouts or safety cannot be established; Safeguarding Team to report student missing to Police.
Student has been charged with a criminal offence.	Behaviour and Welfare Officer Safeguarding Team	Behaviour and Welfare Officer to contact the student to complete Criminal Conviction Disclosure Form. Safeguarding Team to be notified if information shared indicates a risk to student(s)/staff. Safeguarding Team to liaise with Police/Social Care/external agencies. Safeguarding Team to conduct a Risk Assessment.
Student is at risk of or experiencing harm, abuse or neglect or you have concerns about student's safety.	Safeguarding Team, immediately.	Safeguarding Team to contact the student. Safeguarding Team will make appropriate referrals to Social Care/Police and other external agencies. Safeguarding Team to complete a Risk Assessment, if required.
Student is not coping / not able to access course due to physical or mental health.	Tutor Faculty Safeguarding Team.	Faculty to liaise with Safeguarding Team. Arrange a 'fitness to study' meeting with student to address the concerns. Follow 'fitness to study/reside' procedure. If under 18, or under 25 with an EHCP, parent/carer(s) to be contacted by tutor. Safeguarding Team to refer to external support, if required.
Student presents within college in a mental health crisis e.g., self-harm/suicidal ideation.	All staff are responsible for ensuring the student is physically safe before seeking further support. Once student is safe, Safeguarding Team.	Students' safety needs to be addressed immediately. The Safeguarding Team will assess the level of risk and work with external agencies.
Student becomes a young parent, young carer, 'cared for' by the Local Authority or leaves Local Authority Care.	Transition and Retention Advisor	Transition and Retention Advisor to liaise with student, Social Care, and external agencies to offer ongoing support.

Student shares they have a Social Worker, are on a Child in Need Plan or Child Protection Plan.	Safeguarding Team	Safeguarding Team will liaise with Social Care.
Student presents with extremist ideology or is at risk of radicalisation.	Tutor Faculty Safeguarding Team	Tutor/Faculty to explore the student's views with the student. Safeguarding Team to refer to Police/Channel Programme and if appropriate, Social Care. If student is under 18 or 25 with an EHCP, Safeguarding Team to share concerns with parent/carer(s). Safeguarding Team to complete a Risk Assessment.
Student believed to be in possession of a weapon/drugs or under the influence of drugs/alcohol on campus.	Behaviour and Welfare Officer Duty Manager Safeguarding Team	Behaviour and Welfare Officer to be notified immediately. Search procedure instigated by staff members trained and authorised to search students. In the event of a find, paraphernalia to be confiscated and safe arrangements made for student to be sent home. If under 18 or 25 with an EHCP, parent/carer(s) to be contacted. Faculty to instigate disciplinary procedure. Safeguarding Team to be notified and if required refer to Social Care/Police.

Appendix 3

<u>Residential Out of Hours Safeguarding Procedures</u>

Student makes contact with Duty warden on emergency phone and wants to talk in person – serious issue.

Call another Warden for support

Second warden attends

Second Warden not available

- Call student and meet them in their block, bring them to the Accommodation office.
- Sit close to the door if alone and keep the office door open at all times.
- Write verbatim notes as you go along.

Student in immediate risk of harm

Student not in immediate risk of harm

Contact the next of kin – if student is over 18 make the student aware you are going to do this. The data protection of a young person over the age of 18 year can be broken if you believe the safeguarding concerns supersedes their right to confidentiality.

Contact the Out of Hours Mental Health Helpline 0800 915 4644.

If in doubt seek advice from 111.

Call the police if there has been a crime committed – call 999 when someone is in immediate danger. 101 can be called to report a crime that has already occurred or where the response needed is not immediate.

- Never leave the student alone, if parent/carer(s) can collect them, stay with them until they are picked up.
- Remember that if you are concerned for someone's safety or welfare if someone has been harmed or at risk and you are unsure what to do **REFER**.

- Contact the next of kin – if student is over 18 make the student aware you are
- If in doubt seek advice from 111
- Student can be left alone and return to their room, let them know that they can call the duty warden phone at any time throughout the night.
- Remember that if you are concerned for someone's safety or welfare if someone has been harmed or at risk and you are unsure what to do **REFER.**

Ensure the warden log is completed and information is passed on to the Accommodation Day staff, including any notes made on the disclosure, day staff will liaise with Safeguarding and Welfare and arrange any follow up meetings.