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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 2026, Keeping Children Safe in Education 2026, Prevent Duty 2023, and Care Act 2014.

Activate Learning is committed to providing safe, inclusive, caring and supportive learning environments in which all students and apprentices can learn and thrive. This policy sets out our commitment to safeguarding and promoting the welfare of everyone who engages with Activate Learning, including students, apprentices, staff, volunteers, visitors and contractors.

Our safeguarding approach is embedded within our Learning Philosophy and organisational values and is underpinned by our commitment to Safe Students, Safe Staff and Safe Spaces. We promote a culture of professional curiosity, shared responsibility, vigilance and a commitment to preventing harm and promoting wellbeing.

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 and apprentices 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 practice in a way that protects them.

We recognise that some children and adults may be at increased risk of harm due to adverse experiences, dependency on others, communication needs, disability or other individual circumstances. We are committed to working in partnership with students, apprentices, parents and carers, adults at risk, multi-agency partners and our wider communities to promote welfare, prevent harm and achieve positive outcomes.

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

- Email: 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.

Students and apprentices can also submit a safeguarding concern anonymously**.** However, should note that as anonymous reports cannot be followed up directly with the person reporting, we can only respond if contact details are provided and should not be used in an emergency. Staff are not allowed to use the anonymous reporting route.

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 and apprentices. This includes:
    - Providing support and taking action at the earliest opportunity when concerns or needs emerge, recognising that early help can prevent problems from escalating.
    - Protecting children and adults at risk from abuse, neglect, exploitation and other forms of harm, whether occurring within or outside the home, online, in the community, in education or at work placements.
    - Promoting the mental and physical health, wellbeing and development of students and apprentices and taking action where these may be adversely affected.
    - Ensuring children receive appropriate care and support and are safeguarded from harm, enabling them to grow and develop in safe and supportive environments.
    - Taking proportionate and timely action to safeguard and promote the welfare of students and apprentices and enable them to achieve the best possible outcomes.
- 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, apprentices, 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, contractors and subcontractors
- Visitors
- Placement and work-based learning partners
- Students and apprentices enrolled across any Activate Learning provision – including Activate Learning colleges, residential accommodation, Further Education, Higher Education, Apprenticeships, alternative provision, 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 a Safe Students, Safe Staff, Safe Spaces framework, providing a tripartite approach to safeguarding assurance across Activate Learning. This ensures that safeguarding risks relating to our students and apprentices, our staff and those working with them, and our physical and online environments are identified, monitored and appropriately managed.

Monitoring and assurance mechanisms include:

- Half-termly Safeguarding Committee meetings
- Monthly reports to the Group Executive Team
- An annual safeguarding report to the Board of Governors with regular updates
- Annual safeguarding audits and engagement with Local Safeguarding Children Partnerships and Local Authorities
- Ongoing oversight through relevant sub-groups including the Online Safety Working Group and AI Committee and Steering Group Meetings
- Monitoring of safeguarding concerns, trends, incidents, referrals, allegations and emerging risks to inform preventative action and continuous improvement.

These arrangements provide assurance that safeguarding remains effective across students, staff

and spaces, and that learning from incidents, emerging risks, audits, data and external developments is used to strengthen practice and drive continuous improvement.

6. Safeguarding Systems

a) Safeguarding Structure and Governance

Activate Learning embeds safeguarding as a strategic priority across all levels of the organisation, supported by clear leadership, accountability and governance arrangements (utilising the Safe Students, Safe Staff, Safe Spaces framework). Named safeguarding leads provide oversight of safeguarding provision across the Group (see Appendix 3 for named leads).

Safeguarding, including online safety, Prevent and residential accommodation, is subject to regular oversight through the Safeguarding Committee and is a standing agenda item for the Group Executive Team, ensuring effective scrutiny, challenge and assurance.

b) Reporting and Management of Safeguarding Concerns

Any individual (including students, apprentices, 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, apprentices, staff, volunteers, visitors, contractors, or anyone connected with the organisation. The Safeguarding Team can be contacted via:

- Email: 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 or apprentice 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 approached 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 Safeguarding Team Leader and internal audits of safeguarding cases are undertaken regularly by the Team Leader and Deputy Designated Safeguarding Lead (DDSL) to ensure consistency with procedures and best practice.

c) Early Help, Family Help and Multi-Agency Working

Activate Learning recognises that safeguarding is a shared responsibility. Where concerns do not meet the threshold for statutory intervention, the Safeguarding Team will consider universal services, community-based Early Help, targeted Family and Early Help or other appropriate services in line with local threshold guidance.

In line with statutory guidance, including Working Together to Safeguard Children 2026 and Care Act 2014, Activate Learning works collaboratively with Children's and Adult Social Care, safeguarding partnerships, police, health, Prevent partners and other relevant agencies to promote the welfare of children and adults at risk and protect them from harm.

This includes sharing information appropriately, contributing to multi-agency assessments and plans, and providing appropriate support to children subject to Child in Need or Child Protection Plans. Where statutory intervention is not considered appropriate, the Safeguarding Team will continue to monitor and review concerns and consider additional support where required.

Activate Learning participates in Operation Encompass, supporting the timely sharing of police information about domestic abuse incidents where children may be affected.

All safeguarding concerns, referrals, decisions, actions and their rationale will be appropriately recorded and reviewed.

d) Safer Recruitment

We are committed to only employing staff and engaging volunteers who are appropriate to work with children and vulnerable adults.

At least one member of every recruitment panel is required to complete Safer Recruitment training prior to shortlisting, interviewing, and appointing new staff.

Enhanced DBS (Disclosure and Barring Service) checks on all staff, volunteers and adults residing in on-campus accommodation, where required. Activate Learning maintains an accurate Single Central Record (SCR) of all required pre-employment and safeguarding checks, in accordance with statutory requirements.

Where a DBS check has not been received before an individual's start date, appropriate supervision arrangements must be put in place until the check is received. Volunteers must not commence their role until the required enhanced DBS check has been completed. 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.

Where agencies, subcontractors or third-party staff provide services involving contact with students or apprentices, they are required to undertake appropriate pre-employment checks, including DBS checks where applicable, and to provide evidence of these checks to Activate Learning. Contractual arrangements will set out the safeguarding expectations and responsibilities of subcontractors, and appropriate due diligence will be undertaken before services commence.

e) Managing Allegations Against Staff

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

Where an allegation concerns an individual who is not directly employed by Activate Learning, we will work in partnership with their employer or agency to ensure the allegation is appropriately managed. Third-party employers and agencies are expected to fully cooperate with safeguarding enquiries, provide relevant information, including any previous concerns or allegations, and fulfil their responsibilities regarding DBS referrals.

We will act in accordance with our Allegations Against Staff Procedure, Professional Conduct Policy and Staff Disciplinary Procedure where it is alleged that an individual 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 Deputy DSL (DDSL) will liaise with the Local Authority Designated Officer (LADO), children's social care, adult social care, police and/or other relevant agencies, as appropriate. All allegations will be managed confidentially, proportionately and in a timely manner, with appropriate support provided to those involved.

f) 'Low-level' Concerns

Activate Learning is committed to fostering a culture of openness, trust and professional integrity, where concerns about the behaviour of adults working in or on behalf of the organisation, however minor, can be raised, recorded and addressed appropriately.

A low-level concern is any concern that an adult may have acted in a way that is inconsistent with the Professional Conduct Policy or expected professional standards but does not meet the threshold for referral to the LADO or other external agencies. Low-level concerns may relate to any adult working for or on behalf of Activate Learning, including staff, volunteers, agency workers and contractors.

All low-level concerns should be reported promptly to a manager, HR or via the Low Level Concerns Report Form [internal staff use only], in accordance with the Professional Conduct Policy and Staff Disciplinary Procedure.

Concerns will be considered sensitively and proportionately, recorded securely and confidentially, and reviewed by HR in collaboration with the DSL, where appropriate, to identify patterns, emerging risks or signs of escalating behaviour. This supports early intervention, professional accountability and a culture in which concerns about adult behaviour can be raised openly and addressed appropriately.

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. Staff are also required to read Part 1 of Keeping Children Safe in Education and relevant Activate Learning's policies and procedures. Training is refreshed annually.

Staff also receive appropriate training and guidance to develop their understanding of special educational needs and/or disabilities (SEND), inclusion and additional support needs, including the additional risks and barriers some students and apprentices may face in recognising, communicating or disclosing safeguarding concerns. This helps staff to recognise these potential barriers, respond appropriately to concerns, and ensure that safeguarding information, education and support are accessible and inclusive.

The Safeguarding Team also provides regular safeguarding and Prevent updates, including online safety, throughout the year. These reflect local safeguarding risks, emerging trends and current issues to ensure staff maintain the knowledge and skills needed to identify and respond effectively to concerns and safeguard students.

Advice, guidance and resources are provided on a range of safeguarding issues including

physical, emotional and sexual abuse; neglect and self-neglect; domestic, financial and institutional abuse including child to caregiver abuse; child-on-child abuse; sexual violence, harassment and harmful sexual behaviour; violence against women and girls including misogyny and harmful gender-attitudes; honour-based abuse including female genital mutilation, forced marriage or faith-based abuse; radicalisation and extremism; substance misuse; child criminal and sexual exploitation including county lines; human trafficking and modern slavery; online abuse including harmful synthetic content; bullying, discrimination and hate crime; serious violence; and mental ill-health.

All members of the Safeguarding Team must complete appropriate Level 2 and Level 3 safeguarding training, including training provided by local Safeguarding Children Partnerships and Safeguarding Adults Boards, and maintain their professional knowledge through ongoing CPD and awareness of relevant legislation and guidance.

All staff have a responsibility to contribute to a strong safeguarding culture. Staff must remain alert to signs that a student or apprentice may be at increased risk of harm, abuse, neglect or exploitation, including changes in behaviour, appearance or attendance. Staff must respond appropriately to disclosures and report safeguarding concerns promptly to the Safeguarding Team in accordance with Activate Learning procedures.

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 and apprentices, in a timely manner.

Activate Learning follows 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. The Safeguarding Teams also liaise directly with other settings to ensure appropriate risk and

support plans are in place from the point of transfer.

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 and apprentice's 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.

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 annual Prevent Risk Assessments and an Action Plan, which draws on national threat levels and regional priorities, local intelligence from Counter-Terrorism Local Profiles, Police, Prevent Newsletters, and Regional Contest 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 or apprentice 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 organisations 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 Contest 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 Contest 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, apprentices, 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 and training provider.

b) Preventative Education

Activate Learning recognises its important role in providing preventative education to help students and apprentices understand how to keep themselves and others safe, recognise harmful behaviour, and develop the knowledge, skills and confidence to seek help and challenge inappropriate behaviour.

Preventative education is delivered through a range of approaches, tailored to the age, developmental needs, circumstances, and SEND and inclusion requirements of students and apprentices. This includes the curriculum, personal development and tutorial programmes, digital education, student voice activities, enrichment and events. Faculties and relevant staff should identify any additional support or reasonable adjustments needed to enable students with SEND or other additional needs to access and engage with safeguarding content effectively.

Education covers a range of safeguarding and wellbeing themes, including online safety, healthy relationships, consent, sexual violence and harassment, exploitation, mental health and wellbeing, British Values and preventing extremism. It also promotes a culture of respect and zero tolerance of derogatory or discriminatory behaviour and other forms of violence, abuse and harassment.

Preventative education is used to help students and apprentices understand the impact of harmful attitudes and behaviours, develop respectful and inclusive relationships, and understand how and where to seek support or report concerns.

c) Online Safety

Activate Learning prioritises a safe and secure online environment for all members of our community and take all reasonable action to protect students, apprentices, staff and users from online harms when learning online or using college-owned devices and IT services. This includes appropriate filtering and monitoring systems, which are regularly reviewed in line with the Department for Education's Filtering and Monitoring Standards for Schools and Colleges, alongside an annual assessment of our online safety provision using the South-West Grid for Learning 360-degree safe tool.

Online risks are continually evolving and include harmful or inappropriate content, contact, conduct and commerce. This includes risks associated with social media, online grooming and exploitation, bullying, sexual abuse and exploitation, misinformation and disinformation, extremist content, scams and financial exploitation, and the use of generative Artificial Intelligence or digitally altered content, including deepfakes and AI-generated nude or semi-nude images.

Activate Learning also recognises that information security and cyber security are safeguarding considerations where the compromise, loss or misuse of personal or safeguarding information could place students or apprentices at risk

We promote digital literacy and safe, responsible use of technology through curriculum, staff training and preventative education, with online safety and emerging risks reinforced through relevant policies and procedures, including the Online Safety Policy, IT Services Acceptable Use Policy, Artificial Intelligence (AI) Usage Policy, and Student Positive Behaviour Management Policy.

Activate Learning maintains an Online Safety Working Group and AI Committee and Steering Group, bringing together relevant representatives to monitor emerging risks, review incidents and strengthen our online safety provision. Online safety arrangements are regularly reviewed and informed by risk assessment, emerging threats, incidents and relevant national guidance.

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 or apprentice may be a risk to themselves,

others, staff, property, the reputation of the organisation or may be 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 the individual, their 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 and apprentices can 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 and apprentices such as counsellors, wellbeing advisors, progress coaches, residential wardens, 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 or apprentice 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 operates a zero-tolerance approach to the possession, use or supply of illegal substances, alcohol, weapons or other prohibited items, and to attending our learning environments under the influence of alcohol or illegal substances.

Serious violence is recognised as a significant safeguarding concern. Any concerns that a student or apprentice may be carrying, using or intending to use a weapon, or may be at risk of involvement in serious violence, must be reported promptly to the Safeguarding Team. Those involved in or at risk of serious violence will be considered both in terms of the risk they may pose to others and any safeguarding risks or vulnerabilities affecting them.

This approach applies across all Activate Learning environments, including college campuses, work experience and placements, online or virtual spaces, halls of residence and off-site learning, activities or trips.

Where substance misuse, possession of prohibited items or weapons indicates a wider safeguarding or welfare concern, including potential abuse, exploitation, self-harm or risk to others, the concern will be shared with the Safeguarding and Student Support Teams alongside any appropriate disciplinary action. Support will be offered where appropriate.

Where there are reasonable grounds to believe that a student or apprentice is in possession of a prohibited item or an item that may cause harm to themselves or others, they may be searched in accordance with the Student Search Policy.

Where the police undertake a search of a student or apprentice on Activate Learning premises, or in any setting where Activate Learning is in loco parentis or otherwise in control of learners (including halls of residence, educational trips, visits, or work placements), staff retain their duty of care and may act as an Appropriate Adult where appropriate.

h) Use of Reasonable Force and Restrictive Interventions

Activate Learning recognises that appropriate physical contact may be necessary to support students and apprentices, provide care and maintain a safe learning environment. This may include moving and handling, intimate care, guiding or supporting a student, and, where necessary, the use of reasonable force.

Any use of reasonable force must be necessary, proportionate and lawful, using no more force than is necessary and for the shortest time required. Staff must consider the individual circumstances and needs of the student, including any SEND, mental health or medical needs, and act in accordance with Department for Education guidance (Use of Reasonable Force in Schools) and Activate Learning's Use of Restrictive Interventions Procedure.

i) Remote Learning

Activate Learning has a duty of care to all its students and apprentices regardless of programme, method, or location of study, and as such, the same policies and procedures apply to staff and

students/apprentices who engage with us online or remotely, unless otherwise specified. Activate Learning follow national safeguarding guidance when working with individuals 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 and apprentices during work-based learning 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 and apprentices 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) Off-site Activities, Educational Visits and Residential Trips

Safeguarding responsibilities extend to all off-site activities, educational visits and residential trips. Appropriate safeguarding considerations, risk assessments, supervision arrangements and emergency procedures must be in place to promote the safety and wellbeing of students and apprentices throughout the activity or visit.

All activities and visits must be planned and managed in accordance with the Trips and Residential Visit Procedure, which sets out the operational requirements for safeguarding, risk management, supervision and emergency arrangements.

l) Use Of College Premises for Non-College Activities

Activate Learning ensures appropriate arrangements are in place to keep all individuals 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 seeks 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, staff, and the wider college community. These measures are set out in our External Hire Procedure, venue hire agreements, and the Terms and Conditions for the Hire of Facilities.

m) 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), unless subject to the appropriate level of DBS check.

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 and Electively Home Educated (EHE) Students

Activate Learning recognises its safeguarding responsibilities towards all 14-16-year-old students enrolled with us, including EHE students.

Where Activate Learning is the learner's main educational provider, dedicated 14–16 leads oversee pastoral support and work closely with the Safeguarding Team to identify and respond to concerns. EHE learners are subject to the same safeguarding arrangements, policies, procedures and support as other learners while accessing Activate Learning provision. Parents/carers retain responsibility for their education outside the provision delivered by Activate Learning.

Where Activate Learning is not the main education provider, safeguarding responsibility remains with the relevant provider. Activate Learning will nevertheless respond to concerns arising within our provision and share relevant information with the appropriate provider, local authority, parents/carers and statutory agencies where necessary.

14–16 provision takes place across the college, with a designated area for 14–16 learners and their support at each applicable campus. This area may be used by other students outside timetabled hours.

b) Students Placed in Alternative Provision (AP)

In exceptional circumstances, Activate Learning may place a student in Alternative Provision (AP) as part of a personalised support or intervention plan. Activate Learning remains responsible for the student's safeguarding and will ensure that any placement is safe, suitable and meets the student's individual needs.

Where external AP is commissioned, appropriate safeguarding and due diligence checks will be undertaken, including obtaining assurance that appropriate safeguarding checks have been completed on staff working with students. We will ensure that we know where the student is educated, including any subcontracted or satellite provision, and that clear arrangements are in place for information sharing, attendance monitoring, safeguarding concerns and reporting. Placements will be reviewed regularly to ensure that they remain safe, effective and appropriate to the student's needs. Where safeguarding concerns arise in relation to an AP placement, the placement will be reviewed immediately and appropriate safeguarding action taken.

Activate Learning also provides its own alternative and personalised provision for young people who may require additional support to access education. Provision will be informed by the individual circumstances, needs and best interests of the young person and will include appropriate safeguarding, pastoral and educational support.

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

Activate Learning recognises students or apprentices who are cared for or are care experienced often have additional vulnerabilities and are at a higher contextualised risk of harm. We also recognise the significant role of young carers and young parents 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 also face complex circumstances, including trauma, language or cultural barriers, and limited support networks.

We understand that early identification is essential to ensuring that appropriate support is provided at the earliest opportunity. Activate Learning identifies and monitors these cohorts through information provided at application and enrolment, and through ongoing liaison with key partners. Relevant information is recorded and shared appropriately to ensure that individual needs and

vulnerabilities are understood and responded to.

Activate Learning is committed to meeting the needs of these students and apprentices, so they achieve their full potential. To safeguard and promote the educational achievement of these young people, 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 or apprentices who are supported under the Children Act 1989 (as amended 2004) or the Care Act 2014.

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

e) Children Who are Absent from Education and Missing Students and Apprentices

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 and Apprenticeship staff remain responsible for monitoring the attendance of students and apprentices and should, wherever possible, establish the reasons for any absence from their study programme or course. This should be managed in line with the Student Attendance and Absence Management Procedure and Missing Students and Apprentices Procedure.

Residential staff have an additional responsibility for monitoring students living in halls of

residence. They should establish the reasons why a student may be absent from their accommodation or, while in residence, not attending their study programme.

The Safeguarding Team provides additional monitoring and oversight of attendance for vulnerable students, including those who are subject to a Child Protection Plan, are Children in Need, or are children who are 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 and Disabilities (SEND)

Activate Learning recognises that students and apprentices with special educational needs, disabilities, or certain medical or physical health conditions may face additional safeguarding challenges, including bullying, discrimination and exploitation. There may also be additional barriers to recognising abuse and neglect.

Faculty and Apprenticeship staff must be aware of students and apprentices identified SEND and support needs and work with the Support and Inclusion Service to implement appropriate support and strategies. Relevant information and concerns should be shared appropriately to ensure that students and apprentices receive consistent and effective support.

Staff should remain alert to changes in behaviour, attendance, engagement or wellbeing and raise concerns early with Learning Support and/or the Safeguarding Team. Staff should not assume that changes are solely related to a student's SEND or additional needs.

The Safeguarding Team works closely with Learning Support and Faculty staff to coordinate appropriate safeguarding, pastoral and learning support, including for students with EHCPs or other additional learning needs.

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 the student or apprentice's chosen language when safeguarding concerns have arisen or been identified.

h) Students who identify as LGBTQ+, Gender Diverse or are Questioning their Gender

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 people which celebrates diversity and difference and a culture of zero-tolerance for discrimination, bullying and harassment. We work collaboratively with staff, students and apprentices in the LGBTQ+ community to seek their views and understand their lived experiences at Activate Learning.

Activate Learning's Student Gender Identity Procedure sets out how we support those who are transgender, gender diverse, are questioning their gender or request support with social transition.

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 reviews 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, and the Residential Development Group.

j) Students and Apprentices with Criminal Convictions

Activate Learning is committed to the fair and inclusive treatment of all applicants and students/apprentices, 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 or apprentices may require additional support to remain safe from abuse, harm, neglect or exploitation.

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 and Apprentices Requiring Mental Health Support

Activate Learning recognises the important role education plays in promoting positive mental health and wellbeing and in identifying concerns at an early stage. Mental health concerns may, in some circumstances, become safeguarding concerns or indicate that a student or apprentice is experiencing, or at risk of, abuse, neglect or exploitation. This may include self-harm, eating disorders, suicidal ideation or suicide.

Staff should not attempt to diagnose mental health conditions, however, should be alert to changes in a student or apprentice's mental health and wellbeing and report concerns promptly.

Activate Learning will work with relevant internal and external services to promote positive mental health, facilitate early intervention and ensure safeguarding concerns are appropriately assessed and managed in line with our Student Health and Wellbeing Policy.

m) Students and Apprentices Placed in Secure Environments

Activate Learning is committed to the safeguarding and wellbeing of all students and apprentices, 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, those 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/apprentice to ensure they are supported and that any transition or withdrawal from learning is managed sensitively.

n) Students and Apprentices with Medical Conditions

An incident relating to the management of a student or apprentice's medical condition, including allergies, would not in itself warrant a safeguarding referral. A referral should be made where there is concern that the individual may be at increased risk of neglect, abuse or exploitation because of their medical condition, including where essential information, medication or treatment is repeatedly not provided, or where inadequate management places them at significant risk of harm.

Staff should remain alert to any increased vulnerability arising from medical conditions, disabilities or associated care needs and report safeguarding concerns in accordance with the Safeguarding – Reporting a Concern Procedure.

o) **Apprentices Under 18 Living in Employer-Provided Accommodation**

Where an apprentice under the age of 18 is offered or required to live in employer-provided accommodation, Activate Learning will undertake appropriate safeguarding due diligence to ensure that relevant risks are identified and appropriately considered.

The accommodation remains a private arrangement between the employer and apprentice (and, where appropriate, their parent/carer), and Activate Learning is not responsible for, or party to, any tenancy, licence or contractual agreement relating to the accommodation. The employer remains responsible for ensuring the accommodation is safe and suitable and that appropriate welfare arrangements are in place. Activate Learning will maintain appropriate safeguarding oversight throughout the apprenticeship, including agreed welfare checks and review of the arrangements, and will take appropriate action where safeguarding concerns arise or circumstances change.

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 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 organisations 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)

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 - 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
- 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
- Death of a Community Member and Postvention 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

- Missing Students and Apprentices Procedure
- Prevent Risk Assessment [internal document]
- Procedure for Personal Risk Assessments and PEEPs
- Professional Conduct Policy
- Recruitment Policy
- Residential Statement of Principles and Practice
- 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 Gender Identity Procedure
- Student Search Policy
- Use Of Restrictive Interventions 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/apprentices.
- 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/apprentices, 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, including online harms.
- 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 and apprentices.
- Attend training to support students and apprentices with specific needs (e.g. intimate care, emergency medication, etc).
- Make sure students and apprentices know how to report concerns and access help.

Designated Safeguarding Advisers and Safeguarding Team Leaders

- 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 Safeguarding Team Leader, DDSL 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.

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 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): A form of child abuse where individuals or groups manipulate, coerce, or force a child or young person under 18 into committing illegal activities.

Child Sexual Exploitation (CSE): A specific form of child sexual abuse, when an individual or group takes advantage of an unequal power dynamic (based on age, size, status, or intellect) to manipulate, coerce, or deceive a person under the age of 18. The child is pushed or tricked into sexual activity in exchange for things they need, want, or are given (such as money, drugs, alcohol, gifts, food, accommodation, or emotional affection/status) or to benefit the abuser.

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.

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 pregnant and/or is a parent themselves.
- Has exhibited early signs of abusive, violent and/or harmful behaviours.
- 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 missing/goes missing from education, home or care.
- Has been repeatedly removed from the classroom, experienced multiple suspensions, is on a part-time timetable, is at risk of being permanently excluded from schools, colleges and in Alternative Provision or a Pupil Referral Unit.
- Is at risk of exploitation, modern slavery, trafficking, including criminal or sexual exploitation.
- Is at risk of being radicalised into terrorism.
- 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 honour or faith-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.

Extra-familial harm: A term for dangers and abuse that children face outside their family home, such as criminal exploitation, peer abuse, and sexual exploitation. These risks usually happen during adolescence when young people spend more time in the wider community.

Extremism: The promotion of an ideology based on violence, hatred, or intolerance. Key aspects include targeting fundamental rights, undermining democracy, and creating permissive

environments for harm.

Faith Based Abuse: The mistreatment or harm of a person justified or driven by religious or supernatural beliefs. It commonly involves accusations of witchcraft, spirit possession, or being controlled by evil forces.

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: A term used to describe a continuum of behaviours by children and young people under the age of 18 that are not appropriate for their age or stage of development, and which can cause physical or emotional harm to themselves or others.

Honour-Based Abuse (HBA): An incident or crime involving violence, threats, intimidation, coercion, or abuse (psychological, physical, sexual, financial, or emotional) committed to protect or defend the honour of an individual, family, and/or community for perceived or alleged breaches of a local or cultural code of behaviour.

Mental Health: Mental health exists on a continuum, which is experienced differently from one person to the next. Mental health conditions include mental disorders and mental states associated with significant distress, impairment in functioning, or risk of self-harm.

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 psychological and social process where a person adopts extreme political, social, or religious views. This process can lead them to support or commit acts of violence and terrorism.

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).

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 2026)

