

# Safeguarding and Prevent Policy (including Child Protection)

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2	11/9/23	Revised to reflect KCSIE 2023 amendments. Further guidance on staff communication with students.	C Whitmore

## Document Reviewers

Name	Role	Policy Responsibility
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## Relevant Documents

Policy
<p>Related CEG team member policies can be found at the CEG Help Centre including:</p> <ul style="list-style-type: none"> <li>• <a href="#">Health and Safety Policy and Procedures 2015</a></li> <li>• CEG Disciplinary Policy</li> <li>• CEG Equality &amp; <a href="#">Diversity Policy</a></li> <li>• CEG Dignity at Work Policy</li> <li>• CEG <a href="#">Prevent Duty Policy</a></li> <li>• CEG Whistleblowing Policy</li> <li>• CEG Privacy Policy (<a href="https://www.cambridgeeducationgroup.com/privacy-policy.htm">https://www.cambridgeeducationgroup.com/privacy-policy.htm</a>)</li> <li>• ONCAMPUS Attendance Policy</li> <li>• CEG Student Sexual Misconduct Policy and Procedure 2023</li> <li>• ONCAMPUS Missing Student Policy</li> </ul>
Legislation and Government Guidance
<p>See section 1.1, Appendix 1, Appendix 11 KCSIE 2023: <a href="https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/1181955/Keeping_children_safe_in_education_2023.pdf">https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/1181955/Keeping_children_safe_in_education_2023.pdf</a></p>

<b>Approved by:</b>	<b>Signature</b>	<b>Date</b>
Mike Goodwin	M Goodwin	2/09/2023

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## 1. Introduction

This policy is central to meeting safeguarding responsibilities to our students. This includes all students regardless of age. Most of our students are living independently abroad and each is likely to require some level of support at different times while they study with us. As part of our safeguarding commitment, we actively seek to support the wellbeing of all students.

CEG has a duty to take reasonable and necessary steps to ensure that children and vulnerable adults are safe and that reasonably foreseeable harm does not occur as a result of careless acts, deliberate acts or omissions by CEG. Safeguarding also encompasses the statutory duties of child protection, and the protection of children and vulnerable adults from being susceptible to being drawn into terrorism. Students aged under-18 and vulnerable adults could be studying with, or working for, CEG.

### 1.1 Scope:

This policy, and its associate procedures, has been drawn up on the basis of UK legislation, policy and guidance to protect children; it is applied, in whole or in part, to all CEG centres taking into account local legislation which may substitute where applicable UK law.

It is the responsibility of all employees to safeguard students. This policy applies to anyone working on behalf of CEG, including the Executive Board, paid hourly and salaried employees, volunteers, agency workers, consultants, or contractors and currently enrolled students. In addition, CEG recognises that it may have employees or students on work experience who are either aged under 18 or who would fall within the definition of a vulnerable adult. Their safety is equally as important and therefore this policy extends coverage to both groups. The policy applies to all activities involving contact with children or adults who may be at risk. The policy includes face to face activities and activities delivered online. These measures are in addition to those required under general health and safety requirements and legislation.

### 1.2 Definitions

**Safeguarding:** protecting children and vulnerable adults from maltreatment, exploitation, harm, or abuse. This can include protection from physical, sexual, or psychological harm. Safeguarding is also the protection of children and vulnerable adults from involvement with crime and/or terrorism. CEG responsibilities to all students and staff comply with statutory requirements, advice and guidance, including:

- The Children Act 1989 <https://www.legislation.gov.uk/ukpga/1989/41/contents>
- The Children Act 2004 <https://www.legislation.gov.uk/ukpga/2004/31/contents>
- Data Protection Act 2018 and the UK General Data Protection Regulation (UK GDPR)
- The Education Act 2002 <https://www.legislation.gov.uk/id/ukpga/2002/32> which states that teachers, education professionals, social workers, health professionals, police officers and members of the public have a statutory duty to report any concerns or suspicions that a child has been abused
- The Education Act 2011  
<https://www.legislation.gov.uk/ukpga/2011/21/contents/enacted>
- The Sexual Offences Act 2003 <https://www.legislation.gov.uk/ukpga/2003/42/contents>
- Keeping Children Safe in Education 2023  
<https://www.gov.uk/government/publications/keeping-children-safe-in-education--2>
- Working Together to Safeguard Children  
<https://www.gov.uk/government/publications/working-together-to-safeguard-children->

[-2](#)

- Protections of Freedoms Act 2012
- Counter Terrorism and Security Act 2015  
<https://www.legislation.gov.uk/ukpga/2015/6/contents/enacted>
- Protecting Vulnerable Adults 2017
- Equality Act 2010
- What to do if you're worried a child is being abused - Advice for Practitioners (March 2015)  
[https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\\_data/file/419604/What to do if you re worried a child is being abused.pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/419604/What_to_do_if_you_re_worried_a_child_is_being_abused.pdf)

**Child:** is any person under the age of 18. The fact that a child has reached 16 or 17 years of age, is living independently or is in Further/Higher Education does not change their status for the purpose of this policy and procedure. The Children Act 1989 requires the safety or welfare of the child or young person to be of paramount importance; it overrides all other considerations.

As per the process set out in our Admissions Policy, CEG will require the student's parent/guardian to sign a Consent Form confirming that they have understood that CEG is not in loco parentis. CEG does not and cannot accept the responsibilities of guardian to any member of its community. In the case of a Looked After child, appropriate contact will be made with their Local authority, including with their Social Worker.

**Vulnerable Adult:** as defined by section 59 of the Safeguarding Vulnerable Groups Act 2006 as amended by the Protection of Freedoms Act 2012, refers to those persons aged over 18 who by reason of mental or other disability, age or illness are (or may be) unable to take care of themselves or are (or may be) unable to protect themselves against significant harm or exploitation. Adults aged 18 and over have the potential to be vulnerable (either temporarily or permanently) for a variety of reasons and in different situations. A person with a learning difficulty or a communication difficulty may be at greater risk of abuse as it may be difficult for them to report abuse or concerns.

**Prevent:** part of the UK government anti-terrorism programme which aims to safeguard vulnerable People from being susceptible to being drawn into terrorism. When considering the statutory requirements of the Prevent Duty, there is no standard definition of a person likely to be vulnerable to radicalisation.

### 1.3 Aims

The main aims of this policy are:

- 1.3.1 to promote and prioritise the safety, protection and wellbeing of children and vulnerable adults
- 1.3.2 to provide assurance to parents, guardians and other parties that CEG takes reasonable steps to manage risks and keep children and vulnerable adults safe
- 1.3.3 to ensure that all employees and students understand their roles and responsibilities in respect of safeguarding and Prevent. This includes all employees, agency tutors, volunteers, contractors and consultants
- 1.3.4 to provide CEG employees with relevant information, training and support in order to make informed responses to child protection and Prevent issues
- 1.3.5 to ensure that CEG practises safe recruitment procedures, including suitability checks for work with children and vulnerable adults. This should be read in conjunction with the CEG Recruitment Policy which can be found in the Help Centre

- 1.3.6 to provide robust systems and procedures that are followed by all employees in the event of any allegations or suspected abuse, whether the harm has taken place on CEG premises or not
- 1.3.7 to know that accessible support services are available for students and staff.

## 2. Roles and Responsibilities

2.1 **Safeguarding is everyone's responsibility.** All CEG employees are in a position of trust, particularly those **ONCAMPUS** employees who teach, support, guide or in any way interact with students in regular unsupervised situations. Employees, students and volunteers working with children and vulnerable adults within CEG must be familiar with this policy. They must also conduct themselves in accordance with CEG policies (found in the Help Centre).

2.2 All CEG employees are required to confirm they have read this policy in its entirety. **ONCAMPUS** employees who are in direct contact with students must also confirm that they have read Part 1 of the current Keeping Children Safe in Education guidance and Annex B; employees who do not work directly with children must confirm that they have read Annex A of the current Keeping Children Safe in Education guidance.

2.3 To enable employees to meet their responsibilities, CEG will:

- 2.3.1 make all employees aware of their safeguarding responsibilities during induction and provide appropriate training
- 2.3.2 help all employees (and students) to understand what acceptable behaviour is, to be vigilant of possible safeguarding issues, how they can stay safe from harm and how to raise concerns
- 2.3.3 develop an ethos in which an employee feels confident about discussing with the appropriate Safeguarding Lead any concerns about a child, vulnerable adult or a colleague's behaviour
- 2.3.4 ensure that all stakeholders have access to this policy online
- 2.3.5 provide and maintain sites that are safe and secure places to study and work.

2.4 In accordance with the law all staff, contractors and volunteers are reminded of the offence of abuse of positions of trust under the Sexual Offences Act 2003 s.16-19, which makes it an offence for a person aged 18 or over intentionally to behave in certain sexual ways in relation to a child (aged under 18), where the person (aged 18 or over) is in a position of trust. This is defined as looking after a child (aged under 18) who is receiving education at an educational institution, and a person (aged 18 or over) who is not receiving education at that institution.

2.5 CEG has the following designated roles with safeguarding and Prevent responsibilities:

- 2.5.1 Executive Team: carry overall responsibility for all safeguarding and Prevent matters within CEG. All employees are expected to know and understand their safeguarding responsibilities
- 2.5.2 Executive Sponsor
- 2.5.3 Safeguarding and Prevent Sponsor
- 2.5.4 **ONCAMPUS** Centre Directors
- 2.5.5 Heads of Department/Directors
- 2.5.6 Designated Safeguarding Leads
- 2.5.7 Deputy Designated Safeguarding Leads

Details of the safeguarding roles and responsibilities can be found in Appendix 7. The key contacts

information for each department/centre will be provided for employees, student, volunteers, agency workers, consultants or contractors and visitors.

2.6 Student Representatives: some students have positions of authority in relation to other students, for example Student Representatives. These students should be aware that they may be in contact with students who are under-18 and/or vulnerable adults. They must be aware of this policy and act appropriately at all times.

2.7 External Guardianship Providers are appointed by **ONCAMPUS** for all students who are under the age of 18 years old. The guardian team have responsibility to:

- be available by emergency phone 24 hours a day
- act on behalf of the parent/guardian in the case of emergency.

### **3. Training and Induction**

3.1 All employees will receive safeguarding training, including Prevent, as part of their induction training programme appropriate to their role .

3.2 **ONCAMPUS** employees are required to confirm that they have read this policy, procedure and related guidance

3.3 Staff will undertake appropriate internal safeguarding training on a regular basis

3.4 Staff with responsibility for Safeguarding and Prevent (for example Centre Director, DSL, Deputy DSL) will undertake higher level safeguarding and Prevent training in accordance with good practice requirements.

### **4. Handling a Disclosure, allegation and low-level concern**

4.1 CEG procedures are based on the NSPCC guidance *What to do if a child reveals abuse* <https://www.nspcc.org.uk/keeping-children-safe/reporting-abuse/what-to-do-child-reveals-abuse/>

4.2 All employees, students, volunteers, contractors and consultants are expected to handle a disclosure in accordance with the guidance in Appendix 2.

4.3 If a child or vulnerable adult reveals abuse, employees must record and report any concerns to the appropriate safeguarding lead without delay (Appendices 3 -5)

4.4 Refer to Appendix 4 for guidance procedures on managing allegations against CEG employees.

4.6 Allegations involving a student: allegations involving a student and a person under-18 or a vulnerable adult should be reported to the Designated Safeguarding Lead. Consideration will be given as to whether the situation constitutes a child protection/vulnerable adult issue and appropriate actions taken.

4.7 Whistleblowing: is an important aspect of a safeguarding institution. Employees should feel able to raise concerns about poor or unsafe practice and potential failures in the safeguarding regime. Please refer to the CEG Whistleblowing Policy in the Help Centre for further details. General guidance on whistleblowing can be found via: <https://www.gov.uk/whistleblowing> . The NSPCC's 'what you can do to report abuse' dedicated helpline is available as an alternative route for a team member who does not feel able to raise concerns regarding child protection failures internally, or has concerns about the way a concern is being handled by their place of work.

<https://www.nspcc.org.uk/what-you-can-do/report-abuse/dedicated-helplines/whistleblowing-advice-line/> Staff can call 0800 028 0285 – the line is available from 8:00 AM to 8:00 PM, Monday to Friday, 9:00 AM to 06:00 PM at the weekend. Email: [help@nspcc.org.uk](mailto:help@nspcc.org.uk)

#### 4.8 Procedure for Dealing with Concerns of Possible Abuse Outside CEG:

4.8.1 As a result of their contact with an under-18 or adult at risk, an employee or student may become concerned about the welfare of the under-18 or adult at risk and may be concerned that abuse is being perpetrated by someone unconnected with CEG. In these circumstances the individual should report their concerns to the Designated Safeguarding Lead.

4.8.2 If a student or employee is concerned that abuse is being perpetrated by a student against someone unconnected with CEG, the individual should report their concerns to the Designated Safeguarding Lead who will take appropriate action as previously outlined.

4.8.3 If an employee or student is concerned that abuse is being perpetrated by a CEG employee against someone unconnected with CEG, the individual should report their concerns to the line manager (central teams) or Centre Director who will take appropriate action as previously outlined.

4.9 Confidentiality: while an allegation is being investigated, every effort should be made to maintain confidentiality and guard against publicity. Apart from keeping the child, parents and accused person, where applicable, up to date with progress of the case, information should be restricted to those who have a need to know in order to protect the children or adults involved, facilitate enquiries and manage the investigation. The same approach applies in the case of a vulnerable adult.

### 5. Multi-Agency Work

5.1 CEG will work with the appropriate agencies, where they are involved, to provide appropriate support for the child, vulnerable adult, employee. This could include Children's or Adult Social Services and/or Police.

5.2 UK only: the online tool [Report child abuse to a local council - GOV.UK \(www.gov.uk\)](#) directs to the relevant local authority children's social care contact number. If an adult is being abused, or deemed to be at risk of abuse, contact the local council [Find your local council - GOV.UK \(www.gov.uk\)](#)

### 6. Safe Recruitment of Employees

6.1 This includes all employees, agency tutors, volunteers, contractors and consultants

6.2 As part of its recruitment policy CEG will ensure Safer Recruitment practice is followed. An enhanced DBS with barred list will be undertaken for everyone in **ONCAMPUS** centres, Academic Team, Livein Team. Basic criminal record checks will be carried out for non-centre based employees.

6.3 Where contractors or consultants are used, checks are made to ensure that the staff have been subject to the appropriate level of DBS check, and that adequate supervision is in place whilst on the premises.

### 7. Student Welfare

7.1 Safeguarding training will inform appropriate staff of the potential for student welfare issues and how to raise concerns, including verbally, by email or EBS (Ontrack). All concerns should be raised in a timely manner, ideally before the end of the same working day and in accordance with the Reporting Process (Appendix 3).

7.2 Concerns would include the following:

- Bullying and harassment, including sexual misconduct
- Peer on Peer abuse: if peer on peer abuse is identified, a referral will be made by the Designated Safeguarding Lead to the appropriate external agency
- Female Genital Mutilation (FGM): if an employee in the course of their work, discovers that an act of FGM appears to have been carried out on a girl when she was under the age of 18, then this must be reported this to the Police as part of their statutory duty
- Child Sexual Exploitation (CSE)
- Child Criminal Exploitation: County Lines (CCE)
- Children absent from education
- Domestic abuse and/or violence
- Homelessness
- Honour-based violence
- Forced marriage.
- Online safety

See Appendix 1 for further detail.

7.3 Student absent from education

Attendance is recorded for all students. The whereabouts of all students under 18 and those adult students considered to be vulnerable will be monitored and recorded. In the event that a student cannot be located, then steps must be undertaken to make contact with the student in line with the **ONCAMPUS** Attendance Policy, **ONCAMPUS** Missing Student Policy and CEG Emergency procedures. This may include contact with the External Guardianship Provider, parents, agents, accommodation provider and Police as appropriate.

7.4 Homelessness: **ONCAMPUS** expects all students under 18 to live in residences approved by our accommodation team. In exceptional circumstances permission may be given for students to live in another residence. Some adult students choose to live in private accommodation. In the event that a current student becomes homeless, then support is available to them via their centre.

**8. Prevent Duty:** deals with the issue of potential radicalisation and extremism. It applies to all CEG staff.

8.1 All staff members receive Prevent Duty Training from induction onwards.

8.2 Prevent education for students is part of their induction and tutorial programme.

8.3 The CEG Prevent Lead is the Safeguarding and Prevent Sponsor.

8.4 In all centres, the local Prevent Lead will be the home centre Designated Safeguarding Lead.



8.5 For UK centres, the contact details for the regional higher education Prevent co-ordinator will be shared with staff.

8.6 Referral of concern regarding radicalisation of a student:

8.6.1 Where a team member has concerns that a student is expressing violent extremist views or is at risk of being drawn into violent extremism, these concerns should be reported immediately to the Designated Safeguarding Lead using the Prevent Concern form (see Appendix 6 for required content).

8.6.2 The Designated Safeguarding Lead will investigate the matter and discuss with their line manager to assess the seriousness of the case.

8.6.3 If appropriate a referral will be made to the appropriate local authority eg Prevent Team.

8.6.4 The outcome will be shared with the Safeguarding and Prevent Sponsor.

8.7 Concern about staff: this should be reported to the Centre Director (**ONCAMPUS** centres), Safeguarding and Prevent Sponsor (central team) or People Team in their absence. Further advice will be sought from the local Channel team and discussion of case with the relevant local authority lead (eg LADO in the UK).

## **9. Online Conduct:**

9.1 During student induction and tutorials students are taught about the safe use of the internet, the appropriate use of social media, how to safely publish content online and cybercrime.

9.2 Employees should refer to the IT Policy for further information regarding appropriate use of the internet on CEG devices.

9.3 If you are concerned about online sexual abuse report this to the Designated Safeguarding Lead; if you believe a child/vulnerable adult is at immediate risk this must be reported immediately to the police authorities. In the UK, a report can be made to CEOP (Child Exploitation and Online Protection Command) [www.ceop.police.uk](http://www.ceop.police.uk). If a report is made, inform your Designated Safeguarding Lead immediately after this.

## **10. Communication with students:**

10.1 A CEG employee must not use personal mobile phones or email accounts to communicate with students. This includes the taking of photographs.

10.2 Employees must not 'follow' or 'friend' students on social media sites.

10.3 While a student remains under our license, or until the end date for ICAS students, **staff must never:**

- give students their personal mobile phone number
- communicate with students by text message, Whatsapp etc on a personal phone
- give personal email addresses to students
- communicate with students on personal social media sites
- use a personal device to take photos/videos of students.
- All electronic communication with students must happen on company devices (company laptop or mobile phone), never on a personal device.

- Students must be informed of the purpose of taking still or moving photographs of them and how these photographs will be used. Student consent must be requested at the time.
- For Under 18s, parental consent is a required part of the admissions process.
- Students should be suitable dressed in photographs.
- If you have a concern about photographs being taken of a student, please contact the centre's Designated Safeguarding Lead.

## **11. Safety on Site:**

11.1 All visitors to a CEG centre are required to sign in on arrival. During the signing in process, they will be given information about how they should report any safeguarding, child protection and Prevent concerns. Appendix 8 outlines the procedures to manage visitors.

11.2 Staff are trained to raise any concern about a visitor with the Centre Director (or equivalent) immediately.

11.3 Checks of identity will be carried out annually onsite, for this visitors or contractor will need to provide defined documentation.

11.4 Accident Reporting involving children or vulnerable adults: any accident on CEG premises involving a child or vulnerable adult must be reported to the Health and Safety Team immediately and formally recorded on the accident reporting system as soon as possible.

11.5 For further information specific to contractor management, please refer to the CEG management of contractor's policy.

## **Appendix 1 Types of abuse or harm that may be experienced by a child or vulnerable adult**

Reference: <https://www.nspcc.org.uk/what-is-child-abuse/types-of-abuse/>

Reference: Keeping Children Safe in Education September 2023

<https://www.gov.uk/government/publications/keeping-children-safe-in-education--2>

Please note this is not an exhaustive list, please refer to Keeping Children Safe in Education

**Abuse** is a violation of an individual's human and civil rights by any other person or persons and may result in significant harm to, or exploitation of, the person subjected to the abuse.

It is important to note that abuse can:

- Consist of a single act or repeated acts;
- Be intentional or unintentional or result from a lack of knowledge;
- Be an act of neglect, an omission or a failure to act;
- Cause harm temporarily or over a period of time;
- Occur in any relationship;
- Be perpetrated by anyone, individually or as part of a group or organisation;
- Often constitute a crime, i.e. physical, sexual abuse, e.g. downloading or using pornographic images of children and/or storing them on CEG or University computers or equipment.

The following may indicate that abuse is taking place (this list is not exhaustive. Refer to NSPCC Child Protection fact sheet for further information (<https://learning.nspcc.org.uk/research-resources/briefings/definitions-signs-child-abuse>))

- Unexplained or suspicious injuries, particularly if such an injury is unlikely to have occurred accidentally;
- An injury for which the child, adult's or carer's explanation appears inconsistent;
- The child or adult describes an abusive act or situation;
- Unexplained changes in behaviour; for example becoming withdrawn, aggressive behaviour or severe temper outbursts. Neurotic behaviour, for example hair twisting, rocking.
- The display of inappropriate behaviour (sexual or otherwise);
- Apparent mistrust of others;
- Being secretive about what they are doing, including online;
- Changes in attendance patterns
- Absent from education, particularly on repeat occasions and/or prolonged periods
- Withdrawal from extra-curricular/social activities;
- Decline in academic performance;
- Criminal activity;
- Substance or drug misuse;
- Mental health difficulties including depression;
- Self-harm or mutilation, sometimes leading to suicide attempts;
- The child or adult appears increasingly unkempt;
- Loss of weight or being constantly underweight.

The following list is an example of the types of abuse or harm children or adults may encounter (this list is not exhaustive). Further detail is found in KCSIE September 2023.

**Physical abuse or violence**, including hitting, shaking, throwing, slapping, pushing, kicking, poisoning or the giving or supply of illegal drugs, misuse of medication, burning, scalding, drowning, suffocating, restraint or otherwise causing physical harm, or inappropriate sanctions.

**Sexual abuse**, including grooming, rape and sexual assault of, or sexual acts with, a child or

vulnerable adult, or an adult who has not consented or could not consent or was pressured into consenting; the activities may be physical or non-physical for example involving children or adults in looking at, or in the production of, sexual images. Sexual abuse can take place online, and technology can be used to facilitate offline abuse. Sexual abuse is not solely perpetrated by adult males. Women can also commit acts of sexual abuse, as can other children

**Psychological abuse**, including emotional abuse, threats of harm or abandonment, deprivation of contact, humiliation, blaming, controlling, intimidation, coercion, harassment, verbal abuse, isolation or withdrawal from services or supportive networks.

**Financial abuse**, including theft, fraud, exploitation, or the misuse or misappropriation of property, possessions or benefits.

**Physical or emotional neglect and acts of omission**, including ignoring or neglect of emotional, medical or physical care needs, failure to protect a child or adult from physical or emotional danger or to ensure adequate supervision, failure to provide access to social care health, or educational services, the withholding of necessities such as medication, adequate nutrition and heating, and benefits.

**Discriminatory abuse**, including racist, sexist, ageist abuse or abuse based on a person's disability, and other forms of harassment, slurs or similar treatment.

**Internet/electronic abuse**, the use of communication technologies (e.g. internet, text or video messaging, email, chatrooms, social media networking sites) to embarrass, humiliate, threaten, intimidate or bully an individual in an attempt to gain power and control over them.

**So-called 'honour'-based abuse such as:**

**Forced marriage**, a marriage in which one or both partners do not consent to the marriage and are coerced into it. Coercion can be physical, emotional or financial. It also applies to vulnerable adults who may not have the capacity to consent to the marriage. People who are forced to marry, or are at risk of so-called 'honour'-based abuse and might be forced to marry, can go missing from education. Marriage under the age of 18 is illegal in the Netherlands, UK and US. In France, under the Civil Code 2013 the minimum legal age of marriage is 18. However, marriage before the age of 18 is possible with parental and judicial approval.

**Female Genital Mutilation (FGM)** is illegal in the UK, EU and US. Cases of where FGM is reported to have taken place or concerns that it might take place must be treated as a safeguarding issue. If a team member in the course of their work, discovers that an act of FGM appears to have been carried out on a girl under the age of 18, then this **must be reported to the police** as part of their statutory duty. It should be recognised that FGM can occur at any time, for example on reaching adulthood.

**Radicalisation** is the process by which individuals come to support terrorism or violent extremism. Individuals may express extremist ideas, be in possession of extremist literature or express extremist views. They may associate with known extremists or seek to recruit others to an extremist ideology. Concerns that an individual's behaviour indicates involvement with extremist ideas should be considered a safeguarding issue and reported as such to your Designated Safeguarding Lead.

**Bullying**

There is no legal definition of bullying. However, it is usually defined as behaviour that is:

- repeated

- intended to hurt someone either physically or emotionally
- often aimed at certain groups, eg because of race, religion, gender or sexual orientation.

Some forms of bullying are illegal and should be reported via the Designated Safeguarding Lead to the Police. These include:

- Violence or assault
- Theft
- Repeated harassment, including sexual harassment, or intimidation eg name calling, threats and abusive phone calls, emails or text messages
- Hate crimes

**Child Sexual Exploitation** is a form of sexual abuse where young people are exploited for money, power or status. It can occur directly or through the use of technology. Young people may be groomed online through social media sites and apps including dating apps.

Possible indicators may include:

- Acquisition of money, clothes, mobile phones etc. without plausible explanation;
- Gang-association and/or isolation from peers/social networks;
- Exclusion or unexplained absences from class;
- Leaving home/care without explanation and persistently going missing or returning late;
- Excessive receipt of texts/phone calls;
- Returning home under the influence of drugs/alcohol;
- Inappropriate sexualised behaviour for age/sexually transmitted infections;
- Evidence of/suspicious of physical or sexual assault;
- Relationships with controlling or significantly older individuals or groups;
- Multiple callers (unknown adults or peers);
- Frequenting areas known for sex work;
- Concerning use of internet or other social media;
- Increasing secretiveness around behaviours;
- Self-harm or significant changes in emotional well-being.

**Indicators are a guide and do not replace, but should assist, the exercise of professional judgement.**

The person who is making the judgements needs to take into account the principles detailed above and be clear on the evidence that the risk is actually occurring or whether further assessment is required to clarify this. The earlier the intervention the better chances of success.

**Important points to remember – Child Sexual Exploitation:**

- Can affect any child or young person (male or female) under the age of 18 years, including 16 and 17 year olds who can legally consent to have sex;
- Can still be abuse even if the sexual activity appears consensual;
- Can include both contact (penetrative and non-penetrative acts) and non-contact sexual activity;
- Can take place in person or via technology, or a combination of both;
- Can involve force and/or enticementbased methods of compliance and may, or may not, be accompanied by violence or threats of violence;
- May occur without the child or young person’s immediate knowledge (through others copying videos or images they have created and posting on social media, for example);
- May be perpetrated by individuals or groups, males or females, and children or adults. The abuse can be a one-off occurrence or a series of incidents over time,

and range from opportunistic to complex organised abuse;

- Is typified by some form of power imbalance in favour of those perpetrating the abuse.
- Whilst age may be the most obvious, this power imbalance can also be due to a range of other factors including gender, sexual identity, cognitive ability, physical strength, status, and access to economic or other resources;
- The coercers and perpetrators are usually an adult, but can be children and young people in a position of power of either gender;
- Young people may exchange or sell sex as a result of constrained choices such as poverty, isolation and historic abuse;
- Parents/guardians may be involved in the sexual exploitation of their children, or fail to prevent/protect from it;
- Groups of children and young people and multiple perpetrators may be involved (organised abuse);
- Children and young people with additional needs require special consideration up to the age of 25 years.

### **Serious Violence, including Child Criminal Exploitation (CCE): County lines**

Criminal exploitation of children is a geographically widespread form of harm that is a typical feature of county lines criminal activity: drug networks or gangs groom and exploit children and young people to carry drugs and money from urban areas to suburban and rural areas, market and seaside towns. Key to identifying potential involvement in county lines are missing episodes, when the victim may have been trafficked for the purpose of transporting drugs and a referral to the appropriate national referral mechanism should be considered.

[County Lines - National Crime Agency](#) (UK)

Like other forms of abuse and exploitation, county lines exploitation:

- Can affect any child or young person (male or female) under the age of 18 years;
- Can affect any vulnerable adult over the age of 18 years;
- Can still be exploitation even if the activity appears consensual;
- Can involve force and/or enticement-based methods of compliance and is often accompanied by violence or threats of violence;
- Can be perpetrated by individuals or groups, males or females, and young people or adults;
- Is typified by some form of power imbalance in favour of those perpetrating the exploitation. Whilst age may be the most obvious, this power imbalance can also be due to a range of other factors including gender, cognitive ability, physical strength, status, and access to economic or other resources.

### **SEXUAL VIOLENCE AND SEXUAL HARASSMENT**

If dealing with any report of sexual misconduct or harassment, refer to the CEG Student Sexual Misconduct Policy and Procedure 2023.

Sexual violence and sexual harassment can occur between two people of any age and sex, including children and vulnerable adults. It can also occur through a group of people, including children, or vulnerable adults, sexually assaulting or sexually harassing a single person (child) or group of people (children).

People who are victims of sexual violence and sexual harassment will likely find the experience stressful and distressing. In the case of children and vulnerable adults this will, in all likelihood, adversely affect their educational attainment. Sexual violence and sexual harassment exist on a

continuum and may overlap, they can occur online and offline (both physical and verbal) and are never acceptable. It is important that all victims are taken seriously and offered appropriate support. Employees should be aware that some groups are potentially more at risk. Evidence shows females, those with SEND and LGBTQ+ children and vulnerable adults are at greater risk.

**Employees should be aware of the importance of:**

- Making clear that sexual violence and sexual harassment is not acceptable, will never be tolerated and is not an inevitable part of growing up;
- Not tolerating or dismissing sexual violence or sexual harassment as “banter”, “part of growing up”, “just having a laugh” or “boys being boys”;
- Challenging behaviours (potentially criminal in nature), such as grabbing bottoms, breasts and genitalia, flicking bras;
- Up skirting, which typically involves taking a picture under a person’s clothing without their permission, with the intention of viewing their genitals or buttocks to obtain sexual gratification, or cause the victim humiliation, distress or alarm. The Voyeurism (Offences) Act 2019, which is commonly known as the Upskirting Act, came into force on 12 April 2019. It is a criminal offence. Anyone of any sex, can be a victim;
- Dismissing or tolerating such behaviours risks normalising them.

It is important that all employees are aware of sexual violence and the fact that students, including children and vulnerable adults, can and sometimes do, abuse their peers in this way.

**Child-on-child abuse:**

Children can abuse other children (often referred to as child-on-child abuse), and can happen both inside and outside of the centre and online. Staff have an important role to play in preventing this and responding where they believe a child may be at risk from it. Even if there are no reports in their centre it does not mean it is not happening, it may be the case that it is just not being reported. As such it is important if staff have any concerns regarding child-on-child abuse they must speak to their designated safeguarding lead (or a deputy).

Child-on-child abuse is most likely to include, but may not be limited to:

- bullying (including cyberbullying, prejudice-based and discriminatory bullying)
- abuse in intimate personal relationships between children (sometimes known as ‘teenage relationship abuse’)
- physical abuse such as hitting, kicking, shaking, biting, hair pulling, or otherwise causing physical harm (this may include an online element which facilitates, threatens and/or encourages physical abuse)
- sexual violence, such as rape, assault by penetration and sexual assault; (this may include an online element which facilitates, threatens and/or encourages sexual violence)
- sexual harassment, such as sexual comments, remarks, jokes and online sexual harassment, which may be standalone or part of a broader pattern of abuse
- causing someone to engage in sexual activity without consent, such as forcing someone to strip, touch themselves sexually, or to engage in sexual activity with a third party
- consensual and non-consensual sharing of nude and semi-nude images and/or videos (also known as sexting or youth produced sexual imagery)
- upskirting, which typically involves taking a picture under a person’s clothing without their permission, with the intention of viewing their genitals or buttocks to obtain sexual gratification, or cause the victim humiliation, distress, or alarm, and

- initiation/hazing type violence and rituals (this could include activities involving harassment, abuse or humiliation used as a way of initiating a person into a group and may also include an online element).

#### Modern Slavery and the National Referral Mechanism (England and Wales)

Modern slavery encompasses human trafficking and slavery, servitude and forced or compulsory labour. Exploitation can take many forms, including sexual exploitation, forced labour, slavery, servitude, forced criminality and the removal of organs. Further information on the signs that someone may be a victim of modern slavery, the support available to victims and how to refer is found here: <https://www.gov.uk/government/publications/human-trafficking-victims-referral-and-assessment-forms/guidance-on-the-national-referral-mechanism-for-potential-adult-victims-of-modern-slavery-england-and-wales>



**Appendix 2 Handling a Disclosure** If a child or vulnerable adult tells an employee about possible abuse:

**LISTEN**

- Listen quietly and carefully to what the person is saying
- Be patient and focus on what you're being told
- Let the person make the disclosure at their own pace and in their own way
- Do not express your own views and feelings. If you appear shocked or as if you don't believe them, it could make the person stop talking and take back what they've said
- Do not assume anything – don't speculate or jump to conclusions. Do not investigate, interrogate or decide if the person is telling the truth
- Avoid interrupting, asking leading questions or probing for more information than the person wants to give you. Do not put words into the person's mouth
- Ask open questions, eg 'Is there anything else you want to tell me?'
- Take it seriously – you must follow the REASSURE and REPORT procedures

**REASSURE:**

- Let the person know they've done the right thing by telling you. Reassurance can make a big impact
- Make sure they know you'll listen
- Tell them:
  - It's not their fault. Abuse is never someone's fault. It's important they hear, and know, that
  - You'll take them seriously. They may have kept the abuse or concern to themselves because they were scared they wouldn't be believed
- Never promise to keep the information confidential
- Explain to the person that you are not able to investigate what they have told you, but that you will need to discuss the issue with someone who has responsibility for safeguarding and/or Prevent. You must pass the information on, but only those that need to know about it will be told

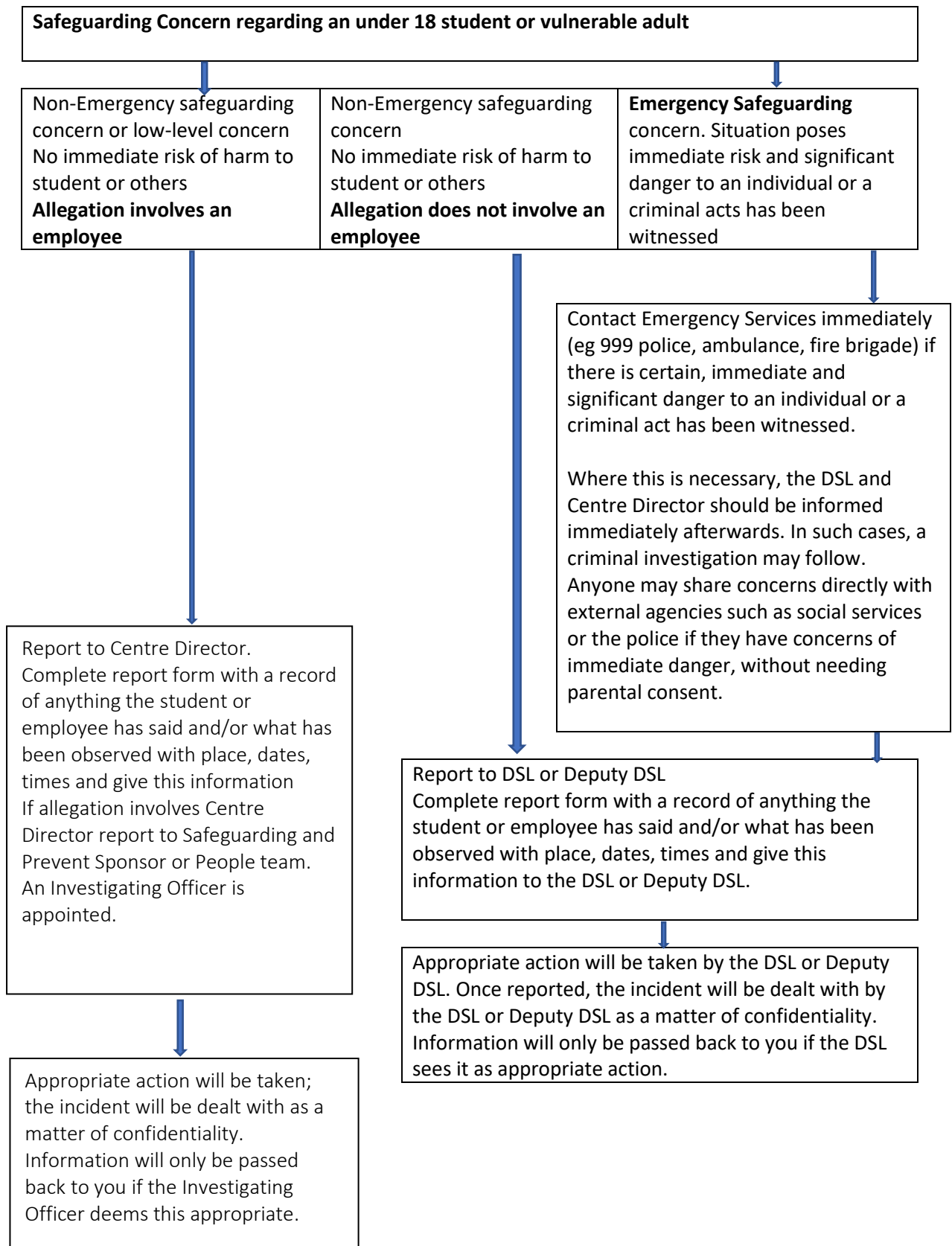
**REPORT:**

- Do not make any attempt to solve or tackle a safeguarding issue yourself. This is not your role
- Do not ask the person to repeat what they have told you to another team member or student
- Report what the person has told you as soon as possible to the appropriate Designated Safeguarding Lead (DSL) so the details are fresh in your mind and action can be taken quickly
- Make notes as soon after the disclosure has been made. Keep these as accurate as possible. Include date, time, place. Be specific. Record the actual words used, including any swear words or slang. Record statements and observable things, for example how the person appeared. Do not include your interpretations or assumptions – keep it factual
- Do not destroy your notes in case they are required by Court. Pass these to the DSL
- Do not discuss the disclosure or allegation with anyone else
- Do not go back to the person who made the disclosure or reopen a conversation with them - the DSL will take the further action which is needed
- If the DSL is not available, report to their Deputy
- If the allegation concerns a member of staff: centre teams report this to the Centre Director; central teams report to the Safeguarding and Prevent Sponsor.

**Your wellbeing:** safeguarding is a highly emotive and emotional subject. Listening to a disclosure can be upsetting. Please keep in mind the support available to you, including our EAP programme and mental health first aiders.

## Appendix 3

### Handling a Disclosure: Reporting Process



## Appendix 5

### Reporting and dealing with allegations involving a CEG employee

Allegations against any member of staff, whether employed or a former employee (including claims of historical abuse) will be managed in line with Keeping Children Safe in Education, September 2023. If a disclosure is received against a staff member, the following actions must be taken:

#### 1.0 If the allegation concerns a centre team member:

- 1.1 The report would be made to the Centre Director.
- 1.2 If the Centre Director is not available, refer to the Safeguarding and Prevent Sponsor – this person will be the Investigating Officer.
- 1.3 The person receiving the allegation will contact the People team immediately.

#### 2.0 If the allegation concerns the Centre Director:

- 2.1 Report to the Safeguarding and Prevent Sponsor who will notify the People team immediately.

#### 3.0 If the allegation concerns a non-centre based employee:

- 3.1 Report to the Safeguarding and Prevent Sponsor who will inform the People team immediately.

#### 4.0 If the allegation concerns the Safeguarding and Prevent Sponsor:

- 4.1 Report to the Executive Sponsor who will notify the People team immediately.

#### 5.0 If the allegation concerns a member of the Executive:

- 5.1 Report to the People Director immediately.
- 5.2 If the allegation concerns the People Director, report to the Group Chief Operating Officer.
- 5.3 Alternatively, use the CEG Whistleblowing Policy which can be found in the Help Centre.

#### 6.0 If the allegation involves a child, the person receiving the allegation will take the following actions:

- 6.1 The allegation will be referred to the appropriate local authority body (eg LADO in UK) within 24 hours of the allegation coming to light and before an investigation has been started. Referral should not be delayed to collect information.
- 6.2 If an allegation requires immediate action but is received outside office hours, the person managing the allegation should consult the local children's services emergency duty team (eg MASH in UK).
- 6.3 Failure to report an allegation or concern in accordance with procedures is a potential disciplinary matter.
- 6.4 Advice or guidance offered by the local LADO or equivalent must be acted upon.
- 6.5 Should an external child protection investigation and/or police investigation be required then this may be undertaken before any internal CEG procedures are actioned.

#### 7.0 As soon as possible after an allegation is made or a concern of suitability is raised, the Centre Director should inform the parent(s) or carer(s) of the child/ren involved, having checked GDPR permissions.

- 7.1 The local LADO or equivalent should be consulted first to ensure that this does not compromise the investigation.
- 7.2 In some circumstances, the parent(s)/carer(s) may need to be told immediately e.g. if a child is injured and requires medical treatment.

7.3 The parent(s)/carer(s) and child should be helped to understand the processes involved and kept informed, where appropriate, about the progress of the case.

8.0 In liaison with the People Team the CEG Disciplinary Policy will be followed with the below considerations from a safeguarding perspective:

- 8.1 Local authorities may need to be involved in developments as required, eg local police, LADO. Outcomes of investigations may also need to be communicated to LADO and/or the Disclosure and Barring Service (DBS) (equivalents in the other nations) for consideration to be barred from working with children.
- 8.2 Referral to a professional registration/regulatory body, for example the General Teaching Council on the grounds of misconduct.
- 8.3 Possible outcomes of an investigation could include referral to the barring lists or regulatory body.
- 8.4 Where a strategy discussion is required with the Police or children's social care (or equivalent), information about the allegation should not be shared until those agencies have agreed what information can be disclosed to the person who is the subject of the allegation.

Where allegations are unfounded or malicious the investigating officer will need to consider:

- 8.5 If the safeguarding allegation was made by a child then there is a need to consider if a referral to children's social care is required to determine if that child is in need of services, or may have been abused by someone else.
- 8.6 If the safeguarding allegation was deliberately invented or raised maliciously by an adult then this could be discussed with the police and advice sought.
- 8.7 Whether disciplinary action is required.
- 8.8 If the person making the malicious or unfounded allegation is a member of staff.
- 8.9 The support needs of the person who was the subject of the safeguarding allegation.

## Appendix 5

### Reporting a Safeguarding Disclosure

If you have a safeguarding concern that is

- (a) as a result of direct disclosure;
- (b) a concern expressed by a third party or
- (c) observation of a student or colleague,

you must report this to the Designated Safeguarding Lead (DSL) by email and confirm receipt before the end of the working day. As soon as possible, a comprehensive record should be sent to the DSL using the **Safeguarding Report Form** on the following page.

If there is an immediate threat to life, always dial 999 and then inform the DSL.

Please remember:

- if the disclosure involves a member of staff in an education centre, report this straight to the Centre Director
- if the disclosure involves a non-centre member of staff, report this straight to the Safeguarding and Prevent Sponsor
- if the disclosure involves the Centre Director, report this to the Safeguarding and Prevent Sponsor or People Team.

In your email include:

1. Name of child/vulnerable adult
2. Date of birth and age of the alleged victim (if known)
3. Gender (M/F/other)
4. Name and address of parent/carer/guardian of alleged victim (if known and applicable)
5. The child/vulnerable adult's account
6. Time, location, date or other relevant information
7. Your relationship to who your safeguarding concern is about
8. Description of any visible bruising or other injuries
9. Any other observations/information: (including the child's or vulnerable adult's emotional state)
10. Action taken
11. Have external agencies been contacted? (yes/no)
12. Have the emergency services (999) or social services been contacted? (yes/no)
13. Name and contact details of external agencies/emergency services/social services contacted – include any relevant reference numbers
14. Include your name, position, date and contact telephone number

## CEG Safeguarding Report Form, including Low-level Concerns

This form should be used to record safeguarding concerns that are (a) as a result of direct disclosure; (b) a concern expressed by a third party or (c) observation of a student. It should also be used to report low-level concerns.

Name of child/vulnerable adult:	
Date of birth (of child/vulnerable adult):	Gender: (M/F/other)
Name and address of parent/carer/guardian of alleged victim (if known and applicable)	
The child's/vulnerable adult's account:	
Time, location, date or other relevant information:	
Your relationship to the person your safeguarding concern is about:	
Description of any visible bruising or other injuries:	
Any other observations/information: (including the child's or vulnerable adult's emotional state	
Action taken:	
Have external agencies been contacted? (yes/no) If yes, include name and contact details of external agencies/emergency services/social services contacted – include any relevant reference numbers	
Have the emergency services or social services been contacted? (yes/no) If yes, include name and contact details of external agencies/emergency services/social services contacted – include any relevant reference numbers	
Signed:	
Name (print):	
Position:	
Contact telephone number:	
Date:	Time:
<b>Date and time received by Designated Safeguarding Lead or appropriate member of staff:</b>	
Action taken:	
Signed:	
Name (print):	
Position:	
Contact telephone number:	
Date:	

## Appendix 6

### Reporting a Prevent Concern

If you believe that someone is at risk of radicalisation or have concerns about a potentially vulnerable person that is being exploited for the purpose of promoting extremist ideology, you must report this to the Designated Safeguarding Lead by email and confirm receipt before the end of the working day.

As soon as possible, a comprehensive record should be sent to the DSL using the **CEG Prevent Report Form** which follows.

If there is an immediate threat to life, always dial 999 or equivalent and then inform the DSL.

In your email include:

1. Name of child/vulnerable adult
2. Date of birth and age of alleged victim/person at risk (if known)
3. Gender (M/F/other)
4. Name and address of parent/carer/guardian of alleged victim (if known and applicable)
5. Your relationship to who your safeguarding concern is about
6. Describe concerns in as much detail as possible; please describe the specific concern(s) relevant to Prevent. For example:
  - a. How / why did the individual come to your notice in this instance?
  - b. Does it involve a specific event? What happened? Is it a combination of factors? Describe them.
  - c. Has the individual discussed personal travel plans to a warzone or countries with similar concerns? Where? When? How?
  - d. Does the individual have contact with groups or individuals that cause you concern? Who? Why are they concerning? How frequent is this contact?
  - e. Is there something about the individual's mobile phone, internet or social media use that is worrying to you? What exactly? How do you have access to this information?
  - f. Has the individual expressed a desire to cause physical harm, or threatened anyone with violence? Who? When? Can you remember what was said / expressed exactly?
  - g. Has the individual shown a concerning interest in hate crimes, or extremists, or terrorism? Consider *any* extremist ideology, group or cause, as well as support for "school-shooters" or public-massacres, or murders of public figures.
  - h. Please describe any other concerns you may have that are not mentioned here.
7. Complex needs: is there anything in the individual's life that you think might be affecting their wellbeing or that might be making them vulnerable in any sense?

For example:

  - a. Victim of crime, abuse or bullying
  - b. Work, financial or housing problems
  - c. Asylum or immigration issues
  - d. Personal problems, emotional difficulties, relationship problems, family issues
  - e. Any erratic, violent, self-destructive or risky behaviours, or alcohol / drug misuse or dependency
  - f. Expressed feelings of injustice or grievance involving any racial, religious or political issue, or even conspiracy theories.
  - g. Educational issues, developmental or behavioural difficulties, mental ill health
  - h. Please describe any other need or potential vulnerability you think may be present

but which is not mentioned here.

8. Other information: please provide any further information you think may be relevant eg social media details, other agencies or professionals working with the individual etc
9. Have external agencies been contacted? (yes/no)
10. Have the emergency services (eg 999) or social services been contacted? (yes/no)
11. Name and contact details of external agencies/emergency services/social services contacted – include any relevant reference numbers
  
12. Include your name, position, date and contact telephone number



## CEG Prevent Report Form

This form should be used to record concerns if you believe that someone is at risk of radicalisation or have concerns about a potentially vulnerable person being exploited for the purpose of promoting extremist ideology. Record concerns that are (a) as a result of direct disclosure; (b) a concern expressed by a third party or (c) observation of a student.

Name of child/vulnerable adult:	
Date of birth (of child/vulnerable adult):	Gender: (M/F/other)
Name and address of parent/carer/guardian of alleged victim (if known and applicable):	
Time, location, date or other relevant information:	
Your relationship to the person your safeguarding concern is about:	
Describe concerns in as much detail as possible; please describe the specific concern(s) relevant to Prevent. For example: <ol style="list-style-type: none"><li>How / why did the individual come to your notice in this instance?</li><li>Does it involve a specific event? What happened? Is it a combination of factors? Describe them.</li><li>Has the individual discussed personal travel plans to a warzone or countries with similar concerns? Where? When? How?</li><li>Does the individual have contact with groups or individuals that cause you concern? Who? Why are they concerning? How frequent is this contact?</li><li>Is there something about the individual's mobile phone, internet or social media use that is worrying to you? What exactly? How do you have access to this information?</li><li>Has the individual expressed a desire to cause physical harm, or threatened anyone with violence? Who? When? Can you remember what was said / expressed exactly?</li><li>Has the individual shown a concerning interest in hate crimes, or extremists, or terrorism? Consider <i>any</i> extremist ideology, group or cause, as well as support for "school-shooters" or public-massacres, or murders of public figures.</li><li>Please describe any other concerns you may have that are not mentioned here.</li></ol>	
Complex needs: is there anything in the individual's life that you think might be affecting their wellbeing or that might be making them vulnerable in any sense? For example: <ol style="list-style-type: none"><li>Victim of crime, abuse or bullying</li><li>Work, financial or housing problems</li><li>Asylum or immigration issues</li><li>Personal problems, emotional difficulties, relationship problems, family issues</li><li>Any erratic, violent, self-destructive or risky behaviours, or alcohol / drug misuse or dependency</li><li>Expressed feelings of injustice or grievance involving any racial, religious or political issue, or even conspiracy theories</li><li>Educational issues, developmental or behavioural difficulties, mental ill health</li><li>Please describe any other need or potential vulnerability you think may be present but which is not mentioned here.</li></ol>	
Other information: please provide any further information you think may be relevant eg social media details, other agencies or professionals working with the individual etc	

Action taken:	
Have external agencies been contacted (yes/no) If yes, include name and contact details of external agencies/emergency services/social services contacted – include any relevant reference numbers	
Signed:	
Name (print):	
Position:	
Contact telephone number:	
Date:	Time:
<b>Date and time received by Designated Safeguarding Lead or appropriate member of staff:</b>	
Action taken:	
Signed:	
Name (print):	
Position:	
Contact telephone number:	
Date:	

## Appendix 7 Roles and Responsibilities

### 1. Heads of Department/Directors will ensure that:

- all employees have completed the required Safeguarding and Prevent training
- relevant staff have read and signed either Part 1 and Annex B of the Keeping Children Safe in Education guidance, or Annex A, as confirmed being appropriate to their role
- appropriate, accurate records are kept in relation to the reporting of suspected abuse
- appropriate risk assessments are undertaken and any issues addressed.

### 2. ONCAMPUS Centre Directors have overall accountability for the safeguarding and welfare of students within their centre.

The day-to-day operation of this policy and its procedures will be the responsibility of the Centre Director who will ensure that:

- all employees have completed the required Safeguarding and Prevent training
- a staff member is allocated to the DSL or DDSL roles
- all staff are aware of which staff have been allocated the roles of the DSL and DDSL
- the Centre Director, DSL and DDSL have current higher level safeguarding training that is updated every two years as a minimum
- all staff have read and signed either Part 1 and Annex B of the Keeping Children Safe in Education guidance, or Annex A, as confirmed being appropriate to their role
- all students know who to turn to for help, advice or support, can access services confidentially, quickly and easily, and have access to 24 hour support
- the centre emergency phone rota is accurate and available
- all reasonable steps are taken to ensure the whereabouts of any student who is aged under 18 years or considered a vulnerable adult
- all relevant employees are made aware of the special needs or particular vulnerabilities of individual students
- regular monitoring and reporting of welfare and safeguarding issues so that trends are identified and acted upon
- any reported suspicions and allegations of abuse of children or vulnerable adults in their centre are taken seriously and actioned swiftly and appropriately; to include discussion with central senior management colleagues as required
- appropriate liaison with local agencies (such as Social Services or the Police)
- appropriate, accurate records are kept in relation to the reporting of suspected abuse
- appropriate risk assessments are actioned for staff in relation to background screening checks
- completion of an annual Safeguarding audit.

### 3. Designated Safeguarding Lead (DSL)

This section is based upon KCSIE Guidance 2023:

<https://www.gov.uk/government/publications/keeping-children-safe-in-education--2>

In accordance with these guidelines, the DSL is responsible for the following:

**3.1 Manage referrals:** to the local authority eg children's social care and Channel programme, or equivalent, as required. To support staff who made referrals.

**3.2 Working with others:**

- a source of support, advice and expertise for all staff
- to be a point of contact with the safeguarding partners
- to liaise with the Centre Director to inform them of cases
- promote supportive engagement with parents and/or guardians.

**3.3 Information sharing** and managing the confidential, secure storage of child protection and Channel information.

**3.4 Raising awareness:**

- to ensure each member of staff has access to, and understands, the company's child protection policy and procedures, especially new and part-time staff
- to ensure the Safeguarding and Prevent Policy (including Child Protection) is available publicly

**3.5 Training, knowledge and skills:**

- training should be updated at least every two years
- undertake Prevent awareness training
- understand and support the Centre with regards to the requirements of the Prevent duty and be able to provide advice and support to staff on protecting children and vulnerable adults from the risk of radicalisation

**3.6 Providing support to staff:**

- support and advise staff and help them feel confident on welfare, safeguarding and child protection matters
- ensure that staff are supported during the referrals processes

**3.7 Understanding the views of children/vulnerable adults:**

- encourage a culture of listening among all staff
- understand the difficulties that children/vulnerable adults may have in approaching staff about their circumstances and consider how to build trusted relationships which facilitate communication

**3.8 Holding and sharing information:** the critical importance of recording, holding, using and sharing information effectively is set out in KCSIE. The DSL will:

- understand relevant data protection legislation and regulations, especially the Data Protection Act 2018 and the UK General Data Protection Regulation (UK GDPR)
- be able to keep detailed, accurate, secure written records of concerns and referrals and understand the purpose of this record-keeping.

**4.0 Deputy Designated Safeguarding Lead**

Deputies will be trained to the same standard as the Designated Safeguarding Lead and assist the Designated Safeguarding Lead (DSL) in all matters of safeguarding, child protection and Prevent.

## **Appendix 8 Safety on Site**

1.0 On arrival and where appropriate:

- 1.1 All visitors enter the site through the main door and report to administration staff
- 1.2 All visitors must state the purpose of their visit and who has invited them or who they wish to see. They should be ready to produce formal identification
- 1.3 All visitors are required to sign the Visitors Record Book which is always kept in reception
- 1.4 All visitors are required to wear a visitor's lanyard
- 1.5 All visitors are advised on local safeguarding procedures, including the DSL/DDSL as well as emergency evacuations procedures and protocol
- 1.6 Visitors are escorted to their point of contact OR their point of contact will be asked to come to reception to receive the visitor. The contact will then be responsible for them while they are on site.

2.0 Any visitor to the site who is not wearing a visitors badge is challenged politely to enquire who they are and their business on site. They should then be escorted to reception to sign the visitors' book and be issued with an identity badge or visitors lanyard.

3.0 All concerns about a visitor should be raised with the Centre Director/Head of Department immediately.

4.0 On departing, visitors leave via reception and:

- 4.1 Enter their departure time in the Visitors Record Book alongside their arrival entry
- 4.2 Return the visitors lanyard to reception

5.0 Checks of identity will be carried out annually onsite, for this visitors or contractor will need to provide defined documentation.

6.0 For further information specific to contractor management, please refer to the CEG management of contractor's policy.

7.0 Further information on Safe Working Practices is found in the Help Centre.

## **Appendix 9 CEG STATEMENT OF BEST PRACTICE (Safeguarding)**

### **Guidance for Employees:**

CEG employees and students are expected to take account of the guidance below in the way that they conduct themselves. This will ensure safety both for themselves and the other party.

- Respect all individuals whatever their age and treat all fairly, without prejudice or discrimination
- Be committed to actively preventing the exploitation and abuse of children and vulnerable adults
- Place the safety and wellbeing of the student first. This must be placed before any personal or organisational goals and before loyalty to friends and colleagues. Abuse in any form can happen within CEG
- Follow guidance on signposting, consultation and referral to appropriate services if you have concerns about individual students
- Ensure all face to face and online contact and communications with students is appropriate
- If an activity must involve a single student, this must occur in a space easily observed by other
- Never have a personal relationship with a student or prospective student
- Do not show favouritism towards any student or prospective student
- Staff are in a position of trust. Always act in a professional manner
- Consider your expected behaviour in certain situations and what might be considered unacceptable. Do not make sexually suggestive or inappropriate remarks to any member of the CEG community
- Consider the wellbeing and safety of event participants in advance through proper planning and development of safe methods of working/activities
- Physical restraint must only be used when a student is in imminent danger of inflicting an injury on themselves or on another, and then only as a last resort and if possible, with another member of staff as a witness
- Do not use touch as a form of communication, even to comfort a student who is distressed. Minor forms of friendly physical contact can be misconstrued
- If physical contact is necessary, e.g. for demonstration purposes, ensure it takes place only with the full consent of the student and that its purpose is clear
- Employee should not engage in social events with students except those organised by or approved by CEG, ensuring risk assessments are carried out where appropriate
- All education visits must be risk assessed and signed off by the Group Health and Safety lead, prior to the visit taking place. If an external company is involved, relevant checks and risk assessments are requested as part of our own risk assessment. Staff must use an activity risk assessment for all activities taking place off site
- Do not take students to your home
- Dress in ways that are appropriate to your role and meet the requirements of the CEG Dress Code and Appearance Policy (Help Desk)

### **Your safeguarding responsibilities: guidelines for working with students under the age of 18 years or vulnerable adults**

- Complete all compulsory training as required

- Report any safeguarding concern which specifically relates to an under 18 year old student or vulnerable adult. Immediate action is required.
- Never give guarantees of confidentiality to students wishing to disclose information or make an allegation; only guarantee that the information will be passed on to those that need to know in order to ensure that the proper action is taken
- Be mindful that it is a criminal offence for any person in a position of trust to engage in, incite or promote sexual activity with someone who is under 18
- Remember local laws about the age for purchasing and consuming alcohol. Planning and organisation of events should take this into account.

### **Use of text, email, photographs and social media**

- While a student remains under our license, or until the end date for ICAS students, **you must never:**
  - give students your personal mobile phone number
  - communicate with students by text message, Whatsapp etc on a personal phone
  - give personal email addresses to students
  - communicate with students on personal social media sites
  - use a personal device to take photos/videos of students.
- All electronic communication with students must happen on company devices (company laptop or mobile phone), never on a personal device.
- Always inform students the purpose of taking still or moving photographs of them and how these photographs will be used. Student consent must be requested at the time.
- For Under 18s, parental consent is a required part of the admissions process.
- Students should be suitable dressed in photographs.
- If you have a concern about photographs being taken of a student, please contact the centre's Designated Safeguarding Lead.
- Employees should not 'follow' or 'friend' students on social media sites. Only the official Facebook page, Twitter account should be used.
- Avoid colloquial language/abbreviations which may be misinterpreted (eg LOL).
- Email security is taken seriously by CEG. Any employee noticing a breach of their email account or password should contact IT Support on <https://jira-ceg.atlassian.net>
- Where it is necessary for employee, students or volunteers to take photographs or video images of children or vulnerable adults, consent must be obtained before these images are taken in order to comply with the Data Protection Act 2018. Personal details and photos which clearly identify an individual must only be published where he/she (or his/her parent/guardian) has given specific agreement. Subjects should be suitably dressed in photographs.
- If you have any concerns or queries arising from reading this guidance please contact your line manager.

## Appendix 10

### Safeguarding Guidance for ONCAMPUS Students, including Child Protection

Students are expected to take account of the guidance below in the way that they conduct themselves.

For further detail refer to the Student Disciplinary Policy

#### All students must:

1. Respect all individuals whatever their age and treat all fairly, without prejudice or discrimination
2. Adhere to the Centre and Partner University's rules and regulations
3. Be polite and considerate to other students, members of staff, and others
4. Turn up on time and attend all classes regularly
5. Work hard in class and meet all deadlines for all assigned work
6. Demonstrate positive behaviour at all times
7. Be responsible for your physical and mental wellbeing
8. Treat the Centre's premises and other people's property with respect
9. Complete your academic studies in a conscientious, honest and professional manner
10. Dress in ways that are appropriate for attending a place of study

#### Safeguarding and Child Protection

Safeguarding is the protection of children and vulnerable adults from harm and abuse. This can include protection from physical, sexual, or psychological harm. Safeguarding is also the protection of children and vulnerable adults from involvement with crime and/or terrorism.

A child: is any person under the age of 18

A vulnerable adult: is any person aged over 18 who by reason of mental or other disability, age or illness are (or may be) unable to take care of themselves or are (or may be) unable to protect themselves against significant harm or exploitation.

All students and staff are expected to be committed to the safeguarding of all members of the **ONCAMPUS** community.

The guidance which follows explains what we need you to do to keep yourself and others in your Centre safe:

1. Follow the Centre guidance about who to tell if you are worried or have concerns about another student. If in doubt, contact your Head of Student Services or equivalent
2. Ensure all face to face and online contact with other students and your tutors is appropriate
3. Do not make sexually suggestive or inappropriate remarks to any member of the **ONCAMPUS** community
4. Do not use touch as a form of communication, even to comfort a student who is distressed. Minor forms of friendly physical contact can be misunderstood
5. Physical behaviour, such as deliberately brushing against someone, interfering with someone's clothes is not acceptable
6. No means no. Do not pressure anyone to do something they are not comfortable with, whether in person or online/messaging. If someone is pressuring you to do something that you are not comfortable with, speak with your Head of Student Services or equivalent
7. Remember that all people under the age of 18 are classed as children under the United



Nations Convention on the Rights of a Child

8. Check local laws regarding the age to purchase and drink alcohol
9. Never have a personal relationship with a member of staff
10. You will receive further guidance during your induction programme and Personal Tutorial lessons

### **What to do if you become aware of an incident involving sexting or sexual harassment:**

**Sexual harassment** is unwanted conduct of a sexual nature that can occur online and offline. It can occur between peers and is called peer-on-peer sexual harassment. Examples of sexual harassment include:

- calling someone a sexualised name
- sharing sexual images without consent
- making unwanted sexual comments and sending sexualised messages, including on social media (sexting)
- sexual coercion and threats
- making sexual remarks about clothes.

If you are the victim of sexual harassment or become aware of an incident involving sexual harassment you must:

1. Report it to your Designated Safeguarding Lead immediately
2. Never view, download or share a picture which you think is a sexual image – in the case of an Under 18, these pictures are illegal
3. If you have already viewed the imagery by accident (for example if the person has showed it to you before you could ask them not to), tell the Centre Director
4. Be reassured the Centre Director will help and support you

### **IMPORTANT:**

If you sexually harass another member of the **ONCAMPUS** community, action will be taken in accordance with the Disciplinary Policy and may lead to your removal from the programme. **Sending or sharing inappropriate images of an under 18 year old and illegal.**

These are both considered criminal offences and the relevant authorities will be notified.

For further information, refer to the CEG Student Sexual Misconduct Policy and Procedure.

### **Radicalisation**

Radicalisation means someone is being encouraged to develop extreme views or beliefs in support of terrorist groups and activities. If you have any concerns that someone you know is being radicalised, you must speak with your Centre Director.

### **Safe use of text, email, photographs, social media and learning platforms (for example, Teams)**

1. All communications with staff members must take place through their CEG/**ONCAMPUS** email address, a CEG-approved digital platform (eg Teams) or CEG/**ONCAMPUS** phone number. Please note that most staff do not have a work phone number.
2. You must not add teachers/staff as friends online – it is important that professional boundaries are maintained

3. Be thoughtful about what you say or post online. Always think:  
*'Would I say or do this in a face to face situation?*  
*Would it be appropriate if my teacher or another member of staff saw this?*

If the answer to either of these questions is no, it is probably best not to share your comments online in the first place

4. Avoid abbreviations which may be misinterpreted (eg LOL)
5. Be thoughtful about who you give your personal mobile phone numbers or email addresses to: do you know the person very well?
6. Do not take photos or video images of other students without their permission. Always inform the other person of the purpose of taking still or moving photographs of them and how these photographs will be used.
7. If you are on a video call in Teams, please blur your background.

You must remember that sending or sharing inappropriate images of an under 18 year old is illegal.

#### **Online bullying:**

**Online bullying** is bullying which happens online via social networks, online games and websites. It is also called **cyber bullying**.

Online bullying can happen when using any device and takes many forms such as:

- Abusive/threatening texts, emails or messages
- Posting abusive comments on social media sites
- Sharing humiliating videos or photos of someone else
- Spreading rumours online
- Group bullying/exclusion online
- Trolling – sending someone menacing/upsetting messages through social networks/chatrooms/games

If you experience any form of cyberbullying, please speak to a member of staff, so that we can support you.

If you bully another student, action will be taken in accordance with the **ONCAMPUS** Disciplinary Policy and may lead to your removal from the programme.

**If you have any concerns or queries arising from reading this guidance, please speak with your Personal Tutor in the first instance.**

## Appendix 11

### Further Information

Related CEG policies can be found at the Help Centre including:

- [Health and Safety Policy and Procedures 2015](#)
- CEG Disciplinary Policy
- CEG Equality & [Diversity Policy](#)
- CEG Dignity at Work Policy
- CEG [Prevent Duty Policy](#)
- CEG Whistleblowing Policy
- CEG Student Sexual Misconduct Policy and Procedure
- ONCAMPUS Missing Student Policy

**Keeping Children Safe in Education September 2022: Annex B** 'Further Information' provides links to government and recommended agency sites

**Child Protection:** <https://www.nspcc.org.uk/what-is-child-abuse/types-of-abuse/>

**Vulnerable Adults:** <https://www.nhs.uk/conditions/social-care-and-support-guide/help-from-social-services-and-charities/abuse-and-neglect-vulnerable-adults/>

**Prevent Strategy:**

- <https://www.gov.uk/government/publications/prevent-strategy-2011>
- [www.gov.uk/government/publications/prevent-duty-guidance](http://www.gov.uk/government/publications/prevent-duty-guidance)
- The Counter-Terrorism and Security Act 2015:  
<http://www.legislation.gov.uk/ukpga/2015/6/contents>
- Office for Students: [Counter-terrorism - the Prevent duty - Office for Students](#)

**Online Safety:** <https://www.ceop.police.uk>

## **Appendix 12**

### **CEG Safeguarding and Prevent Policy (including Child Protection)**

#### **Acknowledgement Statement**

By signing the below, I confirm that I have read the CEG Safeguarding and Prevent Policy in its entirety.

I am a team member who has direct contact with children and have read Part 1 of Keeping Children Safe in Education and Annex B

I am a team member who does not have direct contact with children and confirm that I have read Annex A of Keeping Children Safe in Education

I confirm that I have understood and confirm the below:

1. I know who the Designated Safeguarding Lead (DSL) and the Deputy Safeguarding Leads are for my centre/department and understand their role. I know how to contact them
2. I understand that it is everyone's responsibility to ensure the safeguarding of all under 18 students and vulnerable adults who are involved in any kind of communication with CEG, from first expression of interest and beyond completion of their course
3. That I have a legal duty to report any safeguarding concerns that I have to the DSL or Deputy DSLs as quickly as possible. If the allegation is made against a member of staff, I must report this to the Centre Head/allocated senior manager

Employee Name:

Role:

Department:

Signature:

Date: