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| Safeguarding and Prevent Policy | LS003   | 12             |            |
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## SAFEGUARDING AND PREVENT POLICY

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## 1. Policy Statement

Activate Learning's Safeguarding and Prevent Policy is rooted in the principles established in the [Children Act 1989](#) (as amended 2004) and aligns with current statutory guidance such as [Working Together to Safeguard Children 2023](#), [Keeping Children Safe in Education 2025](#), [Prevent Duty 2023](#), and [Care Act 2014](#).

At Activate Learning, we are committed to creating a safe, caring, and supportive environment for all students, whether on campus, online, or in work placements. This policy underpins our commitment to safeguarding by fostering a culture that prevents harm and promotes the wellbeing of all those who come into contact with Activate Learning through its work, including all students, staff, volunteers, visitors, and contractors.

Our approach is grounded in our Learning Philosophy and driven by our organisational values.

## 2. Commitment Statement

Activate Learning believes everyone has an equal right to live free from abuse, neglect and exploitation, regardless of age, disability, gender reassignment, marriage or civil partnership, pregnancy and maternity, race, religion or belief, sex, or sexual orientation.

We recognise that the welfare of our students is paramount in all the work we do and ensure all decisions are made in their best interests. We all have a responsibility to promote the welfare of all children and adults at risk, to keep them safe and to practise in a way that protects them.

We recognise that some children and adults are additionally vulnerable because of the impact of adverse experiences, their level of dependency on others, communication needs or other issues. We believe that working in partnership with children, adults at risk, their parents or carers, multi-agency partners and our communities, is essential in promoting our student's welfare.

We encourage any individual with safeguarding concerns to contact Activate Learning's Safeguarding Team directly via:

- Email: [safe@activatelearning.ac.uk](mailto:safe@activatelearning.ac.uk)
- Telephone: 01865 550401
- Online form [internal staff use only]: [Record of concern](#)

For further information, see our website: [Safeguarding at Activate Learning](#)

In the event of an emergency or immediate risk of harm, individuals should contact: 999.

## 3. Purpose

This policy sets out the principles of safeguarding which inform our practice and a co-ordinated approach across the organisation to protect children and adults at risk from harm.

Through this policy Activate Learning aims to:

- Create a safeguarding culture which promotes the welfare of all students. This includes:
  - Providing help and support to meet the needs of students as soon as problems emerge.
  - Protecting children and adults at risk from maltreatment, whether that is within or outside the home, including online, in the community and on work placement.
  - Preventing the impairment of student's mental and physical health or development.
  - Ensuring that children grow up in circumstances consistent with the provision of safe and effective care.
  - Taking action to enable all students to have the best outcomes.
- Reduce risks to the health, safety and wellbeing of students enrolled at Activate Learning, on and offline.
- Inform staff of their responsibilities in relation to safeguarding (including Prevent and online safety).
- Provide information that enables staff to identify signs of harm to children and adults and the steps they need to take in response to this.
- Outline the training that all staff can expect to receive to enable them to keep children and adults at risk safe.
- Recruit staff who are well suited to working with children and adults at risk.
- Promote safe working practices and support a culture of constructive challenge by enabling students, staff, volunteers, visitors or contractors to raise and report concerns about any practice that may cause harm to young people or adults.

#### 4. Scope

This policy applies to all individuals who come into contact with Activate Learning, including:

- All employees (permanent, temporary, or casual)
- Governors
- Volunteers
- Agency workers and contractors
- Visitors
- Placement and work-based learning partners
- Students enrolled across any Activate Learning provision – including Activate Learning colleges, residential accommodation, Further Education, Higher Education,

Apprenticeships, online learning, adult learning, and community-based activities.

The safeguarding principles in this policy apply regardless of age, setting, role, or method of engagement.

## 5. Monitoring

The effectiveness and implementation of this policy are monitored through:

- Half-Termly Safeguarding Committee meetings
- Ongoing oversight by sub-groups, including:
  - Online Safety Working Group
  - AI Strategy Meetings
- Annual safeguarding report submitted to the Board of Governors
- Annual audits sent to the local Safeguarding Children Partnership's
- Monthly reports to the Group Executive Team

These mechanisms help us ensure our safeguarding practices are robust, up to date, and continuously improved in response to emerging risks and best practice.

## 6. Safeguarding Systems

### a) Safeguarding Structure and Governance

Activate Learning ensures safeguarding is prioritised at all levels of the organisation and has named leads who oversee the provision of services across the group (see Appendix 3 for named leads). Safeguarding updates and arrangements (including online safety, Prevent, and residential accommodation) are reported on at regular safeguarding committee meetings and as a standing agenda item at Group Executive Team meetings.

### b) Reporting and Management of Safeguarding Concerns

Any individual (including students, staff, parents/carers, professionals, visitors or members of the public) can report safeguarding concerns about any member of our college community. This includes concerns about students, staff, volunteers, visitors, or anyone connected with the organisation. The Safeguarding Team can be contacted via:

- Email: [safe@activatelearning.ac.uk](mailto:safe@activatelearning.ac.uk)
- Telephone: 01865 550401
- Online form [internal staff use only]: [Record of concern](#)

If a staff member is concerned that any student is at risk of harm, they must report this in line with the [Safeguarding – Reporting a Concern Procedure](#). This also contains guidance regarding how to report safeguarding concerns outside of normal college operating hours.

A person-centred approach is used by the Safeguarding Team when making decisions or acting in relation to a safeguarding concern. Decisions are made in line with government guidance and locally agreed multi-agency safeguarding protocols.

Members of the Safeguarding Team receive monthly supervision with a Deputy Designated Safeguarding Lead (DDSL) and internal audits of safeguarding cases are undertaken regularly to ensure consistency with procedures and best practice.

### **c) Multi-Agency Working**

In line with statutory guidance such as [Working Together to Safeguard Children 2023](#) and [Care Act 2014](#), Activate Learning works closely with multi-agency partners such as children and adult's social care, local children and adults safeguarding partnerships, Prevent partners, police, health, and other services to promote the welfare of children and adults at risk and protect them from harm.

This includes providing early help, contributing to inter-agency plans or assessments, and providing additional support to children subject to child in need or child protection plans.

The Safeguarding Team also work with the police through Operation Encompass, a scheme for sharing about incidents of domestic abuse where there are children in the household.

### **d) Safer Recruitment**

We are committed to only employing staff who are appropriate to work with children and vulnerable adults. As such, all hiring managers are required to complete Safer Recruitment training prior to shortlisting, interviewing, and hiring any new staff.

In addition, we complete enhanced DBS (Disclosure and Barring Service) checks on all staff and maintain an accurate single central record of these checks. Appropriate supervision arrangements are made where a DBS has not been received prior to their start date. Two references are sought for all new employees and a reference Risk Assessment is completed if we do not have adequate references prior to starting. Further detail of our safer recruitment procedures is outlined in our Recruitment Policy, as well as our [DBS and Safeguarding Procedure](#).

### **e) Managing Allegations Against Staff**

Activate Learning takes all allegations seriously, including those made against staff, individuals acting on our behalf, those working with our students, or anyone operating within our learning environments. We are committed to responding promptly, fairly, and in accordance with statutory guidance and local safeguarding procedures.

We will act in line with our Allegations Against Staff Procedure, [Professional Conduct Policy](#) and [Staff Disciplinary Procedure](#), when it is alleged that a member of staff (including agency workers, contractors, volunteers, or individuals/organisations using our premises) has:

- Harmed or may have harmed a child or adult at risk,
- Possibly committed a criminal offence against, or related to, a child or adult at risk, or
- Behaved or may have behaved in a way that indicates they may pose a risk of harm to children or adults at risk,
- Behaved or may have behaved in a way that indicates they may not be suitable to work with children or adults at risk.

The Designated Safeguarding Lead (DSL) or DDSL will liaise with:

- The Local Authority Designated Officer (LADO) for allegations involving staff working with children,
- Adult social care where adults at risk may be involved, and
- The police or other external agencies where a criminal offence may have been committed.

Activate Learning ensures that all allegations are managed in a confidential, timely, and proportionate manner, with appropriate support offered to those involved.

#### **f) 'Low-level' Concerns**

Activate Learning is committed to fostering a culture of openness, trust, and professional integrity where all concerns about adult behaviour, no matter how minor, can be raised, recorded, and addressed appropriately.

We recognise the importance of identifying and responding to low-level concerns. These are behaviours that do not meet the threshold for referral to the LADO, police, or children's services, but may still:

- Breach professional boundaries or the [Professional Conduct Policy](#)
- Raise concerns about an individual's conduct, judgement, or values
- Pose a potential risk to student welfare

Low-level concerns may relate to the behaviour of any adult working for or on behalf of Activate Learning, including staff, volunteers, agency workers, and contractors.

All individuals are encouraged to report low-level concerns in accordance with the [Professional Conduct Policy](#) and [Staff Disciplinary Procedure](#). Concerns are recorded confidentially by HR and reviewed in collaboration with the DSL to identify patterns or signs of escalating behaviour.

This proactive approach promotes a transparent and safe organisational culture, enables early intervention and supports reflective practice and professional accountability.

### **g) Staff Training**

All Activate Learning staff must complete mandatory Level 1 Safeguarding and Prevent Awareness as part of pre-employment onboarding. Additional Safeguarding Essentials at Activate Learning, Online Safety, Professional Boundaries and Data Protection training is completed as part of all staff induction. All staff are also required to read [Part 1 of Keeping Children Safe in Education](#) and Activate Learning's policies and procedures relating to safeguarding as part of their induction. This training is refreshed in line with the relevant departmental advice.

The Safeguarding Team also provide regular safeguarding and Prevent updates (including online safety) to staff throughout the year to continue to provide them with relevant skills and knowledge to safeguard students effectively.

All members of the safeguarding team must complete Level 2 and 3 DSL Safeguarding training provided by local Safeguarding Children's Partnerships and Adult Safeguarding through the Safeguarding Adults Boards, updated two and three-yearly, respectively. They must also keep fully apprised of changes to related legislation and updated guidance through regular Continuous Professional Development (CPD).

All staff contribute to creating and maintaining the safeguarding culture at Activate Learning. Everyone who encounters children, adults at risk and their families have a role to play in sharing information to protect them from maltreatment. We provide staff with training and resources to help identify the signs that a student may be at increased risk of harm, abuse, neglect, or exploitation and encourage all staff to be aware of and report changes in a student's behaviour, appearance, attendance, and disclosures which are of concern.

Advice and resources are provided on a range of key safeguarding issues such as: physical abuse; emotional abuse; sexual abuse; neglect and self-neglect; institutional abuse; financial abuse; domestic abuse; child-on-child abuse; sexual violence and harassment; so-called honour-based abuse including female genital mutilation and forced marriage; radicalisation and extremism; substance misuse; child criminal and sexual exploitation including county lines; human

trafficking and modern slavery; online abuse; bullying, discrimination and hate crime; and mental ill-health.

All staff are trained in what to do if someone tells them they or someone else is being abused, exploited, or neglected, and know how to report this to the Safeguarding Team.

#### **h) Confidentiality and Information Sharing**

Activate Learning recognises that the [General Data Protection Regulation](#) (GDPR) and [Data Protection Act 2018](#) do not prevent, or limit, the sharing of information for the purposes of keeping children and adults at risk safe and promoting their welfare. Activate Learning understands that 'safeguarding of children and individuals at risk' is a processing condition that allows practitioners to share special category personal data. This includes allowing practitioners to share information without consent where there is good reason to do so, and that the sharing of information will enhance the safeguarding of student's, in a timely manner.

Activate Learning follow the advice set out in the Department for Education [Information Sharing Advice for Practitioners Providing Safeguarding Services](#) guidance, and [Data Protection in Schools](#) guidance, and if individuals are in any doubt, should speak to the DSL or DDSL for advice.

Activate Learning recognises the importance of information sharing, both within the college, and with other education providers on transfer, including in-year. The school partnership teams work with local education providers to promote the transfer of safeguarding files from schools to Activate Learning's Safeguarding Teams and automated systems are in place for the request of such files.

#### **i) Record Keeping and Retention**

Maintaining detailed records is an essential part of safeguarding practice. As well as keeping records of concerns, discussions and decisions, Activate Learning records the rationale for any decisions made.

Safeguarding records are stored securely (using a [Child Protection Online Management System](#) (CPOMS)) and only accessible by staff who need to know the information to keep students safe or maintain the internal systems. Safeguarding records are handled and retained in accordance with the GDPR and Activate Learning's [Information Security and Data Protection Policy](#).

## **7. Safeguarding Arrangements**

### **a) Prevent and Extremism**

Activate Learning is committed to fulfilling its statutory responsibilities under the [Counter-Terrorism and Security Act 2015](#) and implementing the [Prevent Duty Guidance 2023](#) for both further and higher education providers. We take all reasonable measures to safeguard individuals from being drawn into terrorism, radicalisation, or any form of extremism, while also upholding core values of freedom of speech, academic freedom, and equality. freedom of speech, academic freedom, and equality.

Our approach to the Prevent Duty includes:

- Leadership and Governance

Prevent is embedded within Activate Learning's wider safeguarding governance. The DSL holds strategic oversight for Prevent and is supported by the Safeguarding Committee, DDSLs, and senior leaders across the organisation. Prevent is integrated into our wider systems to safeguard as described in this Policy.

Governors and senior leaders are regularly briefed on Prevent risks and assurance measures, ensuring effective oversight and compliance.

- Risk Assessment and Action Planning

Activate Learning carries out an annual Prevent Risk Assessment and Action Plan, which draws on national threat levels and regional priorities, local intelligence from Counter-Terrorism Local Profiles, Police, Prevent Newsletters, and Regional Prevent Education Coordinators, as well as internal safeguarding data and referral trends.

The assessment is reviewed at least annually and informs our approach to training, communications, and student engagement. Local risks are monitored year-round in partnership with external agencies.

- Staff Training

Staff are trained to recognise early signs that a student may be susceptible to radicalisation or extremist influence. These indicators can include sudden changes in behaviour or appearance, social isolation, expressions of extreme or intolerant views, secretive online activity, or increased interest in conspiracy theories or extremist content.

All staff undertake Prevent training including the [Home Office Prevent Awareness e-learning](#). The Safeguarding Team receive advanced training on Prevent referrals and working with multi-agency partners, including Channel Awareness training. Training is reinforced through regular safeguarding, Prevent and online safety updates.

- Referral Pathways and Support

Individuals who identify concerns that someone may be susceptible to radicalisation or extremist

influence must follow the organisation's [Safeguarding – Reporting a Concern Procedure](#).

Where early concerns are identified, Activate Learning takes a proportionate, and trauma-informed approach. This may include one-to-one support from the Safeguarding Team, referral to wellbeing, counselling, or coaching services, engagement with external agencies, or structured intervention such as Channel support where appropriate.

The Safeguarding Team is trained to make appropriate Prevent referrals in line with local safeguarding protocols, ensuring responses are timely and focused on support and early intervention. Our focus is always on safeguarding the individual, building trust, and promoting critical thinking and resilience.

- Partnership Working

Activate Learning works closely with local authorities, Regional Prevent Education Coordinators, Police, and safeguarding partners to share relevant information, respond to emerging risks, and provide joined-up support for individuals at risk.

- Wider Engagement and External Speakers

Activate Learning supports freedom of expression and open academic debate, while also protecting individuals from extremist influence. As outlined in our External Speaker and Events Procedure, we apply thorough due diligence when assessing the suitability of external speakers, partnerships, and materials. This includes:

- Reviewing the background and content of proposed activities
- Considering reputational and safeguarding risks
- Seeking advice from the Regional Prevent Education Coordinators or other agencies when necessary

Events may be modified, postponed, or declined if they present a safeguarding risk or contravene our values of tolerance, inclusion, and respect.

- Site Security

Activate Learning recognises the importance of preparedness and protection in safeguarding students, staff, and visitors from all forms of terrorism, including attacks on physical premises. We pay due regard to the [Terrorism \(Protection of Premises\) Act 2025](#) to strengthen preparedness and response to terrorist threats. This includes undertaking site security assessments and implementing proportionate protective security measures, training relevant staff to identify threats and respond to major incidents, and testing our emergency and lockdown procedures.

Through this robust and proportionate approach, Activate Learning ensures compliance with the [Prevent Duty](#) while maintaining a safe, inclusive, and respectful learning environment. This

contributes to our wider safeguarding culture and upholds our responsibilities as an education provider.

## **b) Preventative Education**

Activate Learning recognises that it plays a crucial role in providing preventive education to members of our communities, about how to keep themselves and others safe. This is provided in a variety of ways that is tailored to the needs of the student but included in the academic curriculum, personal development tutorials, digital education, student voice activities, and via the enrichment and events programme.

These cover topics such as online safety, British Values, preventing extremism, 'Speak Up, Speak Out' against sexual violence and harassment, healthy relationships, consent, exploitation, and mental health and wellbeing.

## **c) Online Safety**

Activate Learning prioritises a safe and secure online environment for all members of our community and take all reasonable action to limit exposure to risks whilst learning online, or using college owned devices and IT services, using appropriate filtering, and monitoring systems.

Activate Learning regularly reviews their effectiveness in line with the Department for Education's [Filtering and Monitoring Standards for Schools and Colleges](#) and undertakes an annual assessment of our online safety provision using the [South-West Grid for Learning 360-degree safe tool](#).

We actively promote digital literacy and competencies providing education and guidance on online safety and harms, with knowledge integrated into the curriculum, staff training, and reinforced through our established policies including Activate Learning's [Online Safety Policy](#), [IT Services Acceptable Use Policy](#), [Artificial Intelligence \(AI\) Usage Policy](#), and [Student Positive Behaviour Management Policy](#).

Activate Learning fosters a collaborative environment by establishing the Online Safety Working Group and AI Strategy Group, comprising of a diverse range of representatives from our college community. These groups play a vital role in reviewing and continuously enhancing our online safety provisions and initiatives.

## **d) Personal Risk Assessments**

As per the Procedure for Personal Risk Assessments and PEEPs (Personal Emergency Evacuation Plans), the Safeguarding Team will conduct Safeguarding Personal Risk Assessments when it is believed that an Activate Learning student may be a risk to themselves, other students, staff, property, the reputation of the organisation or at risk from others. The decision will be made on a case-by-case basis by members of the Safeguarding Team, and conducted in conjunction with students, parent/carers, external professionals, and internal staff, where appropriate.

#### **e) Student Health and Wellbeing**

Activate Learning is committed to its vision of creating and promoting an inclusive learning environment, complying with the [Equality Act 2010](#) and the [Children and Families Act 2014](#). We recognise that students face a variety of difficulties and challenges that may affect their health, wellbeing, or behaviour, and aim to engage our best endeavours to provide additional support and make reasonable adjustments so that barriers are removed to enable academic success, as detailed in our Student Health and Wellbeing Policy. Activate Learning also has a range of services to support the diverse needs of our students such as a counsellor's, wellbeing advisors, progress coaches, contemplation rooms, careers advice, learner voice engagement activities and student representatives.

However, there may be times when, having considered and exhausted all reasonable options, it is decided that a student cannot meet the expectations of being an Activate Learning learner, as their physical, mental, emotional, or psychological health is having an unacceptably deleterious impact upon themselves and other students, staff, or visitors. In such circumstances Activate Learning may utilise the [Fitness to Study and Reside Policy and Procedure](#).

#### **f) Equality and Inclusion**

Activate Learning strives to develop a culture of mutual respect, tolerance, kindness, and acceptance where every person feels safe and free to express who they are, as detailed in Activate Learning's Statement of British Values, [Equality and Diversity Policy](#), and [Student Code of Conduct](#). Incidents of discrimination, bullying, harassment, or victimisation will be dealt with under the [Student Positive Behaviour Management Procedure](#) and incidents of child-on-child abuse will be dealt with in accordance with the Child-On-Child Abuse, Student Harassment and Sexual Misconduct Procedure.

#### **g) Prohibited Items and Substance Misuse**

Activate Learning upholds a zero-tolerance policy for students who bring in, consume, or attend

our learning environments under the influence of illegal substances or alcohol. This is inclusive of all Activate Learning environments such as college campuses, work experience or placements, online or virtual spaces, and off-site learning or trips. However, Activate Learning recognises that students misusing substances may be indicative of a wider safeguarding or welfare concern and alongside disciplinary processes, will refer to the safeguarding and student support teams to offer support to students.

To support our safeguarding practice, it may be necessary to search students if there are reasonable grounds to believe they are in possession of a banned, prohibited, or illegal item, or items which may be used to harm themselves or others. Searches will be conducted in accordance with our [Student Search Policy](#). In the event police undertake a search of a student on college premises, Activate Learning staff retain a duty of care to the student(s) involved and may act in the role of Appropriate Adult.

Activate Learning recognises that students in possession of certain items may indicate they are at risk of harm such as abuse or exploitation and/or may present a risk to others and in line with the [Student Positive Behaviour Management Policy](#), will share such concerns with the Safeguarding Team.

#### **h) Use of Physical Contact and Reasonable Force**

Activate Learning recognise that appropriate use of physical contact can enhance a student's experience and contribute to a safe learning environment. Physical contact may include, moving and handling of students, intimate care, or at times, the use of reasonable force as described in the Department for Education guidance [Use of Reasonable Force in Schools](#) and Activate Learning's [Use of Reasonable Force Procedure](#). Activate Learning will identify and arrange access to appropriate staff training for those utilising positive physical touch as part of their defined role.

#### **i) Remote Learning**

Activate Learning has a duty of care to all its students regardless of programme, method, or location of study, and as such, the same policies and procedures apply to staff and students who engage with us online or remotely, unless otherwise specified. Activate Learning follow national safeguarding guidance when working with students online, such as [South-West Grid for Learning Safe Remote Learning](#) and the Department for Education's [Safeguarding and Remote Education](#) and [Providing Remote Education](#).

#### **j) Work Placements**

Activate Learning is committed to safeguarding students during work placements and work experience by ensuring comprehensive due diligence checks and proactive engagement with employers. Employers are actively engaged and provided with advice and guidance to help them maintain a safe and supportive environment for students in the workplace and surrounding community. This helps ensure the wellbeing of students and apprentices throughout the duration of their placement.

Students, apprentices, and their parents or carers are also given clear advice and guidance about how to keep themselves safe while on placement. This includes information on safeguarding expectations and how to seek support if they encounter any concerns.

### **k) Use Of College Premises for Non-College Activities**

Activate Learning ensures appropriate arrangements are in place to keep student's safe when hiring or renting out college facilities and premises to organisations or individuals as per Department for Education guidance [Out-Of-School Settings: Safeguarding Guidance For Providers](#). Activate Learning seek assurance from providers and confirms they have appropriate safeguarding and child protection policies and procedures in place, and ensure arrangements are in place for the provider to liaise with the college on these matters, as appropriate.

When college premises are hired for private events where safeguarding policies may not typically apply (e.g., weddings or private parties), Activate Learning takes steps to ensure the safety of students and the wider college community. These measures are set out in venue hire agreements and the Terms and Conditions for the Hire of Facilities.

### **l) Contractors and Visitors**

Activate Learning ensures that any contractor, or any employee of the contractor, who is to work at or on behalf of the organisation, has been subject to the appropriate level of DBS check. Under no circumstances is a contractor on whom no checks have been obtained allowed to work unsupervised or engage in regulated activity relating to children.

Activate Learning ensures all visitors and contractors sign in at Reception and read our 'Important Information for Visitors' statement, which details how to report a safeguarding concern and our expectations whilst visiting our premises. Visitors and contractors are appropriately supervised whilst on site (including in residential accommodation).

Activate Learning's External Speaker Procedure ensures careful consideration and due diligence checks are undertaken regarding the suitability of external organisations or individuals invited to speak at or on behalf of Activate Learning.

## 8. Safeguarding Provisions for Specific Groups of Students

### a) 14–16-year-old Students

Activate Learning assumes overarching responsibility for safeguarding 14-to-16-year-old students who are enrolled with Activate Learning as their main educational provider. There is a dedicated leader for the 14-to-16-year-old provision who is responsible for overseeing their pastoral support and collaborates closely with the Safeguarding Team to identify concerns and manage referrals. The provision lead is responsible for collaborating with local authorities and main education providers regarding attendance and pastoral support.

Safeguarding issues relating to students whose primary education provider is not Activate Learning will remain the responsibility of their main provider, however, Activate Learning staff will proactively seek and share information with the primary education provider to facilitate effective communication that reduces the risk of harm.

14-to-16 education takes place all around the college, however there is a designated area for the sole use of education and support for 14-to-16-year-olds at each applicable college campus. This area may be used for other students outside the timetabled/usual hours that the 14-to-16-year-olds attend college.

### b) Students Placed in Alternative Provision (AP)

There may be exceptional circumstances where a student is placed in an AP setting as part of a personalised support or intervention plan. In such cases, we follow government guidance on [Alternative Provision](#) to ensure the safety, welfare, and educational progress of the student.

We will ensure that the AP provider is subject to appropriate safeguarding and due diligence checks, is quality assured, and the provision is suitable to meet the student's needs. Regular reviews will be undertaken to monitor the suitability, effectiveness, and safety of any placement.

### c) Students who are Cared For, Care Experienced, Young Carers or Young Parents

Activate Learning recognises students who are cared for or are care experienced often have additional vulnerabilities and are at a higher contextualized risk of harm. We also recognise the significant role young carers and young parents play within their families but appreciate the additional responsibilities this can place on them. Furthermore, we acknowledge that unaccompanied asylum-seeking children (UASC) or separated young people may face complex circumstances, including trauma, language or cultural barriers, and a lack of support networks.

Activate Learning is committed to meeting the needs of these students, so they achieve their full potential. To safeguard and promote the educational achievement of these students, the Safeguarding Team has designated persons who are responsible for ensuring that these young people are supported at college through close liaison with faculty staff, parent/carers, and local authorities, in line with the Department for Education's [Promoting The Education Of Looked-After And Previously Looked-After Children](#) guidance.

#### **d) Students In Need of Early Help and Protection**

Activate Learning recognises that when a child or adult has a social worker, it is an indicator that they may be more vulnerable to harm or facing additional barriers to their overall health and wellbeing.

The Safeguarding Team understand the local criteria and protocols for statutory assessment and intervention in their respective areas and are responsible for undertaking any early help assessments or making referrals to statutory services when a child or adult is in need or is at risk of abuse, harm, neglect or exploitation. The Safeguarding Team will work in conjunction with staff to gather information required for statutory assessments completed by social care and will continually liaise with social care professionals regarding students who are supported under the [Children Act 1989](#) (as amended 2004) or the [Care Act 2014](#).

If, after a referral, the student's situation does not appear to be improving, the Safeguarding Team, with the support of the DDSL's or DSL will consider following local escalation procedures to ensure their concerns have been addressed and, most importantly, that the student's situation improves.

#### **e) Children Who are Absent from Education and Learners Who Go Missing Throughout the College Day**

Activate Learning recognises there are many different risk factors associated with unexplained absences or repeated and/or prolonged non-attendance and it is often an early indicator of vulnerability and a range of safeguarding issues.

Faculty staff remain responsible for the overall attendance of students and must try and establish as far as possible the reasons why a student is missing from their study programme in line with our Student Attendance and Absence Management Procedure and Learners Who Go Missing Throughout the College Day Procedure. Additional monitoring and oversights are in place by the Safeguarding Team for the attendance of vulnerable students (such as children in need, has a child protection plan, or is a child who is cared for).

Activate Learning inform the Local Authority when removing a child from roll through use of

September Guarantee.

**f) Students with Special Educational Needs**

Activate Learning recognises students with special educational needs, disabilities, or certain medical or physical health conditions can face additional safeguarding challenges online and offline such as bullying, discrimination, and exploitation. There are also often additional barriers to recognising abuse and neglect in this group of students. The Safeguarding Team liaise with the learning support team in relation to students with education, health and care plans or additional learning needs and Activate Learning provides additional pastoral support for these students.

**g) Students with English as an Additional Language**

Activate Learning ensures that for students where English is not their first language, information about safeguarding is provided in an accessible format that promotes full understanding. To prevent additional barriers to recognising or responding to harm, abuse, neglect, or exploitation due to communication differences, Activate Learning will endeavour to arrange translators in student's chosen language when safeguarding concerns have arisen or been identified.

**h) Students who identify as LGBTQ+ or Gender Diverse**

Activate Learning believes all people have the right to be protected and kept safe from abuse and neglect and recognises that people who identify as Lesbian, Gay, Bi-Sexual, Transgender, Questioning + (LGBTQ+) are often at greater risk of some types of abuse or harm e.g., discrimination, exploitation, online abuse, and mental ill-health.

We create a safe, supportive, and inclusive environment for all students which celebrates diversity and difference and a culture of zero-tolerance for discrimination, bullying and harassment. We work collaboratively with staff and students in the LGBTQ+ community to seek their views and understand their lived experiences at Activate Learning. Activate Learning's Gender Identity Procedure sets out how we support students who are transgender and those with a diverse gender identity.

**i) Students Residing in Residential Accommodation**

Activate Learning has a dedicated Accommodation team including out of hours wardens employed to support effective safeguarding of students residing in residential accommodation. All Accommodation staff receive Level 2 safeguarding training and further CPD so that they can

effectively respond to safeguarding concerns out of usual business hours. They work collaboratively with the Safeguarding Team to identify any welfare or safety concerns for students who reside in residential accommodation.

Activate Learning review the effectiveness of the residential provision against the [Further Education Residential Accommodation: National Minimum Standards](#) and monitor this through the Safeguarding Committee, with oversight from the Safeguarding Link Governor.

#### **j) Students with Criminal Convictions**

Activate Learning is committed to the fair and inclusive treatment of all applicants and students, including those with criminal convictions. We aim to support rehabilitation through access to education, while maintaining a strong safeguarding culture. Where an unspent conviction is declared, a collaborative assessment process, guided by the [Student Criminal Convictions Procedure](#) and [Admissions Policy](#), will be followed to ensure any support needs or safeguarding considerations are identified and appropriately managed.

For individuals released on temporary licence (ROTL), Activate Learning will work in partnership with the relevant prison or probation service to ensure that appropriate support arrangements and risk assessments are in place.

#### **k) Adults At Risk**

Activate Learning recognises that some adult students may require additional support to remain safe from abuse, harm, or neglect.

Under the [Care Act 2014](#), safeguarding duties apply to any adult (aged 18 or over) who:

- Has care and support needs (regardless of whether those needs are being met by a local authority);
- Is experiencing, or is at risk of, abuse or neglect; and
- Is unable to protect themselves from the risk of or experience of abuse or neglect as a result of their care and support needs.

An adult meeting these criteria is considered an Adult at Risk. Activate Learning is committed to identifying and supporting such individuals through a robust safeguarding approach. We work in line with the [Care Act 2014](#) and its six key safeguarding principles.

Where there is concern that an adult may be experiencing or at risk of significant harm, the Safeguarding Team may seek advice or make a referral to the relevant Safeguarding Adults Board

or adult social care service for further support or action.

### **l) Students Requiring Mental Health Support**

Activate Learning recognises the significant role we play in supporting the mental health and wellbeing of our students and reflect this commitment in our Mental Health Matters Here Strategy. Progress against the associated action plan is overseen by the Mental Health Lead and reported on to the Group Executive and Governing Body through the Safeguarding Committee.

We recognise that mental health problems can, in some cases, be an indicator that a student has suffered or is at risk of suffering abuse, neglect or exploitation, and have clear provisions in place for identifying and supporting students with possible mental health problems, including routes to escalate and refer for specialist support.

### **m) Students Placed in Secure Environments**

Activate Learning is committed to the safeguarding and wellbeing of all students, including those who whilst enrolled with us, are placed in secure environments such as prisons, hospitals, secure mental health settings, or other secure providers.

In some cases, students placed in secure environments may not be able to continue their studies with us due to restrictions on access, communication, or the nature of their programme. However, we will explore options on a case-by-case basis, considering the individual's circumstances, support needs, and the feasibility of ongoing engagement with education.

Where appropriate, we will work collaboratively with the secure environment provider, relevant professionals, and the student to ensure the student is supported and that any transition or withdrawal from learning is managed sensitively.

## **9. Feedback**

If there are questions about the content of this document, how to interpret it or about how this procedure applies to an individual's situation, please contact [safe@activatelearning.ac.uk](mailto:safe@activatelearning.ac.uk) for further advice or clarification.

Feedback on this policy, or how it is implemented in practice, can be submitted through via [Customer Feedback](#), in accordance with our [Customer Compliments, Comments and Complaints Policy](#).

## 10. Whistleblowing

All parties should feel able to raise concerns about poor or unsafe practices, or potential failures in Activate Learning's safeguarding arrangements, and can be assured that any concerns raised will be taken seriously and handled appropriately by the Senior Leadership Team.

Concerns of a safeguarding nature should be escalated using the [Safeguarding – Reporting a Concern Procedure](#). Individuals should also consult the organisation's [Whistleblowing Procedure](#) for guidance on raising concerns that fall outside of typical safeguarding processes.

If an individual feels unable to raise their concern internally, or believes that their concerns have not been addressed appropriately, they may contact an external whistleblowing service e.g., the NSPCC (National Society for the Prevention of Cruelty to Children) [Whistleblowing Advice Line](#) (0800 028 0285 / [help@nspcc.org.uk](mailto:help@nspcc.org.uk))

## 11. Review

This policy will be formally reviewed annually by the Director – Designated Safeguarding Lead (DSL) in collaboration with the Safeguarding Committee and Senior Leadership Team. The review process will ensure the policy remains up to date, legally compliant, and informed by current best practice and statutory guidance.

## 12. References

This policy statement should be read in conjunction with the following policy, procedures, and guidance:

### Legislation and Guidance:

- [Care Act 2014](#)
- [Children Act 2004](#)
- [Children and Families Act 2014](#)
- [Counter-Terrorism and Security Act 2015](#)
- [Meeting Digital and Technology Standards in Schools and Colleges - Filtering And Monitoring Standards for Schools and Colleges - Guidance - Gov.Uk](#)
- [Use Of Reasonable Force in Schools - Gov.Uk](#)
- [Safeguarding And Remote Education - Gov.Uk](#)
- [Providing Remote Education: Guidance For Schools - Gov.Uk](#)
- [Information Sharing Advice for Safeguarding Practitioners - Gov.Uk](#)
- [Data Protection in Schools](#)

- [Equality Act 2010](#)
- [Further Education Residential Accommodation: National Minimum Standards](#)
- [General Data Protection Regulation](#)
- [Data Protection Act 2018](#)
- [Keeping Children Safe in Education](#)
- [Prevent Strategy 2011 - GOV.UK](#)
- [Prevent Duty Guidance: England and Wales \(2023\) - GOV.UK](#)
- [Promoting and Supporting Mental Health and Wellbeing in Schools and Colleges - GOV.UK](#)
- [Use of Reasonable Force and Other Restrictive Interventions Guidance](#)
- [Searching, screening and confiscation in schools - GOV.UK](#)
- [South-West Grid for Learning Safe Remote Learning](#)
- [Working Together to Safeguard Children 2023](#)
- [Protective Security and Preparedness for Education Settings - GOV.UK](#)
- [Generative AI Product Safety Expectations - GOV.UK](#)

#### **Activate Learning Policies and Procedures:**

- [Admissions Policy](#)
- [Allegations Against Staff Procedure](#)
- [Child-On-Child Abuse, Student Harassment and Sexual Misconduct Procedure](#)
- [Customer Compliments Comments and Complaints Policy](#)
- [DBS and Safeguarding Procedure](#)
- [Equality and Diversity Policy](#)
- [External Speaker Procedure](#)
- [Fitness to Study/Reside Policy](#)
- [Fitness to Study/Reside Procedure](#)
- [Information Security and Data Protection Policy](#)
- [IT Services Acceptable Use Policy](#)
- [Online Safety Policy](#)
- [Artificial Intelligence \(AI\) Usage Policy](#)
- [Learners Who Go Missing Throughout the College Day Procedure](#)
- [Professional Conduct Policy](#)
- [Recruitment Policy](#)
- [Safeguarding Reporting a Concern Procedure](#)
- [Staff Disciplinary Procedure](#)
- [Statement of British Values](#)
- [Student Attendance, Punctuality and Absence Management Policy](#)

- [Student Positive Behaviour Management Policy](#)
- [Student Positive Behaviour Management Procedure](#)
- [Student Code of Conduct](#)
- [Student Criminal Convictions Procedure](#)
- [Student Health and Wellbeing Policy](#)
- [Student Search Policy](#)
- [Use of Reasonable Force Procedure](#)
- [Whistleblowing Procedure](#)



## Appendix 1 - Safeguarding Roles and Responsibilities

**All staff have a fundamental role to play in safeguarding children and adults at risk.**

**Activate Learning is committed to creating and maintaining a culture of vigilance, where safeguarding is everyone's responsibility. We will work together to protect our students by:**

- Valuing, listening to, and respecting all students, in line with our core values.
- Appointing a Designated Safeguarding Lead (DSL), Deputy DSLs, and a Safeguarding Link Governor in accordance with statutory requirements.
- Embedding safeguarding through policies, procedures, and codes of conduct for staff and students.
- Safely recruiting and vetting all staff, volunteers, and contractors through robust safer recruitment procedures.
- Recording, storing, and handling personal and safeguarding information securely and professionally, in line with data protection and safeguarding legislation.
- Ensuring children, adults at risk, and families understand how to access help, and that concerns are responded to in line with safeguarding procedures.
- Providing regular safeguarding updates to staff to help reduce harm proactively.
- Involving students, parents/carers appropriately, and sharing concerns with relevant agencies.
- Using our procedures to manage any allegations against staff and those using our premises appropriately, including working with LADO (Local Authority Designated Officer) when required.
- Maintaining an inclusive environment, addressing bullying, harassment, or discrimination effectively.
- Having clear feedback, complaints, and whistleblowing processes.
- Providing a safe physical environment via health and safety measures.
- Promoting equality, diversity, and British Values.
- Ensuring robust risk assessments (e.g. Personal Risk Assessments, PEEPs) and care or support plans are in place for students who require them.
- Raise awareness of safeguarding issues to aid the identification of students at risk of harm so that appropriate action/ referrals can be made.

### **Contractors and Volunteers**

- Contribute to creating a safe learning environment for all.
- Be 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 adult at risk.

## **All staff**

- Complete appropriate safeguarding training, including reading Part 1 of Keeping Children Safe in Education, and receive regular safeguarding updates.
- Understand how to recognise signs of abuse, neglect, exploitation, and radicalisation.
- Know and follow the safeguarding policy, professional conduct guidance, and safeguarding reporting procedures.
- Treat disclosures with sensitivity and confidentiality, sharing information only on a need-to-know basis with appropriate staff.
- Contribute to creating a safe learning environment for all.
- Know the identity and role of the DSL, Deputy DSLs, Safeguarding Team and understand how to access safeguarding support.
- Are aware of and follow the organisation's safeguarding policies and procedures; they recognise, respond to, and report any concerns that may be raised about the safety and welfare of a learner and any misconduct of other staff members.
- Are aware of behaviour policies, staff behaviour policies, safeguarding response to children who go missing from education and role of the designated safeguarding lead (including the identity of the DSL and any Deputies).

## **Faculty staff**

### **In addition to all staff points:**

- Ensure that the learning environment is safe, and that Safeguarding is embedded within teaching practice to educate students on staying safe, building resilience, and developing critical thinking skills.
- Promote British values and Prevent, challenging extremist views and ideologies.
- Ensure that support/care plans, Risk Assessments and PEEPs are in place for relevant students.
- Attend training to support students with specific needs (e.g. intimate care, emergency medication, etc).
- Make sure students know how to report concerns and access help.

## **Designated Safeguarding Advisers**

- Hold up-to-date Level 3 Designated Safeguarding Lead and Prevent training.
- Respond to safeguarding concerns in a timely, proportionate, and person-centred manner.
- Conduct risk assessments, record actions, and escalate cases to the Deputy DSL or DSL

as required.

- Liaise with external agencies, including Children's and Adult Services, Channel, and Police, and make relevant referrals.
- Report key concerns to the DDSL or DSL, as appropriate.

### **Deputy Designated Safeguarding Leads (DDSLs)**

- Have a responsibility at an operational level within the organisation, ensuring specialist safeguarding staff are supported and directed in their duties.
- Report any concerns requiring LADO involvement to the relevant LADO and inform the DSL.
- 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.
- Has a responsibility at an operational level within the organisation, ensuring specialist safeguarding training is delivered to all staff requiring it.
- Staff are supported and directed in their duties.

### **Director - Designated Safeguarding Lead (DSL)**

- Acts in an advisory capacity for the group, keeping members of the group up to date with changes in legislation and best practice including issues relating to child protection, online safety, and the Prevent Duty.
- Acts as the main contact for outside agencies and the most senior 'go to' person in the organisation, delegating these responsibilities to the DDSL as appropriate.
- 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.

### **Safeguarding Committee**

- Includes representatives from the Board of Governors, Group Executive Team, Faculty, Human Resources, Information Technology, Student Support, Health and Safety, Activate Apprenticeships, Residential Accommodation, Learning Support and ensures that sound arrangements for safeguarding are in place across all these service areas.
- Leads developments, monitors compliance, and assesses impact.

## Group Executive Lead for Safeguarding

- Completes Designated Lead Safeguarding training.
- Has organisational strategic responsibility for ensuring Activate Learning meets its duties under Safeguarding and Prevent, overseeing strategic risk, compliance, and assurance.

## Safeguarding Link Governor

- Provides strategic oversight, support, and challenge to ensure safeguarding is effective across Activate Learning.
- Ensures appropriate policies and procedures are in place for action to be taken in a timely manner to safeguard and promote learner's welfare.
- Receives regular updates from the DSL and provides assurance to the Board.

## Appendix 2 – Definitions

**Abuse:** A form of maltreatment that can affect both children and adults at risk. It involves inflicting harm or failing to prevent harm, including exposure to the abuse of others. Abuse may be physical, emotional/psychological, sexual, financial, discriminatory, organisational, or involve neglect. It can occur in families, institutions, care settings, or online, and may be perpetrated by individuals known to the person, including professionals, carers, peers, or strangers.

**Adult at Risk:** A person aged 18 or over who is at risk of or experiencing abuse or neglect due to care and/or support needs.

**Child:** Anyone under 18 years old, entitled to protection and services under safeguarding legislation.

**Child Criminal Exploitation (CCE) & Child Sexual Exploitation (CSE):** Forms of abuse where power imbalances are used to manipulate or coerce a child into criminal or sexual activity, often in exchange for something the victim needs or for the perpetrator's gain. Trafficking may be involved.

**Child on Child Abuse:** Abuse between children that can include:

- bullying (including cyberbullying, prejudice-based and discriminatory bullying)
- abuse in intimate personal relationships between children (sometimes known as 'teenage relationship abuse')
- physical abuse such as hitting, kicking, shaking, biting, hair pulling, or otherwise causing

physical harm (this may include an online element which facilitates, threatens, and/or encourages physical abuse)

- sexual violence such as rape, assault by penetration and sexual assault; (this may include an online element which facilitates, threatens, and/or encourages sexual violence)
- sexual harassment such as sexual comments, remarks, jokes, and online sexual harassment, which may be standalone or part of a broader pattern of abuse
- causing someone to engage in sexual activity without consent, such as forcing someone to strip, touch themselves sexually, or to engage in sexual activity with a third party
- consensual and non-consensual sharing of nude and semi-nude images and/or videos (also known as sexting or youth produced sexual imagery)
- Upskirting which typically involves taking a picture under a person's clothing without their permission, with the intention of viewing their genitals or buttocks to obtain sexual gratification, or cause the victim humiliation, distress, or alarm, and
- initiation/hazing type violence and rituals (this could include activities involving harassment, abuse or humiliation used as a way of initiating a person into a group and may also include an online element).

**Child Protection:** Actions to protect children from violence, exploitation, abuse, and neglect.

**Child Abduction:** The unauthorised removal or retention of a child by someone without legal responsibility, including parents, acquaintances, or strangers.

**Designated person:** A trained staff member responsible for receiving and handling safeguarding and child protection concerns.

**Discriminatory Abuse:** Abuse based on protected characteristics such as race, gender, age, disability, religion, or sexual orientation. It includes harassment, slurs, exclusion, unequal treatment, or hate crime. Discriminatory abuse can be verbal, physical, or systemic, and may occur in any setting, including services and care environments.

**Domestic Abuse:** Can include psychological, physical, sexual, financial, or emotional abuse. Children may be victims directly or through witnessing abuse in the home or relationships.

**Duty of care:** The responsibility of individuals working with students to take reasonable steps to ensure their safety and wellbeing.

**Early help:** Support given as soon as problems emerge to prevent escalation. Any child may benefit from early help, but all staff should be particularly alert to the potential need for early help for a child who:

- is disabled or has certain health conditions and has specific additional needs
- has special educational needs (whether or not they have a statutory Education, Health and

Care plan)

- has a mental health need
- is a young carer
- is showing signs of being drawn in to anti-social or criminal behaviour, including gang involvement and association with organised crime groups or county lines
- is frequently absent from education, missing/goes missing from home, or care,
- has experienced multiple suspensions, is at risk of being permanently excluded from schools, colleges and in Alternative Provision or a Pupil Referral Unit.
- is at risk of modern slavery, trafficking, sexual and/or criminal exploitation
- is at risk of being radicalised or exploited
- has a parent or carer in custody or is affected by parental offending
- is in a family circumstance presenting challenges for the child, such as drug and alcohol misuse, adult mental health issues and domestic abuse
- is misusing alcohol and other drugs themselves
- is at risk of so-called 'honour'-based abuse such as Female Genital Mutilation or Forced Marriage
- is a privately fostered child.

**Emotional Abuse:** Behaviour that causes distress, fear, or emotional harm. This includes threats, intimidation, humiliation, blaming, controlling behaviour, coercion, isolation, or preventing someone from having contact with others. It can undermine an individual's self-esteem and mental wellbeing and is often present alongside other forms of abuse.

**Extremism:** Vocal or active opposition to fundamental British values, including calls for violence against armed forces personnel.

**Female Genital Mutilation (FGM):** A procedure involving injury to or removal of female genitalia for non-medical reasons. It is illegal in the UK and a form of child abuse with long-term consequences.

**Financial Abuse:** Misuse or theft of an adult's money, possessions, or assets. It includes theft, fraud, exploitation, pressure regarding wills or property, and denying access to personal finances. Financial abuse may also involve misusing power of attorney or benefits, particularly in cases where the adult lacks capacity.

**Forced Marriage:** A crime where one or both individuals are coerced into marriage without full, free consent. Can involve threats, violence, or emotional pressure, often under the guise of cultural practices.

**Harmful Sexual Behaviour:** Sexual behaviour that is inappropriate, abusive, or violent and not age-appropriate. It includes behaviours that may harm development and can occur between peers.

**Mental Health:** A person's emotional and psychological wellbeing. Mental health concerns may indicate abuse or trauma. Staff should not diagnose but can recognise concerns and refer them through safeguarding processes.

**Modern Slavery:** A serious crime that includes human trafficking, forced labour, domestic servitude, and sexual exploitation. Victims are often controlled through threats, violence, or debt bondage. Adults at risk may be targeted because of vulnerabilities and may not identify themselves as victims. Modern slavery can occur in private homes, care settings, farms, factories, or other workplaces.

**Neglect:** The persistent failure to meet the basic physical, emotional, medical, or social needs of a child or adult at risk, which is likely to result in serious harm to health or development. This can involve inadequate provision of food, clothing, shelter, supervision, protection from harm, or access to healthcare. For adults at risk, neglect may include failing to provide necessary care, support, or protection, often in care settings or by those in a position of responsibility.

**Organisational Abuse:** Abuse that occurs within a care setting, such as a hospital, care home, supported living, or domiciliary care. It includes poor or neglectful care, unsafe or undignified practices, lack of choice, or a culture that prioritises institutional needs over the individual. It may involve one or several members of staff or the wider organisation.

**Physical Abuse:** Physical abuse involves the intentional use of force that results in pain, injury, or physical suffering. This includes actions such as hitting, slapping, pushing, kicking, misuse of medication, inappropriate restraint, or force-feeding. It may occur in domestic, institutional, or care settings and can be perpetrated by carers, family members, professionals, or others in a position of trust.

**Radicalisation:** The process through which individuals support or use terrorist violence, often linked to extremist ideologies.

**Safeguarding:** Protecting children and adults at risk from harm, ensuring safe and effective care, and promoting positive outcomes. This includes proactive measures to keep students safe before issues arise.

**Self-Neglect:** A person's failure to care for themselves in a way that threatens their health, safety, or wellbeing. This may include poor personal hygiene, not eating or drinking, hoarding, or neglecting medical conditions. While adults have the right to make unwise decisions, safeguarding intervention is required when self-neglect places them at significant risk of harm.

**Serious Violence:** Children may be at risk of involvement in violent crime, often indicated by absence from education, injuries, change in behaviour or relationships, self-harm, or possession of unexplained gifts.

**Sexual Abuse:** Sexual abuse is any sexual activity to which the individual has not consented or was unable to consent to, or where they were coerced into participating. It includes rape, sexual assault, sexual acts to which the individual did not or could not agree, and non-contact abuse such as indecent exposure, sexual harassment, or being made to watch sexual acts. Sexual abuse can occur in care relationships, families, institutions, or communities.

**Sexual Harassment:** Unwanted conduct of a sexual nature that can occur online or offline. Includes comments, jokes, gestures, and behaviours that intimidate or humiliate.

**Sexual Violence:** Is rape, assault by penetration, sexual assault, causing someone to engage in sexual activity without consent (when referring to sexual violence we are referring to sexual offences under the Sexual Offences Act 2003).

**So-Called 'Honour'-Based Abuse (HBA):** Crimes committed to protect or defend family/community 'honour', including FGM, forced marriage, or breast ironing. Often involves family/community pressure and multiple perpetrators. All forms are abuse and should be escalated accordingly.

**Terrorism:** Acts designed to intimidate the public or influence government, involving serious violence, damage, or disruption, motivated by political, religious, or ideological aims.

### Appendix 3: Safeguarding Team Structure (correct as of August 2025)

