



Adult and Community Learning

Safeguarding Policy 2022-23 v1

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Reviewed by:

| Role | Name | Date |
|---|-----------------|------------|
| Designated Safeguarding Lead | Janet Dawson | 13/09/2022 |
| Deputy Designated Safeguarding Lead 1 | Richard Heath | 13/09/2022 |
| Deputy Designated Safeguarding Lead 2 | Jan Lennon | 13/09/2022 |
| Adult & Community Learning Delivery Lead | Judy Hallam | 13/09/2022 |
| Service Manager - Education Services Delivery | Sarah Tregaskis | 01/09/2022 |
| Advisory Board | Chair: Kam Kaur | |

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1. Policy statement and principles

Context

Warwickshire Adult & Community Learning (ACL) safeguarding arrangements are inspected by Ofsted under the judgements for leadership & management and also impact the judgement on the personal development, and behaviour and attitudes of learners.

This policy is available on the [Warwickshire County Council ACL](#) webpages and all staff and volunteers are required to read it and confirm they have done so in writing before commencing work for ACL.

This policy will be reviewed at least annually unless an incident, new legislation or guidance suggests the need for an interim review. Representatives of the whole learning community of learners, parents, staff, volunteers, and Education Services Senior Leadership Team (ES-SLT) will be involved in reviewing, shaping, and developing ACL's safeguarding arrangements.

This policy will reference online abuse and abuse that will take place in person. These types of abuse can occur simultaneously.

Definitions

Child: References to "child" or "children" in this policy means anyone under the age of 18 years.

Adult at Risk: ACL bases its definition of an "Adult at Risk" on that used within the Data Protection Act 2018 and defines an Adult at Risk as someone over 18 years of age who (i) has needs for care and support; and (ii) is experiencing, or is at risk of, neglect, or physical, mental or emotional harm; and (iii) as a result of those needs is unable to protect themselves against neglect or harm, or the risk of it.

Safeguarding Children: In defining our approach towards children, ACL draws on the definition used by the DfE in Keeping Children Safe in Education 2022 (KCSE). While KCSE only applies to Schools and Colleges, we will play our part in:

- Protecting children from maltreatment.

- Preventing impairment of children's health or development.

- Ensuring that children are growing up in circumstances consistent with the provision of safe and effective care.

- Taking action to enable all children to have the best outcomes.

Safeguarding Adults at Risk: While ACL is not subject to the provisions of the Care Act 2014, it draws broadly on this act to inform its policy on safeguarding Adults at Risk. We will play our part to:

- Ensure that the rights of Adults at Risk are protected to enable them to live in safety, free from abuse and neglect.

- Ensure that the wellbeing of the Adult at Risk is promoted and that in deciding on any action to be taken we will take into account their views, wishes, feelings and beliefs, for example when considering whether to refer concerns to statutory bodies or when seeking support from charitable organisations.

Staff refers to all those working for or on behalf of ACL, full-time or part-time, temporary or permanent, in either a paid or voluntary capacity.

Harassment is determined legally as behaviour from one person towards at least one other which is intended to cause alarm or distress. Sexual harassment is meant, in the context of this policy, as unwanted conduct of a sexual nature, whether occurring online or offline

Harm is defined as the ill treatment or impairment of health and development. Health includes both physical and mental health. Development includes physical, intellectual, emotional, social and behavioural development.

Significant Harm is a term used in law that justifies compulsory intervention in family life in the best interests of children. Assessing Significance is done by comparing the child's health or development to what could be reasonably expected of a similar child. However, there is no absolute consideration in assessing significant harm

Victim is a widely recognised and understood term. ACL recognises that not everyone who has been

subjected to abuse considers themselves a victim or would want to be described in this way. Staff should be conscious of this when managing any incident and be prepared to use any term with which the individual is most comfortable.

'Alleged perpetrator(s)' and where appropriate **'perpetrator(s)'**. These are widely used and recognised terms and the most appropriate to aid effective drafting of guidance. Staff should think very carefully about their use of terminology, not least because in some cases the abusive behaviour will have been harmful to the perpetrator as well.

Safeguarding statement

Our learners are adults. We recognise our moral and statutory responsibility to safeguard and promote the welfare of all learners, children and Adults at Risk.

We endeavour to provide a safe and welcoming environment where all learners are respected and valued. ACL staff are uniquely placed to observe changes in a learner's appearance, behaviour, communication and the outward signs of abuse, neglect, exploitation, and radicalisation. They may also become aware of family circumstances in which there are safeguarding concerns for children and Adults at Risk. We are alert to these signs and follow our procedures to ensure that learners and others receive effective support, protection, and justice.

The procedures contained in this policy apply to all staff, volunteers, and contractors and are consistent with statutory guidance and those of the locally agreed multi-agency safeguarding arrangements put in place by Warwickshire Safeguarding Partnership.

Policy principles

- Safeguarding is everyone's responsibility. Everyone who comes into contact with learners and their families has a role to play. To fulfil this responsibility effectively, all practitioners should make sure their approach is person centred. This means that they should consider, at all times, what is in the best interest of the learner, child or Adult at Risk. All practitioners, regardless of their role, are professionally accountable for their actions and decision making in relation to safeguarding.
- All Designated Safeguarding Leads should access Warwickshire's Early Help Pathway to Change training and ensure all staff are prepared to identify children that may benefit from early help. Early help is to put in the right support at the right time so that problems are less likely to escalate to a point where the child becomes vulnerable or in need. Early Help is sustainable so that problems are less likely to re-occur.
- Early Help does not always mean early years. While research does show that most impact can be made in those crucial first few years of a child's life, Early Help can be needed and put in place at any time and at any age. All children, young people and families in Warwickshire are entitled to receive Early Help. This means offering information, advice, guidance, and support to families as soon as a concern emerges or seems likely to emerge.
- This is not an additional responsibility for practitioners but an essential part of the 'day job' for all people working with children and families.
- ACL's responsibility to safeguard and promote the welfare of its learners, children and Adults at Risk is of paramount importance.
- All people, regardless of age, gender, ability, culture, race, language, religion, or sexual identity, have equal rights to protection.
- All staff have an equal responsibility to act on any suspicion or disclosure that may suggest a learner, child or adult with care and support needs may experience harm at home, in the community or in an ACL venue. Learners who are safe and feel safe are better equipped to learn.
- Staff at ACL are uniquely placed to observe changes in learner's appearance, behaviour, communication and the outward signs of abuse, neglect, exploitation, and radicalisation. Learners may also turn to a trusted adult at ACL when they are in distress or at risk. It is vital that all ACL staff are alert to the signs of abuse, are approachable and trusted by learners, listen actively, and

understand the procedures for reporting their concerns. ACL will act on identified concerns and will act to prevent concerns from escalating.

- All staff members will maintain an attitude of ‘**it could happen here**’ where safeguarding is concerned. When concerned about the welfare of a learner, staff members should always act in the interests of the learner.
- If, at any point, there is a risk of immediate serious harm to a learner, child, or adult with care and support needs, a referral will be made to WCC Children’s Services or WCC Adult Safeguarding Service as appropriate and/or the Police immediately. **Anybody can make a referral.** If the situation of a learner, child or Adult at Risk does not appear to be improving, any staff member with concerns should challenge the designated safeguarding lead (DSL) to consider the person’s needs and be provided with the escalation process to make sure they are confident in the response to the person’s needs. If a member of staff remains concerned, they can discuss their concerns with ACL Delivery Lead, another DSL or contact WCC Children’s Services or WCC Adult Safeguarding Service as appropriate for additional advice (contact details in section 28 below).
- All staff are professionally accountable and follow the staff code of conduct. Any concerns or allegations of misconduct, including wellbeing concerns for staff are shared swiftly and at the earliest opportunity to **maintain a culture of vigilance.** All staff are aware of their responsibility to share low level concerns with equal urgency to ensure all learners, children and Adults at Risk are supported in an **environment of openness, trust, and transparency.**

Policy aims:

- To provide all staff with the necessary information to enable them to meet their safeguarding responsibilities.
- To ensure consistent good practice, through training, auditing and development.
- To demonstrate ACL’s commitment with regard to safeguarding and protection to learners, parents, and other partners.
- To contribute to ACL’s safeguarding portfolio.

2. Safeguarding legislation and guidance

The legislative context

The following legislation underpins ACL’s provision of a safe and secure environment and supports the fulfilment of its statutory duties.

Care Act 2014

Children Acts of 1989 and 2004

Counter-Terrorism and Security Act 2015

DBS Code of Practice November 2015

Education Act (2002) Section 175

Equality Act 2010

Health and Safety at Work Act 1974

Human Rights Act 1998

Keeping Children Safe in Education 2022

Modern Slavery Act 2015

Rehabilitation of Offenders Act 1974

Safeguarding Vulnerable Groups Act 2006 as amended by the Protection of Freedoms Act 2012

Sexual Offences (Amendment) Act 2000

Sexual Offences Act 2003

Keeping Children Safe in Education

ACL requires that all staff should at the least read Part One of [Keeping Children Safe in Education 2022](#). WCC Education Services Senior Leadership Team, working with SLT and especially their designated safeguarding lead, should ensure that those staff who do not work directly with children read either Part one or Annex A (a condensed version of Part one) of this guidance. This will be based on an assessment of which guidance will be most effective for their staff to safeguard and promote the welfare of children. The ACL Delivery Lead should ensure that mechanisms are in place to assist staff to understand and discharge their role and responsibilities as set out in Part one (or Annex A if appropriate) of this guidance. Staff can find a copy in ACL's All Staff Teams area; paper copies are available at ACL offices.

Advice for practitioners

[What to do if you're worried a child is being abused 2015 - Advice for practitioners](#) is non- statutory advice which helps practitioners (everyone who works with children) to identify abuse and neglect and take appropriate action. A copy of this document is stored in the ACL All Staff Teams area.

Human Rights

The Human Rights Act 1998 (HRA) sets out the fundamental rights and freedoms that everyone in the UK is entitled to and contains the Articles and protocols of the European Convention on Human Rights (ECHR) (the Convention) that are deemed to apply in the UK. It compels public organisations to respect and protect an individual's human rights when they make individual decisions about them.

The specific convention rights applying to ACL and safeguarding are:

Article 3: the right to freedom from inhuman and degrading treatment (an absolute right)

Article 8: the right to respect for private and family life (a qualified right) includes a duty to protect individuals' physical and psychological integrity

Article 14: requires that all of the rights and freedoms set out in the Act must be protected and applied without discrimination, 25 and

Protocol 1, Article 2: protects the right to education.

Being subjected to harassment, violence and or abuse, including that of a sexual nature, may breach any or all of these rights, depending on the nature of the conduct and the circumstances.

The Equality Act

According to the Equality Act 2010, ACL must not unlawfully discriminate against learners because of their sex, race, disability, religion or belief, gender reassignment, pregnancy and maternity, or sexual orientation (protected characteristics).

3. Roles and responsibilities

Key personnel

| Role | Name | Email | Telephone |
|---|---------------|----------------------------------|--------------|
| Designated Safeguarding Lead (DSL) (Must be a member of the Senior Leadership Team) | Jan Dawson | janetdawson@warwickshire.gov.uk | 01926 738990 |
| Deputy Designated Safeguarding Lead 1 (Must have undertaken DSL training) | Richard Heath | richardheath@warwickshire.gov.uk | 01926 738992 |

Deputy Designated

Jan Lennon

janlennon@warwickshire.gov.uk

01926 736390

Safeguarding Lead 2 (Must have undertaken DSL training)
Training booked 3&4 November

The Designated Safeguarding Lead (DSL)

An appropriate person

The designated safeguarding lead should have the appropriate status and authority within ACL to carry out the duties of the post. The role of the designated safeguarding lead carries a significant level of responsibility, and they should be given the additional time, funding, training, resources and support they need to carry out the role effectively. Their additional responsibilities include providing advice and support to other staff on welfare, safeguarding and child protection matters, taking part in strategy discussions and inter-agency meetings, and/or supporting other staff to do so, and to contributing to the assessment of children or Adults at Risk.

An appropriate senior member of staff, from ACL leadership team must be appointed to the role of DSL.

DSL Duties

Lead on Safeguarding (including online safety)

The DSL should take lead responsibility for safeguarding. This should be explicit in the role holder's job description. This will not be delegated although the activities of the DSL may be delegated to appropriately trained deputies.

Availability

During term time the DSL (or a deputy) should always be available (during opening hours) for staff to discuss any safeguarding concerns.

Manage Referrals

The DSL is expected to refer cases:

- of suspected abuse and neglect of children to the local authority children's social care as required, and support staff who make referrals to local authority children's social care.
- of suspected abuse and neglect of an adult with care and support needs to the local authority adult safeguarding social care team as required, and support staff who make referrals to local authority children's social care.
- to the Channel programme where there is a radicalisation concern as required and support staff who make referrals to the Channel programme
- where a person is dismissed or left due to risk/harm to a child to the Disclosure and Barring Service as required, and
- where a crime may have been committed to the Police as required. [NPCC - When to call the police](#) should help understand when to consider calling the police and what to expect when working with the police.
- using the prescribed pro forma/system to Children's Social Care and the Prevent policing team for a joint assessment where there is a concern that a child is at risk of radicalisation; and to the Channel panel if subsequently advised to do so.

Work with others

To

- act as a source of support, advice and expertise for all staff

- act as a point of contact with the safeguarding partners, having a working knowledge of locally agreed multi-agency safeguarding arrangements and procedures put in place by Warwickshire Safeguarding.
- liaise with ACL Delivery Lead to inform him or her of issues - especially ongoing enquiries under section 47 of the Children Act 1989 and police investigations.
- as required, liaise with the “case manager” and the local authority designated officer(s) (LADO) for child protection concerns in cases which concern a staff member
- report any concerns that an adult with care and support needs is experiencing, or at risk of, abuse or neglect, to Social Care and Support on: 01926 412080.
- liaise with staff (especially teachers, pastoral support staff, IT technicians, the named person with oversight for SEND in a college and senior mental health leads) on matters of safety and safeguarding and welfare (including online and digital safety) and when deciding whether to make a referral by liaising with relevant agencies so that individual’s needs are considered holistically
- liaise with the senior mental health lead and, where available, the mental health support team, where safeguarding concerns are linked to mental health
- promote supportive engagement with parents and/or carers in safeguarding and promoting the welfare of children, including where families may be facing challenging circumstances
- work with ACL Delivery Lead and relevant strategic leads, taking lead responsibility for promoting educational outcomes by knowing the welfare, safeguarding and protection issues that learners are experiencing, or have experienced, and identifying the impact that these issues might be having on attendance, engagement and achievement at ACL. This includes:
 - ensuring that ACL knows who its Adults at Risk are, understanding their academic progress and attainment, and maintaining a culture of high aspirations for this cohort, and supporting teaching staff to provide additional academic support or reasonable adjustments to help Adults at Risk to reach their potential, recognising that even when any statutory intervention has ended, there is still a lasting impact on educational outcomes.
 - Attending and/or contributing to child protection conferences, strategy meetings and multi-agency exploitation meetings
 - developing effective links with relevant statutory and voluntary agencies including Warwickshire Safeguarding.

Share information and managing the safeguarding file

The DSL is responsible for ensuring that safeguarding files are kept up to date.

Information should be kept confidential and stored securely. It is good practice to keep concerns and referrals in a separate file for each person.

Records should include:

- a clear and comprehensive summary of the concern
- details of how the concern was followed up and resolved
- a note of any action taken, decisions reached and the outcome.

The DSL should ensure the file is only accessed by those who need to see it and where the file or content within it is shared.

The DSL requests that learners provide at least one emergency contact number.

Raise awareness

The DSL should:

- ensure each member of staff has access to, and understands, ACL’s Safeguarding Policy and procedures, especially new and part-time staff
- ensure ACL’s Safeguarding Policy is reviewed annually (as a minimum) and the procedures and implementation are updated and reviewed regularly, and work with the ACL Delivery Lead regarding this
- ensure ACL’s Safeguarding Policy is available publicly and learners and their families know that

referrals about suspected abuse or neglect may be made and the role of ACL in this, i.e. on [WCC's Adult and Community Learning web pages](#) or by other means.

- link with the safeguarding partner arrangements to make sure staff are aware of any training opportunities and the latest local policies on local safeguarding arrangements, and
- help promote educational outcomes by appropriate sharing of information with teachers and ACL leadership staff about the welfare, safeguarding or protection issues of Adults at Risk.
- inform ACL Delivery Lead of any serious safeguarding enquiries, especially under section 47 of the Children Act 1989 and any Police investigations.

Maintain training, knowledge and skills

The DSL should maintain their knowledge engaging and sharing training throughout their time in post. The DSL should revisit their training at least every two years (including Prevent training), and regularly (at least annually) updates their knowledge and skills to keep up with any developments relevant to their role.

ACL is dedicated to maintaining its knowledge through accessing Warwickshire's network meetings and actively engaging with Warwickshire's integrated training offer. The information is shared with all staff through staff briefings, Safeguarding surgeries, meetings. This is the development of our ongoing culture of vigilance

Training should provide the DSL with a good understanding of their own role, how to identify, understand and respond to specific needs that can increase the vulnerability of children and adults, as well as specific harms that can put children and adults with care and support needs at risk, and the processes, procedures and responsibilities of other agencies, particularly local authority social care services, so they:

- understand the assessment process for providing early help and statutory intervention, including local criteria for action and local authority social care referral arrangements
- have a working knowledge of how local authorities conduct child protection investigations and adult safeguarding inquiries to be able to contribute to these effectively when required to do so
- understand the importance of the role the DSL has in providing information and support to local authority services in order to safeguard and promote the welfare of children and adults with care and support needs.
- understand the lasting impact that adversity and trauma can have, including on behaviour, mental health and wellbeing, and what is needed in responding to this in promoting educational outcomes
- are alert to the specific needs of those with special educational needs and disabilities (SEND), those with relevant health conditions
- understand the importance of information sharing, both within ACL, and with the safeguarding partners, other agencies, organisations and practitioners, in keeping with the [Warwickshire Safeguarding Information Sharing Agreement](#).
- understand and support ACL with regards to the requirements of the Prevent duty and can provide advice and support to staff on protecting learners from the risk of radicalisation
- can understand the unique risks associated with online safety and be confident that they have the relevant knowledge and up to date capability required to keep learners safe whilst they are online at ACL
- can recognise the additional risks that learners with special educational needs and disabilities (SEND) face online, for example, from bullying, grooming and radicalisation and are confident they have the capability to support learners with SEND to stay safe online
- obtain access to resources and attend any relevant or update training courses, and
- encourage a culture of listening to learners and taking account of their wishes and feelings, among all staff.
- keeps a record of staff attendance at safeguarding training

In addition to the formal training set out above, their knowledge and skills **should** be refreshed (this might be via e-bulletins, meeting other DSLs, or simply taking time to read and digest safeguarding developments) at regular intervals, as required, and at least annually, to allow them to understand and keep up with any developments relevant to their role.

Provide support to staff

Training should support the DSL in developing expertise, so they can support and advise staff and help them feel confident on welfare, safeguarding and protection matters. This includes specifically to:

- ensure that staff are supported during the referrals processes, and
- support staff to consider how safeguarding, welfare and educational outcomes are linked, including to inform the provision of academic and pastoral support.
- ensure that staff do everything they can to support social workers and contribute to assessments when Social Care become involved
- ensure that all staff sign to indicate that they have read and understand the safeguarding policy; the staff behaviour policy (code of conduct); the behaviour policy; ACL's safeguarding response to children who go missing from education; the role of the DSL (including the identity of the DSL and any deputies); and Part 1 of *Keeping Children Safe in Education 2022* (and also Part 5 and Annex B of *Keeping Children Safe in Education 2022* in relation to staff who work directly with children)
- ensures that all staff understand that if they have any concerns about the welfare of a child or adult with care and support needs, they should act on them immediately, either by speaking to the DSL (or a deputy) or, in exceptional circumstances, taking responsibility to make a referral to the relevant Social Care service.
- ensures that all staff know how to make a referral and has a working knowledge of relevant national guidance in respect of all specific safeguarding issues, ensuring that all staff receive necessary training, information and guidance
- understands the unique risks associated with online safety and ensures that staff are trained to have the requisite knowledge and up to date capability to keep learners safe whilst they are online
- understands the relevance of data protection legislation and regulations, especially the Data Protection Act 2018 and General Data Protection Regulation (GDPR) in respect of safeguarding
- liaises with the ACL Delivery Lead as appropriate
- ensures that ACL Delivery Lead is aware of the responsibility under *Working Together 2018* to refer all allegations that a child has been harmed by or that children may be at risk of harm from a member of staff or volunteer to the Local Authority Designated Officer (LADO) within one working day prior to any internal investigation; and to the Disclosure and Barring Service (DBS) as appropriate.

Understand the views of learners

It is important that all learners feel heard and understood. Therefore, DSL's (and deputies) should be supported in developing knowledge and skills to:

- encourage a culture of listening to learners and taking account of their wishes and feelings, among all staff, and in any measures ACL may put in place to protect them, and,
- understand the difficulties that learners may have in approaching staff about their circumstances and consider how to build trusted relationships which facilitate communication
- work closely with pastoral support staff; the SENCo; staff with designated responsibility for promoting mental health and emotional wellbeing; the ICT lead and any ICT support staff in relation to safeguarding matters (including online and digital safety) and whether to make referrals to relevant partner agencies

All staff **should** be aware that learners may not feel ready or know how to tell someone that they are being abused, exploited, or neglected, and/or they may not recognise their experiences as harmful. For example, learners may feel embarrassed, humiliated, or being threatened. This could be due to their vulnerability, disability and/or sexual orientation or language barriers. This should not prevent staff from having a professional curiosity and speaking to the DSL if they have concerns about a learners. It is also important that staff determine how best to build trusted relationships with learners which facilitate communication.

Hold and share information

The DSL **should** be equipped to:

- understand the importance of information sharing, both within ACL, and with the safeguarding partners, other agencies, organisations and practitioners
- understand relevant data protection legislation and regulations, especially the Data Protection Act 2018 and the UK General Data Protection Regulation (UK GDPR), and
- be able to keep detailed, accurate, secure written records of concerns and referrals and understand the purpose of this record-keeping

The Deputy Designated Safeguarding Leads (DDSLs)

ACL has decided to have 2 Deputy Designated Safeguarding Leads. The deputies should be trained to the same standard as the DSL and the role should be explicit in their job description. Whilst the activities of the DSL can be delegated to appropriately trained deputies, the ultimate lead responsibility for child protection, as set out above, remains with the DSL, this lead responsibility should not be delegated.

In the absence of the DSL, the DDSL carries out those functions necessary to ensure the ongoing safety and protection of learners. In the event of the long-term absence of the DSL, one deputy will lead for safeguarding, assuming all the functions of the DSL as above.

ACL Delivery Lead

The ACL Delivery Lead has a strategic leadership responsibility for ACL's safeguarding arrangements and must ensure compliance with all duties under legislation, having regard to this guidance, and ensuring ACL's policies, procedures and training are effective and comply with the law at all times. ACL Delivery Lead should ensure that the policies and procedures are understood, and followed by all staff.

The ACL Delivery Lead ensures that:

- An appropriate senior member of staff, from ACL's leadership team, is appointed to the role of designated safeguarding lead. The DSL should take lead responsibility for safeguarding and child protection (including online safety). This should be explicit in the role holder's job description.
- The DSL has the appropriate status and authority within ACL or college to carry out the duties of the post. The role carries a significant level of responsibility and the postholder should be given the additional time, funding, training, resources, and support needed to carry out the role effectively.
- ACL has more than one deputy DSL. Any deputy (or deputies) should be trained to the same standard as the DSL.
- The DSL role is explicit in the role holder's job description (and also the job description of any Deputy Designated Safeguarding Leads) and that safeguarding responsibilities are identified explicitly in the job/role descriptions of every member of staff and volunteer
- The DSL or a Deputy DSL is always available during ACL opening hours for staff to discuss any safeguarding concerns, at least via telephone or other media.
- ACL contributes to multi-agency working to safeguard and protect learners, children and Adults at Risk, and staff do everything they can to support social care and police professionals if they become involved.
- ACL has safeguarding policies and procedures, including a staff code of conduct, that are consistent with local safeguarding partnership and statutory requirements, reviewed annually and made available publicly on the [Adult and Community Learning – Warwickshire County Council](#) website or by other means
- ACL has procedures for dealing with allegations of abuse made against members of staff and volunteers including allegations made against ACL Delivery Lead and allegations against other learners.
- ACL follows safer recruitment procedures that include any required statutory checks on the suitability of staff
- ACL has an induction strategy that ensures all staff, including ACL Delivery Lead, and volunteers

receive information about ACL's safeguarding arrangements, Staff Behaviour Policy (Code of Conduct) and the role of the DSL on induction

- ACL has a training strategy that ensures all staff, including ACL Delivery Lead, and volunteers receive appropriate and regularly updated safeguarding training (including online safety) and updates as required (at least annually) to provide them with the relevant skills and knowledge to safeguard effectively in line with any requirements of Warwickshire Safeguarding. The training strategy will also ensure that the DSL receives refresher training and regular updates as defined under the DSL's duties above
- All ACL staff, including temporary staff and volunteers, are provided with copies of or access to ACL's Safeguarding Policy and Staff Behaviour Policy (code of conduct) before they start work at ACL
- ACL teaches learners about safeguarding and how to keep themselves safe at all times, including when online, as part of a broad and balanced curriculum
- All staff feel able to raise concerns about poor or unsafe practice and that such concerns are handled sensitively and in accordance with the whistleblowing procedure
- The culture of ACL supports the provision of effective pastoral care and early help
- Learners are provided with opportunities throughout the curriculum to learn about safeguarding and how to keep themselves safe at all times, including when online, as part of a broad and balanced curriculum
- All allegations that a child has been harmed by or that children may be at risk of harm from a member of staff or volunteer are reported personally to the LADO within one working day prior to any internal investigation. Follows any advice from the LADO to refer to the Disclosure and Barring Service anyone who has harmed or may pose a risk of harm to a child.
- A case officer from the senior leadership team is appointed to investigate allegations concerning members of staff and volunteers and/or act as a point of contact for the member of staff/volunteer against whom the allegation is made.
- ACL's safeguarding, recruitment and managing allegations procedures take into account the procedures and practice of the Local Authority, local safeguarding partnership and national guidance.
- ACL annually audits its safeguarding to highlight how its duties have been carried out. An action plan will be drawn up and any weaknesses will be rectified in accordance with that plan.

Advisory Board

The Advisory Board considers ACL's strategic plans and make sure they reflect safeguarding legislation, regulations specific to its activities, statutory guidance, and the safeguarding expectations of Warwickshire County Council. They work with Education SLT and ACL SLT to review whether the actions the organisation has put in place create a safe culture and help keep people safe. A member of the Advisory Board will assume the responsibility for overseeing safeguarding.

The Advisory Board member ensures:

- Safeguarding, including Prevent is an agenda item at Board meetings
- An annual review of safeguarding policies and procedures is undertaken and that this is reported to Board members.
- Learning from case reviews locally and nationally, improves ACL's policies, procedures and practices.
- Champion safeguarding throughout the organisation.
- Attendance at relevant safeguarding training events.
- Support for the Advisory Board in developing their individual and collective understanding of safeguarding.
- Support for regular safeguarding updates for staff, learners and volunteers.

- There are ways to gather the views of staff and volunteers in relation to safeguarding and sharing these with the board.

4. Good practice guidelines and staff code of conduct

To meet and maintain our responsibilities towards learners, we identify standards of good practice and set out our expectations of staff in the staff behaviour policy, which all members of staff and volunteers are required to read and sign before starting work in ACL.

In summary, our expectations of staff include:

- treating all learners with respect
- setting a good example by conducting ourselves appropriately
- involving learners in decisions that affect them
- encouraging positive, respectful, and safe behaviour among learners
- being a good listener
- being alert to changes in learners' behaviour and to signs of abuse and neglect and exploitation
- recognising that challenging behaviour and mental health difficulties may be an indicator of abuse
- reading and understanding ACL's child protection policy, staff behaviour policy (code of conduct) and guidance documents on wider safeguarding issues, for example bullying, behaviour, physical contact, criminal and sexual exploitation, extremism, online safety, and information-sharing
- asking the learner's permission before initiating physical contact, such as administering first aid
- maintaining appropriate standards of conversation and interaction with and between learners and avoiding the use of sexualised or derogatory language
- not participating in, tolerating or dismissing sexual violence or sexual harassment as "banter", "part of growing up", "just having a laugh" or "boys being boys".
- making clear that sexual violence and sexual harassment is not acceptable, will never be tolerated and is not an inevitable part of growing up; and
- challenging behaviours (potentially criminal in nature) which constitute sexual harassment, such as grabbing bottoms, breasts, and genitalia, flicking bras, and lifting skirts
- being aware that the personal and family circumstances and lifestyles of some learners lead to an increased risk of abuse
- referring all concerns about a learner's safety and welfare to the DSL or, if necessary, directly to the Police or Social Care
- following ACL's rules regarding communication and relationships with learners, including via social media
- referring all allegations against members of staff, volunteers or other adults that work with learners and any concerns about breaches of the staff behaviour policy directly to ACL Delivery Lead; and any similar allegations against or concerns about ACL Delivery Lead directly to the Service Manager of Education Delivery Services.

5. Abuse of position of trust

A breach of trust occurs when the boundaries of the relationship between a professional and a learner is broken due to inappropriate behaviour by the professional, which involves an abuse of power.

All ACL staff are aware that inappropriate behaviour towards learners is unacceptable and that their conduct towards learners must be beyond reproach.

6. Learners who may be particularly vulnerable

Some learners are more vulnerable to abuse and neglect than others. Several factors may contribute to that increased vulnerability, including prejudice and discrimination; isolation; social exclusion; communication issues; a reluctance on the part of some adults to accept that abuse can occur; as well as an individual learner's personality, behaviour, disability, mental and physical health needs and family circumstances.

To ensure that all our learners receive equal protection, we will give special consideration to those who are:

- disabled, have special educational needs or have mental health needs
- young carers
- affected by parental substance misuse, domestic abuse and violence or parental mental health needs
- asylum seekers
- in receipt of support and services from a social worker
- vulnerable to being bullied, or engaging in bullying behaviours
- living away from home or in temporary accommodation
- living transient lifestyles
- living in chaotic and unsupportive home situations
- vulnerable to discrimination and maltreatment on the grounds of race, ethnicity, religion, disability, or sexuality
- at risk of sexual and/or criminal exploitation
- at risk from or involved with serious violent crime
- do not have English as a first language
- at risk of female genital mutilation (FGM)
- at risk of forced marriage
- at risk of being drawn into extremism

This list provides examples of additionally vulnerable groups and is not exhaustive. Special consideration includes the provision of safeguarding information and resources in community languages and accessible formats for children and parents/carers with communication needs.

7. Learners with special educational needs and disabilities (SEND) or have mental health needs

Learners with SEND or who have mental health needs can face additional safeguarding challenges.

Additional barriers can exist when recognising abuse and neglect in this group, which can include:

- assumptions that indicators of possible abuse such as behaviour, mood and injury relate to the learner's disability or mental health issues without further exploration.
- the potential for learners with SEN and disabilities being disproportionately impacted by behaviours such as bullying, without outwardly showing any signs; and
- communication barriers and difficulties in overcoming those barriers.

Staff are trained to manage these additional barriers to ensure this group of learners is appropriately safeguarded; and are aware that mental health difficulties can, in some cases, be an indicator that an individual has suffered or is at risk of suffering abuse, neglect or exploitation.

Staff are not expected or trained to diagnose mental health conditions or issues, but they will record and report any concerns about a learner's mental health to the DSL as with any other safeguarding concern, recognising that mental health concerns may be an outcome and/or indicator of wider safeguarding issues and concerns.

8. Early Help

ACL staff are particularly important as they are in a position to identify concerns early, provide help for learners and to promote their welfare, to prevent concerns from escalating.

ACL recognises that providing timely early help is more effective in promoting the welfare of learners than reacting later.

ACL should record concerns using their safeguarding recording systems and to share their concerns with the DSL (or a Deputy DSL), who is most likely to have a complete picture and be the most appropriate person to decide how best to respond to any concerns.

ACL is committed to working in partnership with children, parents and other agencies to identify situations in which children and/or their families would benefit from early help and to signpost appropriate support.

9. Attendance

We recognise that full attendance by learners at the course on which they are enrolled is important to their well-being and enables them to access the opportunities available to through ACL. Attendance is monitored closely, and we contact absent learners by phone, email or letter.

10. Helping children to understand and recognise risk and identify available support

The ACL approach is designed to help learners to think about risks they may encounter, recognise when they are at risk and with the support of staff work out how to get help when they need it and how risks might be reduced or managed. Discussions about risk are empowering and enabling for all learners and promote sensible behaviour rather than fear or anxiety. Learners are taught how to conduct themselves and how to behave in a responsible manner. Learners are also reminded regularly about online safety, the risks of sharing content and images online and tackling bullying, including cyber bullying procedures. ACL continually promotes an ethos of respect and learners are encouraged to speak to a member of staff of their choosing about any worries they may have.

Learners are taught to understand and manage risk at induction, during their course, via classroom discussions, access to posters, Be Safe cards, [ACL website](#). In our organisation the named staff are Richard Heath, Janet Dawson and Jan Lennon.

Posters in corridors and classrooms promote safeguarding. Be Safe cards are distributed at course commencement

11. Support for learners, families and staff involved in a safeguarding concern

Abuse is devastating for the individual and can also result in distress and anxiety for staff who become involved.

We will support learners, their families, and staff by:
taking all suspicions and disclosures seriously;

- nominating a link person (*usually the DSL*) who will keep all parties informed and be the central point of contact; where a member of staff is the subject of an allegation made by a learner, separate link people will be nominated to avoid any conflict of interest;
- responding sympathetically to any request from learners or staff for time out to deal with distress or anxiety;
- maintaining confidentiality and sharing information on a need-to-know basis only with relevant individuals and agencies;
- storing records securely;
- offering details of helplines, counselling or other avenues of external support;

- following the procedures laid down in our safeguarding, whistleblowing, complaints and disciplinary procedures;
- co-operating fully with relevant statutory agencies.

12. Safeguarding concerns and allegations made about staff, including supply teachers, volunteers and contractors

Expectations

Staff who are the subject of an allegation have the right to have their case dealt with fairly, quickly and consistently and to be kept informed of its progress.

Suspension is not the default option and alternatives to suspension will always be considered. However, in some cases staff may be suspended where this is deemed to be the best way to ensure that allegations are investigated fairly, quickly and consistently and that all parties are protected. In the event of suspension, ACL will provide support and a named contact for the member of staff.

Staff, parents and governors are reminded that publication of material that may lead to the identification of a teacher who is the subject of an allegation is prohibited by law. Publication includes verbal conversations or writing, including content placed on social media sites.

Allegations concerning staff who no longer work at ACL or historical allegations will be reported to the Police.

ACL will make every effort to maintain confidentiality and guard against unwanted publicity while an allegation is being investigated or considered.

Concerns about a child

All allegations in respect of an individual who works at ACL, including supply teachers, volunteers and contractors that fulfil any of the following criteria will be reported to the LADO within one working day:

- behaved in a way that has harmed or may have harmed a child;
- possibly committed a criminal offence against or related to a child;
- behaved towards a child(ren) in a way that indicates they may pose a risk of harm to children;
- behaved or may have behaved in a way that indicates they may not be suitable to work with. (Includes behaviour that may have happened outside of the setting, this is known as transferable risk)

The LADO contact number is 01926 745376. Referrals to the LADO should be submitted on a Position of Trust (POT) MARF form and sent to ado@warwickshire.gov.uk.

NB it is ACL Delivery Lead's responsibility to contact and refer to the LADO when necessary. The only exception is when the allegation is against ACL Delivery Lead/principal, in which instance the Service Manager for Education Delivery Services will undertake that responsibility.

Concerns about an adult

All allegations that an adult with care and support needs is experiencing, or at risk of, abuse or neglect, should be made to Social Care and Support on: 01926 412080.

Low level concerns

The term 'low-level' concern does not mean that it is insignificant. A low-level concern is any concern – no matter how small, and even if no more than causing a sense of unease or a 'nagging doubt' - that an adult working in or on behalf of ACL or college may have acted in a way that:

- is inconsistent with the staff code of conduct, including inappropriate conduct outside of work and

- does not meet the harm threshold or is otherwise not serious enough to consider a referral to the LADO.

Examples of such behaviour could include, but are not limited to:

- being over friendly with learners
- having favourites
- humiliating learners.

Low-level concerns should be shared initially with ACL's DSL. The DSL should inform ACL Delivery Lead/principal of all the low-level concerns in a timely fashion according to the nature of each particular low-level concern. The ACL Delivery Lead should be the ultimate decision maker in respect of all low-level concerns.

Low-level concerns which are shared about supply staff and contractors should be notified to their employers, so that any potential patterns of inappropriate behaviour can be identified.

If the ACL Delivery Lead is in any doubt as to whether the information which has been shared about a member of staff as a low-level concern in fact meets the harm threshold, they should consult with their LADO (relating to a child) or Social Care and Support (relating to an adult with care and support needs).

13. Complaints procedure

Our complaints procedure will be followed where a learner or parent raises a concern about poor practice towards a learner that initially does not reach the threshold for child protection action. Poor practice examples include unfairly singling out a learner or attempting to humiliate them, bullying or belittling a learner or discriminating against them in some way. Complaints are managed by the ACL Delivery Lead, and other members of the senior leadership team. An explanation of the Complaints Procedure is included in the safeguarding information for parents and learners.

Complaints from staff are dealt with under ACL's complaints and disciplinary and grievance procedures. Complaints which escalate into a safeguarding concern will automatically be managed under ACL's safeguarding procedures.

14. Staff reporting concerns about a colleague or other adult who works with children (Whistleblowing)

Staff who are concerned about the conduct of a colleague – including visiting practitioners and volunteers – towards a learner are undoubtedly placed in a very difficult situation. They may worry that they have misunderstood a situation and they will wonder whether a report could jeopardise a colleague's career. All staff must remember that the welfare of the child is paramount.

ACL's whistleblowing policy enables staff to raise concerns or allegations, initially in confidence, and for a sensitive enquiry to take place.

Staff are expected to report all concerns about poor practice or possible abuse by colleagues - including what may seem minor contraventions of ACL's staff behaviour policy (code of conduct) – to ACL Delivery Lead; to facilitate proactive and early intervention in order to maintain appropriate boundaries and a safe culture that protects learners, children and adults with care and support needs, and reduces the risk of serious abuse within ACL.

The recommended format for all staff to record any such poor practice or possible abuse by colleagues or other adults who work with learners is the pro forma 'Logging A Concern about the behaviour of an adult who works with children', also known as the 'Yellow form'.

All such forms should be passed directly to ACL Delivery Lead. Alternatively, staff are free to approach ACL Delivery Lead directly to discuss their concerns.

Concerns or complaints about ACL Delivery Lead should be reported to the DSL, whose contact details are displayed in the Welcome to Learning Booklet sent to all learners at commencement of their course, and on

the ACL website [ACL Website](#) for any member of staff to use in such an instance. The 'Yellow form' should also be used for that purpose as above.

Staff may also report concerns about suspected abuse or neglect directly to Social Care or the Police if they believe direct reporting is necessary to secure action to safeguard children or an adult with care and support needs.

Staff can also contact the Local Authority:

- About risk to children: The Local Authority Designated Officer, (LADO) is responsible for the co-ordination of responses to allegations against people who work with children. The LADO contact number is 01926 745376.
- About risk to adults with care and support needs: Social Care and Support: 01926 412080.

The NSPCC whistleblowing helpline is also available for staff who do not feel able to raise concerns regarding child protection internally. Staff can call 0800 028 0285 between 8.00a.m. and 8.00p.m., Monday to Friday or e mail help@nspcc.org.uk. Information is also available on the NSPCC website at <https://www.nspcc.org.uk/what-you-can-do/report-abuse/dedicated-helplines/whistleblowing-advice-line/>.

15. Staff training

Training, knowledge, and skill

General requirements

All staff should receive appropriate safeguarding training (including online safety) at induction. The training should be regularly updated. In addition, all staff should receive safeguarding (including online safety) updates (for example, via email, e-bulletins, and staff meetings), as required, and at least annually, to continue to provide them with relevant skills and knowledge to safeguard learners, children and adults with care and support needs effectively.

It is important that all staff have training to enable them to recognise the possible signs of abuse, neglect, exploitation and radicalisation and to know what to do if they have a concern.

Induction

New staff and volunteers will receive an explanation during their induction which will include:

- ACL's safeguarding policy
- signs and indicators of abuse and neglect
- responding to disclosure of abuse or neglect
- reporting and recording arrangements
- the staff behaviour policy (code of conduct)
- the identity and role of the DSL and all Deputy DSLs
- ACL's response to learners who discontinue attending their lessons.
- ACL's whistleblowing policy

All the above will be explained before a new member of staff or volunteer has direct contact with learners. ACL's safeguarding policy and staff behaviour policy (code of conduct) will be sent with the letter confirming an appointment with a written requirement that the individual reads the two policies in advance of starting work at ACL.

The individual will be given an opportunity to clarify any issues on their first day at work and then asked to sign to confirm that they have read and understood both policies and undertake to comply with them.

Refresher training

All staff, including ACL Delivery Lead, volunteers and governors will receive appropriate, regularly updated safeguarding training and thematic updates to include online safety as required (at least annually) during

inset days and regular discussions at staff meetings, to provide them with the requisite skills and knowledge to safeguard children effectively in line with statutory guidance and any requirements of the local safeguarding partnership.

Specific issues

Disclosing abuse

All staff should be aware that learners may not feel ready or know how to tell someone that they are being abused, exploited, or neglected, and/or they may not recognise their experiences as harmful. For example, learners may feel embarrassed, humiliated, or being threatened. This could be due to their vulnerability, disability and/or sexual orientation or language barriers. This should not prevent staff from having a professional curiosity and speaking to the DSL if they have concerns about a learner, child, or adult with care and support needs. It is also important that staff determine how best to build trusted relationships with learners, which facilitate communication.

Vulnerability

All staff will be made aware of the increased risk of abuse to certain groups, including those with special educational needs and disabilities, those in receipt of care or previously in care, and young carers. They will be made aware of the risks associated with specific safeguarding issues including child sexual exploitation, child criminal exploitation, county lines activity, peer on peer abuse, sexual harassment and sexual violence, extremism, so-called honour based abuse including female genital mutilation and forced marriage; and will receive training in relation to keeping learners safe online.

Safer recruitment

In addition, the ACL Delivery Lead (and/or other members of SLT as appropriate) will attend safer recruitment training, and ACL will ensure that there are at least two members of SLT have attended safer recruitment training within the past three years.

Supply staff and other visiting staff will be given ACL's Visiting Staff Leaflet.

16. Safer recruitment

ACL endeavours to ensure that we do our utmost to employ only suitable staff and allow only suitable volunteers to work with learners.

Expectations of applicants

Safer recruitment means that all applicants will:

- complete an application form which includes their employment history and explains any gaps in that history;
- provide two referees, including at least one who can comment on the applicant's suitability to work with children;
- provide evidence of identity and qualifications;
- if offered employment, be checked in accordance with the Disclosure and Barring Service (DBS) regulations as appropriate to their role. This will include:
 - an enhanced DBS check and a barred list check for Family Learning tutors and Programme Lead
 - an enhanced DBS check without a barred list check for all tutors, managers, invigilators, Business Support staff
- if offered employment, provide evidence of their right to work in the UK;

- be interviewed by a panel of at least two staff from the Wider Leadership Team if shortlisted.

Expectations of ACL

ACL will also:

- ensure that every job description and person specification for roles in the setting includes a description of the role holder's responsibility for safeguarding;
- ask at least one value-based question at interview for every role in the setting about the candidate's attitude to safeguarding and motivation for working with adult learners;
- verify the preferred candidate's mental and physical fitness to carry out their work responsibilities;
- obtain references for all shortlisted candidates, including internal candidates;
- carry out additional or alternative checks for applicants who have lived or worked outside the UK;
- ensure that applicants for teaching posts are not subject to a prohibition order issued by the Secretary of State;
- check that members of the advisory board are not the subject of a section 128 direction made by the Secretary of State prohibiting or restricting her/him from taking part in the management of an independent school, academy or free school because a person subject to any such prohibition or restriction is disqualified.

At least one member of each recruitment panel will have attended safer recruitment training.

ACL maintains a single central record (SCR) of recruitment checks undertaken and ensures that the record is maintained.

Induction

All new members of staff and volunteers will undergo an induction that includes familiarisation with ACL's safeguarding policy, staff behaviour policy (code of conduct), other issues in keeping with their training needs.

All staff are required to sign to confirm they have received a copy of the safeguarding policy and staff behaviour policy (code of conduct).

ACL obtains written confirmation from supply agencies and third-party organisations that they have satisfactorily undertaken all appropriate checks in respect of individuals they provide to work in ACL that ACL would have undertaken if they were employing the individual directly.

Volunteers

Volunteers will undergo checks commensurate with their work in ACL and contact with learners.

Under no circumstances will a volunteer who has not been appropriately checked be left unsupervised or be allowed to engage in Regulated Activity.

Volunteers who work only in a supervised capacity and are not in Regulated Activity will undergo the safer recruitment checks appropriate to their role, in accordance with ACL's risk assessment process and statutory guidance.

Contractors

ACL checks the identity of all contracted staff on their arrival at ACL and requests confirmation from contractor that the appropriate DBS checks have been carried out. As required by statutory guidance, where contractors and/or their staff are engaged in Regulated Activity, barred list checks are also requested. Contractors and any of their staff who have not undergone checks will not be allowed to work unsupervised or in Regulated Activity.

17. Site security

Visitors to ACL, including contractors, are asked to sign in and are given an identity badge, which confirms they have permission to be on site. All visitors are expected to observe ACL safeguarding and health and safety regulations to ensure learners and staff are kept safe. ACL Delivery Lead will exercise professional judgement in determining whether any visitor should be escorted or supervised while on site.

18. Behaviour Management

Behaviour Policy

Our Behaviour Policy will be set out in a separate document and will be reviewed regularly by the WCC Education Services Senior Leadership Team. It will be shared with all staff before they start working with learners as part of their induction. The policy will be transparent to staff and learners.

ACL staff will use every possible strategy to de-escalate a situation where there is a threat of violence or aggression towards an individual or property; communicating calmly; using non-threatening verbal and body language; helping learners to recognise their own 'triggers' and 'early warning signs', and distracting or helping learners to see a positive way out of a difficult situation.

ACL recognises that where it is not possible to de-escalate a situation it may be necessary to remove others to a place of safety and call the police.

Appropriate Adult

The DSL should liaise with ACL Delivery Lead or principal to inform him or her of issues, especially ongoing enquiries under section 47 of the Children Act 1989 and police investigations. This should include being aware of the role of the appropriate adult to safeguard the interests, rights, entitlements and welfare of children and vulnerable people who are suspected of a criminal offence, by ensuring that they are treated in a fair and just manner and are able to participate effectively.

Items of concern or risk

If an ACL member of staff has reasonable grounds for suspecting that the learner may have items in their possession, such as: knives or weapons; illegal drugs; stolen items; fireworks; pornographic images; indecent images of children; which may be reasonably suspected to have been, or be likely to be, used to commit an offence or to cause personal injury to or damage to the property of any person (including the learner), the staff member may request to confiscate as appropriate, the item they consider harmful or detrimental to the wellbeing of others.

In the event that a member of staff suspects that a confiscated device contains indecent images of children, they will pass the device to the DSL and will not examine the device themselves. The DSL will take advice from the Police before examining the device.

If the learner does not wish to relinquish the item in their possession, the DSL will take advice from the Police.

19. Record Keeping

To maintain safeguarding records, ACL will:

- keep clear detailed written records of safeguarding concerns (noting the date, event and action taken), even where there is no need to refer the matter to social care services.
- keep records in a meticulous chronological order, either on paper or electronically;
- ensure all records are kept secure and in locked locations;

Safeguarding records will be maintained independently from the learner's main ACL file and ACL file will

be 'tagged' to indicate that separate information is held. Such records will only be accessible to the DSL and leaders who need to be aware.

ACL staff should record any safeguarding concerns about a child, adult, or adult with care and support needs on the form *Logging A Concern About A Child's Safety and Welfare* (Form C) also known as the 'Green form'. The same format will be used by staff to record and report any observations or concerns that suggest a child might benefit from early help.

The records will include, in addition to the name, address and age of the subject, timed and dated observations describing the subject's behaviour, appearance, statements/remarks made to staff or other learners and observations of interactions between the learner, other learners, family members or members of staff that give rise to concern. Where possible and without interpretation, the exact words spoken by the subject will be recorded. The contextual location should also be recorded. Records will be signed, dated and timed by the member of staff making the record.

Records of safeguarding observations or concerns can be completed electronically or as a paper version but it is most important that one consistent system for the recording of concerns is readily accessible to every member of staff irrespective of role and that all records are passed to the DSL, who should complete the form to confirm what action has been taken.

Safeguarding records form a part of a learner's record, which they ordinarily have a right to see. Any learner wishing to access their safeguarding records will need to submit a request to ACL for consideration. Access to the record will then be arranged but records may be redacted in line with the requirements of the General Data Protection Regulation (GDPR) if releasing information would place the learner, or any other person, at risk of significant harm. More information about requesting access to records is found at [Access to information – Warwickshire County Council](#).

20. Confidentiality and Information Sharing

Confidentiality requirements

All staff will understand that safeguarding issues warrant a high level of confidentiality, not only out of respect for the learner, family and staff involved but also to ensure that information being released into the public domain does not compromise evidence.

- ACL will manage and share confidential information about safeguarding children in line with the [Information sharing: advice for practitioners \(publishing.service.gov.uk\)](#).
- ACL will manage and share confidential information about safeguarding adults in line with [Information Sharing Agreement \(safeguardingwarwickshire.co.uk\)](#).

Data Protection

The Data Protection Act 2018 (DPA) and the GDPR places duties on ACL and individual staff to process personal information fairly and lawfully and to keep the information they hold safe and secure.

Staff will ensure confidentiality protocols are adhered to and information is shared appropriately. If in any doubt about confidentiality, staff will seek advice from the DSL, another SLT member or outside agency as required for example Social Care.

Reporting Safeguarding Concerns

It is reasonable for staff to discuss day-to-day concerns about learners with colleagues to ensure that learners' general needs are met in the setting. However, staff should report all safeguarding concerns to the DSL or ACL Delivery Lead or – in the case of concerns about ACL Delivery Lead – to the Service Manager of Education Delivery Services. The person receiving the referral will then decide who else needs to have the information and they will disseminate it on a 'need-to-know' basis.

All staff must be aware that they cannot promise to keep secrets.

The DSL or a deputy DSL should always be available to discuss safeguarding concerns but in exceptional circumstances where neither the DSL nor any appointed deputy DSL are available, that should not delay appropriate action being taken and staff should speak to a member of SLT or take advice from Children's Social Care if they are concerned about a child.

All safeguarding and child protection information will be handled in line with the principles of the Data Protection Act 2018, which require that sensitive information is:

- processed for limited purposes
- adequate, relevant and not excessive
- accurate
- kept no longer than necessary
- processed in accordance with the data subject's rights
- secure.

Consent

The DSL will normally obtain consent from the learner to share sensitive information within ACL or with outside agencies. Where there is good reason to do so, the DSL may share information *without* consent, and will record the reason for not obtaining consent.

Information sharing will take place in a timely and secure manner and where:

- it is necessary and proportionate to do so; and
- the information to be shared is relevant, adequate and accurate.

Information sharing decisions will be recorded, whether or not the decision is taken to share.

Recording

Record of concern forms (Green and Yellow forms) and other written information will be stored in a locked facility and any electronic information will be password protected and only made available to relevant individuals.

Every effort will be made to prevent unauthorised access to sensitive information. Any sensitive information that needs to be stored on portable devices such as laptop computers or tablets or on portable media such as a CD or flash drive will be password protected or encrypted and kept in locked storage.

Learners can view [Warwickshire County Council's Privacy Notice for Education and Learning](#) on its web pages.

Information for learners about requesting access to personal records is found at [Access to information – Warwickshire County Council](#).

21. Site arrangements

Where WCC is not the owner of the venue, site safety is the responsibility of the site owner

22. Photography and images

The vast majority of people who take or view photographs or videos for entirely innocent, understandable and acceptable reasons. Sadly, some people abuse others through taking or using images, so we must ensure that we have some safeguards in place.

To protect learners we will:

- seek their consent for photographs or video images to be taken;
- ensure learners are appropriately dressed; and
- encourage learners to tell us if they are worried about any photographs/images that are taken of them.

Furthermore, when using images for publicity purposes (e.g. on our website or in newspapers or

publications), we will:

- seek their consent
- establish whether the image will be retained for further use, where and for how long;
- ensure that images are stored securely and used only by those authorised to do so.

For the protection of learners and staff, only ACL owned equipment will be used to record and store images taken by staff or volunteers on site or during activities.

Visiting practitioners who work directly with learners are subject to the same restrictions as staff and volunteers in the setting in respect of recording and storing images of children. However, some visiting professionals are permitted to record images of the premises only specifically for professional purposes and to support ACL, e.g. professionals providing advice or preparing quotations for work such as maintenance, health and safety and building.

23. Online Safety

Potential risk

It is common to use electronic equipment including mobile phones, tablets and computers on a daily basis to access the internet and share content and images via social networking sites. These technologies and the internet are a source of education, communication, entertainment and fun. Unfortunately, however, some people will use those technologies to harm others and the use of technology has become a significant component of many safeguarding issues. Technology often provides the platform that facilitates harm through criminal and sexual exploitation; county lines activity; radicalisation; sexual predation and cyber bullying.

It is essential that learners are safeguarded from potentially harmful and inappropriate online material. ACL seeks to protect and educate learners and staff in their use of technology and establish mechanisms to identify, intervene in, and escalate any concerns where appropriate. The breadth of issues within online safety is considerable, but can be categorised into four areas of risk:

- content: being exposed to illegal, inappropriate or harmful content, for example: pornography, fake news, racism, misogyny, self-harm, suicide, anti-Semitism, radicalisation and extremism.
- contact: being subjected to harmful online interaction with other users; for example: peer to peer pressure, commercial advertising and adults posing as children or young adults with the intention to groom or exploit them for sexual, criminal, financial or other purposes.
- conduct: personal online behaviour that increases the likelihood of, or causes, harm; for example, making, sending and receiving explicit images (e.g. consensual and non-consensual sharing of nudes and semi-nudes and/or pornography, sharing other explicit images and online bullying; and
- commerce: risks such as online gambling, inappropriate advertising, phishing and or financial scams. If you feel your learners, learners or staff are at risk, please report it to the Anti-Phishing Working Group (<https://apwg.org/>).

Managing risk

All staff receive online safety training and are trained to be vigilant about and to report any concerns about risk online in the same way that they notice and report offline concerns.

ACL's **online safety policy** explains how we try to keep learners safe at ACL, learning remotely and protect and educate learners in the safe use of technology. ACL has appropriate filters and monitoring systems in place to protect learners from potentially harmful online material.

ACL's online safety co-ordinator is Richard Heath.

Safeguarding learners in online learning and communication between staff and learners

ACT offers lessons in person and online.

Planning an online/virtual lesson

In the event where staff deliver a lesson online or virtually:

- All lessons will be delivered in accordance with ACL's safeguarding policy, staff behaviour (code of conduct) and acceptable use of ICT policies. This will ensure that ACL's filtering and monitoring software is enabled.
- Staff will always use service owned devices and accounts for the delivery of online/virtual lessons.
- Where possible, applications that facilitate the recording of lessons will be used subject to data protection and retention/storage guidelines. SLT will randomly sample recorded lessons in order to safeguard learners/learners and staff and to ensure that policies are being followed.
- ACL will request and obtain written consent from learners including consent to record lessons and video conversations before staff communicate with learners online.
- ACL will ensure that online learning tools and systems are used in line with privacy and data protection/GDPR requirements.
Online/virtual lessons should be timetabled, and ACL Delivery Lead or DSL will be able to drop into any virtual lesson at any time – the online version of entering a classroom for learner welfare and safeguarding purposes.
- Staff delivering online/virtual teaching will be expected to display the same standards of dress and conduct that they would when working face to face in the setting, modelling appropriate behaviour and presentation to learners/learners and families.
- It is important that all staff who interact with learners online continue to look out for signs that a learner may be at risk, distressed for some reason or vulnerable in some other way; and report and record any concerns to the DSL in the normal way. The DSL will respond to any such concern as they would any other safeguarding concern.

Delivering an online/virtual lesson

Below are issues that staff must take into account when delivering online/virtual lessons or communicating with learners online, particularly where webcams are used:

- Staff and learners must be fully dressed and wear suitable clothing, as should anyone else in the household.
- Any computers used should be in appropriate areas, for example not in bedrooms; and the background should be blurred. If it is not possible to blur the background, staff must consider what learners can see in the background and whether it would be appropriate in a classroom. This includes photographs, artwork, identifying features, mirrors etc.
- Staff will ensure that resources and videos used are appropriate – learners may not have support immediately to hand at home if they feel distressed or anxious about content.
- Live classes should be recorded so that if any issues were to arise, the video can be reviewed.
- Live classes will be kept to a reasonable length of time so that screen time can be managed to minimise disruption for a household.
- Language must be professional and appropriate, including that used by any other individuals in the background.
- Staff must only use platforms specified by senior managers and approved by ACL's ICT manager/co-ordinator for communication with learners/learners.
- Staff should record the length, time, date and attendance of any sessions held.

Staff members delivering lessons or communicating with learner online/virtually will raise any issues in respect of inappropriate dress, setting, behaviour etc with the learner immediately and will end the online

interaction if necessary. Any such incident will be recorded and reported to the DSL. If a staff member believes that a learner is recording a lesson or conversation without prior consent, the lesson will be brought to an end or the learner will be logged out immediately.

Exceptional circumstances

In rare and exceptional circumstances where staff urgently need to contact a learner by telephone and do not have access to an ACL-owned device, they will discuss this with a senior member of staff. If it is agreed there is no alternative to using a personally owned device, staff members will always use 'caller withheld' to ensure the learner is not able to identify the staff member's personal contact details.

Staff conduct

Staff receive advice regarding their personal online activity, use of social networking and electronic communication with learners, about which there are strict rules in the [Policy on Email, Internet and Social Media](#). Staff found to be in breach of these rules may be the subject of a referral to the LADO and/or may be subject to disciplinary action.

Filtering and monitoring

ACL will take all reasonable action to limit learners' exposure to the above risks from ACL's IT system, to safeguard and promote the welfare of learners and provide them with a safe environment in which to learn. ACL will ensure that the venues they use have appropriate filters and monitoring systems in place and that the leadership team and relevant staff have an awareness and understanding of the provisions in place, manage them effectively, and know how to escalate concerns when identified.

The leadership team should consider their learners' characteristics, the number of learners, how often they access the IT system, and the proportionality of costs versus safeguarding risks. The [UK Safer Internet Centre](#) has published guidance as to what "appropriate" filtering and monitoring might look like.

24. Safeguarding procedures

Recognising abuse

Abuse of a child

There are four categories of child abuse:

- Physical abuse
- Emotional abuse
- Sexual abuse
- Neglect

Definitions of these are found on the West Midlands Safeguarding Children Group web page [1.18 Additional guidance](#).

Abuse of an adult with care and support needs

There are ten categories of abuse that an adult with care and support needs may experience:

- Physical abuse
- Domestic violence
- Sexual abuse
- Psychological abuse
- Financial or material abuse
- Modern slavery
- Discriminatory abuse

- Organisational abuse
- Neglect and acts of omission
- Self-neglect

Definitions of these are found on the WSB web page [Recognising and Reporting Abuse](#).

Indicators of abuse

Physical signs define some types of abuse, for example bruising, bleeding or broken bones resulting from physical or sexual abuse, or injuries sustained while an individual has been inadequately supervised. The identification of physical signs is complicated, as individuals may go to great lengths to hide injuries, often because they are ashamed or embarrassed, or their abuser has threatened further violence or trauma if they 'tell'. It is also quite difficult for anyone without medical training to categorise injuries into accidental or deliberate with any degree of certainty. For those reasons it is vital that staff are also aware of the range of behavioural indicators of abuse and report any concerns to the DSL.

It is the responsibility of staff to report their concerns. It is not their responsibility to investigate or decide whether a person has been abused.

A person who is being abused or neglected may:

- have bruises, bleeding, burns, fractures or other injuries;
- show signs of pain or discomfort;
- keep arms and legs covered, even in warm weather;
- look uncared for;
- change their eating habits;
- have difficulty in making or sustaining friendships;
- appear fearful;
- be reckless with regard to their own or other's safety;
- self-harm;
- frequently miss lessons or arrive late;
- show signs of not wanting to go home;
- display a change in behaviour – from quiet to aggressive, or happy-go-lucky to withdrawn;
- challenge authority;
- become disinterested in their learning;
- be constantly tired or preoccupied;
- be wary of physical contact;
- be involved in, or particularly knowledgeable about drugs or alcohol;
- inappropriately display sexual knowledge or behaviour
- acquire gifts such as money or a mobile phone from new 'friends' or acquaintances.

Individual indicators will rarely, in isolation, provide conclusive evidence of abuse. They should be viewed as part of a jigsaw and each small piece of information will help the DSL to decide how to proceed.

It is very important that staff report all their concerns, however minor or insignificant they may think they are – they do not need 'absolute proof' that an individual is at risk.

Impact of abuse

The impact of abuse, neglect and exploitation should not be underestimated, and emotional scars may remain in adult life, however well buried. For some people adulthood may be characterised by one or more of the following: anxiety, depression or other mental health difficulties, self-harm, eating disorders, alcohol and substance misuse, unequal and destructive relationships, unfulfilled potential and long-term physical health difficulties.

Taking action

Staff should always maintain an attitude of "It could happen here".

Key points for staff to remember when taking action are:

- in an emergency take the action necessary to help the person, for example, call 999;
- report your concern to the DSL as quickly as possible – immediately when there is evidence of physical or sexual abuse;
- do not start your own investigation; share information on a need-to-know basis only – do not discuss the issue with colleagues, friends or family;
- complete a record of concern, using your the designated safeguarding reporting system and
- seek support for yourself if you are distressed or need to debrief.

If a member of staff or volunteer is concerned about a learner's welfare

There will be occasions when staff may suspect that a learner may be at risk without unequivocal evidence. The learner's behaviour may have changed, their artwork could be unusual or bizarre, they may write stories or poetry that reveal confusion or distress, or physical but inconclusive signs may have been noticed. In these circumstances, staff will try to give the learner the opportunity to talk. The signs they have noticed may be due to a variety of factors, for example they have moved home, a pet has died, a grandparent is very ill or an accident has occurred.

Staff are encouraged and supported to ask learners if they are OK, if there is anything the learner would like to talk to them about and if they can help in any way. Staff are trained to do this by asking appropriate open questions which do not lead the learner in any particular direction but invite the learner to talk about anything if they wish to.

Staff should use the same record of concern, form C (Green form) to record these early concerns. If the learner does begin to reveal that they are being harmed, staff should follow the advice below. Following an initial conversation with the learner, if the member of staff remains concerned, they should discuss their concerns with the DSL.

If a learner discloses to a member of staff or volunteer

It takes a lot of courage for a person to disclose that they are being abused. They may feel ashamed, particularly if the abuse is sexual. Their abuser may have threatened what will happen if they tell. They may have lost all trust in others. Or they may believe, or have been told, that the abuse is their own fault. Sometimes they may not be aware that what is happening is abusive.

If a learner talks to a member of staff about any risks to their safety or wellbeing, the staff member will need to let the learner know that they must pass the information on – staff are not allowed to keep unsafe secrets. The point at which they tell the learner this is a matter for professional judgement. If they jump in immediately the learner may think that they do not want to listen but if left until the very end of the conversation, the learner may feel that they have been misled into revealing more than they would have otherwise.

During their conversations with learners, staff will:

- allow the learner to speak freely;
- remain calm and not overreact – the learner may stop talking if they feel they are upsetting their listener.
- give reassuring nods or words of comfort – 'I'm glad you told me'/'Thank you for telling me'; 'You're doing very well'; 'I believe you'; 'What happened to you is not your fault'/'This isn't your fault'; 'I'm going to do what I can to help you';
- not be afraid of silences – staff must remember how hard this must be for the learner;
- under no circumstances ask investigative questions – such as how many times this has happened, whether it happens to siblings too, or what does the learner's friend think about it; (however, it is reasonable to ask questions to clarify understanding and to support a meaningful referral if that is required, e.g., 'when did this happen', 'where did this happen?')
- at an appropriate time tell the learner that in order to help them, the member of staff must pass the information on;
- not automatically offer any physical touch as comfort. It may be anything but comforting to a

- learner who has been abused;
- avoid admonishing the learner for not disclosing earlier. Saying things such as ‘I do wish you had told me about this when it started’ or ‘I can’t believe what I’m hearing’ may be the staff member’s way of being supportive but may be interpreted by the learner to mean that they have done something wrong;
- tell the learner what will happen next;
- let the learner know that someone (either the member of staff or another named person, e.g. the DSL) will be in touch with them before the end of the day;
- report verbally to the DSL (or ACL Delivery Lead if the learner has made an allegation against a member of staff);
- write up their conversation as soon as possible on the record of concern form Form C (Green form) and hand it to the DSL (or ACL Delivery Lead if the learner has made an allegation against a member of staff); and
- seek support if they feel distressed or need to debrief.

Acting on a disclosure

ACL should carefully consider any report of sexual violence and/or sexual harassment. The DSL (or deputy) is likely to have a complete safeguarding picture and be the most appropriate person to advise on ACL’s or college’s initial response. Important considerations will include:

- the wishes of the victim in terms of how they want to proceed. This is especially important in the context of sexual violence and sexual harassment. Victims should be given as much control as is reasonably possible over decisions regarding how any investigation will be progressed and any support that they will be offered. This will however need to be balanced with ACL’s or college’s duty and responsibilities to protect others;
- the nature of the alleged incident(s), including whether a crime may have been committed and consideration of harmful sexual behaviour;
- the ages and developmental stages of any children involved;
- any special educational needs of any adults involved;
- any power imbalance between the learner and the alleged perpetrator. For example, is the alleged perpetrator(s) significantly older, more mature or more confident? Does the learner have a disability or learning difficulty?
- if the alleged incident is a one-off or a sustained pattern of abuse (sexual abuse can be accompanied by other forms of abuse and a sustained pattern may not just be of a sexual nature);
- that sexual violence and sexual harassment can take place within intimate personal relationships between peers;
- are there ongoing risks to the learner, other learners, children, adults with care and support needs or college staff; and
- other related issues and wider context, including any links to sexual or criminal exploitation.

25. Making a referral

The DSL (and any deputies) are most likely to have a complete safeguarding picture and be the most appropriate person to advise on the response to safeguarding concerns.

- The DSL will report any concerns that a child is experiencing, or at risk of, abuse or neglect, by making a referral to Children’s Social Care (and if appropriate the Police).
- The DSL will report any concerns that an adult with care and support needs is experiencing, or at risk of, abuse or neglect, to Social Care and Support on: 01926 412080.

The learner will be told that a referral is being made, unless to do so would increase the risk to the subject of the referral or create undue delay. All staff should be aware of the process for making referrals to Children’s

Social Care (for a child) to Social Care and Support (for an adult with care and support needs) and what may follow a referral, along with the role they might be expected to play in any assessments.

26. Bullying and peer abuse

ACL believes that all learners have a right to attend the community venue and learn in a safe environment. Learners should be free from harm, both from staff and other learners in ACL.

Types of peer abuse

Learners may be harmed by other learners. All peer abuse is unacceptable and will be taken seriously. It is most likely to include, but is not limited to:

- bullying (including online bullying prejudice-based and discriminatory bullying);
- abuse in intimate personal relationships between peers;
- 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 stand-alone or part of a broader pattern of abuse;
- Consensual and non-consensual sharing of nudes 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 (not necessarily a skirt) without them knowing, with the intention of viewing their genitals or buttocks to obtain sexual gratification, or cause the victim humiliation, distress or alarm (upskirting is a criminal offence and may constitute sexual harassment). Anyone of any gender can be a victim;
- teenage relationship abuse – defined as a pattern of actual or threatened acts of physical, sexual or emotional abuse, perpetrated against a current or former partner;
- initiation/hazing - (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. For example, can be used to induct newcomers into an organisation such as sports team or groups by subjecting them to a series of potentially humiliating, embarrassing or abusing trials which promote a bond between them; and
- prejudiced behaviour – a range of behaviours which causes someone to feel powerless, worthless or excluded and which relates to prejudices around belonging, identity and equality, in particular prejudices linked to disabilities, special educational needs, ethnic, cultural and religious backgrounds, gender and sexual identity.

Impact of peer abuse

Bullying is a very serious issue that can cause considerable anxiety and distress. At its most serious level, bullying can have a disastrous effect on a person's well-being and in very rare cases has been a feature in suicide.

Different gender issues can be prevalent when dealing with peer-on-peer abuse, for example girls being sexually touched/assaulted or boys being subject to initiation/hazing type violence. Whilst mindful of the particular vulnerability of women and girls to violence, it is also recognised that boys as well as girls can be abused by members of the opposite as well as the same gender group.

We recognise that some learners will sometimes negatively affect the learning and wellbeing of others and their behaviour will be dealt with under ACL's behaviour policy. However, there will be occasions when a learner's behaviour warrants a response under safeguarding procedures.

Managing bullying

All incidences of bullying, including cyber-bullying and prejudice-based bullying should be reported to the DSL.

All members of staff will receive a copy of ACL's Behaviour Policy, which contains the anti-bullying procedures, as part of their induction and are trained to be aware of the harm caused by bullying and to respond to all incidents of bullying and peer on peer abuse proactively.

Abuse is abuse and will not be tolerated, minimised or dismissed as 'banter'; 'just having a laugh'.

Reporting concerns

Occasionally, allegations may be made against learners by others in ACL, which are of a safeguarding nature. Safeguarding issues raised in this way may include physical abuse, emotional abuse, sexual abuse and sexual exploitation. Members of staff to whom such allegations are made and/or who become concerned about a learner's sexualised behaviour, including any known online sexualised behaviour, **should** record their concerns in the usual way on a Green form and report them to the DSL as soon as possible, as with any other safeguarding concern.

It is likely that for an allegation or concern to be addressed under safeguarding procedures, some of the following features will be found. The allegation or concern:

- refers to their behaviour towards a more vulnerable learner;
- is of a serious nature, possibly including a criminal offence;
- raises risk factors for other learners in ACL;
- indicates that other learners may have been affected by this learner;
- indicates that young people outside ACL may be affected by this learner.

It is important for ACL to consider the wider environmental factors and context within which peer abuse occurs. Such factors may include the potential for bullying and peer abuse to take place across a number of social media platforms and services; and for things to move from platform to platform online. ACL will also consider the potential for the impact of the incident to extend further than the venue's local community (e.g., for images or content to be shared in other settings) and for a victim (or alleged perpetrator(s)) to become marginalised and excluded by both online and offline communities. There is also the strong potential for repeat victimisation in the future if abusive content continues to exist somewhere online. Online concerns can be especially complicated. Support is available from The UK Safer Internet Centre at 0344 381 4772 and helpline@saferinternet.org.uk and the Internet Watch Foundation at <https://www.iwf.org.uk/>.

27. Harmful sexual behaviour

What is sexual violence and sexual harassment?

When referring to sexual violence, this policy uses the definitions of sexual offences in the Sexual Offences Act 2003 as follows:

- **Rape:** A person (A) commits an offence of rape if: he intentionally penetrates the vagina, anus or mouth of another person (B) with his penis, B does not consent to the penetration and A does not reasonably believe that B consents.
- **Assault by Penetration:** A person (A) commits an offence if: s/he intentionally penetrates the vagina or anus of another person (B) with a part of her/his body or anything else, the penetration is sexual, B does not consent to the penetration and A does not reasonably believe that B consents.
- **Sexual Assault:** A person (A) commits an offence of sexual assault if: s/he intentionally touches another person (B), the touching is sexual, B does not consent to the touching and A does not reasonably believe that B consents.

What is consent?

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

- a child under the age of 13 can never consent to any sexual activity;
- the age of consent is 16 years;
- some people of 16 years and older may not have the capacity to consent, e.g. a person with special educational needs
- sexual intercourse without consent is rape.

Sexual harassment

Sexual harassment is unwanted conduct of a sexual nature that can occur online and offline. It is likely to: violate a person's dignity, and/or make them feel intimidated, degraded or humiliated and/or create a hostile, offensive or sexualised environment.

Online sexual harassment may happen on its own or as part of a wider pattern of sexual harassment and/or sexual violence.

Sexual harassment creates an atmosphere that, if not challenged, can normalise inappropriate behaviours and provide an environment that may lead to sexual violence. ACL therefore recognises the importance of identifying and challenging sexual violence and sexual harassment in its approach to safeguarding.

How ACL will respond to reports of sexual violence and sexual harassment

- This policy sets out a set of principles which ACL will consider in responding on a case-by-case basis. All responses to reports of sexual violence will be subject to an immediate risk and needs assessment undertaken by the DSL (or a deputy), using her/his professional judgement and supported by other agencies, such as Social Care and the Police. The need for a risk and needs assessment in relation to reports of sexual harassment will be considered on a case-by-case basis.
- It is essential that all victims are reassured that they are being taken seriously, regardless of how long it has taken them to come forward, and that they will be supported and kept safe. Abuse that occurs online or outside of ACL should not be downplayed and should be treated equally seriously. A victim should never be given the impression that they are creating a problem by reporting sexual violence or sexual harassment. Nor should a victim ever be made to feel ashamed for making a report.

Risk assessment

The risk and needs assessment will consider:

- the victim, especially their protection and support;
- the alleged perpetrator(s) (if she/he/they attend the same ACL); and
- other members of ACL (adult learners and staff), especially any actions that are appropriate to protect them.

The DSL (or a deputy) should ensure they are engaging with Social Care and the police as appropriate. Where there has been a report of sexual violence, it is likely that professional risk assessments by sexual violence specialists will be required. ACL's risk assessment should not replace the detailed assessments of expert professionals. Any such professional assessments should be used to inform ACL's approach to supporting and protecting learners and learners and updating our own risk assessment.

Action following a report of sexual violence and/or sexual harassment - what to consider

The DSL (or deputy) is likely to have a complete safeguarding picture and will therefore be the most appropriate person to lead ACL's initial response. Important considerations will include:

- the wishes of the victim in terms of how they want to proceed. This is especially important in the context of sexual violence and sexual harassment. Victims will be given as much control as is reasonably possible over decisions regarding how any investigation will be progressed and any support that they will be offered. However, if the victim asks ACL not to tell anyone about the sexual violence or sexual harassment, the DSL (or a deputy) will have to balance the victim's wishes against their duty to protect the victim and others.
- the nature of the alleged incident(s), including: whether a crime may have been committed and consideration of harmful sexual behaviour;
- any special educational needs of the learners involved;
- any power imbalances. For example, is the alleged perpetrator(s) /significantly older, more mature or more confident? Does the victim have a disability or learning difficulty?
- if the alleged incident is a one-off or a sustained pattern of abuse;
- whether there are ongoing risks to the victim, children, adult learners, ACL staff, or other family members;
- only sharing information with those staff who need to know in order to support the learners involved and/or be involved in any investigation. For instance, teachers may be asked to monitor a learner's welfare without needing to know that they are a victim of sexual violence or harassment.

Peers sharing a classroom – initial considerations following a report of sexual violence

Any report of sexual violence is likely to be traumatic for the victim. However, reports of rape and assault by penetration are likely to be especially difficult for the victim and close proximity with the alleged perpetrator(s) is/are likely to be especially distressing. Whilst ACL establishes the facts of the case and starts the process of liaising with Children's Social Care and the Police, the alleged perpetrator(s) will usually be removed from any classes they share with the victim. Consideration will also be given to how best to keep the victim and alleged perpetrator(s) a reasonable distance apart on ACL premises and on transport to and from ACL, where appropriate. These actions are in the best interests of both learners and should not be perceived to be a judgment on the guilt of the alleged perpetrator(s).

In all cases, the initial report should be carefully evaluated, reflecting the wishes of the victim, the nature of the allegations and the protection of all learners will be especially important when considering any immediate actions.

Consideration also needs to be given to the fact that the alleged perpetrator may also be a victim of exploitation and may be in a position of coercion and control.

Responding to a report of sexual violence

A victim may contact the Police directly, but ACL will also speak to the Police if it becomes aware that an offence has been or may have been committed, to ensure effective action is taken to safeguard other learners as well as the victim. Any appropriate referrals to Social Care will also be made.

Responses to all incidents of both sexual violence and sexual harassment will be underpinned by the principles of:

- zero tolerance of sexual violence and sexual harassment;
- support for both the victim and alleged perpetrator(s), particularly pending the outcome of investigations;
- all parties have an ongoing right to an education and are safest if they remain in ACL subject to appropriate risk assessments and risk management;

- exclusion will be avoided unless that is the only realistic option to keep one or more parties safe.

Subsequent considerations

Safeguarding the victim

The needs and wishes of the victim should continue to be paramount (along with protecting any children affected) as the case progresses. Wherever possible, the victim if they wish, should be able to continue in their normal routine. Overall, the priority should be to make the victim's daily experience as normal as possible, so that ACL is a safe space for them.

Support will be tailored on a case-by-case basis. Support can include emotional and practical support for victims from sexual violence specialists; and/or provision of a designated trusted adult in ACL of the learner's choice to talk to about their needs. Every effort will be made to avoid isolating the victim, in particular from supportive peer groups, but we recognise that learners may choose to discontinue attending.

Ensuring the right to education

Similarly, the alleged perpetrator(s) has an ongoing right to an education and **should** be able to continue in their normal routine subject to the ongoing risk assessment and the needs of the victim.

Where a learner is subject of bail conditions, ACL will work with the Police to manage any implications and safeguard all learners/learners concerned without jeopardising the Police investigation.

If a learner is convicted or receives a caution for a sexual offence, ACL will update its risk assessment, ensure relevant protections are in place for all learners and consider any suitable action in light of the behaviour policy.

Publicity

In the light of possible publicity, speculation and interest within the learner and wider community, ACL will consider any other measures necessary to safeguard both the victim and perpetrator(s), especially from any bullying or harassment (including online).

Assessing safeguarding and rights

Where the perpetrator(s) is/are going to remain at ACL, the principle would be to continue keeping the victim and perpetrator(s) in separate classes and continue to consider the most appropriate way to manage potential contact on ACL premises and transport. The nature of the conviction or caution and wishes of the victim will be especially important in determining how to proceed in such cases.

ACL will have a difficult balancing act to consider. On one hand it needs to safeguard the victim (and the wider learner/learner body) and on the other hand provide the alleged perpetrator(s) with an education, safeguarding support as appropriate and implement any disciplinary sanctions. Support (and sanctions) will be considered on a case-by-case basis.

28. Sexual imagery

Sexting

Sexting is when someone sends or receives a sexually explicit image, video or text, usually on a mobile phone. It can include:

- sexual or 'dirty' pictures
- naked pictures and selfies
- explicit text messages

- pictures in underwear, or not wearing many clothes.

Sexting – creating or sharing any sexual images or videos of a child or young person under 18 is illegal, even if permission has been given and the receiver is known.

Image-based sexual abuse

Image-based sexual abuse (sometimes referred to as ‘revenge porn’) is a criminal offence. It is when someone shares sexually explicit images or videos of another person without their consent, and with the aim of causing them distress or harm. It refers to materials that are shared both online and offline and includes uploading images to the internet and social media channels, sharing by text and email, and showing someone a physical or electronic image or video.

Anyone can be affected by image-based sexual abuse. Image-based sexual abuse is a violation of privacy and people who have been targeted often feel humiliated, angry or depressed. The victim might feel too ashamed or embarrassed to report the crime to the police.

Responding to an incident

All incidences of sexting or image-based sexual abuse will be dealt with as safeguarding concerns and should be reported to the DSL. The primary concern at all times will be the welfare and protection of the people involved. ACL will therefore work in partnership with external agencies with a view to responding proportionately to the circumstances of any incident.

If staff become concerned about sexual images in relation to a device in the possession of a learner (e.g. mobile phone, tablet, digital camera), the staff member may request to confiscate as appropriate, the item they consider harmful or detrimental to the wellbeing of others.

In the event that a member of staff suspects that a confiscated device contains indecent images of children, they will pass the device to the DSL and will not examine the device themselves. The DSL will take advice from the Police before examining the device.

If the learner does not wish to relinquish the item in their possession, the DSL will take advice from the Police.

The DSL will discuss the concerns with the relevant staff and speak to learners involved as appropriate. If, at any point in the process, there is concern that a child or adult with care and support needs has been harmed or is at risk of harm a referral will be made to Social Care and/or the Police immediately.

The Police will always be informed when there is reason to believe that indecent images involve sexual acts and/or any child in the imagery is under 13 years of age.

Viewing imagery

Staff will not look at or print any indecent images.

Adults should **not** view sexual imagery unless there is good and clear reason to do so. Wherever possible, the DSL’s responses to incidents will be based on what they have been told about the content of the imagery.

Any decision to view imagery will be based on the DSL’s professional judgement. Imagery will never be viewed if the act of viewing will cause significant distress or harm to a learner.

If a decision is made to view potentially indecent images, the DSL will be satisfied that viewing:

- is the only way to make a decision about whether to involve other agencies (i.e. it is not possible to establish the facts from the young people involved)
- is necessary to report the image to a website, app or suitable reporting agency to have it taken down, or to support a learner or parent to make a report
- is unavoidable because an individual has presented an image directly to a staff member or the imagery has been found on an ACL device or network

If it is necessary to view the imagery, then the DSL will:

- discuss and agree the decision to do so beforehand with ACL Delivery Lead or the appropriate Social Care agency

- ensure viewing is undertaken by the DSL or Deputy DSL with delegated authority from ACL Delivery Lead
- ensure viewing takes place with another member of staff present in the room, ideally ACL Delivery Lead, another DSL or a member of the senior leadership team. The other staff member does not need to view the images
- wherever possible ensure viewing takes place on college premises, ideally in ACL Delivery Lead or DSL's office
- ensure wherever possible that images are viewed by a staff member of the same sex as the young person in the imagery
- record the viewing of the imagery in the learner's safeguarding record, including who was present, why the image was viewed and any subsequent actions; and ensure this is signed and dated and meets the wider standards set out by Ofsted for recording safeguarding incidents.

Deletion of images

If ACL has decided that other agencies do not need to be involved, then consideration will be given to deleting imagery from devices and online services to limit any further sharing of the imagery.

29. Exploitation

Types of exploitation

All staff will be aware of sexual exploitation, criminal exploitation, modern slavery and human trafficking. These occur where an individual or group takes advantage of an imbalance of power to coerce, manipulate or deceive another person for personal or commercial gain. Victims may be any age, gender, nationality and ethnicity.

Exploitation does not always involve physical contact and can also occur through the use of technology. Sexual exploitation can include both contact (penetrative and non-penetrative acts) and non-contact sexual activity and may occur without the a person's immediate knowledge (e.g. through others copying videos or images they may have created and posted on social media).

Victims may feel unable to leave or report the crime through fear or intimidation and may not recognise themselves as a victim. The victim may have been sexually and/or criminally exploited even if the sexual/criminal activity appears consensual.

Contextual factors

Exploitation can have a long-lasting adverse impact on physical and emotional health. It may also be linked to other criminal activity including illegal drugs. Drug networks or gangs can groom and exploit others to carry drugs and money from urban areas to suburban and rural areas, market and seaside towns.

Criminal exploitation can involve force and/or enticement-based methods of compliance and is often accompanied by violence or threats of violence. It can be perpetrated by individuals or groups; males or females; and young people or adults. It is typified by some form of power imbalance in favour of those perpetrating the exploitation. As well as age, the power imbalance can also be due to other factors including gender, cognitive ability, physical strength, status and access to economic or other resources.

Victims may often unwittingly be drawn into sexual and/or criminal exploitation through grooming which may present as the offer of friendship and care, gifts, drugs, alcohol and sometimes accommodation.

All staff are trained to be vigilant about and report indicators of exploitation to the DSL immediately. The DSL will consider the need to make a referral to Social Care and/or the Police.

County Lines

County lines is a term used to describe gangs and organised criminal networks involved in exporting illegal drugs (primarily crack cocaine and heroin) into one or more importing areas [within the UK], using dedicated mobile phone lines or other forms of “deal line”.

Exploitation is an integral part of the county lines offending model with children and vulnerable adults exploited to move [and store] drugs and money. Offenders will often use coercion, intimidation, violence (including sexual violence) and weapons to ensure compliance of victims.

Children and adults can easily become trapped by this type of exploitation and become victims of modern slavery as county lines gangs create drug debts and can threaten serious violence and kidnap towards victims (and their families) if they attempt to leave the county lines network.

30. So-called ‘honour based’ abuse

So-called ‘honour-based’ abuse (HBA) encompasses crimes which have been committed to protect or defend the honour of a family and/or community. Such crimes include Female Genital Mutilation (FGM), forced marriage, and practices such as breast ironing. Abuse committed in the context of preserving ‘honour’ often involves a wider network of family or community pressure and can include multiple perpetrator(s). It is important to be aware of this dynamic and additional risk factors when deciding what form of safeguarding action to take.

Staff will be alert to the possibility of a child being at risk of HBA or already having suffered HBA.

All forms of so-called HBA are abuse (regardless of the motivation) and staff will record and report any concerns about a person who might be at risk of HBA to the Designated Safeguarding Lead as with any other safeguarding concern. The DSL will consider the need to make a referral to the Police and/or Social Care as with any other safeguarding concern; and may also contact the Forced Marriage Unit on 020 7008 0151 or via email at fmu@fco.gov.uk for advice as necessary.

31. Female genital mutilation (FGM)

What is FGM?

Female genital mutilation (FGM) is the collective name given to a range of procedures involving the partial or total removal of the external female genitalia for non-medical reasons or other injury to the female genital organs. It has no health benefits and harms girls and women in many ways. The practice, which is most commonly carried out without anaesthetic, can cause intense pain and distress with long-lasting harmful consequences, including difficulties in childbirth.

FGM is carried out on girls of any age, from young babies to older teenagers and adult women, so staff are trained to be aware of risk indicators. Many such procedures are carried out abroad and staff will be particularly alert to suspicions or concerns expressed by female learners about going on a long holiday during the summer vacation period.

Indications that FGM may already have taken place may include:

- having difficulty or looking uncomfortable when walking, sitting or standing;
- spending longer than normal in the bathroom or toilet due to difficulties urinating;
- spending long periods of time away from a classroom during the day with bladder or menstrual problems;
- having frequent urinary, menstrual or stomach problems;
- having prolonged or repeated absences from college, especially with noticeable behaviour changes (e.g. withdrawal or depression) on the girl’s return;
- being reluctant to undergo normal medical examinations;

- confiding in a member of staff without being explicit about the problem due to embarrassment or fear;
- talking about pain or discomfort between her legs.

FGM & the Law

In England, Wales and Northern Ireland, the practice is illegal under the Female Genital Mutilation Act 2003. Any person found guilty of an offence under the Female Genital Mutilation Act 2003 is liable to a maximum penalty of 14 years imprisonment or a fine, or both. (See <https://www.gov.uk/government/publications/female-genital-mutilation-guidelines> for further information).

Responding to FGM

FGM and under 18s

Teachers are subject to a statutory duty defined by Section 5B of the Female Genital Mutilation Act 2003 (as inserted by section 74 of the Serious Crime Act 2015) to report to the Police personally where they discover (by means of a disclosure from the child or by observing physical signs) that an act of FGM appears to have been carried out on a girl who is aged under 18. This is known as mandatory reporting. Information on when and how to make a report can be found at: <https://www.gov.uk/government/publications/mandatory-reporting-of-female-genital-mutilation-procedural-information>. Teachers in that situation will record their concerns and inform the DSL, who will support the teacher in making a direct report to the Police. A referral will also be made to Children’s Social Care.

FGM and adults

If staff have a concern that an adult may be at risk of FGM, they will record their concern and inform the DSL as they would any other safeguarding concern. The DSL will discuss the concern with Social Care if the adult has care and support needs and/or in all other instances the Police.

32. Forced Marriage

A forced marriage is a marriage in which a female (and sometimes a male) does not consent to the marriage but is coerced into it. Coercion may include physical, psychological, financial, sexual and emotional pressure. It may also involve physical or sexual violence and abuse.

A forced marriage is not the same as an arranged marriage. In an arranged marriage, which is common in several cultures, the families of both spouses take a leading role in arranging the marriage but the choice of whether or not to accept the arrangement remains with the prospective spouses.

In a forced marriage situation, children may be married at a very young age, and well below the age of consent in England. Staff will be particularly alert to suspicions or concerns raised by a learner about being taken abroad and not being allowed to return to England.

Since June 2014 forcing someone to marry has become a criminal offence in England and Wales under s.121 of the Anti-Social Behaviour, Crime and Policing Act 2014 – see <https://www.gov.uk/forced-marriage> for further information).

33. Protection from Radicalisation and Extremism

What are radicalisation and extremism?

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

Extremism is the vocal or active opposition to fundamental values, including the rule of law, individual liberty and the mutual respect and tolerance of different faiths and beliefs. This also includes calling for the death of members of the armed forces. Even very young children have been exposed, in rare circumstances, to extremism at home and elsewhere including online.

Many of extremist groups make sophisticated use of the internet and social media to target people and spread their ideology, making some more vulnerable to being influenced by extremist ideas. Those who feel isolated or disaffected in some way are particularly vulnerable to radicalisation as they are other forms of abuse and exploitation.

The Prevent Duty

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

Some individuals are vulnerable to extremist ideology and radicalisation. Protecting children and adults from the risk of radicalisation is part of ACL's wider safeguarding duties and is similar in nature to protecting children and adults from other forms of harm and abuse. As such, the DSL is responsible for ACL's strategy for protecting children and adults from those risks.

ACL responsibilities

ACL has defined responsibilities to ensure that learners are safe from terrorist and extremist material when accessing the internet.

During the process of radicalisation, it is possible to intervene to prevent vulnerable people being radicalised. ACL is committed to preventing learners from being radicalised and drawn into any form of extremism or terrorism. ACL promotes the values of democracy, the rule of law, individual liberty, mutual respect and tolerance of those with different faiths and beliefs by providing learners with opportunities through the curriculum to discuss issues of religion, ethnicity and culture and learn how to discuss and debate points of view; and by ensuring that all learners are valued and listened to within the learning environment.

ACL staff receive training that provides them with both the information they need to understand the risks affecting learners in this area; and a specific understanding of how to identify those who may be at risk of radicalisation and how to support them. Staff are trained to report all concerns about possible radicalisation and extremism to the DSL immediately as they would any other safeguarding concern, identifying early indicators of possible radicalisation including changes in behaviour and attitudes to learning; and expressions of interest in extremist ideas along with a tolerance towards potential violence to certain members of society.

ACL recognises the importance of providing a safe space for learners to discuss controversial issues; and building their resilience and the critical thinking skills they need in order to challenge extremist perspectives. ACL will also support parents/carers who raise concerns about their children being vulnerable to radicalisation.

The website www.educateagainsthate.com is informative and useful, designed to equip leaders, teachers and parents with the information, tools and resources they need to recognise and address extremism and radicalisation and offer support.

As part of ACL's overall safeguarding arrangements and ongoing action plan for improvement, the DSL will consider identified local issues; intelligence from learners, parents, staff and partner agencies; and new information from national issues and learning to review practice and procedures in order to keep learners safe.

Referral

The DSL (or deputy) will make appropriate referrals to the Police PREVENT team and Channel programme in respect of any learner whose behaviour or comments suggest that they are vulnerable to being radicalised and drawn into extremism and terrorism in order to ensure that learners receive appropriate support. Channel is a programme which focuses on providing support at an early stage to people who are identified as being vulnerable to being drawn into terrorism. An individual's engagement with the programme is entirely voluntary at all stages.

As a Channel partner, ACL may be asked to attend a Channel panel to discuss the individual referred to determine whether they are vulnerable to being drawn into terrorism and consider the appropriate support.

34. Adults in receipt of care or who were previously children in care

ACL is a provider of adult learning and may not always be aware of the historical or home circumstances of its learners. However ACL recognises that when a learner is in receipt of care or has previously been a child in care, the learner may be more vulnerable to harm than other learners and may face barriers to educational attainment in relation to attendance, learning, behaviour and poor mental health issues. Where ACL is aware of these issues, it will take them and any needs into account when making plans to support the learner.

Local authorities have ongoing responsibilities to young people who cease to be children in care and become care leavers. That includes keeping in touch with them, preparing an assessment of their needs and appointing a Personal Advisor who develops a pathway plan with the young person. This plan describes how the local authority will support the care leaver to participate in education or training.

If there is a safeguarding concern with respect to a known care leaver, the DSL should liaise with the Personal Advisor as necessary.

If there is a safeguarding concern with respect to an adult with care and support needs, the DSL should liaise with the Social Service Care and Support team as necessary.

35. Related safeguarding documents

- Staff Behaviour Policy (code of conduct)
- Learner Behaviour
- Complaints procedure
- Tackling bullying including prejudice-based bullying
- Whistleblowing
- Safer recruitment and selection

36. Domestic abuse

What is domestic abuse?

Domestic abuse can encompass a wide range of behaviours and may be a single incident or a pattern of incidents. That abuse can be, but is not limited to, psychological, physical, sexual, financial or emotional. Children can be victims of domestic abuse. They may see, hear, or experience the effects of abuse at home and/or suffer domestic abuse in their own intimate relationships (teenage relationship abuse). All of which can have a detrimental and long-term impact on their health, well-being, development, and ability to learn.

Exposure to domestic abuse and/or violence can have a serious, long lasting emotional and psychological impact. In some cases, victims may blame themselves for the abuse and may have had to leave the family home as a result. Domestic abuse can affect people where they encounter it within their personal relationships, as well as in the context of their home life.

The law and domestic abuse

Domestic Abuse Act 2021

The Act creates a statutory definition of domestic abuse based on the [existing cross-government definition](#).

‘Abusive behaviour’ is defined in the act as any of the following:

- physical or sexual abuse
- violent or threatening behaviour
- controlling or coercive behaviour
- economic abuse
- psychological, emotional or other abuse

For the definition to apply, both parties must be aged 16 or over and ‘personally connected’.

‘Personally connected’ is defined in the act as parties who:

- are married to each other
- are civil partners of each other
- have agreed to marry one another (whether or not the agreement has been terminated)
- have entered into a civil partnership agreement (whether or not the agreement has been terminated)
- are or have been in an intimate personal relationship with each other have, or there has been a time when they each have had, a parental relationship in relation to the same child are relatives

The Act recognises children as victims of domestic abuse in their own right, statutory obligations to victims of domestic abuse are afforded to children too. All children can witness and be adversely affected by domestic abuse in the context of their home life where domestic abuse occurs between family members.

Reporting concerns

All concerns about domestic abuse will be reported to the DSL as with any other safeguarding concern. The DSL will respond to the report by consulting Children’s Social Care if a child is likely have been affected, and Social Service Care and Support if it relates to an adult with care and support needs. In the event of a learner without care and support needs, the DSL may seek further advice from local [Domestic abuse services](#) or Refuge’s National Domestic Abuse Helpline 0808 2000 247.

Appendix 1

Suggested wording for information about Safeguarding to be included in ACL's Prospectus

ACL wishes to inform learners of its safeguarding policy and procedures, to safeguard and promote their welfare. This safeguarding policy specifies that the Designated Safeguarding Lead should ensure that ACL's safeguarding policy is available publicly (e.g. via ACL website), so that its learners can be aware of any safeguarding referrals that may be made; and the role of ACL in that process.

The following information can be used in ACL's brochure:

'Warwickshire Adult and Community Learning (ACL) has a responsibility to make arrangements to safeguard and promote the welfare of its learners, and to act responsibly if it becomes aware that a child or adult with care and support needs may be at risk. Staff will seek, in general, to discuss any concerns with the learner and discuss any need to make a referral to Social Care Services or the Police if that is considered necessary. This will only be done where such discussion will not place an individual at increased risk of harm or cause undue delay. Occasionally, concerns are passed on which later it appears are unfounded. Learners will appreciate that ACL's Designated Safeguarding Lead carries out their responsibilities in accordance with the law and acts in the best interests of learners, children and adults with care and support needs.'

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Appendix 2

Standards for Effective Safeguarding Practice

ACL's safeguarding responsibilities are inspected under the 'Leadership and Management' judgement in Ofsted inspections. The following standards will support the self-evaluation of our effectiveness in safeguarding.

In best practice, ACL will:

1. Have an ethos in which learners feel secure, their viewpoints are valued, and they are encouraged to talk and are listened to;
2. Provide suitable support and guidance so that learners have a range of appropriate adults to whom they can turn if they are worried or in difficulties;
3. Work with learners to build an understanding of ACL's safeguarding responsibilities and that this may occasionally require referred to appropriate agencies as a constructive and helpful measure;
4. Ensure all learners are able to receive the right help at the right time to address concerns and risks and prevent issues escalating;
5. Ensure all staff are vigilant for cases of suspected abuse, recognising the signs and symptoms, having clear procedures whereby all members of staff report such cases to the Designated Safeguarding Lead or – in her/his absence – the deputy Designated Safeguarding Lead, and are aware of Local Authority and Warwickshire Safeguarding procedures so that information is passed on effectively to the relevant professionals;
6. Monitor learners who have been identified as at risk; maintain clear records of learners' progress and welfare *in a secure place*; maintain sound policies on confidentiality; provide appropriate information to other professionals; and submit reports to and attend multi-agency safeguarding meetings as required;
7. Provide and support regular safeguarding training and updates for all staff and ensure that Designated Safeguarding Leads attend update training every two years to ensure their skills and expertise are up to date; and ensure that targeted funding for this work is used solely for this purpose;
8. Contribute to an inter-agency approach to safeguarding by developing effective and supportive liaison with other agencies;
9. Use the curriculum to teach about safeguarding, raise awareness and build confidence so that learners have a range of contacts and strategies to identify risk, know who they can talk to about anything causes them concern and understand the importance of protecting others;
10. Provide clear policy statements for learners on safeguarding and behaviour;
11. Have a clear understanding of the various types of bullying and peer abuse – face to face, online, physical, verbal, sexual, prejudice based and indirect – and act promptly and firmly to combat it, making sure that learners are aware of ACL's position on this issue and who they can contact for support;
12. Have a clear understanding of the signs and impact of racist, disability, homophobic, transphobic and peer abuse; and a clear commitment to identifying and challenging those forms of abuse in order to safeguard learners and maintain the safeguarding culture of ACL;
13. Take particular care that learners with SEN, disabilities and/or mental health difficulties, who may be especially vulnerable to abuse, are supported effectively with particular attention paid to ensuring that those with communication difficulties are enabled to express themselves to a member of staff with appropriate communication skills;
14. Have a clear policy about the handling of allegations of abuse by members of staff, ensuring that all staff are fully aware of the procedures and that they are followed correctly at all times;
15. Have a written safeguarding policy, which is produced, owned and regularly reviewed by all staff, (taking into account the views of learners, Advisory Board, and ES-SLT), which clearly outlines ACL's position and positive action in respect of the aforementioned standards;
16. Have a Single Central Record in place.

Reference Documents

Keeping Children Safe in Education (DfE 2022)

Working Together to Safeguard Children (DfE 2018)

Warwickshire Safeguarding inter-agency procedures: <https://www.safeguardingwarwickshire.co.uk>

Child Protection Record Keeping Guidance (WCC Education Safeguarding Service)

What to do if You're Worried a Child is being Abused 2015 – Advice for Practitioners (HMG 2015)

Further Information, Advice and Support

If you are worried about a child and think they may be experiencing, or at risk of neglect, abuse or cruelty, contact the Warwickshire Children and Families Front Door (Front Door) on 01926 414144.

If you are worried about an adult with care and support needs and think they may be experiencing, or at risk of, abuse or neglect, contact Warwickshire Social Care and Support on 01926 412080.

WCC Education Safeguarding Advice:

- 01926 418608 or email: MASHeducationlead@warwickshire.gov.uk
- 07425 623337 or email: carllewis@warwickshire.gov.uk

Integrated Safeguarding Training

For information about a range of integrated safeguarding training courses, please contact:

- Heidi Saunders (Targeted Support Officer and Training Lead) 07879113776
heidisaunders@warwickshire.gov.uk
- Sophie Morley (Training Administrator) 01926 742601 / 077477 58712
sophiemorley@warwickshire.gov.uk